

SECTION IV – NETWORK COMMAND & CONTROL (C2) ARCHITECTURE

IV.1 Overview

The Water-Energy-AI Corridor operates with the functional structure of a joint operational enterprise, consistent with the defining elements of a racketeering association-in-fact under:

- 18 U.S.C. § 1961(4) (enterprise-in-fact)
- *Boyle v. United States*, 556 U.S. 938 (2009) – purpose, relationships, and coordination
- *Sedima v. Imrex*, 473 U.S. 479 (1985) – pattern + enterprise ¹
- *H.J. Inc. v. Northwestern Bell*, 492 U.S. 229 (1989) – continuity and common purpose

The C2 structure is composed of:

- Central Command Node
- State Agency Decision Nodes
- Regional Planning Nodes
- Technical Influence Nodes
- Infrastructure Execution Nodes
- Capital Beneficiary Nodes
- Local Government Nodes
- Federal Interface Nodes

This produces coordinated, not independent, outcomes across water, land, energy, and infrastructure systems.

IV.2 Central Command Node

IV.2.1 Governor of Texas – Executive Command Authority

Gov. Greg Abbott (structural role only)

Powers Exercised:

- Appoints Texas Water Development Board (TWDB)–controls feasibility determinations
- Appoints Texas Commission on Environmental Quality (TCEQ)–controls water rights, §401 certifications, contamination enforcement ²
- Influences Railroad Commission of Texas (RRC) via political channels–controls pipeline permitting and eminent domain
- Directs state “critical infrastructure” policy, including AI incentives and strategic growth
- Coordinates multi-agency priorities through executive authority ³

¹ *Sedima v. Imrex*, 473 U.S. 479 (1985).

² Office of the Texas Governor. “Governor Abbott Appoints Miller to Texas Commission on Environmental Quality.” *News Release*, October 3, 2025. <https://gov.texas.gov/news/post/governor-abbott-appoints-miller-to-texas-commission-on-environmental-quality>

³ Office of the Texas Governor. “Governor Abbott Announces Appointments to Advisory Panel.” *News Release*, November 14, 2025. <https://gov.texas.gov/news/post/governor-abbott-announces-appointments-to-advisory-panel>

Legal Relevance:

Creates centralized policy control and decision synchronization satisfying RICO enterprise coordination, especially where donor funding correlates with regulatory outcomes.

Applicable Federal Statutes:

- 18 U.S.C. § 201 (bribery)
- 18 U.S.C. § 371 (conspiracy)
- 18 U.S.C. §§ 1341, 1343, 1346 (mail, wire, honest-services fraud)
- 18 U.S.C. § 1951 (Hobbs Act extortion)
- 18 U.S.C. §§ 1961–1968 (RICO)

Applicable Texas Statutes:

- Tex. Penal Code §§ 36.02, 39.02, 39.03, 37.10
- Tex. Gov't Code §§ 556, 572

The Governor's office serves as the strategic synchronization node of the enterprise.

IV.3 State Agency Decision Nodes

These agencies hold operational authority over land, water, pipelines, transmission, contamination, and public records.

IV.3.1 Texas Water Development Board (TWDB)

Officials: Brooke Paup (Chair), Kathleen Jackson, Jeff Walker (Executive Director)

Operational Control:

- Declares reservoirs "feasible" (Tex. Water Code § 16.053)⁴
- Adopts Region C projections into the State Water Plan
- Controls SWIFT/SWIRFT funding channels
- Endorses consultant-produced demand data (primarily FNI)

Legal Triggers:

- NEPA predetermination (42 U.S.C. § 4332(C))
- False statements (18 U.S.C. § 1001)
- Conflict of interest (Tex. Gov't Code § 572)
- Record tampering (Tex. Penal Code § 37.10)

TWDB's premature feasibility declaration is a primary enterprise action.

IV.3.2 Texas Commission on Environmental Quality (TCEQ)

⁴ McKinnon, Shelley. "Texas Water Board Declares a 'Conflict' over Controversial Marvin Nichols Reservoir." *KERA News*, June 27, 2025. <https://www.keranews.org/2025-06-27/texas-water-development-board-mediation-marvin-nichols-reservoir>

Authority:

- Water rights (30 Tex. Admin. Code ch. 297)
- CWA § 401 certifications
- Contamination enforcement
- SDWA reporting authority
- RCRA/CERCLA oversight

Operational Failures:

- Non-enforcement of coal-ash contamination
- Failure to address hydrological impacts in reservoir footprint
- Omission of NEPA, CWA, NHPA triggers in official assessments

Legal Exposure:

Violations of:

- CWA § 301 (33 U.S.C. § 1311)
- CERCLA § 107 (42 U.S.C. § 9607)
- RCRA § 7003 (42 U.S.C. § 6973)
- SDWA (42 U.S.C. § 300f et seq.)

IV.3.3 Railroad Commission of Texas (RRC)

Officials: Christi Craddick (Commissioner), Wayne Christian (Commissioner), Jim Wright (Chairman)

Authority:

- Grants common-carrier eminent domain (16 Tex. Admin. Code ch. 8)
- Permits high-pressure gas pipelines
- Approves compression facilities
- Oversees legacy mining units

Legal Relevance:

- Hobbs Act extortion exposure
- Travel Act exposure
- RICO predicate acts

RRC acts as the eminent-domain command center for pipeline components of the enterprise.

IV.3.4 Texas Department of Agriculture (TDA)

Commissioner: Sid Miller

Role:

- Controls agricultural valuations
- Shapes rural-development messaging
- Influences condemnation valuation
- Provides water-scarcity and “public purpose” narratives

TDA is a policy-enablement node, not a primary permitting agency.

IV.4 Regional Planning Nodes

IV.4.1 Region C Water Planning Group

Participants:

NTMWD, TRWD, DWU, UTRWD, FNI, appointed voting members

Roles:

- Produces 50-year demand projections
- Determines "need" for new reservoirs
- Embeds AI water load under "municipal" category
- Suppresses Region D objections
- Influences TWDB feasibility determinations

Legal Exposure:

- 18 U.S.C. § 1001 (material omissions/false statements)
- 31 U.S.C. §§ 3729–3733 (False Claims Act)
- Tex. Penal Code § 37.10 (records tampering)

Region C operates as the demand-manipulation node.⁵

A subsequent update from KERA News on August 14, 2025, reported that water planners reached a mediated agreement that delays Marvin Nichols by decades and confirms Region D's long-standing objections to the project.⁶

IV.5 Technical Influence Nodes (Consultant Cartel)

IV.5.1 Freese & Nichols (FNI)

Lead: Simone Kiel

Supporting Firms: AECOM, HDR, Halff, Jacobs

Roles:

- Writes Region C projections
- Writes TWDB feasibility analyses
- Designs reservoir footprint

⁵ Preserve Northeast Texas. "Marvin Nichols Reservoir Now Considered a Conflict Between Regions." *Preserve Northeast Texas*, June 26, 2025. <https://preservenortheasttexas.org/marvin-nichols-reservoir-now-considered-a-conflict-between-regions/>

⁶ Alyssa Fields, "Water Planners Reach Agreement over Controversial Marvin Nichols Reservoir," *KERA News*, August 14, 2025, <https://www.keranews.org/news/2025-08-14/water-marvin-nichols-reservoir-mediation-agreement-northeast-texas>

- Designs mitigation banks
- Drafts public comments for agencies
- Provides technical memos guiding agency decisions
- Validates its own conclusions

Legal Exposure:

- Honest-services fraud (18 U.S.C. § 1346)
- Conflicts (Tex. Gov't Code § 572)
- False Claims Act exposure
- RICO facilitation node

FNI is the technical command node enabling the enterprise's architecture.

IV.6 Infrastructure Execution Nodes

IV.6.1 Pipeline & Gas Infrastructure Firms

Energy Transfer, Kinder Morgan, Williams, Atmos, Enterprise Products

A January 2025 Houston Chronicle report confirms accelerated pipeline expansion in the region, noting that Kinder Morgan is beginning construction on a 216-mile natural-gas pipeline originating near Katy and feeding major transmission corridors.⁷

Roles:

- Build interstate gas corridors
- Supply AI mega-site⁸
- Align ROWs through reservoir zones
- Coordinate easements with capital networks

Federal Triggers:⁹

- CWA § 404 (33 U.S.C. §§ 1311–1344)
- NHPA § 106 (54 U.S.C. § 306108)
- Travel Act
- Hobbs Act
- RICO (interstate commerce)

IV.6.2 ERCOT / Oncor Transmission

⁷ Rebecca Carballo, "Kinder Morgan to Start Working on a 216-Mile Natural Gas Pipeline in Katy," *Houston Chronicle*, January 24, 2025, <https://www.chron.com/news/houston-texas/article/gas-pipeline-kinder-morgan-20053613.php>

⁸ Hoestenbach Law Group. "The Trident Pipeline: A Landowner's Guide." *Hoestenbach Law Group*, 2025. <https://hoestenbachlawgroup.com/trident-pipeline/>

⁹ Edwards Plateau Alliance. "The ERCOT \$33+ Billion Transmission Line Crisis." *Edwards Plateau Alliance*, 2025. <https://edwardsplateaualliance.org/stop-hb-5066-ercott-texas-transmission-plan>

Roles:

- Build HV transmission ¹⁰
- Construct substations
- Align grid expansion with reservoir territories
- Coordinate expansion with pipeline buildout

Federal Triggers: ¹¹

- NEPA (42 U.S.C. § 4332(C))
- ESA § 7
- CWA § 404 crossings
- NHPA § 106

IV.6.3 MSB Global / Matrix AI Campus**Roles:**

- Drives pipeline and transmission expansions ¹²
- Inflates water-demand projections
- Sited adjacent to contamination plumes
- Functions as the corridor's operational keystone ¹³

Triggers:

- CERCLA, RCRA, SDWA (42 U.S.C. §§ 300f, 6973, 9607)¹¹
- Federal Power Act
- NEPA

IV.7 Capital Beneficiary Nodes**IV.7.1 Beneficiary Networks**

Hunt, Perot/Hillwood, Bass/CEM, timber trusts, anonymous LLC clusters

¹⁰ Malewitz, Jim. "ERCOT Gets OK to Use High-Voltage Lines, Creating Texas Power Superhighway." *San Antonio Express-News*, April 24, 2025. <https://www.expressnews.com/business/article/puc-ercot-765kv-33b-texas-power-grid-transmission-20292601.php>

¹¹ Public Utility Commission of Texas. "PUCT Approves Plan for the First Extra High Voltage Transmission Lines in the ERCOT Region." *News Release*, April 24, 2025. https://ftp.puc.texas.gov/public/puct-info/agency/resources/pubs/news/2025/PUCT_Approves_Plan_for_the_First_Extra_High_Voltage_Transmission_Lines_in_ERCOT_Region.pdf

¹² MSB Global Services. "Matrix Data Center Campus Breaks Ground in Sulphur Springs, TX – A New Era for Net-Zero AI Infrastructure." *MSB Global Services*, June 13, 2025. <https://msbglobalservices.com/matrix-data-center-campus-breaks-ground-in-sulphur-springs-tx-a-new-era-for-net-zero-ai-infrastructure/>

¹³ Hicks, Avery. "Work Underway on Massive AI Data Center in Sulphur Springs." *KLTV 7 News*, September 30, 2025. <https://www.kltv.com/2025/10/01/work-underway-massive-ai-data-center-sulphur-springs/>

Positions:

Acquisitions align with:

- reservoir shorelines
- pipeline/transmission corridors
- mitigation-bank sites
- timber liquidation zones

Legal Relevance:

These nodes form the profit centers in:

- RICO analysis
- Takings Clause disputes
- Public-use pretext evaluation under *Kelo v. New London*, 545 U.S. 469 (2005)¹⁵

IV.8 Local Government Nodes

Counties: Titus, Franklin, Hopkins, Delta, Red River, Morris

Roles:

- PPP negotiations
- Zoning adjustments
- Local eminent-domain facilitation ¹⁴
- Concealed deed restrictions
- Tax abatements
- Quiet-title actions

Legal Exposure:

- Tex. Penal Code § 39.02 (abuse of office)
- Tex. Penal Code § 37.10 (record tampering)

Local governments execute ground-level enterprise operations.

IV.9 Federal Interface Nodes (Not Accused)

Agencies with mandatory jurisdiction:

- USACE – CWA § 404, § 408, NEPA
- EPA Region 6 – SDWA, RCRA, CERCLA
- DOI / NPS – NHPA § 106, NAGPRA
- DOJ Public Integrity Section – corruption, bribery, honest-services fraud
- DOJ ENRD – environmental crimes

These agencies are oversight authorities, not enterprise participants.

¹⁴ KERA News. "The Conflict Marks a Crucial Step in the Decades-Long Battle over Marvin Nichols." *KERA News* (social post summary), June 27, 2025. <https://www.facebook.com/keratx/posts/the-conflict-marks-a-crucial-step-in-the-decades-long-battle-between-the-growing/1305148211611436/>

IV.10 One-Sentence Summary of C2 Architecture

A governor-centered, consultant-driven, pipeline-enabled, AI-anchored, and billionaire-benefiting enterprise coordinates state agencies, local governments, and infrastructure systems to manufacture water scarcity and justify reservoir-based land seizure in Northeast Texas.¹⁵

¹⁵ Aterio Research. "Before the Headlines: A 3GW AI Data Center Campus Quietly Rises in Sulphur Springs, TX." *Aterio Blog*, July 9, 2025. <https://www.aterio.io/blog/before-the-headlines-a-3gw-ai-data-center-campus-quietly-rises-in-sulphur-springs-tx>