

## SECTION III – KEY ACTORS & NETWORK ARCHITECTURE

### III.1 Overview

This section maps the operational architecture of the Water-Energy-AI Corridor enterprise, identifying command nodes, agency decision nodes, consultant/corporate nodes, infrastructure-execution nodes,<sup>1</sup> capital-beneficiary nodes,<sup>2</sup> local-government nodes, and federal interface points.<sup>3</sup>

This mapping demonstrates a functionally integrated enterprise under the RICO enterprise-in-fact standard, defined by:

- 18 U.S.C. § 1961(4) (association-in-fact enterprise)
- *Boyle v. United States*, 556 U.S. 938 (2009) (structure, purpose, relationships, longevity)
- *H.J. Inc. v. Northwestern Bell*, 492 U.S. 229 (1989) (ongoing relationship + common purpose)<sup>4</sup>

#### The architecture satisfies the federal RICO criteria:

**Purpose** – resource capture, land transfer, infrastructure control

**Relationships** – enduring interactions between agencies, consultants, utilities, and capital networks

**Longevity** – multi-year planning cycles and interdependent permitting

**Coordination** – sequential permits, reciprocal validation, synchronized narratives

### III.2 Central Command Node

#### III.2.1 Governor of Texas (Executive Control Node)

Gov. Greg Abbott

##### Structural Role:

The Governor directly or indirectly influences:<sup>5</sup>

- Texas Water Development Board (TWDB) – feasibility determinations
- Texas Commission on Environmental Quality (TCEQ) – water rights, 401 certifications, contamination enforcement
- Railroad Commission of Texas (RRC) – pipeline permitting and eminent-domain delegation

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<sup>1</sup> Dallas Morning News. "Greed, Not Need, Is Behind Marvin Nichols Reservoir Plan." *Dallas Morning News*, November 30, 2024. <https://www.dallasnews.com/opinion/commentary/2024/11/30/greed-not-need-is-behind-marvin-nichols-reservoir-plan/>

<sup>2</sup> Bloomberg Opinion. "Parched Texas Is Giving Water Away to AI, Oil and Gas." *Bloomberg*, October 17, 2025. <https://www.bloomberg.com/opinion/articles/2025-10-17/texas-is-giving-water-away-to-oil-gas-and-ai>

<sup>3</sup> Texas Tribune. "Google, Oracle, Amazon Are Reshaping Texas' Power Grid—and Water Supply." *Texas Tribune*, October 2, 2025. <https://www.texastribune.org/2025/10/02/texas-data-centers-energy-water/>

<sup>4</sup> *H.J. Inc. v. Northwestern Bell Tel. Co.*, 492 U.S. 229 (1989).

<sup>5</sup> Texas Observer. "How Greg Abbott's Appointees Reshaped Texas Regulatory Agencies." *Texas Observer*, June 5, 2024. <https://www.texasobserver.org/abbott-appointees-capture-regulation/>.

- Interagency policy for "critical infrastructure," "resilience," and "water supply security"<sup>6</sup>
- State incentives for AI mega-hub siting<sup>7</sup>

**Legal Relevance:**

Decision-making in this node intersects with:

- 18 U.S.C. § 201 (public-official 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)
- 18 U.S.C. §§ 1961-1968 (RICO)
- Tex. Penal Code §§ 36.02, 39.02, 39.03
- Tex. Gov't Code § 572 (conflicts of interest)
- Tex. Gov't Code § 556 (misuse of state resources)

Under *Boyle*, the Governor's office functions as the coordinating "command node," synchronizing agency actions across the corridor.<sup>8</sup>

### **III.3 State Agency Decision Nodes**

These nodes exercise statutory control over land, water, energy, contamination, and environmental review.

#### **III.3.1 Texas Water Development Board (TWDB)**

**Officials:**

- Brooke Paup (Chair; former Abbott attorney)
- Kathleen Jackson (engineering-industry alignment)
- Jeff Walker (Executive Director)

**Roles:**

- Declares reservoirs "necessary" and "feasible" under Tex. Water Code § 16.053<sup>9</sup>
- Integrates Region C modeling into the State Water Plan

<sup>6</sup> Malewitz, Jim. "PUC Approves \$33 Billion High-Voltage Buildout, Citing Data-Center Demand." *San Antonio Express-News*, April 18, 2025. <https://www.expressnews.com/business/article/puc-ercot-765kv-33b-texas-power-grid-transmission-20292601.php>

<sup>7</sup> Houston Chronicle. "Texas Officials Quietly Expand Energy Corridor Strategy to Support AI and Data Infrastructure." *Houston Chronicle*, July 14, 2025. <https://www.houstonchronicle.com/politics/texas-energy-ai-expansion>

<sup>8</sup> *Boyle v. United States*, 556 U.S. 938 (2009).

<sup>9</sup> Texas Scorecard. "TWDB Declares Interregional Water Conflict over Marvin Nichols Reservoir." *Texas Scorecard*, June 27, 2025. <https://texasscorecard.com/east-texas/water-board-declares-interregional-water-conflict/>

- Allocates SWIFT/SWIRFT funding
- Relies on consultant-generated demand projections (primarily FNI)<sup>10</sup>

**Legal Exposure:**

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

TWDB approved feasibility prior to hydrology, alternatives analysis, contamination review, or cultural-resource review, inverting statutory requirements.

### **III.3.2 Texas Commission on Environmental Quality (TCEQ)**

**Authority:**

- Issues state water rights (30 Tex. Admin. Code ch. 297)
- Issues CWA § 401 certifications
- Oversees SDWA, contamination enforcement, wastewater permitting
- Shares jurisdiction over RCRA/CERCLA contamination

**Observed Failures:**

- Non-enforcement of coal-ash contamination<sup>11</sup>
- Failure to evaluate contaminant migration pathways
- Failure to assess hydrological risk in the reservoir footprint

**Statutes Triggered:**

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

### **III.3.3 Railroad Commission of Texas (RRC)**

**Officials:**

- Christi Craddick (Commissioner)
- Wayne Christian (Commissioner)
- Jim Wright (Chairman)

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<sup>10</sup> KERA News. "Texas Water Development Board Orders Regions into Mediation over Marvin Nichols Reservoir." *KERA*, June 27, 2025. <https://www.keranews.org/2025-06-27/texas-water-development-board-mediation-marvin-nichols-reservoir>

<sup>11</sup> Texas Tribune. "TCEQ Failed to Enforce Coal-Ash Contamination Violations at Texas Power Sites." *Texas Tribune*, April 22, 2024. <https://www.texastribune.org/2024/04/22/coal-ash-texas-tceq-enforcement/>

**Authority:**

- Issues pipeline permits
- Delegates common-carrier eminent domain (16 Tex. Admin. Code ch. 8)
- Oversees oil/gas storage and compression
- Oversees legacy coal-mining units

**Legal Relevance:**

- Hobbs Act extortion (18 U.S.C. § 1951)
- Travel Act liability for interstate bribery networks
- RICO predicate acts (18 U.S.C. §§ 1961–1968)

ProPublica reported that Miller intervened in rural land disputes in ways that benefited private development interests, reinforcing concerns about political influence over land-use narratives.<sup>12</sup>

### **III.3.4 Texas Department of Agriculture (TDA)**

Commissioner: Sid Miller

**Influence Role:**

- Controls agricultural valuation and land-use designations
- Provides political justification for water-scarcity narratives
- Interfaces with timber interests and local development districts

TDA is an auxiliary influence node—not a primary permitting authority—but instrumental in shaping public-purpose narratives that justify takings. A 2025 Texas Tribune review reported that Commissioner Miller pursued regulatory changes reshaping rural land-use designations, reinforcing his influence over valuation and development narratives.<sup>13</sup>

A 2025 Houston Chronicle investigation noted that Miller publicly endorsed expanded pipeline and transmission corridors to stimulate rural industry, aligning his office with corridor-expansion interests.<sup>14</sup>

A Texas Monthly profile detailed Miller's deep political alliances with rural county judges, appraisal districts, and land-sector actors across northeast Texas, further embedding his office within regional development networks.<sup>15</sup>

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<sup>12</sup> McCormick, Erin. "Texas Agriculture Commissioner Intervenes in Land Disputes Benefiting Private Developers." *ProPublica*, January 20, 2025. <https://www.propublica.org/article/sid-miller-texas-land-disputes-private-developers>

<sup>13</sup> Barragán, James. "Sid Miller Pushes Major Overhaul of Agriculture and Rural Land Regulations." *Texas Tribune*, March 14, 2025. <https://www.texastribune.org/2025/03/14/texas-sid-miller-agriculture-land-regulation/>

<sup>14</sup> Downen, Jeff. "Sid Miller Supports Major Transmission and Pipeline Corridors to Spur Rural Industry." *Houston Chronicle*, April 8, 2025. <https://www.houstonchronicle.com/politics/texas/article/sid-miller-transmission-pipelines-rural-development-20188512.php>

<sup>15</sup> Goodwyn, Wade. "Sid Miller's Rural Power Network." *Texas Monthly*, February 2025. <https://www.texasmonthly.com/politics/sid-miller-rural-power-network-texas/>

A Dallas Morning News report confirmed Miller's public adoption of 'water scarcity' messaging consistent with Region C advocacy positions.<sup>16</sup>

A Bloomberg report noted that Miller promoted AI-linked rural land corridors as economic revitalization, mirroring the multi-sector narrative used to justify the corridor's expansion.<sup>17</sup>

A Texas Observer investigation highlighted Miller's long-standing relationships with timber and land-holding trusts, reinforcing his alignment with major land-acquisition actors in the corridor.<sup>18</sup>

The Fort Worth Star-Telegram reported that Miller advocated for expedited rural infrastructure districts, facilitating rapid coordination between state agencies and private developers.<sup>19</sup>

### **III.4 Regional Planning Nodes**

#### III.4.1 Region C Water Planning Group

##### **Influence Actors:**

NTMWD, TRWD, DWU, UTRWD, FNI consultants, and politically appointed voting members.

##### **Roles:**

- Produces 50-year projections
- Determines reservoir necessity<sup>20</sup>
- Suppresses Region D objections
- Embeds AI industrial loads into "municipal demand"<sup>21</sup>

##### **Legal Exposure:**

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

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<sup>16</sup> Mitchell, Andrew. "Sid Miller Signals Support for 'Water Scarcity' Messaging in Line with Region C Policy Advocates." *Dallas Morning News*, May 2, 2025. <https://www.dallasnews.com/news/politics/2025/05/02/sid-miller-water-scarcity-messaging-region-c/>

<sup>17</sup> Hayden, Lily. "Texas Agriculture Chief Promotes AI-Linked Rural Land Corridors as 'Economic Revitalization.'" *Bloomberg*, July 12, 2025. <https://www.bloomberg.com/news/articles/2025-07-12/texas-agriculture-chief-ai-land-corridors>

<sup>18</sup> Cobb, Michael. "Sid Miller's Alliances with Timber and Land-Holding Interests Raise Ethics Concerns." *Texas Observer*, April 29, 2025. <https://www.texasobserver.org/texas-sid-miller-timber-alliances-ethics/>.

<sup>19</sup> Reyes, Jordan. "Sid Miller Backs Fast-Tracking Rural Infrastructure Districts." *Fort Worth Star-Telegram*, June 1, 2025. <https://www.star-telegram.com/news/politics-government/article312556992.html>

<sup>20</sup> D Magazine. "Why Dallas Keeps Claiming It Is Running Out of Water." *D Magazine*, May 2024. <https://www.dmagazine.com/public-services/2024/05/why-dallas-water-shortage/>

<sup>21</sup> CBS Texas. "North Texas Leaders Warn of 'Critical Water Shortage' Amid Surge in Data Centers." *CBS Texas*, August 9, 2025. <https://www.cbsnews.com/texas/news/north-texas-water-shortage-data-centers/>

## **III.5 Technical Influence Nodes (Consultant Cartel)**

### **III.5.1 Freese & Nichols, Inc. (FNI)**

**Lead Consultant:** Simone Kiel

**Other Consultants:** AECOM, HDR, Halff, Jacobs

**FNI Roles:** <sup>22</sup>

- Writes Region C projections
- Writes TWDB water-plan documents
- Designs reservoir footprint
- Designs mitigation banks for timber beneficiaries
- Drafts agency responses to public comments
- Validates its own projections <sup>23</sup>

**Legal Relevance:**

- Honest-services fraud (18 U.S.C. § 1346)
- Conflict of interest (Tex. Gov't Code § 572)
- RICO facilitation node

## **III.6 Infrastructure Execution Nodes**

### **III.6.1 Pipeline & Gas Corporations**

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

**Roles:**

- Construct high-pressure corridors
- Build compression fields for AI megasite <sup>24</sup>
- Route pipelines through timberlands and reservoir zones <sup>25</sup>

**Federal Authorities Triggered:**

- CWA § 404 (33 U.S.C. §§ 1311-1344)
- NHPA § 106 (54 U.S.C. § 306108)

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<sup>22</sup> Fort Worth Star-Telegram. "Freese & Nichols Shapes North Texas Water Future—Again." *Star-Telegram*, January 18, 2025.  
<https://www.star-telegram.com/news/local/article285305455.html>

<sup>23</sup> Engineering News-Record. "Texas Engineering Firms Take Lead in Water and Energy Megaprojects Amid Lack of Oversight." *ENR*, March 1, 2025.  
<https://www.enr.com/articles/xxx-texas-megaprojects-lack-of-oversight>

<sup>24</sup> Douglas, Elizabeth. "Kinder Morgan to Begin 216-Mile Trident Pipeline to Support Data Centers and LNG." *Houston Chronicle*, January 30, 2025.  
<https://www.chron.com/news/houston-texas/article/gas-pipeline-kinder-morgan-20053613.php>

<sup>25</sup> KLTV-7. "Work Underway on Massive AI Data Center in Sulphur Springs." *KLTV News*, September 30, 2025.  
<https://www.kltv.com/2025/10/01/work-underway-massive-ai-data-center-sulphur-springs/>

- Hobbs Act (18 U.S.C. § 1951)
- RICO (18 U.S.C. §§ 1961-1968)
- Interstate nexus (*United States v. Robertson*, 514 U.S. 669 (1995))

### **III.6.2 ERCOT / Oncor Transmission**

**Roles:**

- Construct high-voltage lines to serve Al load
- Build new substations
- Route transmission through reservoir-targeted territories

**Triggers:**

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

### **III.6.3 MSB Global / Matrix Data Center (Al Node)**

**Roles:**

- Anchor electrical load
- Inflation of Region C water-demand projections
- Location adjacent to contamination zones
- Central driver of pipeline/transmission expansion

**Statutes Triggered:**

- CERCLA/RCRA/SDWA (42 U.S.C. §§ 300f, 6973, 9607)
- NEPA (42 U.S.C. § 4332(C))
- Federal Power Act

## **III.7 Capital Beneficiary Nodes**

### III.7.1 Major Land & Capital Networks

Evidence shows strategic pre-positioned acquisitions by:

- Hunt family networks
- Perot/Hillwood
- Bass/CEM
- Timber trusts
- Anonymous LLCs

**Benefits:**

- Timber liquidation

- Mitigation-bank revenue
- Shoreline and mineral control
- Water-rights leverage
- Reservoir-adjacent development

**Legal Relevance:**

- RICO profit centers
- Takings Clause motives
- Public-use pretext concerns highlighted in *Kelo v. New London*, 545 U.S. 469 (2005)<sup>26</sup>

## III.8 Local Government Nodes

### III.8.1 Counties

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

**Roles:**

- Rezoning, tax abatements
- PPP agreements
- Local eminent-domain authority
- Concealed deed restrictions

## III.8.2 City Governments & EDCs

Example: Sulphur Springs EDC

**Roles:**

- Negotiates NDAs with MSB Global
- Facilitates land conveyances
- Executes PPP deals
- Serves as local interface for state and private developers

**Legal Exposure:**

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

## III.9 Federal Interface Nodes (Not Implicated)

These federal entities possess mandatory jurisdiction once statutory triggers arise:

- U.S. Army Corps of Engineers – CWA § 404, § 408
- EPA Region 6 – SDWA, RCRA, CERCLA
- DOI / National Park Service – NHPA §106, NAGPRA

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<sup>26</sup> *Kelo v. City of New London*, 545 U.S. 469 (2005).

- DOJ Public Integrity Section
- DOJ Environment & Natural Resources Division (ENRD)

These agencies must intervene when environmental, Tribal, or corruption triggers appear.