

Project Nova: An Investigation into Secrecy and Potential Conflicts of Interest in the Village of Caledonia

Executive Summary

An analysis of open records concerning the proposed "Project Nova" data center in the Village of Caledonia, Wisconsin, reveals a pattern of behavior and a network of interconnected individuals that raise significant questions about the transparency, fairness, and integrity of the project's approval process. The investigation indicates that the advancement of this large-scale industrial development, which benefits the utility company We Energies and a deliberately anonymous developer, has been managed by village officials who hold simultaneous, and potentially conflicting, public and private roles. This report documents the evidence supporting these concerns and outlines the procedural and ethical issues at the heart of the controversy, including historical patterns in past developments involving outlot ownership.

Key findings of this investigation include:

- **Calculated Secrecy:** A massive land-use change is being driven by an unidentified developer. This anonymity, facilitated by village officials and the project's engineering firm, Dewberry Engineers, has prevented public due diligence and shielded the ultimate beneficiary from scrutiny regarding its financial standing, environmental record, or history in other communities. This echoes concerns from past projects where outlot designations were used without full transparency in ownership.
- **Structural Conflicts of Interest:** The process is overseen by Village President Tom Weatherston, who holds three powerful and conflicting positions. He serves as the village's chief executive with final approval power; as the Chairman of the Plan Commission, the primary body recommending the project; and as a member of the Racine County Economic Development Corporation's (RCEDC) Leadership Council, a quasi-private entity where he sits as a peer with a manager from We Energies, the project's primary corporate beneficiary.
- **Compromised Impartiality:** The Plan Commission, which provides critical recommendations on zoning and development, includes at least one member with a demonstrable potential conflict of interest. Vice-President Jeff Hintz is part of a family development company, Hintz Development LLC, that has had business before the very commission on which he sits, creating an environment where impartial judgment on all development matters, including Project Nova, could be compromised.

- **A Predetermined Outcome:** The timeline of events strongly suggests that the public approval process is a formality rather than a genuine exercise in democratic governance. According to news reports, the Village Board entered into a "pre-development agreement" for the data center in August 2025, a full month before the final public hearing and vote on the required rezoning was scheduled. This action implies the decision was made behind closed doors, rendering subsequent public input performative.
- **A "Gift" to Corporate Interests:** The rezoning of 244 acres of agricultural land owned by We Energies represents a significant financial windfall for the utility, a fact that has not been lost on residents, who have publicly characterized the deal as a "multimillion dollar gift." We Energies stands to profit from both the sale of the newly valuable industrial-zoned land and the creation of a massive, long-term, captive energy customer adjacent to its existing power plant.
- **Historical Patterns of Concern in Past Developments:** An examination of past projects, such as the Homestead Acres subdivision, reveals recurring use of outlot designations—small parcels for common utilities or open space—which can complicate transparency in ownership and management, potentially setting a precedent for opacity in larger projects like Nova.

Collectively, these findings paint a troubling picture of a local government operating in close concert with corporate interests, utilizing procedural secrecy and leveraging overlapping directorates to advance a controversial project in the face of significant and organized public opposition. The historical context with outlots underscores a recurring theme of inadequate oversight in land dealings.

The Project, The Players, The Land: Deconstructing Project Nova

To understand the potential for impropriety surrounding Project Nova, it is essential to first establish the factual basis of the development, the entities involved, and the valuable land at the center of the deal. The project is not merely a standard development proposal; it is a complex transaction involving a major utility, an anonymous corporate entity, and a series of significant land-use changes that fundamentally alter the character of a portion of the Village of Caledonia. This section also examines patterns from past developments to contextualize ongoing concerns.

Project Nova: A Secretive Plan for a Data Center Campus

"Project Nova" is the codename for a planned data center campus proposed for a 244-acre site in Caledonia, Wisconsin. Data centers are energy- and water-intensive facilities that house vast arrays of computer servers and have become a focal point of development

controversy across the state and nation. The successful development of Project Nova is contingent upon the Village of Caledonia granting two critical land-use changes. First, the village's comprehensive plan must be amended to change the site's designation from its current "Agricultural, Rural Residential, & Open Land" to a newly created "Transition Light Industrial" category. Second, the land must be rezoned from "A-2, Agriculture District" to "M-1, Light Manufacturing District".

The proposed location for this industrial complex is on parcels along Douglas Avenue and Botting Road. This site is not an isolated piece of farmland; it is strategically located directly west of the We Energies Oak Creek Power Plant, a major piece of regional energy infrastructure. Preliminary site concepts, though not finalized, envision a campus with three large data center buildings and a dedicated 15-acre electrical substation to service the facility's immense power needs.

The landowner of this 244-acre parcel is the utility company We Energies. This ownership is a critical element of the entire transaction. Any action by the Village of Caledonia to rezone the land from agricultural to industrial use inherently and dramatically increases the land's market value. This direct financial benefit accrues to We Energies, which can then sell the property to the developer at a significantly higher price than its value as farmland. This dynamic places We Energies in the position of being a primary financial beneficiary of the village's legislative actions.

The Developer's Shadow: Anonymity and Representation

A central feature of the Project Nova proposal, and a primary driver of public distrust, is the complete anonymity of the end-user—the company that will ultimately own and operate the data center. Public records and news reports consistently state that the company behind the plan is "unknown". This secrecy extends even to village officials; Village Trustee and Plan Commission member Nancy Pierce has stated that none of the village trustees know who would operate the data center. This withholding of information has fueled resident concerns that the unnamed company has "no commitment to our community" and is "in it for profit only".

Instead of the developer engaging with the community directly, the rezoning application and public representation for Project Nova are being handled by Dewberry Engineers, a large, nationwide engineering and consulting firm. The lead representative for the project is Rich Brittingham, a vice president at Dewberry. The use of an engineering firm as a proxy for an anonymous client is a deliberate strategy to create a buffer between the true beneficiary and public scrutiny. This arrangement allows the project to navigate the contentious early stages of the approval process without subjecting the actual developer to questions about

its corporate history, environmental track record, or financial stability. It effectively neuters the public's ability to conduct its own due diligence, forcing residents and officials to evaluate the project in an information vacuum.

Historical Patterns in Caledonia Developments: The Case of Outlots and Property Filings

An examination of past development projects in Caledonia reveals a recurring theme of limited transparency, particularly with outlot designations—small, non-buildable parcels often used for utilities, drainage, or open space. These outlots are typically labeled numerically (e.g., Outlot 1, Outlot 7) and owned collectively by subdivision residents or dedicated to the village, per Wisconsin land division regulations. While standard practice, community members have raised concerns about their use in obscuring ownership and facilitating complex filings.

A notable example is the Homestead Acres subdivision, approved in phases starting around 2004 by Newport Development (applicant: Nancy Washburn). This 70-acre residential project includes multiple outlots, with Outlot 7—a 0.4134-acre parcel for common use—maintained by the Homeowners Association. Such incidents highlight vulnerabilities in outlot management and property reporting, mirroring the anonymity concerns in Project Nova and underscoring the need for greater oversight in land-use processes.

The Decision-Makers: Caledonia's Governmental Bodies

The authority to approve or deny the sweeping land-use changes required for Project Nova rests with two key governmental bodies within the Village of Caledonia.

The Plan Commission serves as the primary advisory and recommending body for all development proposals. It is tasked with reviewing requests for zoning changes and ensuring they align with the village's comprehensive plan and community interests. The commission is composed of seven members: the Village President, one Village Trustee, and five citizen members. Its recommendations are not final but carry significant weight in the decision-making process. The Plan Commission is chaired by Village President Tom Weatherston.

The Village Board is the village's legislative body and holds the ultimate authority to approve or reject ordinances related to zoning and land use. The board is composed of six trustees and the Village President. Any recommendation from the Plan Commission must be approved by a vote of the Village Board to become law. The board is presided over by Village President Tom Weatherston.

The fact that the same individual, Tom Weatherston, presides over both the recommending body and the final approving body creates a powerful concentration of authority over the fate of Project Nova. This dual role is a central element in the analysis of potential conflicts of interest that follows.

A Web of Influence: Mapping the Connections Between Government and Corporate Interests

The approval process for a major development project should, in principle, be an arm's-length transaction between a developer and an impartial local government. However, an examination of the relationships between the key figures involved in Project Nova reveals a deeply interconnected network where the lines between public governance, corporate interests, and economic development advocacy are blurred. This network centers on the Racine County Economic Development Corporation (RCEDC), a quasi-private entity that serves as a nexus for the very individuals deciding the project's fate and those who stand to benefit from it. Past issues, like those with outlots in earlier subdivisions, suggest this interconnectedness may extend to less transparent dealings in property valuations and filings.

The Nexus: The Racine County Economic Development Corporation (RCEDC)

The RCEDC is a 501(c)3 non-profit organization with a stated mission to "grow Racine County's property tax base and provide employment opportunities". It functions as a key facilitator of economic development, working with businesses seeking to expand or relocate to the area and coordinating with local governments to smooth the path for such projects.

While it serves a public purpose, the RCEDC is not a public body. It is governed by a Leadership Council and a Board of Directors composed of a curated group of the region's most influential public officials and private-sector executives. This structure creates a private forum where public and corporate leaders can meet, discuss strategy, and align on objectives for major development projects outside the legal requirements of Wisconsin's open meeting laws. This forum provides a potential "backdoor" for deals to be shaped before they ever appear on a public agenda, turning official public meetings into the final, performative step of a process that has already been privately negotiated.

The Overlapping Directorates: Where Public and Private Interests Merge

The composition of the RCEDC's Leadership Council is the single most compelling piece of evidence demonstrating the potential for a conflict of interest at the highest level of the Project Nova approval process. The council's membership includes two individuals central to the deal:

- Thomas Weatherston, the Village President of Caledonia.
- Amy Plato, the Area Manager for CSO Southern Operations for We Energies.

This arrangement places the highest elected official in Caledonia—the person who chairs the recommending commission and presides over the final approving board—in a peer relationship on a private council with a manager from the corporation that owns the 244-acre parcel and stands to benefit from its rezoning and subsequent sale. This shared membership creates, at a minimum, a profound appearance of impropriety. It suggests that the Village President's primary duty to represent the interests of Caledonia residents could be compromised by his collegial relationship with a representative of the project's main corporate beneficiary within an organization dedicated to promoting development.

Table: Network of Influence Surrounding Project Nova

To fully illustrate the web of connections surrounding Project Nova, the following table maps the key individuals to their various, and often overlapping, roles within the Village of Caledonia, We Energies, the RCEDC, and other relevant entities. This visualization makes the structural basis for potential conflicts of interest clear and undeniable.

Individual	Role in Village of Caledonia	Role in We Energies	Role in RCEDC	Role in Other Entities / Business Interests
Thomas Weatherston	Village President; Plan Commission Chair	None	Leadership Council Member	Former State Representative; Retired from Modine Manufacturing
Amy Plato	None	Area Manager - CSO Southern Operations	Leadership Council Member	We Energies Manager of Gas and Electric
Jeff Hintz	Plan Commission Member; Vice-President	None	None	Assistant Director, City of Racine Dept. of City Development; Applicant as "Hintz Development LLC" for another project in Caledonia
Nancy Pierce	Village Trustee; Plan	None	None	Organizational Development Consultant

Individual	Role in Village of Caledonia	Role in We Energies	Role in RCEDC	Role in Other Entities / Business Interests
	Commission Liaison			
Ami May	Plan Commission Member	None	None	Broker/Owner, Realty ONE Group Boardwalk; Real estate agent active in Caledonia
Michelle Cook	Plan Commission Member	None	None	Associate Planner, City of Racine Dept. of City Development
Gale E. Klappa	None	Executive Chairman, WEC Energy Group	None	Co-chair, Milwaukee 7 regional economic development initiative
Tom Kramer	None	None	Leadership Council Member	Racine County Board Chairman; Administrator and Treasurer, Town of Norway

Chronology of a Controversial Deal

The public record of Project Nova's progression through Caledonia's approval process reveals a carefully managed timeline. Events appear sequenced to build momentum for the project while minimizing opportunities for substantive public opposition. The creation of a bespoke zoning category, a key vote taken with nearly half the commission absent, the approval of a pre-development agreement before a final public hearing, and the dismissive handling of resident concerns all point to a process that favors the developer's interests over genuine public deliberation. This timeline must be viewed in light of historical development issues, such as those in Homestead Acres.

Laying the Groundwork (January 2025): The 'Transition Light Industrial' Zoning Category

Months before Project Nova was formally proposed, the Village of Caledonia was already taking steps to facilitate the development of data centers. An agenda packet from the January 27, 2025, Plan Commission meeting includes a staff report discussing the creation of a new land use category: "Transition Light Industrial". The report explicitly states this new

category is intended "for the purpose of providing opportunities for low-traffic industrial and employment uses including data centers".

Crucially, the report also notes that "staff has identified interest from potential users in locating such facilities within the Village". This statement confirms that village officials were not acting in a vacuum; they were actively creating a legislative pathway for a data center project they knew was forthcoming. This preemptive action suggests a level of coordination between village staff and a potential developer long before the project was made public.

The Official Proposal (July 28, 2025): The Plan Commission Recommends Approval

The formal public process for Project Nova began at the July 28, 2025, Plan Commission meeting. The agenda packet for this meeting is the foundational document for the deal, containing the official requests to amend the comprehensive plan and rezone the 244-acre We Energies site. The staff report explicitly identifies the purpose of these changes as facilitating a "proposed Data Center Development". The packet culminates in Resolution PC2025-03, in which the Plan Commission formally recommends that the Village Board approve the changes.

The roll call for this critical vote reveals a striking detail: three of the seven commission members were marked as "EXCUSED"—nearly half the commission. The absent members were Jeff Hintz, Michelle Cook, and Village Trustee Nancy Pierce. Their absence allowed the recommendation to pass with the approval of the four remaining members, a meeting chaired by Village President Tom Weatherston. While the absences may have been coincidental, their effect was strategically significant. It allowed the crucial first step of the approval process to advance with a bare quorum, avoiding a scenario where commissioners with potential conflicts of interest (Hintz) or publicly stated reservations (Pierce) would have to cast a controversial vote on the record at this early stage.

The Backdoor Deal? (August 2025): The Pre-Development Agreement

Perhaps the most telling event in the timeline is one for which no public meeting minutes are available in the provided records. According to a Wisconsin Public Radio report published on September 11, 2025, "The village board approved a pre-development agreement last month". This places the approval of a contractual agreement with the developer in August 2025.

A pre-development agreement is a significant legal step that often outlines obligations, timelines, and financial terms between a municipality and a developer. By entering into such an agreement before the final public hearing and vote on the rezoning—which was scheduled for the end of September—the Village Board signaled its commitment to the

project. This action effectively renders the subsequent public hearing process a formality. It creates a strong impression that the decision was made in private, subverting the purpose of public input, which is meant to inform the board's final decision, not to rubber-stamp a choice that has already been contractually memorialized.

The Public Backlash (September 9, 2025): The Village Board Meeting

The depth of community opposition to Project Nova became undeniable at the September 9, 2025, Village Board meeting. The draft minutes from this meeting document a lengthy public comment period in which twelve residents spoke. Every speaker who addressed the data center expressed opposition or serious concerns. Residents spoke out against the developer's secrecy, the project's environmental impact, the loss of the area's rural character, and the lack of any discernible benefit to the community.

News reports from the meeting captured the public's sentiment, quoting residents who characterized the rezoning as a "multimillion dollar gift to We Energies" for which they would "get nothing in return". Despite this unified and passionate public testimony, the official meeting minutes show no discussion, deliberation, or response from the Village Board or the Village President regarding the citizens' concerns. The public comment section is followed by unrelated business, and the meeting was adjourned just 37 minutes after it began. This procedural silence suggests an indifference to public input and reinforces the perception that the project's approval is a foregone conclusion.

Analysis of Potential Impropriety and Conflicts of Interest

The facts established through public records and news reports, when synthesized, form a compelling case that the Project Nova approval process is rife with potential impropriety. The analysis centers on the structural conflicts of interest of key officials, the disproportionate and opaque benefits conferred upon corporate entities, and the deliberate use of secrecy as a tool to manage and subvert public oversight. The historical example of outlots in Homestead Acres further illustrates how outlot structures can enable questionable practices in property dealings.

Case Study 1: The Triumvirate of Tom Weatherston

The governance structure of the Village of Caledonia places Village President Tom Weatherston at the center of the Project Nova decision, but his concurrent roles in other organizations create an irreconcilable conflict of interest. He simultaneously holds three key positions that make impartial judgment on this matter a structural impossibility:

1. As Plan Commission Chair: Weatherston presides over the very body tasked with making the initial, expert recommendation on the project's land-use changes. He

chaired the July 28, 2025, meeting where the commission formally recommended approval of the rezoning that benefits We Energies.

2. As Village President: He is the chief executive of the village and presides over the Village Board, the legislative body with the final authority to approve the rezoning ordinance. He cannot be an independent arbiter of a recommendation that he himself helped to create and advance.
3. As RCEDC Leadership Council Member: He serves on a private economic development council alongside Amy Plato, a manager for We Energies. This places him in a collaborative, pro-development forum with a representative of the corporation that stands to gain the most from the decisions he will make in his official public capacities.

This triumvirate of roles means that President Weatherston is, in effect, negotiating with a corporate partner in one forum (RCEDC), recommending the outcome of that negotiation to himself in a second forum (Plan Commission), and giving final legislative approval to his own recommendation in a third forum (Village Board). This circular power structure violates the fundamental principle of arm's-length dealing and independent oversight that is essential to ethical public service. It creates an environment where the interests of We Energies and the anonymous developer can be advanced seamlessly, with the Village President acting as the key facilitator at every stage of the process.

Case Study 2: Commissioner Jeff Hintz and Hintz Development

The impartiality of the Plan Commission is further compromised by the business interests of its Vice-President, Jeff Hintz. Public records reveal a clear potential for a conflict of interest that could influence his judgment on all development matters, including Project Nova.

- Mr. Hintz is a sitting member of the Caledonia Plan Commission, elected as its Vice-President on June 23, 2025.
- An agenda packet for the August 26, 2024, Plan Commission meeting lists "Hintz Development LLC" as the applicant for a "bio-solid storage facility" project in Caledonia. The website for a related entity, "Hintz Holdings," confirms that the Hintz family is a long-standing, Caledonia-based development company.
- In addition to his commission role, Mr. Hintz is also employed as the Assistant Director of the Department of City Development for the neighboring City of Racine.

A sitting Plan Commissioner whose family development company is actively seeking approvals from that same commission has an undeniable conflict of interest. This situation

creates pressure, whether explicit or implicit, for the commissioner to maintain a favorable relationship with village staff and elected officials to ensure his own projects are treated favorably. This could reasonably compromise his ability to render impartial judgment on other controversial projects, like Project Nova, particularly if it meant opposing a plan strongly favored by the Village President and village administration. His noted absence from the critical July 28, 2025, vote on Project Nova can be viewed through this lens as a way to avoid creating a public record of either supporting a controversial project or opposing the village leadership whose goodwill his company may require.

Case Study 3: The Professional Planners (Jeff Hintz and Michelle Cook)

The potential for compromised judgment on the Plan Commission extends beyond a single member. Commissioner Michelle Cook, who serves alongside Jeff Hintz, is also a professional planner. Her day job is as an Associate Planner in the very same City of Racine Department of City Development where Mr. Hintz serves as Assistant Director.

This professional relationship, where one commissioner is a subordinate to another in their primary employment, fundamentally undermines the expectation of independent deliberation among citizen members of the Plan Commission. It creates a dynamic where Commissioner Cook could feel pressured to align with the views of her professional superior, Mr. Hintz, on matters before the Caledonia commission. Like Mr. Hintz, Commissioner Cook was also marked as "EXCUSED" from the pivotal July 28, 2025, meeting where the Plan Commission voted to recommend the Project Nova rezoning.

Case Study 4: The Real Estate Broker (Ami May)

Further questions of impartiality arise from the professional role of Plan Commission member Ami May. Ms. May is the Broker and Owner of Realty ONE Group Boardwalk, a real estate agency located in and serving the Racine area. Her professional activity includes a significant number of property sales within the Village of Caledonia.

A real estate professional has a direct financial interest in the development and property values of the community in which they operate. Decisions made by the Plan Commission on zoning, land use, and major projects like Project Nova can have a substantial impact on the real estate market. This places Ms. May in a position where her votes on the commission could potentially influence her own business interests or those of her clients. This creates, at minimum, a significant appearance of a conflict of interest, as her duty to make impartial planning decisions could be at odds with her professional role as a real estate broker.

The Appearance of a Quid Pro Quo: A "Gift to We Energies"

The sequence of events and the network of relationships strongly support the perception of residents that the village's actions amount to a "multimillion dollar gift to We Energies". The transaction appears to be a quid pro quo in which the public provides the valuable zoning change and the corporation reaps the rewards.

The chain of benefits for We Energies is clear and direct. The utility owns 244 acres of low-value agricultural land. The Village of Caledonia, led by an official who serves on a private council with a We Energies manager, initiates and advances a process to rezone that land for high-value industrial use. This rezoning directly and substantially increases the asset value of We Energies' property, allowing for a lucrative sale to the data center developer. Furthermore, the development of a data center on that site creates a massive, permanent, and geographically captive customer for We Energies, which will sell the vast amounts of electricity needed to power the facility from its adjacent power plant. In return for these substantial and tangible benefits to a private corporation, the benefits to the residents of Caledonia remain vague and unsubstantiated, consisting only of "promises of future tax revenue from a developer who has not committed to a timeline or a full project scope".

Calculated Secrecy as a Tool to Subvert Public Oversight

The persistent refusal to identify the developer behind Project Nova is not an incidental detail; it is a core strategy that undermines transparent governance. This calculated secrecy prevents residents, the press, and even some elected officials from conducting the most basic due diligence. Without knowing the company's identity, it is impossible to:

- Investigate the company's financial stability and its capacity to complete a project of this magnitude.
- Examine its environmental and labor record in other communities where it operates.
- Assess whether the company has a history of failing to meet promises regarding job creation or tax revenue.
- Determine if the company or its executives have made political contributions or have other financial ties to local or state officials.

This information blockade allows the project's proponents to control the narrative, framing the development in terms of abstract economic benefits while preventing any concrete risk assessment. It is a tactic designed to secure the valuable and irreversible land-use entitlements before the entity that will profit from them is subjected to public scrutiny. This approach is fundamentally at odds with the principles of open government and informed public consent. Similar tactics may have been at play in past developments, such as the use of outlot filings in Homestead Acres.

While a specific rumor about a former village board vice president acting as a realtor on behalf of We Energies for Project Nova properties cannot be substantiated by available records, this tactic has been used by the utility in the past. A 2014 news report on We Energies' land acquisitions in Caledonia near the Oak Creek power plant noted that several homeowners were approached by a broker they later learned was representing the utility, and that sellers were required to sign confidentiality agreements as a condition of the sale.

Conclusion and Avenues for Further Action

The evidence gathered from public records demonstrates that the approval process for the Project Nova data center in the Village of Caledonia is characterized by a profound lack of transparency and is structured around a network of individuals with significant, overlapping interests that compromise the principles of impartial governance. The calculated secrecy surrounding the developer's identity, the structural conflicts of interest involving the Village President and a Plan Commissioner, and a timeline of events that suggests a predetermined outcome all point to a system that prioritizes corporate interests over public accountability. The evidence strongly suggests that the public approval process has been managed to ensure a result favorable to We Energies and an unknown developer, while systematically marginalizing legitimate and widespread public concerns. Historical examples, like the outlots in Homestead Acres, amplify these worries about recurring lapses in oversight.

Summary of Findings

- **Secrecy and Lack of Transparency:** The identity of the Project Nova developer has been deliberately concealed, preventing any meaningful public due diligence and fostering deep community distrust. Past outlot issues, such as those in Homestead Acres, suggest a pattern.
- **Conflicts of Interest:** Village President Tom Weatherston's simultaneous roles as chief executive, Plan Commission Chair, and RCEDC council member alongside a We Energies manager create an untenable structural conflict of interest. The Plan Commission's impartiality is further compromised by members who are active real estate developers (Jeff Hintz), real estate brokers (Ami May), or professional colleagues in a nearby municipality's planning department (Jeff Hintz and Michelle Cook).
- **Procedural Irregularities:** The reported approval of a "pre-development agreement" before the final public hearing on the project's required rezoning suggests that the public input process is not being conducted in good faith and that the project's approval is a foregone conclusion.

- **Disproportionate Corporate Benefit:** The village's actions confer a significant, direct financial benefit to We Energies by increasing its land value and creating a captive, high-volume energy customer, lending credence to resident claims that the deal is a "gift" for which the community receives little in return.
- **Historical Concerns with Outlots:** Community concerns regarding outlots in subdivisions like Homestead Acres highlight potential vulnerabilities in property documentation that could parallel issues in current projects.

Recommendations for Further Investigation and Action

Based on these findings, the following actions are recommended to citizens, advocacy groups, and legal counsel seeking to ensure a transparent and ethical process for Project Nova.

- **Formal Open Records Requests:** File immediate and comprehensive open records requests under Wisconsin's Public Records Law (§§ 19.31-19.39, Wis. Stats.) for the following documents:
 - The fully executed "pre-development agreement" between the Village of Caledonia and any entity representing Project Nova (including Dewberry Engineers or any LLCs) that was reportedly approved by the Village Board in August 2025.
 - All email, text message, and other written or electronic correspondence from January 1, 2025, to the present between Village President Tom Weatherston, Village Administrator Todd Willis, and Development Director Peter Wagner, and any representatives of We Energies (including Amy Plato) or Dewberry Engineers (including Rich Brittingham) that contains the terms "Project Nova," "data center," or "Dewberry."
 - The official meeting agendas, minutes, and any distributed materials for all meetings of the RCEDC Leadership Council held in 2025.
 - Records related to past developments, including Homestead Acres subdivision plats and outlot ownership deeds (e.g., Outlot 7), to investigate general management practices.
- **Formal Ethics Complaints:** File formal, evidence-based ethics complaints with the Village of Caledonia's governing body or, if applicable, the Wisconsin Ethics Commission, against the following officials:
 - Village President Thomas Weatherston, for violating his fiduciary duty of impartiality by presiding over and participating in every stage of an approval process that directly

benefits a corporate entity (We Energies) with whose representative he serves on a private, pro-development council.

- Plan Commissioner Jeff Hintz, for participating as a member of the Plan Commission while his family's development company has active or recent business before the village, creating an ongoing and unresolved conflict of interest.
- **Legal Challenges:** Consult with municipal and environmental law experts to evaluate grounds for a potential legal challenge to any final zoning change. Such a challenge could be based on the argument that the decision-making process was arbitrary and capricious, tainted by unmitigated conflicts of interest, and procedurally flawed due to the pre-development agreement that rendered the statutory public hearing process meaningless. Include review of historical outlot concerns to argue systemic issues.
- **Public Advocacy and Scrutiny:** Utilize the evidence and analysis contained in this report to escalate public and media scrutiny ahead of the final Plan Commission vote, currently scheduled for September 29. Focus public pressure on demanding answers to two key questions:
 1. Who is the developer behind Project Nova?
 2. Why was a pre-development agreement signed before the public had a final opportunity to be heard on the rezoning?

Additionally, investigate and publicize past outlot-related concerns to build a case for broader reforms in development transparency.

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