

Institute for the Advancement of Legal and Ethical AI

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Analysis of Saline Township FOIA Response

Validity and Execution of Consent Judgment; Attorney Retention, Authorization, and Insurance Defense Records (Related Digital / Stargate Data Center)

February 8, 2026

1. Executive Summary

On February 8, 2026, we submitted a Freedom of Information Act request to Saline Township, Washtenaw County, Michigan, seeking records related to the validity and execution of a consent judgment in the Related Digital / Stargate data center lawsuit, attorney retention and authorization, and the role of the Township's liability insurer in the defense and settlement [1].

The Township produced 36 PDF documents totaling approximately 30.5 MB. These records reveal a sequence of events in which a 575-acre data center development was denied by the Township Board on a 4-1 vote on September 10, 2025 [21], only for a lawsuit filed two days later to produce a consent judgment overriding that denial within approximately 30 days [23].

The documents raise significant questions about:

- The **compressed timeline** from lawsuit filing to consent judgment execution (approximately 30 days), with the proposed consent judgment originating from the plaintiff's attorney [4];
- **Attorney retention irregularities**, including the absence of any board resolution authorizing the retention of litigation counsel David B. Landry;
- Potential **Open Meetings Act violations** in the September 10 public hearing (5 minutes, 59 citizens, no recorded discussion) [20] and October 1 closed session (no documented 2/3 roll call vote) [18];
- **Insurance coverage gaps**: the insurer declined to defend or indemnify, offering only up to \$250,000 in defense cost reimbursement while reserving fraud and bad-faith exclusions [23];
- **Notable gaps in production**, including missing September 24 special meeting minutes, the executed consent judgment itself, the denial reasons attachment, and all electronic communications.

2. Background and FOIA Request

In July 2025, RD Michigan Property Owner I, LLC and associated landowners submitted an Application for Conditional Rezoning to develop a data center on approximately 575 acres along Michigan Avenue (US-12) in Saline Township [12, 23]. The site comprises eight parcels, three of which carry PA 116 farmland preservation enrollments dating to January 1983 [12].

The Township Planning Commission recommended denial on August 12, 2025 [23]. The Township Board formally denied the rezoning request on September 10, 2025, by a vote of 4-1 [21].

Our FOIA request sought records in two stages: (1) attorney retention and authorization records, consent judgment execution records, insurance records, IDD/IFEC records, and board minutes (5-business-day pro-

duction); and (2) electronic communications, financial records, settlement drafts, intergovernmental communications, and insurance history (15-business-day production) [1].

3. Document Inventory

The Township produced 36 PDF documents, which we categorize as follows:

Category	Files	Size	Description
Meeting Minutes/Agendas	7	711 KB	Sep 10 (public hearing + regular), Oct 1 (special), Oct 15 (regular)
Attorney Letters/Reports	4	2.5 MB	Landry letter, Lucas fee agreement, vendor reports, insurance letter
Landry Invoices/Checks	4	585 KB	Invoices 31594 and 31801; corresponding check stubs
Lucas Invoices/Checks	12	2.4 MB	Invoices 8845, 9013, 9174, 9544, 9648, 9813; corresponding stubs
Insurance Policies	4	17.9 MB	Policies for 2011–12, 2024–25, 2025–26; premium stubs 2020–25 [16]
IDD Records	2	3.3 MB	Public hearing notice; IDD Resolution No. 25-001
Budget	2	3.0 MB	FY 2025–26 budget (duplicate file)
Legislative Contact	1	165 KB	Treasurer Zink’s contact with Sen. Irwin

Table 1: FOIA Response Document Inventory

4. Timeline of Events

Date	Event
Jan. 1983	Three parcels enrolled in PA 116 farmland preservation [12]
Feb. 14, 2024	Saline Township signs fee agreement with Castleberry & Lucas (Fred Lucas) at \$200/hr [2]
Dec. 1, 2024	MTPP insurance policy takes effect; includes Non-Monetary Suit Defense Costs endorsement (\$250K) and Private Property Use Restriction Sublimit [13]
Jun. 5, 2025	First documented reference to data center: Lucas conference with “Walbridge representative re: data farm” [6]
Jul. 2025	Plaintiffs submit Application for Conditional Rezoning for data center on ~575 acres [23]
Jul. 17, 2025	Lucas attends meeting with “data storage reps” (3.00 hrs) [7]
Aug. 12, 2025	Planning Commission recommends denial of rezoning [23]; Lucas attends (4.00 hrs combined) [8]
Sep. 10, 2025	Public hearing on proposed IDD: opened and recessed in 5 minutes; 59 citizens present; no substantive discussion recorded [20]
Sep. 10, 2025	Board votes 4–1 to deny the data center project. Treasurer Zink moved denial; Clerk Marion sole dissenter. Reasons for denial referenced as attachment— <i>not produced</i> [21]
Sep. 12, 2025	Lawsuit filed: <i>RD Michigan Property Owner I, LLC et al. v. Saline Township</i> , Case No. 25-001577-CZ, Washtenaw County Circuit Court
Sep. 19, 2025	Insurer (MTPP/Tokio Marine HCC) notified of lawsuit [23]
Sep. 22, 2025	Landry’s first billable activity: reviews plaintiff attorney’s email on “projected benefits to township of consent judgment” [3]

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Date	Event
Sep. 24, 2025	Landry attends public meeting with Board, Planning Commission, and public; reviews zoning ordinance, master plan, all plaintiff submissions, DTE letter (7.20 hrs) [3]. Special meeting held— <i>minutes not produced</i>
Sep. 26, 2025	Landry writes to Clerk Marion requesting closed session: “I have recently received a proposed Consent Judgment from the attorney for the Plaintiff. This matter is time-sensitive.” [4]
Sep. 29, 2025	Landry reviews proposed consent judgment (3.40 hrs); researches IFEC law; reviews site plans, Water Resources Commissioner letter, condominium documents [3]
Oct. 1, 2025	Special meeting (Joint Board + Planning Commission, 7:00–10:07 PM). Closed session with Landry and Lucas. Board votes 4–1 to “move forward with trying to settle.” After reopening, Landry presents consent agreement to residents [18]
Oct. 1, 2025	Treasurer Zink contacts Sen. Jeff Irwin: “I would like to discuss Data Centers coming in and building agriculture land” [24]
Oct. 2–3, 2025	Both attorneys finalize consent judgment edits incorporating Board-approved provisions [3, 9]
Oct. 6, 2025	Lucas conference with Alan Greene, Landry, Kelly Marion, Jim Marion, and the Washington Post [9]
Mid-Oct. 2025	Consent judgment entered by the Court , dismissing the lawsuit [23]
Oct. 15, 2025	Lucas states publicly: “the Board was not in favor of this project but had to decide on the facts of the lawsuit.” Board votes 4–0 to approve IDD Resolution No. 25-001 (Zink absent). Wilkin PA 116 terminated [15, 19]
Oct. 29, 2025	Landry paid \$10,740 (Invoice 31594, Check 8692) [3, 17]
Nov. 20, 2025	Landry receives proposed joint stipulation re: motion to intervene to set aside consent judgment [5]
Dec. 17, 2025	Landry reviews Kathryn Haushalter’s motion to intervene; researches OMA “reenactment of a meeting curing any procedural error” [5]
Jan. 7, 2026	Court sets briefing schedule for motion to intervene [5]
Jan. 14, 2026	Landry drafts letter asserting ZBA lacks jurisdiction to hear Haushalter’s appeal [5]
Jan. 15, 2026	Paralegal Luanne Kozma responds disagreeing with jurisdiction letter [5]
Feb. 1, 2026	Landry paid \$6,540 (Invoice 31801); Lucas paid \$1,600 (Invoice 9813) [5, 11]
Feb. 6, 2026	Tokio Marine HCC issues coverage determination: no duty to defend or indemnify; limited \$250K defense cost reimbursement; reserves fraud/bad-faith exclusions [23]
Feb. 21, 2026	Vendor reports generated: combined legal costs \$34,670 [22]
Feb. 8, 2026	FOIA request submitted [1]
Feb. 20, 2026	Judge Julia Owdziej denies Haushalter’s motion to intervene in Washtenaw County Circuit Court; rules motion untimely, finds video shows settlement vote occurred in open session, holds intervention prejudicial given billions already committed

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Date	Event
Feb. 26, 2026	Saline Township produces 36 PDF documents in response to FOIA request

5. Key Actors

5.1 Township Board

Name	Role	Sep 10	Oct 1	Oct 15	Notes
James C. Marion	Supervisor	Deny	Settle*	IDD	Three Marions on 5-member board
Jennifer M. Zink	Treasurer	Deny	Settle*	<i>Absent</i>	Contacted Sen. Irwin
Kelly L. Marion	Clerk	Oppose deny	Settle*	IDD	Sole vote against denial; FOIA coordinator
Tom P. Hammond	Trustee	Deny	Settle*	IDD	Moved settlement and IDD motions
Dean R. Marion	Trustee	Deny	Settle*	IDD	Supported IDD motion

Table 3: Township Board Voting Record on Data Center.

*Oct 1 vote was 4–1; the single dissenter is not identified in the minutes.

5.2 Attorneys

Fred Lucas (Castleberry & Lucas): General township attorney since February 2024, billing at \$200/hr. First engaged on data center matters June 5, 2025. Total billed: 70.70 hours / \$14,490 across six invoices [2, 6–11].

David B. Landry (Landry, Mazzeo, Dembinski & Stevens): Litigation counsel retained specifically for the data center lawsuit, billing at \$300/hr. First billed September 22, 2025. Total billed: 57.60 hours / \$17,280 across two invoices [3, 5]. No board resolution authorizing his retention was produced.

Alan Greene: Attorney of unknown affiliation consulted by both Landry and Lucas on multiple occasions beginning October 6, 2025 [5, 9, 10].

5.3 Plaintiff Parties

Seven plaintiffs filed the lawsuit: RD Michigan Property Owner I, LLC (lead developer entity); Feldkamp Siblings, LLC; Dennis and Lynn Ellen Finkbeiner; Wilkin Farm Properties I, LLC; and Dennis C. and Alice M. Wilkin [23]. The Wilkin properties and Feldkamp parcels are among the eight IDD parcels [12].

5.4 Intervenors

Kathryn Haushalter filed a motion to intervene seeking to invalidate the consent judgment and also filed an appeal to the Zoning Board of Appeals. She is represented by attorney **Robert Dube** (admitted pro hac vice) and supported by attorney **Ellis Boal** and paralegal **Luanne Kozma** [5].

6. Analysis of Key Issues

6.1 Compressed Settlement Timeline

The most striking feature of the FOIA production is the speed with which the Township moved from denial to consent judgment. The Board denied the project on September 10 [21]. A lawsuit was filed two days later on September 12 [23]. By September 26—only 14 days after filing—litigation counsel Landry had already received a proposed consent judgment from the plaintiff’s attorney [4].

The consent judgment was *proposed by the plaintiff’s side*, not developed by Township counsel [3, 4]. Landry’s invoice further reveals that the plaintiff’s “tenant” (likely the data center operator) provided separate redlined

changes [3], suggesting a three-party negotiation (Township, property-owning plaintiffs, and the operating tenant).

The Board voted to settle on October 1 [18], and the consent judgment was entered by the court sometime in mid-October [23]—roughly 30 days from filing to final judgment. By comparison, the typical timeline for a contested zoning case in Michigan runs 12–18 months.

6.2 Attorney Retention and Authorization

The FOIA production contains no board resolution, meeting minutes entry, or other documentation authorizing the retention of David Landry as litigation counsel. The fee agreement produced covers only Castleberry & Lucas [2]. Landry’s letter of September 26, 2025 states he was “retained to represent the Township in the lawsuit” [4] but does not identify who retained him or under what authority.

The insurance coverage letter confirms that the insurer (MTPP) “will not retain counsel on behalf of the Township” [23], meaning Landry was not assigned by the insurer. The question of who authorized the expenditure of \$17,280 in public funds on a litigation attorney without a documented board vote is a significant governance concern.

6.3 Open Meetings Act Concerns

6.3.1 September 10 Public Hearing

The meeting minutes for the September 10 public hearing on the proposed IDD record only a 5-minute hearing despite 59 citizens being present, with no substantive discussion [20]. However, as discussed below, the October 1 meeting minutes have been shown to materially misrepresent what actually occurred (omitting public comment and mischaracterizing the setting of the settlement vote). This pattern of unreliable minutes calls into question whether the September 10 hearing was in fact as perfunctory as the minutes suggest, or whether the minutes simply failed to document the discussion that took place. Michigan’s Open Meetings Act (MCL 15.261 *et seq.*) and PA 198 of 1974 require that public hearings on proposed Industrial Development Districts afford meaningful public participation.

6.3.2 October 1 Meeting: Minutes vs. Video Record

The October 1 special meeting minutes record a motion to enter closed session but do not document the required two-thirds roll call vote (MCL 15.267(1)) [18]. The minutes describe the settlement vote vaguely as a motion to “move forward with trying to settle the lawsuit” and do not clearly establish that the vote occurred in open session.

However, video of the October 1 meeting tells a different story. A publicly available recording shows that the settlement vote was preceded by substantive public comment in open session—residents questioned the attorneys about decommissioning terms, DTE power prioritization, industrial zoning implications, and the adequacy of a \$5–10 million bond for a billion-dollar project. The actual motion, stated in open session, was: “I move to approve the consent judgment with the terms outlined by our attorneys.” The roll call vote is clearly recorded on video: Kelly Marion (yes), Jim Marion (**no**), Tom Hammond (yes), Dean Marion (yes), Jennifer Zink (yes)—passing 4–1.

The discrepancy between the minutes and the video record is significant. Judge Owdziej relied on the video in denying the motion to intervene, stating: “There was a public comment period, and the resolution was ‘I move to approve the consent judgement that has been outlined by our attorney.’ So, to say that happened in hiding or in secret just isn’t accurate.” Township attorney Landry characterized the minutes discrepancy as “a

simple clerical error.”

Notably, Landry’s second invoice includes a December 17, 2025 time entry for “Review Open Meetings Act and legal research re reenactment of a meeting curing any procedural error in meeting minutes” [5]. This entry suggests that the Township’s own counsel identified the minutes deficiencies and was researching whether a subsequent “reenactment” could cure them.

6.3.3 *Broader Reliability of Meeting Minutes*

The demonstrated inaccuracy of the October 1 minutes—which omitted the public comment period, mischaracterized the motion language, and failed to clearly document an open-session roll call vote—raises a fundamental question about the reliability of *all* meeting minutes produced in this FOIA response. If the October 1 minutes materially misrepresent what occurred, the September 10 minutes (recording only a 5-minute hearing with no discussion) and the October 15 minutes may be equally unreliable as a factual record of what actually transpired at those meetings.

6.4 Erratum: Filing Venue

The Tokio Marine HCC coverage determination letter of February 6, 2026 states that the lawsuit was “filed with the State of Michigan, in the Circuit Court for Lake County on September 12, 2025” [23]. However, all other available evidence—including the consent judgment itself, the Washtenaw County Circuit Court docket, and the February 20, 2026 hearing before Judge Julia Owdziej in Washtenaw County—confirms that Case No. 25-001577-CZ was filed in **Washtenaw County Circuit Court**, not Lake County. The insurer’s reference to Lake County appears to be a factual error in the coverage letter. Our original analysis characterized this as potential “forum shopping”; that characterization was incorrect and has been withdrawn. However, an error of this magnitude in a formal coverage determination—misidentifying the court in which the lawsuit was filed—raises questions about the thoroughness of Tokio Marine HCC’s review of the underlying claim and whether other factual or legal conclusions in the coverage letter warrant similar scrutiny.

6.5 Insurance Coverage and Financial Exposure

The February 6, 2026 coverage letter from Tokio Marine HCC determined that the insurer had **no duty to defend or indemnify** the Township because the lawsuit sought only equitable relief (declaratory and injunctive), not monetary damages [23].

The insurer offered limited defense cost reimbursement up to \$250,000 under the Non-Monetary Suit Defense Costs Endorsement, but **reserved rights** under three exclusions [23]:

1. **Exclusion 2** (Fraud, dishonesty, bad faith): If any insured acted fraudulently or in bad faith, even the limited reimbursement could be denied.
2. **Exclusion 3** (Deliberate violation of law): If the Township deliberately violated any statute, rule, or regulation.
3. **Exclusion 10** (Property use restriction / regulatory taking): The Private Property Use Restriction Sub-limit was ruled “not available” because primary coverage was already excluded.

Critically, **the consent judgment was entered before the insurer issued its coverage determination**. The Township settled the case in October 2025 without knowing whether insurance would cover any costs [23]. Total legal expenses to date are \$34,670 [22], well within the \$250,000 reimbursement limit, but the reserved exclusions mean this reimbursement remains at risk.

6.6 Vote Reversal Pattern

The Board's voting trajectory is remarkable:

- **September 10:** 4–1 to *deny* the data center [21]
- **October 1:** 4–1 to *settle* the lawsuit [18]
- **October 15:** 4–0 to *approve* the IDD resolution (Zink absent) [19]

Attorney Lucas's public statement on October 15 that “the Board was not in favor of this project but had to decide on the facts of the lawsuit” [19] confirms that the settlement was driven by litigation pressure, not a change of position on the merits. The question is whether a 30-day-old lawsuit with no discovery, no depositions, and no judicial ruling could genuinely have created sufficient litigation risk to justify reversing a 4–1 democratic vote.

Treasurer Zink's absence from the October 15 meeting—and her contact with Senator Irwin the same day as the settlement vote, expressing concern about “Data Centers coming in and building agriculture land” [24]—suggests at least one elected official viewed the settlement as improper.

6.7 Financial Oversight

Total legal expenditures of \$34,670 [22] exceeded the Township's \$25,000 legal services budget by 34% [14]. Combined legal and consulting costs of \$74,438 were 49% over the \$50,000 combined budget. The budget also shows \$104,834 in unexplained miscellaneous income against a \$2,000 budget [14].

Several financial anomalies appear in the check stubs:

- Check #8634 (Lucas, \$2,550) exceeds Invoice #9013 (\$1,400) by \$1,150 [7]
- Check #8639 (Lucas, \$8,630) exceeds Invoice #9174 (\$5,040) by \$3,590 [8]
- The vendor report total for Lucas (\$17,390) exceeds the sum of produced invoices (\$14,490) by \$2,900 [22]

Landry's second invoice contains redacted hour entries totaling approximately 3.20 hours (\$960), raising questions about whether the Township improperly redacted billable hour amounts under a privilege claim [5].

6.8 Consent Judgment as Part of Broader Infrastructure Context

The FOIA request identifies the data center as connected to the “Related Digital / Stargate” project, implicating broader energy and infrastructure concerns including DTE power contracts (MPSC Case U-21990) and regional transmission planning [1]. The establishment of the IDD is a prerequisite for an Industrial Facilities Exemption Certificate (IFEC)—a property tax abatement under PA 198 of 1974—for the data center facility [12, 15].

7. Gaps in Production

The following records were requested but not produced:

1. **September 24 Special Meeting Minutes:** Referenced in the October 15 consent agenda [19] but not produced. This meeting occurred between the lawsuit filing (Sep 12) and Landry's request for a closed session (Sep 26), and may contain critical information about early settlement discussions.
2. **Denial Reasons Attachment:** The September 10 minutes state that the data center was denied “for the following reasons: see attached as part of the minutes” [21]. The attachment was not produced.

3. **Executed Consent Judgment:** The actual consent judgment entered by the court was not produced, despite being the central document in the FOIA request.
4. **Board Resolution Authorizing Attorney Retention:** No resolution or meeting minutes entry authorizing Landry's retention was produced.
5. **Electronic Communications:** The FOIA request's Stage 2 sought all emails, text messages, and electronic communications. None were produced.
6. **Consent Judgment Drafts:** Multiple drafts and redlined versions are referenced in Landry's invoices [3] but were not produced.
7. **Carlisle Wortman Planning Review:** Referenced by Landry [3, 4] but not produced.
8. **DTE Letter and Water Resources Commissioner Letter:** Both referenced in Landry's invoice entries [3] but not produced.
9. **Intergovernmental Communications:** No correspondence with court, county, state, or federal entities was produced.
10. **Insurance Assignment/Coverage Correspondence:** Communications between the Township and its insurer prior to the February 6 letter were not produced.

8. Conclusion

The FOIA response documents reveal a pattern of rapid, litigation-driven reversal of a democratic decision. Within 30 days of a 4–1 vote to deny a data center rezoning, the Township Board—under pressure from a lawsuit filed in Washtenaw County Circuit Court—approved a consent judgment and Industrial Development District resolution that effectively granted what the Board had just denied.

Key concerns include: (1) the absence of documented authorization for litigation counsel; (2) potential Open Meetings Act violations in both the September 10 public hearing and October 1 closed session; (3) a consent judgment proposed by the plaintiff, negotiated on a compressed timeline, and entered before the Township's insurer even issued a coverage determination; (4) a vote reversal justified solely by litigation pressure from a 30-day-old lawsuit with no discovery; and (5) significant gaps in the FOIA production, including the consent judgment itself, the denial reasons, September 24 meeting minutes, and all electronic communications.

The Township's own litigation counsel researched whether "reenactment of a meeting" could cure procedural errors in the October 1 meeting [5]. The insurer has reserved fraud and bad-faith exclusions that could jeopardize even the limited \$250,000 defense cost reimbursement [23].

A resident, Kathryn Haushalter, filed a motion to intervene seeking to invalidate the consent judgment [5]. On February 20, 2026, Washtenaw County Circuit Court Judge Julia Owdziej denied the motion on multiple grounds. The court ruled the motion was untimely because the case had already been closed when the consent judgment was entered in October 2025, and held that by-right intervention is not available in a closed case. On the Open Meetings Act claims, the court found that video of the October 1, 2025 meeting showed the settlement vote occurred in open session, notwithstanding ambiguities in the meeting minutes; Judge Owdziej stated: "There was a public comment period, and the resolution was 'I move to approve the consent judgement that has been outlined by our attorney.' So, to say that happened in hiding or in secret just isn't accurate." Township attorney Landry characterized the minutes discrepancy as "a simple clerical error." The court also found that intervention would be prejudicial given the enormous financial commitments already made, including a \$40 million nonrefundable deposit to DTE Energy and \$2 billion in specialized equipment already ordered. Attorney Robby Dube, representing Haushalter, indicated they disagree with the ruling and

are considering further legal options. Haushalter and other residents also filed a separate mandamus complaint on January 28, 2026 in Washtenaw County Circuit Court alleging the Saline Township Zoning Board of Appeals failed to hold a required hearing on data center construction permits.

These records warrant continued investigation, including examination of the missing documents identified in Section 6, and close attention to any appeal of the February 20 ruling and the related mandamus action in Washtenaw County.

Prepared by Michael J. Bommarito II, President, Institute for the Advancement of Legal and Ethical AI.

All citations reference documents produced by Saline Township in response to FOIA Request dated February 8, 2026.

References

- [1] Michael J. Bommarito, II. FOIA request to Saline Township: Attorney retention, representation, and authorization records. Electronic and physical copy to Kelly L. Marion, Township Clerk, February 2026. Submitted pursuant to MCL 15.231 *et seq.*
- [2] Castleberry & Lucas and Township of Saline. Attorney fee agreement (Hourly Fee Basis) between Township of Saline and Castleberry & Lucas, February 2024. Signed by Frederick Lucas and James C. Marion. File: Letter Fred Lucas.pdf.
- [3] David B. Landry. Invoice no. 31594 (Final Bill), Landry, Mazzeo, Dembinski & Stevens, P.C., October 2025. 35.80 hours at \$300/hr = \$10,740.00. Period: Sep 22–Oct 6, 2025. File: Invoice David Landry 31594.pdf.
- [4] David B. Landry. Letter to Saline Township Board of Trustees requesting closed session meeting, September 2025. Landry, Mazzeo, Dembinski & Stevens, P.C. File: Letter David Landry.pdf.
- [5] David B. Landry. Invoice no. 31801, Landry, Mazzeo, Dembinski & Stevens, P.C., January 2026. 21.80 hours at \$300/hr = \$6,540.00. Period: Nov 20, 2025–Jan 21, 2026. Partially redacted. File: Invoice David Landry 31801.pdf.
- [6] Fred Lucas. Invoice no. 8845, Castleberry & Lucas, July 2025. 3.50 hrs general + 1.50 hrs Jupiter = \$1,150.00. File: Invoice Fred Lucas 8845.pdf.
- [7] Fred Lucas. Invoice no. 9013, Castleberry & Lucas, August 2025. 7.00 hrs = \$1,400.00. File: Invoice Fred Lucas 9013.pdf.
- [8] Fred Lucas. Invoice no. 9174, Castleberry & Lucas, September 2025. 23.70 hrs general + 1.00 hr Jupiter = \$5,040.00. File: Invoice Fred Lucas 9174.pdf.
- [9] Fred Lucas. Invoice no. 9544, Castleberry & Lucas, November 2025. 18.75 hrs = \$3,750.00. File: Invoice Fred Lucas 9544.pdf.
- [10] Fred Lucas. Invoice no. 9648, Castleberry & Lucas, December 2025. 7.75 hrs = \$1,550.00. File: Invoice Fred Lucas 9648.pdf.
- [11] Fred Lucas. Invoice no. 9813, Castleberry & Lucas, January 2026. 6.50 hrs general + 1.00 hr Jupiter = \$1,600.00. File: Invoice Fred Lucas 9813.pdf.
- [12] Kelly L. Marion. Notice of public hearing: Proposed Industrial Development District, September 2025. 8 parcels, ~575 acres. File: IDD Notice.pdf.
- [13] Michigan Township Participating Plan. MTPP insurance policy, December 1, 2024 – December 1,

- 2025, 2024. Policy No. M24MTP81285-05. File: Insurance Policy December 24 to December 25 .pdf.
- [14] Saline Township. FY 2025–2026 budget, 2025. File: Budget 25_26 .pdf.
- [15] Saline Township. Resolution establishing Industrial Development District No. 25-001, October 2025. Adopted 4–0 (Zink absent). File: IDD Resolution .pdf.
- [16] Saline Township. Insurance premium check stubs and invoices, 2020–2025, 2025. File: Insurance Check Stubs Invoices .pdf.
- [17] Saline Township. Check stub no. 8692, payment to Landry, Mazzeo, Dembinski & Stevens, P.C., October 2025. \$10,740.00. Old Nation Bank. File: Check Stub David Landry 31594 .pdf.
- [18] Saline Township. Special meeting minutes (Joint Township Board and Planning Commission), October 1, 2025, October 2025. Certified by Kelly L. Marion, Clerk. File: October 1 .pdf.
- [19] Saline Township. Regular meeting minutes, October 15, 2025, October 2025. Certified by Kelly L. Marion, Clerk. File: October Minutes .pdf.
- [20] Saline Township. Public hearing meeting minutes, September 10, 2025, September 2025. Certified by Kelly L. Marion, Clerk. File: Minutes September 10 .pdf.
- [21] Saline Township. Regular meeting minutes, September 10, 2025, September 2025. Certified by Kelly L. Marion, Clerk. File: Septmeber 10 Regular Meeting .pdf.
- [22] Saline Township. Vendor QuickReports: Landry, Mazzeo, Dembinski & Stevens and Castleberry & Lucas, February 2026. Combined total: \$34,670. File: Dave Landry & Fred Lucas Report .pdf.
- [23] Sarah M. Spigno. Coverage determination letter, claim no. MTP-24-15348, February 2026. Tokio Marine HCC – Public Risk Group, on behalf of Michigan Township Participating Plan. File: February 6 Letter .pdf.
- [24] Jennifer M. Zink. Contact request to Senator Jeff Irwin, October 2025. Re: “Data Centers coming in and building agriculture land.” File: senatedems.com_irwin_contact_request .pdf.