

No. 2017-442 -C2

**INFORMATION**

**THE STATE OF TEXAS**

**VS.**

**WILL JONES**

**CID #**

**Date of Bond:**

**Bondsman:**

**OFFERING GIFT TO A  
PUBLIC SERVANT**

**Texas Penal Code §36.09**

**Booking #:**

**Jeff Kearney & Jim Dunham**  
Attorneys for Defendant  
(Retained)

**Amy L. Cadwell**  
Pro Tem Criminal District Attorney  
For the State of Texas



FILED  
2017 MAR 21 PM 1:55  
JON R. SINGLE  
DISTRICT CLERK  
MCLENNAN CO. TX.  
DEPUTY

**WILL JONES**

**OFFENSE: OFFERING GIFT TO PUBLIC  
SERVANT (Class A Misdemeanor)**

D.O.B.: September 25, 1971

Code: Texas Penal Code §36.09

CID#:

Booking#:

SID#:

Bond Amount: \$

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**Cause No. 2017- 442 -C2**

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**IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS:**

I, AMY L. CADWELL, Pro Tem Criminal District Attorney of McLennan County, in said State of Texas, now here in the 54th District Court of McLennan County, at the January, 2017 A.D. Term thereof, do present this information which charges and presents to said Court that **WILL JONES**, in the County of McLennan and State of Texas, heretofore on or about the 1<sup>st</sup> day of December, 2015, in McLennan County, Texas, did then and there intentionally or knowingly offer or agree to confer on Benedict Raymond Matus, a public servant, namely, a candidate for the Republican Party's nomination for the office of McLennan County Commissioner Precinct 3, a benefit, to-wit: money of the value of \$1250.00, that the defendant knew Benedict Raymond Matus was prohibited by law from accepting,  
**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

**AMY L. CADWELL**

McLennan County Pro Tem Criminal District Attorney

A handwritten signature in black ink, appearing to read "Amy L. Cadwell", written over a horizontal line.

**AMY L. CADWELL**

*Pro Tem Criminal District Attorney*

*State Bar #24057435*

THE STATE OF TEXAS  
COUNTY OF MCLENNAN

§  
§  
§

DOCKET #

COURT:

2017-442-0287  
54th District Court

FILED  
2017 MAR 21 PM 1:55  
JAMES E. BAKER  
DISTRICT CLERK  
MCLENNAN COUNTY, TEXAS

### COMPLAINT

BEFORE ME, THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED THE AFFIANT HEREIN, A PEACE OFFICER UNDER THE LAWS OF TEXAS, WHO, BEING DULY SWORN, ON OATH MADE THE FOLLOWING STATEMENTS AND ACCUSATIONS:

My name is Patrick Peña and I am commissioned as a peace officer with the Department of Public Safety as a Texas Ranger. I hereby state upon my oath that I have reason to believe and do believe that heretofore, and before the making and filing of this Complaint, that **Will Jones, a white male, date of birth [REDACTED]** did on or about 12/01/2015, in McLennan County, Texas, intentionally and knowingly committed Offering Gift to Public Servant against the laws of the State. [Penal Code 36.09, Class A Misdemeanor]

My probable cause for said belief and accusation is as follows

1. On 06/06/2016, the McLennan County District Attorney requested the Texas Rangers investigate McLennan County Commissioner Will Jones after Commissioner Jones offered to refund Benedict Raymond Matus' filing fee back during the election for McLennan County Commissioner of Precinct 3.
2. I, Texas Ranger Patrick Peña, was given a copy of a Facebook post that was anonymously mailed to the District Attorney's Office. This Facebook post was shown to have been posted by "Will Jones", and the profile picture is of Commissioner Jones shaking hands with Governor Greg Abbott. The following was posted verbatim on Facebook on 01/08/2016:

"I offered to refund Benny's filing fee because I thought it was the right thing to do. His only platform was that the seat has always been from West. He chose not to accept and that's fine. I have no problem running for re-election on my record of providing essential services to our citizens, protecting taxpayers, and securing our safety and quality of life today and for future generations. That's what I promised I would do, and my record shows that I have followed through on those promises."

9. I showed Commissioner Jones the copy of the Facebook post. He admitted he typed the post, and it was from his personal Facebook page. He stated he stood behind that post "100%." I also showed him a picture of the text message he sent Matus on 12/15/2015 at 7:07 AM. He read the text message, and he admitted he sent Matus the text message.

  
Complainant

03/21/2017

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT/COMPLAINANT ON  
THIS THE \_\_\_\_\_ DAY OF \_\_\_\_\_.

\_\_\_\_\_  
MAGISTRATE  
MCLENNAN COUNTY, TEXAS