



**WILLIAMSON COUNTY DISTRICT ATTORNEY COMPLAINT FORM**

<b>COMPLAINANT</b>		
<b>Name: Robert M. McCabe</b>		
<b>Address: 203 S. Austin Ave.</b>		
<b>City: Georgetown</b>	<b>State: TX</b>	<b>Zip Code: 78626</b>
<b>DL# or ID#:</b>	<b>Email: Robert@defendingtexas.com</b>	
<b>Phone: (512) 240-5385</b>	<b>Cell Phone:</b>	
<b>WITNESS</b>		
<b>Name: Shawn Dick</b>		
<b>Address: 405 M.L.K. Street, Suite 265</b>		
<b>City: Georgetown</b>	<b>State: TX</b>	<b>Zip Code: 78626</b>
<b>Phone: (512) 943-1234</b>	<b>Cell Phone:</b>	
<b>INCIDENT</b>		
<b>Nature of Incident: Criminal complaint against Bill Gravell (see details below)</b>		<b>Date: 4/7/2020</b>
<b>Subject of Complaint: Williamson County Judge Bill Gravell</b>		
<b>Governmental Agency: Williamson County Judge</b>		
<b>Description of Incident:</b>		
<p>On April 7, 2020, Williamson County Judge Bill Gravell, hereinafter referred to as Gravell, while not engaged in official county business, had a sheriff's deputy drive he and his wife to the Jarrell Fire Department (AKA Williamson County ESD #5) where he obtained firefighter "bunker gear" and a respirator which he then dressed in. Gravell then had the deputy drive he and his wife to his daughter's (identified as Camy Reynolds) home in Jarrell for the sole purpose to attend his grandson's birthday party.</p> <p>On April 7, 2020, at 2:52 pm, a <i>Twitter</i> account under the name "Buddy Falcon" posted photographs of Gravell, taken outside the home in Jarrell, dressed in the bunker gear and respirator (see printed copy of relevant post)</p> <p>On April 7, 2020, at 3:32 pm, I commented on the "Buddy Falcon" <i>Twitter</i> post that Gravell's actions constituted "Abuse of Official Capacity" (see printed copy of relevant post).</p> <p>On April 7, 2020, at approximately 3:52 pm, I received a call to my cell phone from my administrative assistant, who advised that Gravell's office was calling for me, that it was an emergency and that I needed to contact them right away. At 3:54 pm, while on the call with my assistant, I received a call from Williamson County District Attorney Shawn Dick, hereinafter referred to as Dick. He relayed that Gravell was holding on the other line and that it was an emergency that he reach me. Dick was concerned about the urgency of the</p>		

call and opined that it must be related to a COVID-19 situation. I assured Dick that I was confident it was related to the *Twitter* post referenced above and asked that Dick bring Gravell into the call. Prior to me relaying that information to Dick, it was apparent Dick had no knowledge of any *Twitter* post. We then engaged in a 3-way conversation with Gravell and I speaking and Dick listening and not engaging with either of us during our brief exchange. Gravell asked that I remove the *Twitter* photographs posted by “Buddy Falcon” referenced above. I informed Gravell that I had no control over “Buddy Falcon” posts, that I did not take the photographs and that I did not have a way to remove them. Gravell stated that if I had a problem with he or Williamson County Sheriff Chody that I could take it up with them but he needed his daughter and other family left out of it. He stated that he was fully aware Dick was on the phone, and knew full well that he could be prosecuted for his misconduct, that he had a deputy drive him and his wife to the Jarrell Fire Department where he then borrowed bunker gear, dressed up and had the deputy drive him to his grandson’s birthday party so he could surprise him because he had not seen him in some weeks. Gravell asked again if I could take action to remove the photographs posted by “Buddy Falcon.” I declined and told him that people are missing funerals, re-scheduling weddings and have been unable to see their loved ones due to the stay at home orders, that he was not above anyone else and that I did not appreciate his “do as I say, not as I do” action, that what he did was “bullshit” and that I was not interested in helping him in any way. Gravell then disconnected the call. Dick and I then spoke for several minutes. In relation to this call, Dick acknowledged that he would need to consider what action his office planned to take in relation to criminal charges, as Gravell made admissions during the call which could rise to the level of criminal misconduct and that Dick was now a witness to those admissions. Dick was also shocked that Gravell characterized the need to reach me over this as an “emergency” given the COVID-19 crisis and was dumbfounded as to Gravell reaching out to Dick in order to reach me over a *Twitter* post.

**Potential statutes violated include and are not limited to:**

**• Texas Penal Code §39.02(a)(2): Abuse of Official Capacity**

“A public servant commits an offense if, with intent to obtain a benefit, he intentionally or knowingly misuses government property, services, personnel, or any other thing of value belonging to the government that has come into the public servant’s custody or possession by virtue of the public servant’s office or employment.”

Gravell used his position as County Judge to misuse government property from the Jarrell Fire Department to dress-up to surprise his grandson for a birthday party. That equipment was out of service while being used by Gravell. The property must be re-sanitized before being placed back into service for official use. This will result in an expense.

Gravell used his position as County Judge to misuse government personnel by having a sheriff’s deputy drive he and his wife to the Jarrell Fire Department and onward to the birthday party. This was for a non-official purpose. The deputy was presumably being paid for his services by the taxpayers and not by Gravell personally.

**• Texas Penal Code §39.03(a)(1): Official Oppression**

“A public servant acting under color of his office or employment commits an offense if he intentionally subjects another to mistreatment...that he knows is unlawful.”

Gravell used his position as County Judge to subject the sheriff’s deputy driver to mistreatment, namely, by unnecessarily exposing that deputy to health risks during the COVID-19 emergency, by having that deputy drive him to the Jarrell Fire Department and onward to his grandson’s birthday party for a non-official purpose.

**• Texas Government Code §418.173: Violation of Emergency Management Plan**

“A state, local, or interjurisdictional emergency management plan may provide that failure to comply with the plan or with a rule, order, or ordinance adopted under the plan is an offense. The plan may prescribe a punishment for the offense but may not prescribe a fine that exceeds \$1,000 or confinement in jail for a term that exceeds 180 days.”

Gravell was not engaged in official county business as an essential employee when he violated the ‘stay at home’ orders in place at the time he attended the birthday party on April 7, 2020.

**Potential witnesses include and are not limited to:**

- Robert M. McCabe
- Shawn Dick
- Camy Reynolds

Daughter of Gravell. Made several social media posts corroborating the fact that Gravell was in attendance at the party.

- Mark McAdams

Jarrell Fire Chief. Will corroborate that Gravell asked to borrow bunker gear and a respirator for the sole purpose of dressing up to attend the birthday party.

**Supporting Evidence:** Photos \_\_\_\_\_ Video \_\_\_\_\_ Texts \_\_\_\_\_ Other \_\_\_\_\_

**Signature:**

**Date:**

**Sworn to and Subscribed before me on**  
**this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.**

**Notary Public** \_\_\_\_\_

**OFFICE USE**

**Employee Receiving Complaint:**

**Control #:**

- Referred to another Agency:

\_\_\_\_\_  
Agency Name

- Investigation Requested

\_\_\_\_\_  
Agency Name

/ \_\_\_\_\_  
Representative

**Date:**

**Attachments:** Yes \_\_\_\_\_ No \_\_\_\_\_