

121779

Cause No. _____

**THE STATE OF TEXAS,
ex rel. KATRINA AULSON,**

§

In the District Court

§

§

Relator

§

§

vs.

§

40th Judicial District

§

**MATTHEW LEWIS ZAJIC,
in his official capacity as Ellis County
Commissioner, Precinct 2,**

§

§

§

Respondent

§

§

Ellis County, Texas

**ORIGINAL VERIFIED PETITION FOR REMOVAL OF
ELLIS COUNTY COMMISSIONER MATT ZAJIC
AND REQUEST FOR TEMPORARY SUSPENSION PENDING TRIAL**

TO THE HONORABLE RAY WHELESS, PRESIDING JUDGE OF THE FIRST
ADMINISTRATIVE JUDICIAL REGION OF TEXAS:

COMES NOW the State of Texas, upon the relation of KATRINA AULSON (“Relator”), and files this Original Verified Petition for Removal of Matthew Lewis Zajic (“Respondent”) from the office of Ellis County Commissioner, Precinct 2, pursuant to Chapter 87 of the Texas Local Government Code. Relator further requests, after issuance of the order requiring citation, that Respondent be temporarily suspended from office pending trial pursuant to Texas Local Government Code § 87.017. In support, Relator respectfully shows:

PLAIN STATEMENT

While serving as Ellis County Commissioner, Matthew Zajic knowingly used an Ellis County-owned vehicle for his personal purposes, including for the purpose of committing theft of property at a Walmart in Ennis, Texas. As a direct consequence of Zajic’s conduct and arrest, Ellis County personnel were required to retrieve the County vehicle from the Walmart parking lot. Zajic’s personal use of County property violated Ellis County policy governing County vehicles, a policy of which Zajic had acknowledged receipt. His knowing misuse of County property for personal purposes also violated the obligations he assumed by his oath of office to faithfully execute the duties of the office of County Commissioner and to preserve, protect, and defend the Constitution and laws of the United States and of

Original Petition for Removal of County Officer

this State. Taken together, the acts alleged below constitute intentional and unlawful conduct relating to the duties of Zajic's office, constitute official misconduct, and warrant his removal from office under Chapter 87 of the Texas Local Government Code.

ARTICLE I

NATURE OF THE PROCEEDING

1. This is a civil statutory proceeding to remove a county officer for official misconduct under Texas Local Government Code §§ 87.011–87.019.

2. Respondent is the duly appointed and presently serving Ellis County Commissioner for Precinct 2. A county commissioner is expressly subject to removal under Chapter 87. TEX. LOC. GOV'T CODE § 87.012.

3. "Official misconduct" includes intentional, unlawful behavior relating to official duties by an officer entrusted with the administration of justice or execution of the law. TEX. LOC. GOV'T CODE § 87.011(3). Official misconduct is a statutory ground for removal. *Id.* § 87.013(a)(2).

4. The principal ground alleged here is that Respondent intentionally used and misused county-owned property entrusted to him by virtue of his office to facilitate and further criminal conduct undertaken for his own benefit, in direct contravention of the limited governmental purpose for which that property was entrusted to him.

5. Texas law recognizes that willful use of county vehicles and fuel for private benefit may constitute misapplication or misappropriation and official misconduct supporting removal. *State ex rel. Hightower v. Smith*, 671 S.W.2d 32, 35–36 (Tex. 1984).

ARTICLE II

RELATOR; RESPONDENT; JURISDICTION AND VENUE

1. Relator KATRINA AULSON is a resident of the State of Texas, has lived in Ellis County for at least six months immediately preceding the filing of this Petition, and is not currently, nor has she ever been, under indictment in Ellis County. Relator therefore has standing to file this Petition under Texas Local Government Code § 87.015(b).

2. Respondent Matthew Lewis Zajic resides in Ellis County, Texas, and presently holds the office of Ellis County Commissioner, Precinct 2.

3. This proceeding is properly filed in a district court of Ellis County because Respondent resides in Ellis County. TEX. LOC. GOV'T CODE § 87.015(a).

4. Ellis County is within the First Administrative Judicial Region. Accordingly, pursuant to Section 87.015(c) of the Texas Local Government Code, this Petition is addressed to the Presiding Judge of the First Administrative Judicial Region.

5. Immediately after filing, the District Clerk is required by Texas Local Government Code § 87.0151 to deliver a copy of this Petition to the Presiding Judge of the First Administrative Judicial Region, who shall assign a district judge from a judicial district that does not include Ellis County to conduct this removal proceeding.

ARTICLE III

RESPONDENT'S ASSUMPTION OF OFFICE AND OATH

1. On May 26, 2026, Respondent won the Republican primary runoff election for Ellis County Commissioner, Precinct 2.

2. On May 27, 2026, Respondent was appointed to fill the unexpired term of the Precinct 2 office, and on that date he assumed office.

3. On May 27, 2026, Respondent executed his Official Bond and Oath of Office as Ellis County Commissioner, Precinct 2. In his oath, Respondent solemnly swore that he would faithfully execute the duties of his office and would, to the best of his ability, “preserve, protect, and defend the Constitution and laws of the United States and of this State.” A true and correct copy of Respondent’s Official Bond and Oath is attached as Exhibit A.

4. Respondent’s Official Bond was likewise conditioned upon his faithful performance of the duties of his office.

ARTICLE IV

RESPONDENT'S ACTUAL NOTICE CONCERNING COUNTY PROPERTY

1. On May 28, 2026, one day after taking office, Respondent personally signed an Acknowledgment concerning the Ellis County Personnel Policy Manual. A true and correct copy is attached as Exhibit B.

2. In that signed Acknowledgment, Respondent stated that he had received his copy of the Ellis County Personnel Policy Manual, accepted responsibility for reading and familiarizing himself with the policies, and agreed to abide by its provisions.

3. Section 12.01 of the Manual states that the County provides tools, equipment, and vehicles for the County job being performed. Section 12.02 provides: “No personal use of any County property,

materials, supplies, tools, equipment or vehicles is permitted. Violations may result in discharge and possible prosecution.” The pertinent sections of the Manual are attached as Exhibit C.

4. Relator does not rely upon the Personnel Policy Manual as the exclusive source of Respondent’s legal duty or contend that the Manual alone determines the scope of an independently elected officer’s authority. Respondent’s signed Acknowledgment and the Manual are alleged as evidence that Respondent had actual written notice that County vehicles were entrusted for governmental purposes and not for personal use.

ARTICLE V

PRIOR WALMART THEFT INCIDENTS

AS CIRCUMSTANTIAL EVIDENCE OF INTENT

1. Before Respondent took office, Ennis Police Department records documented alleged theft incidents involving Respondent at Walmart in Ennis, Texas, on April 17, 2026, April 22, 2026, and April 30, 2026. Items alleged to have been stolen include diapers, ribeye steak, a salad kit, sweet tea, apple juice, prime beef ribs, choice beef Angus tenderloin, and Angus cowboy ribeye steak.

2. On May 30, 2026, after Respondent had assumed office, Ennis Police Department records documented another alleged theft involving Respondent at the same Walmart. Items alleged to have been stolen include picture hangers, toddler clothing, a desktop calculator, and a contractor nozzle.

3. Relator does not allege the April 22 or April 30 conduct as independent grounds for removal, because Texas Local Government Code § 87.001 prohibits removal for an act committed before election to office.

4. Those earlier incidents, however, are relevant circumstantial evidence of Respondent’s intent, plan, purpose, and state of mind in connection with the June 11, 2026, incident alleged below. “We cannot read an accused’s mind, and absent a confession, we must infer his mental state from his ‘acts, words and conduct.’” *Nisbett v. State*, 552 S.W.3d 244, 267 (Tex. Crim. App. 2018)

5. The May 30 incident is likewise alleged as circumstantial evidence concerning Respondent’s course of conduct and intent.

ARTICLE VI

JUNE 11, 2026: USE OF COUNTY VEHICLE TO FACILITATE THEFT

1. On June 11, 2026, while serving as Ellis County Commissioner, Precinct 2, Respondent drove a county-owned truck entrusted to him by virtue of his office to the Walmart store in Ennis, Ellis County, Texas.

2. Based upon the facts and circumstances alleged herein, including Respondent's repeated prior theft conduct at the same Walmart, Relator alleges that Respondent drove the county-owned truck to Walmart with the intent to commit theft and thereby used County property to facilitate and further criminal conduct undertaken for his own benefit.

3. At approximately 5:18 p.m. on June 11, 2026, Ennis Police were dispatched to Walmart regarding a theft and were advised that the suspect was being detained in Walmart's Asset Protection Office. Respondent is identified as the suspect.

4. Respondent was taken into custody at approximately 5:41 p.m. The arrest report identified the offense as Theft of Property \$100-<\$750 under Texas Penal Code § 31.03(e)(2)(A). Items alleged to have been stolen include prime strip steak, tomahawk ribeye, and cowboy ribeye. A true and correct copy of all Ennis Police records referenced herein is attached as Exhibit D.

5. A contemporaneous local newspaper account reported that Respondent was accused of shoplifting approximately \$250 worth of tomahawk steaks at self-checkout; that the conduct was reportedly captured on store surveillance video; and that, when store personnel initially confronted Respondent concerning unpaid merchandise, Respondent indicated that he would correct the issue but allegedly failed to do so and was confronted again minutes later. A true and correct copy of the June 18, 2026 Ellis County Press report is attached as Exhibit F.

6. Respondent's intent and purpose may be inferred from the totality of the facts and circumstances, including the repeated alleged theft incidents at the same retailer, the circumstances of the June 11 transaction and confrontation, and Respondent's use of the county-owned vehicle to travel to the location where the theft was committed.

7. Respondent's arrest and confinement in the Ennis Detention Center prevented him from returning the county-owned truck to a secure location. Following the arrest, the vehicle remained at the Walmart location overnight, and Ellis County personnel were required to retrieve it the following day.

8. The County's own public-information production contains a contemporaneous June 12, 2026, text message to Respondent from Casey Crow, Respondent's official administrative assistant, stating: "We picked up your truck and it is at the barn." A true and correct copy of the pertinent Public Information Act production is attached as Exhibit E.

9. The County's Public Information Act production independently corroborates the published report that County personnel were required to retrieve the county-owned truck after Respondent's arrest.

ARTICLE VII

SUBSEQUENT INVESTIGATION OF MULTIPLE THEFTS

1. On June 15, 2026, Ennis police documented and investigated multiple additional theft incidents involving Respondent at the same Walmart, including incidents occurring before and after Respondent assumed office.

2. On June 24, 2026, Respondent appeared at the Ennis Police Department, where he was arrested on an active warrant and taken into custody for the second time in thirteen (13) days.

3. Relator pleads these subsequent investigative and arrest facts as part of the factual chronology and as circumstantial evidence bearing on the character and intent of the June 11 conduct. Relator does not allege that an arrest or criminal charge, standing alone, establishes guilt or constitutes the ground for removal alleged in this Petition.

ARTICLE VIII

GROUND FOR REMOVAL

OFFICIAL MISCONDUCT THROUGH MISUSE OF GOVERNMENT PROPERTY

1. Texas Penal Code § 39.02(a)(2) provides that a public servant commits Abuse of Official Capacity if, with intent to obtain a benefit or with intent to harm or defraud another, the public servant 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 office or employment.

2. Penal Code § 39.01(2) defines "misuse" to include dealing with property contrary to an agreement under which the public servant holds the property, a contract of employment or oath of office, a law governing custody or disposition of the property, or a limited purpose for which the property is delivered or received.

3. The county-owned truck was government property belonging to Ellis County. It came into Respondent's custody and possession by virtue of his office as County Commissioner.

4. The vehicle was entrusted to Respondent for governmental and County purposes, not to facilitate theft or other criminal conduct for Respondent's private benefit.

5. Respondent had actual notice of that limitation. One day after taking office, he signed the County's written policy acknowledgment. The County policy expressly prohibited personal use of County vehicles. Respondent had also sworn his Oath of Office the previous day, promising faithfully to execute his duties and to preserve, protect, and defend the law.

6. Nevertheless, a mere fifteen (15) days after taking office, on June 11, 2026, Respondent intentionally and knowingly used the county-owned truck to travel to Walmart for the purpose of committing theft and obtaining property for his own benefit. He thereafter committed the intended theft and was arrested.

7. Respondent thereby dealt with County property contrary to the limited governmental purpose for which it had been delivered to and received by him and contrary to the obligations under which he holds public office.

8. Respondent's conduct constituted intentional and unlawful behavior relating to his official duties. Respondent's conduct also constituted intentional and unlawful behavior relating to his custody and use of County property entrusted to him solely by virtue of his office. His conduct therefore constitutes "official misconduct" as defined by Texas Local Government Code § 87.011(3) and constitutes a ground for removal under § 87.013(a)(2)./

9. In *State ex rel. Hightower v. Smith*, the Supreme Court of Texas held that willfully using county vehicles and fuel for private benefit constitutes misapplication or misappropriation even when the activity also accomplishes a legitimate public function. There the Court upheld removal of the Smith County Sheriff for official misconduct. 671 S.W.2d 32, 35–36 (Tex. 1984). Hightower further recognized a separate removal charge arising from an official's use of a county vehicle for a personal trip. *Id.*

10. Here, the alleged private purpose is more serious: Respondent used County property not merely for an unauthorized personal trip, but to facilitate and further an intended criminal theft for his own benefit.

11. The object of this proceeding is not to punish Respondent for a criminal offense. It is to protect the public by removing from public office an officer who has allegedly been faithless to the trust placed in him and who has *intentionally misused County property entrusted to him by virtue of that office*. See *Meyer v. Tunks*, 360 S.W.2d 518, 520 (Tex. 1962), citing *McDaniel v. State*, 9 S.W.2d 478, 481 (Tex. Civ. App. 1928).

ARTICLE IX

REQUEST FOR ORDER REQUIRING CITATION

1. Contemporaneously with the filing of this Petition, Relator will apply in writing under Texas Local Government Code § 87.016 for an order requiring citation and a certified copy of this Petition to be served on Respondent.

2. This Petition sets forth the alleged ground for removal in plain and intelligible language and identifies the time and place of the alleged act constituting the ground for removal with as much certainty as the nature of the case permits, as required by § 87.015(c) and *State ex rel. Hightower v. Smith*, 671 S.W.2d 32, 33–34 (Tex. 1984).

3. Relator respectfully requests that the assigned district judge grant the application for citation and direct the District Clerk to issue citation in accordance with § 87.016.

ARTICLE X

REQUEST FOR TEMPORARY SUSPENSION PENDING TRIAL

1. After issuance of the order requiring citation, Texas Local Government Code § 87.017(a) authorizes the assigned district judge to temporarily suspend Respondent and appoint another person to perform the duties of the office pending trial.

2. Relator requests that Respondent be temporarily suspended from the office of Ellis County Commissioner, Precinct 2, at the earliest practicable time after the statutory prerequisite of issuance of the order requiring citation has been satisfied.

3. Temporary suspension is warranted because the alleged misconduct directly concerns Respondent's intentional misuse of government property entrusted to him by virtue of the office he continues to occupy.

4. The alleged misconduct was not merely private conduct disconnected from the office. Respondent allegedly used a county-owned vehicle, made available to him because he was County Commissioner, to facilitate criminal conduct undertaken for his own benefit.

5. The alleged misuse also imposed a direct operational consequence upon Ellis County. Respondent's arrest left the county-owned vehicle at the Walmart location overnight, requiring County personnel to retrieve the vehicle the following day and return it to County custody.

6. The alleged misconduct occurred against the backdrop of a continuing scheme or course of similar alleged conduct by the Respondent, in which multiple criminal offenses were committed within a relatively short period of time.

7. Respondent's continued occupancy of the office necessarily carries continuing authority over and access to County property, personnel, funds, equipment, information, and other public resources. The allegations therefore directly implicate whether Respondent should remain entrusted with those resources while the removal proceeding is pending.

8. Relator requests that the Court set the request for temporary suspension for hearing at the earliest practicable time following issuance of the citation order, temporarily suspend Respondent pending final disposition, and appoint a qualified temporary officer in accordance with § 87.017.

9. Relator acknowledges that § 87.017(b) requires the temporary appointee to execute the bond prescribed by the Court, with at least two good and sufficient sureties, before suspension may take effect.

ARTICLE XI

TRIAL AND REPRESENTATION OF THE STATE

1. This proceeding is civil and shall be conducted, as much as possible, in accordance with the rules and practice governing other civil cases, in the name of the State of Texas and on the relation of Relator. TEX. LOC. GOV'T CODE § 87.018(b); *Meyer*, 360 S.W.2d at 520.

2. Pursuant to Texas Local Government Code § 87.018(f), the Presiding Judge of the First Administrative Judicial Region shall appoint a prosecuting attorney from another judicial district or county in the region to represent the State in this proceeding.

3. Relator requests trial on the merits and a judgment removing Respondent from the office of Ellis County Commissioner, Precinct 2, upon a finding that the ground for removal alleged herein is true.

ARTICLE XII

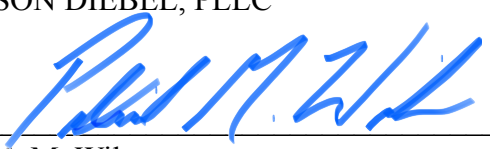
PRAYER

WHEREFORE, PREMISES CONSIDERED, Relator respectfully requests that:

- a. the District Clerk immediately deliver a copy of this Petition to the Presiding Judge of the First Administrative Judicial Region as required by § 87.0151;
- b. the Presiding Judge assign an eligible district judge from a judicial district that does not include Ellis County to conduct this proceeding;
- c. the assigned district judge grant Relator's written application for an order requiring citation under § 87.016 and direct issuance and service of citation and a certified copy of this Petition upon Respondent;
- d. after issuance of the citation order, the Court promptly hear Relator's request under § 87.017 and temporarily suspend Respondent from the office of Ellis County Commissioner, Precinct 2, pending trial;
- e. the Court appoint a qualified temporary officer to perform the duties of the office during any period of suspension, subject to the bond required by § 87.017(b);
- f. the Presiding Judge appoint a prosecuting attorney from another judicial district or county in the First Administrative Judicial Region to represent the State as required by § 87.018(f);
- g. this cause be set for trial in accordance with Chapter 87;
- h. after trial, the Court enter judgment removing Matthew Lewis Zajic from the office of Ellis County Commissioner, Precinct 2, for official misconduct; and
- i. Relator and the State receive all other relief, at law or in equity, to which they may be entitled.

Respectfully submitted,

WILSON DIEBEL, PLLC

By: 

Patrick M. Wilson

State Bar No. 90001783

303 N College St

Waxahachie, TX 75165

patrick@wilsondiebel.com

ATTORNEY FOR RELATOR

AFFIDAVIT OF KATRINA AULSON

AFFIDAVIT AND VERIFICATION OF ORIGINAL VERIFIED PETITION FOR REMOVAL
OF ELLIS COUNTY COMMISSIONER MATT ZAJIC AND REQUEST FOR TEMPORARY
SUSPENSION PENDING TRIAL.

STATE OF TEXAS §

COUNTY OF ELLIS §

BEFORE ME, the undersigned authority, on this day personally appeared KATRINA
AULSON, who, being by me duly sworn, stated:

“My name is KATRINA AULSON. I am over eighteen years of age and competent to
make this verification. I am a resident of the State of Texas, have lived in Ellis County, Texas, for
at least six months immediately preceding the filing of this Petition, and I am not currently, nor
have I ever been, under indictment in Ellis County. I am the Relator in the foregoing Original
Verified Petition for Removal of County Officer. I have read the Petition. The factual allegations
stated in the Petition are true and correct to the best of my knowledge based upon my personal
knowledge, official and public records, law-enforcement records, records produced under the
Texas Public Information Act, and other sources identified or described in the Petition.”

Katrina Aulson

KATRINA AULSON, Relator

SUBSCRIBED AND SWORN TO before me by Katrina Aulson on the 14th day of
September, 2026.

Kailey Haynes
Notary Public, State of Texas

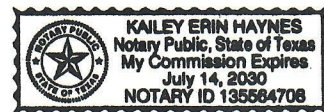


EXHIBIT LIST

EXHIBIT A: Copy of Official Bond and Oath of Office of Matthew Lewis Zajic, dated May 27, 2026

EXHIBIT B: Matthew Lewis Zajic Personnel Policy Acknowledgment, signed May 28, 2026

EXHIBIT C: Pertinent page of the Ellis County Personnel Policy Manual

EXHIBIT D: Ennis Police Department offense and arrest records

EXHIBIT E: June 12, 2026 text message

EXHIBIT F: Ellis County Press report dated June 18, 2026



FILED FOR RECORD - ELLIS COUNTY, TEXAS
INSTRUMENT NO. 2618779 FILING DATE/TIME MAY 28, 2026, AT 8:02AM
P.O. BOX 3967 PEORIA, IL 61612-3967
P: (800)645-2402 E: surety.south@rlicorp.com
RLISURETY.COM

EXHIBIT A

Official Bond And Oath

Bond No. LSM5058468

KNOW ALL MEN BY THESE PRESENTS:

That we, Matthew Lewis Zajic, as Principal,
and RLI Insurance Company, a corporation duly licensed to do business in the State of
Texas, as Surety, are held and firmly bound unto the Ellis County Treasurer in the
penal sum of Three Thousand and 00/100 DOLLARS
(\$ 3,000.00), to the payment of which sum, well and truly to be made, we jointly and severally bind ourselves and our legal
representatives firmly by these presents.

Signed this 27th day of May, 2026.

THE CONDITION OF THIS OBLIGATION IS SUCH, That whereas, the said Principal was duly ☐ elected ☒ appointed to the
office of Commissioner Pct. 2
State of Texas, for the term commencing on the 27th day of May, 2026 and ending on the 31st day of
December, 2026

NOW THEREFORE, if the said Principal shall faithfully perform the duties of his said office, then this obligation shall be void and of no
effect, otherwise to remain in full force and effect.

Countersigned

N/A



Matthew Lewis Zajic

Matthew L. Zajic
Principal

RLI Insurance Company

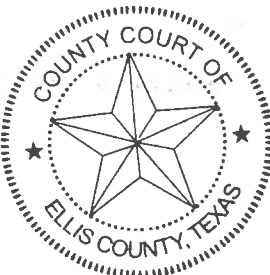
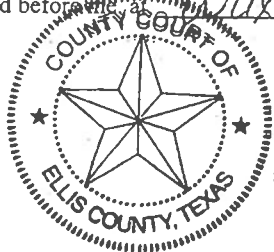
Eric Raudins
Sr. Vice President

OATH OF OFFICE (COUNTY COMMISSIONERS and COUNTY JUDGE)

I, Matthew Lewis Zajic, do solemnly swear (or affirm), that I will faithfully execute the duties of
the office of County Commissioner Precinct 2 of the State of Texas, and will to the best of my
ability preserve, protect, and defend the Constitution and laws of the United States and of this State; and I furthermore solemnly swear (or
affirm) that I will not be, directly or indirectly, interested in any contract with or claim against the County, except such contracts or claims
as are expressly authorized by law and except such warrant as may issue to me as fees of office. So help me God.

Sworn to and subscribed before me, Waxahachie Texas, this 27 day of May, 2026

SEAL



Matthew L. Zajic
Principal

Amy Stuenkel
Notary Public
Ellis County, Texas

A CERTIFIED COPY
ATTEST: SEP - 4 2026
KRYSTAL VALDEZ, COUNTY CLERK
ELLIS COUNTY, TEXAS
BY Haley Watson DEPUTY

00000TXD20-10,0

OATH OF OFFICE
(GENERAL)

I, Matthew Lewis Zajic, do solemnly swear (or affirm), that I will faithfully execute the duties of the office of County Commissioner Precinct 2 of the State of Texas, and will to the best of my ability preserve, protect, and defend the Constitution and laws of the United States and of this State, so help me God.

Sworn to and subscribed before me, at

Waxahachie

Texas, this

27

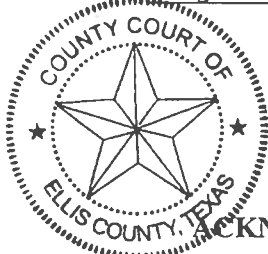
day of

May

2026

Principal

SEAL



Amy Guerrero Deputy
Ellis County, Texas

ACKNOWLEDGEMENT OF SURETY

THE STATE OF Ohio
County of Cuyahoga } ss

On this 27th day of May, 2026, before me, the undersigned officer, personally appeared Eric Raudins who acknowledged himself to be the aforesaid Sr. Vice President of the RLI Insurance Company, a corporation, and he as such officer, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself as such officer.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.

Jill A. Scott
Notary Public
Jill A. Scott

Cuyahoga
County



JILL A. SCOTT
Notary Public, State of Ohio
My Commission Expires
September 22, 2030



A CERTIFIED COPY
ATTEST: SEP - 4 2026
KRYSTAL VALDEZ, COUNTY CLERK
ELLIS COUNTY, TEXAS
BY Halley Watson DEPUTY

00000TXD20-10,0

EXHIBIT B

ACKNOWLEDGMENT

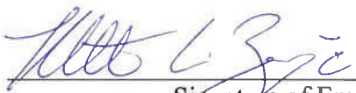
I have received my copy of the **ELLIS COUNTY PERSONNEL POLICY MANUAL**, which outlines my privileges and obligations as an employee, the County's Drug and Alcohol Policy and provides a summary of my benefits. I acknowledge that the provisions of these policies are part of the terms and conditions of my employment and I agree to abide by them. I accept responsibility for reading and familiarizing myself with the policies in this manual. I understand that it contains general personnel policies of the County. If I need clarification on any of the policies in this manual, I will contact my supervisor (or County personnel representative).

Since this information is necessarily subject to change, it is understood that any changes will be communicated to me by my supervisor through official notices and/or through postings on employee bulletin boards.

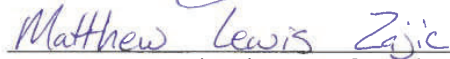
I further understand that my employment may be terminated **at will** so that **both** the County and its employees remain free to choose to end their relationship at any time, for any legal reason or no reason at all.

I also acknowledge that as a County employee, I have a personal responsibility to provide quality service to the public, to achieve the highest degree of safety possible for my fellow workers and for myself, to continually make suggestions for improvement and to demonstrate a spirit of teamwork and cooperation. If at any time my immediate supervisor or my department head has reasonable suspicion that I am experiencing health problems, which may affect my ability to do my job without endangering myself, my fellow workers, or the citizens of the County, then I agree to undergo a "fit for duty" physical at the County's expense.

It is further understood that I will be granted compensatory time off in lieu of payment of overtime to the extent provided by law and that due to inclement weather, lack of work or other business reasons, I may be directed by my supervisor to use my accrued comp time.



Signature of Employee



Printed Name of Employee



Date Signed

EXHIBIT C

12.0 USE OF COUNTY PROPERTY

12.01 GENERAL POLICY

The County attempts to provide each employee with adequate tools, equipment and vehicles for the County job being performed, and expects each employee to observe safe work practices and safe and courteous operation of vehicles and equipment in compliance with all municipal, county, state and federal regulations.

12.02 USE OF TOOLS, EQUIPMENT, PROPERTY AND VEHICLES

Employees who are assigned tools, equipment or vehicles by their departments are responsible for them and for their proper use and maintenance.

Alteration of equipment or removal of environmental or safety-related devices is specifically prohibited and is grounds for disciplinary action.

No personal use of any County property, materials, supplies, tools, equipment or vehicles is permitted. Violations may result in discharge and possible prosecution.

12.03 VALID DRIVER'S LICENSE

All operators of County vehicles and equipment are required to have the valid State of Texas driver's license necessary for that vehicle or equipment and to keep supervisors informed of any change in their licenses.

12.04 VEHICULAR REPORTING

Driving Record: Employees who operate County vehicles are required to notify the department head of:

1. Any moving violation citations, whether personal or job-related.
2. Suspension or revocation of the driver's license.

Failure to notify supervisor within three (3) working days may result in a demotion or discharge.

Accident Reporting: Employees must report all vehicular accidents and property damage or liability claims involving County equipment or vehicles to their supervisors and to the police immediately. Each vehicular accident, no matter how minor, must be reported to the police department so that an official accident report can be filed. The department head shall send the Purchasing Agent a copy of all accident reports involving County equipment or vehicles as soon as the investigation is completed. See Section 11.07 for reporting on-the-job injuries, if necessary.



EXHIBIT D
Ennis Police Department
Incident Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 08:41

General Information

Case Number:	2026-00009615	Reporting Officer:	1048 - Treadaway, Emily
Occurred Location:	700 E ENNIS AVE, Ennis, TX 75119	Reported Date:	06/11/2026 17:18
Disposition:	Pending Prosecution	Incident Type:	Theft/Larceny
Disposition Date:	06/15/2026	Occurred From:	06/11/2026 17:18
		Occurred Through:	06/11/2026 17:18

Offenses

#	Statute Group	Group Agency	Crime Code	Statute	Description	Offense Date
1	State		23H - Larceny All Other	PC 31.03(e)(2)(A)	Theft Prop >=\$100<\$750	06/11/2026

Subjects

Number	Type	Name	Address	Contact Information	Race	Sex	DOB
1	Suspect	ZAJIC, MATTHEW LEWIS			White	Male	
2	Victim	WALMART	700 E ENNIS AVE, Ennis, TX 75119	Business - (972) 875-9671			
3	Reporting Person	HALL, SHANELL LAJUNIA			Black or African American	Female	

Properties

#	Date	Type	Property Loss Type	Description	Name	Subject Role
1	06/11/2026	Consumable Goods	Recovered, Stolen/Etc.	PRIME STRIP		
2	06/11/2026	Consumable Goods	Recovered, Stolen/Etc.	THAWK RIBEYE		
3	06/11/2026	Consumable Goods	Recovered, Stolen/Etc.	COWBY RIBEYE		

Vehicles

Number	Role	Type	Make/Model	Color	Plate/Registration	Year	State
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Evidence

Counter	Evidence Type	Code	Description	Current Location	Date Received	Make/Model
1	Recording-Audio/Visual	Evidence	Walmart Security Footage	In	06/12/2026	

Associated Arrest Records

Summary Narrative

Author: System **Date Created:** 06/11/2026 18:49

Officer Camarillo arrived on scene and arrested a male individual for theft.



Ennis Police Department

Calls for Service



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 10:20

General Information

Incident Number:	2026-00009615	Incident Type:	THEFT	Call Date/Time:	06/11/2026 17:18
Location	700 E ENNIS AVE, Ennis, TX	Location	Walmart	Originating Call	(903) 493-0002
Formatted:	75119	Common Name:		Number:	
Nature Of Call:		Status:	Just Occurred	Priority:	4 - Medium
Source:	Phone				

Subjects

Role:	Caller	Primary Caller:	Yes	Non-Disclosure:	No
Subject Type:	Adult	Name Formatted:	HALL, SHANELL	Location	
Primary Contact		Date of Birth:		Formatted:	
Information:		License State:		Local Id Number:	
License Number:		Weight Range		License Expiration	
Height Range		Lower:		Date:	
Lower:		Ethnic Origin:		Race:	
Sex:				Hair Color:	
Eye Color:					
Role:	Suspect	Primary Caller:	No	Non-Disclosure:	No
Subject Type:	Adult	Name Formatted:	ZAJIC, MATTHEW LEWIS	Location	
Primary Contact		Date of Birth:		Formatted:	
Information:		License State:		Local Id Number:	
License Number:		Weight Range		License Expiration	
Height Range	6'2"	Lower:		Date:	
Lower:		Ethnic Origin:		Race:	White
Sex:	Male			Hair Color:	Brown
Eye Color:					

Disposition

Disposition:	No Report	Count:	1	Unit:	1021
Date/Time:	06/11/2026 17:46				

Narratives

Entered By: Elyssa Ellis Date Entered: 06/11/2026 17:18

WORTH OF MEAT STOLEN

Entered By: Elyssa Ellis Date Entered: 06/11/2026 17:19

W/M APPROX 510 // SUBJECT IS DETAINED IN AP OFFICE

Entered By: Elyssa Ellis Date Entered: 06/11/2026 17:20

SUBJECT TX DL



Ennis Police Department

Calls for Service



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 10:20

Narratives

Entered By: Haydin Thomas **Date Entered:** 06/11/2026 17:35
1021 ADV BODY CAM IS DEAD

Entered By: Haydin Thomas **Date Entered:** 06/11/2026 17:42
1 IN CUSTODY 17:41

Entered By: Haydin Thomas **Date Entered:** 06/11/2026 17:45
+65810 STARTING MILEAGE / 1048 1 X 95 ENROUTE TO PD

Entered By: Adrian Ornelas **Date Entered:** 06/11/2026 17:46
I arrived on scene and assisted as a cover unit.Shortly after, i cleared.

Entered By: Haydin Thomas **Date Entered:** 06/11/2026 17:52
65813 ENDING MILEAGE



Ennis Police Department

Incident Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 08:43

General Information

Case Number: 2026-00009841
Reporting Officer: 1051 - Edwards, Hannah
Occurred Location: 700 E ENNIS AVE, Ennis, TX 75119
Reported Date: 06/15/2026 13:56
Incident Type: Theft/Larceny
Disposition: Pending Prosecution
Occurred From: 04/17/2026 16:07
Disposition Date: 06/25/2026
Occurred Through: 04/17/2026 16:07

Offenses

#	Statute Group	Group Agency	Crime Code	Statute	Description	Offense Date
1	State		280 - Stolen Property Offenses (Receiving, Etc.)	PC 31.16(c)(2)	Organized Retail Theft >=\$100<\$750	04/17/2026

Subjects

Number	Type	Name	Address	Contact Information	Race	Sex	DOB
1	Suspect	ZAJIC, MATTHEW LEWIS			White	Male	
2	Victim	WALMART	700 E ENNIS AVE, Ennis, TX 75119	Business - (972) 875-9671			
3	Witness	GIBSON, TYLER DAN			White	Male	

Properties

#	Date	Type	Property Loss Type	Description	Name	Subject Role
1	04/17/2026	IBR - None/Unknown	None			

Vehicles

Number	Role	Type	Make/Model	Color	Plate/Registration	Year	State
1	Suspect Vehicle	Automobile	FORD-EXPEDITION	Black		2018	TX

Evidence

Counter	Evidence Type	Code	Description	Current Location	Date Received	Make/Model
1	Other	Evidence	DVD+R SECURITY FOOTAGE	In	06/15/2026	

Associated Arrest Records

Summary Narrative

Author: System

Date Created: 06/15/2026 16:03

Officers responded to a theft report.



Ennis Police Department

Incident Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 08:45

General Information

Case Number: 2026-00009843
Reporting Officer: 1051 - Edwards, Hannah
Occurred Location: 700 E ENNIS AVE, Ennis, TX 75119
Reported Date: 06/15/2026 14:12
Incident Type: Theft/Larceny
Disposition: Exceptional Clearance
Occurred From: 04/22/2026 14:22
Disposition Date: 06/25/2026
Occurred Through: 04/22/2026 14:22

Offenses

#	Statute Group	Group Agency	Crime Code	Statute	Description	Offense Date
1	State		23H - Larceny All Other	PC 31.03(e)(2)(A)	Theft Prop >=\$100<\$750	06/15/2026

Subjects

Number	Type	Name	Address	Contact Information	Race	Sex	DOB
1	Suspect	ZAJIC, MATTHEW LEWIS			White	Male	
2	Victim	WALMART	700 E ENNIS AVE, Ennis, TX 75119	Business - (972) 875-9671			
3	Witness	GIBSON, TYLER DAN			White	Male	

Properties

#	Date	Type	Property Loss Type	Description	Name	Subject Role
1	06/15/2026	Merchandise	Stolen/Etc.	1X MILM DIAPERS S5 58P		
2	06/15/2026	Consumable Goods	Stolen/Etc.	4X ANGUS COWBOY RIBEYE STEAK		

Vehicles

Number	Role	Type	Make/Model	Color	Plate/Registration	Year	State
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Evidence

Counter	Evidence Type	Code	Description	Current Location	Date Received	Make/Model
1	Other	Evidence	DVD+R SECURITY FOOTAGE	In	06/15/2026	

Associated Arrest Records

Summary Narrative

Author: System

Date Created: 06/15/2026 16:16

Officers took a theft report



Ennis Police Department

Incident Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 08:44

General Information

Case Number: 2026-00009842
Reporting Officer: 1051 - Edwards, Hannah
Occurred Location: 700 E ENNIS AVE, Ennis, TX 75119
Reported Date: 06/15/2026 14:12
Incident Type: Theft/Larceny
Disposition: Exceptional Clearance
Occurred From: 04/30/2026 14:47
Disposition Date: 06/25/2026
Occurred Through: 04/30/2026 14:47

Offenses

#	Statute Group	Group Agency	Crime Code	Statute	Description	Offense Date
1	State		23H - Larceny All Other	PC 31.03(e)(2)(A)	Theft Prop >=\$100<\$750	06/15/2026

Subjects

Number	Type	Name	Address	Contact Information	Race	Sex	DOB
1	Suspect	ZAJIC, MATTHEW LEWIS			White	Male	
2	Victim	WALMART	700 E ENNIS AVE, Ennis, TX 75119	Business - (972) 875-9671			
3	Witness	GIBSON, TYLER DAN			White	Male	

Properties

#	Date	Type	Property Loss Type	Description	Name	Subject Role
1	06/15/2026	Consumable Goods	Stolen/Etc.	1X MARKETSIDE PIZZA RANCH SALAD KIT 12.6 OZ		
2	06/15/2026	Consumable Goods	Stolen/Etc.	1X RED DIAMOND FRESH BREWED SOUTHERN SWEET TEA, 1 GALLON		
3	06/15/2026	Consumable Goods	Stolen/Etc.	2X MOTTS 100% JUICE ORIGINAL APPLE JUICE, 48FL, BOTTLE		
4	06/15/2026	Consumable Goods	Stolen/Etc.	4X MCCLAREN FARMS BONE IN COWBOY CUT SHORT RIBS, PRIME BEEF, 2-4 LB		
5	06/15/2026	Consumable Goods	Stolen/Etc.	1X MCCLAREN FARMS WHOLE BEEF TENDERLOIN, CHIOCE ANGUS BEEF, 4.2-8.4 LB		
6	06/15/2026	Consumable Goods	Stolen/Etc.	1X ANGUS COWBOY RIBEYE STEAK		

Vehicles

Number	Role	Type	Make/Model	Color	Plate/Registration	Year	State
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Evidence

Counter	Evidence Type	Code	Description	Current Location	Date Received	Make/Model
1	Other	Evidence	DVD+R SECURITY FOOTAGE	In	06/15/2026	

Associated Arrest Records



Ennis Police Department

Incident Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 09/09/2026 08:46

General Information

Case Number: 2026-00009844
Reporting Officer: 1051 - Edwards, Hannah
Occurred Location: 700 E ENNIS AVE, Ennis, TX 75119
Reported Date: 06/15/2026 14:12
Incident Type: Theft/Larceny
Disposition: Exceptional Clearance
Occurred From: 05/30/2026 12:07
Disposition Date: 06/25/2026
Occurred Through: 05/30/2026 12:07

Offenses

#	Statute Group	Group Agency	Crime Code	Statute	Description	Offense Date
1	Local	TX0700100	999 - Not Reportable	31.03	Theft Under \$100	05/30/2026

Subjects

Number	Type	Name	Address	Contact Information	Race	Sex	DOB
1	Suspect	ZAJIC, MATTHEW LEWIS	[REDACTED]	[REDACTED]	White	Male	[REDACTED]
2	Victim	WALMART	700 E ENNIS AVE, ENNIS, 75119	Business - (972) 875-9671			
3	Witness	GIBSON, TYLER DAN	[REDACTED]	[REDACTED]	White	Male	[REDACTED]

Properties

#	Date	Type	Property Loss Type	Description	Name	Subject Role
1	06/15/2026	Tools	Stolen/Etc.	1x OOK Picture Hangers, Value Pack, 30 pound capacity,40 pieces		
2	06/15/2026	Clothes/Furs	Stolen/Etc.	1x WONDER NATION TODDLER BOYS SHORT SLEEVE OUTFIT SET,2 PIECE, SIZES 12M-5T		
3	06/15/2026	Merchandise	Stolen/Etc.	1X PEN+GEAR 12 DIGIT MIMI! DESKTOP CALCULATOR, BLACK, OFFICE STATIONERY		
4	06/15/2026	Lawn/Yard/Garden Equipment	Stolen/Etc.	1X ORB CONTRACTOR NOZZLE		

Vehicles

Number	Role	Type	Make/Model	Color	Plate/Registration	Year	State
1	Suspect Vehicle	Automobile	FORD-EXPEDITION	Black	[REDACTED]	2018	TX

Evidence

Counter	Evidence Type	Code	Description	Current Location	Date Received	Make/Model
1	Other	Evidence	DVD+R SECURITY FOOTAGE	In	06/15/2026	

Associated Arrest Records



Ennis Police Department

Arrest Report



Agency: Ennis Police Department
Agency #: TX0700100

Print Date/Time: 08/03/2026 14:37

Subject Type: Adult
Number: 3406

From Date: All
To Date: All

Charges			
Offense/Charge	06/24/2026 10:00	Statute Group:	State
Date/Time:		Statute	Organized Retail Theft >=
Statute Crime	23C - Shoplifting	Description:	\$100<\$750
Code:		Attempt/Commit:	Completed
NCIC Code:		Plea:	
Larceny Code:	Shoplifting	Disposition:	Referred to Other Auth
Other Agency:	No	Clery Location:	Unknown
Scene Code:	Grocery/Supermarket	Reason To	
Multiple	Not Applicable	Commit:	
Clearance			
Indicator:			

Weapons	
Weapon:	Unarmed
Feature:	

Injury Information		
Injury Types:	Hospital:	Extent Of Injury:
Transported By:	Medical	Condition:
	Treatment:	

Narratives	
Entered By: 1032 - Jones, Zachary	Date Entered: 06/24/2026 10:22

On 06/24/2026, I, Det. Z. Jones, was on duty with the Ennis Police Department and assigned to the Criminal Investigation Division. At approximately 0931 hours, I was informed that Matthew Zajic was in the lobby to turn himself in on an active warrant. The warrant number was [REDACTED] for Organized Retail Theft ≥ \$100 and < \$750.

I escorted Zajic to the jail, where he was booked without incident. I then cleared the call with no further action taken.

EXHIBIT E

8:20



100



1

CC



Mo

Casey >

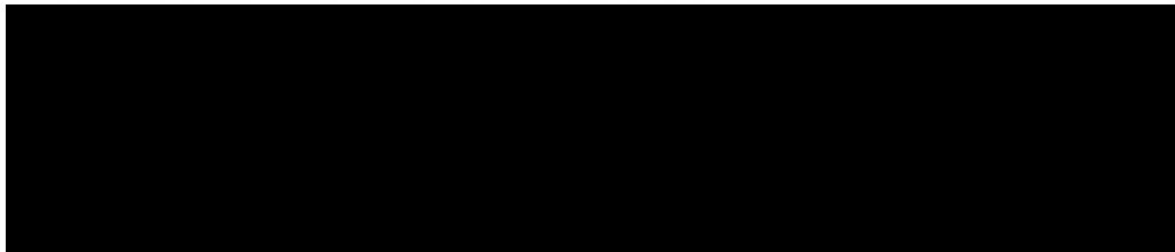
PM

Do you know what size base
you want Mike to pickup from
Vulcan tomorrow?



1.5" minus

Wed, Jun 10 at 9:55 AM



Fri, Jun 12 at 7:37 AM

We picked up your truck and it
is at the barn.



Fri, Jun 12 at 3:26 PM





Thanks

You bet.



Thu, Jun 18 at 7:20 AM

You gonna be in today?

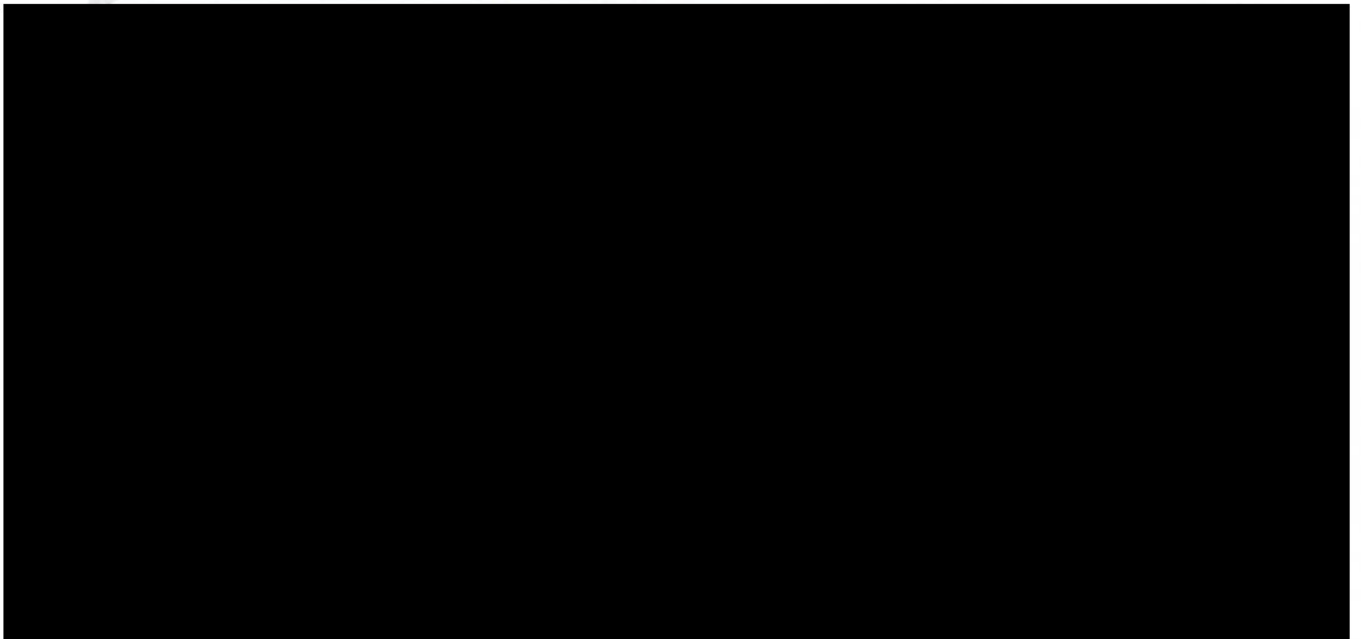
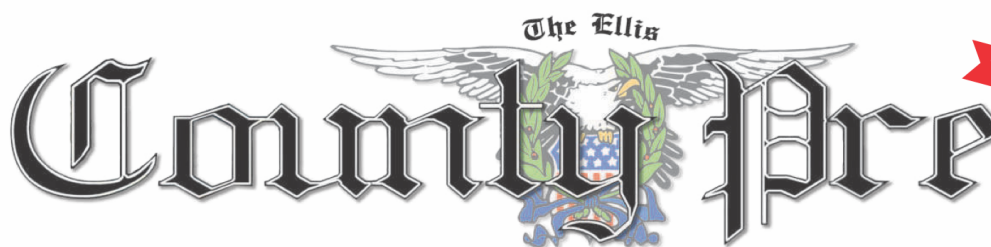


EXHIBIT F



ELLIS COUNTY'S ONLY INDEPENDENTLY-OWNED CONSERVATIVE NEWSPAPER

JUNE 18, 2026 | VOL. 35 NO. 13 | DEFENDING TRUTH AND FREEDOM SINCE 1992 | WWW.ELLISCOUNTYPRESS.COM

\$1

Comm. Matt Zajic, pct 2, arrested for shoplifting

By Rita Cook / Freelance Writer

ENNIS – Newly elected Ellis County Precinct 2 Commissioner Matthew Zajic was arrested over the weekend in Ennis.

The arrest occurred at Walmart on the evening of June 11.

Zajic was arrested in connection with a Theft of Property (>\$100-<\$750), which is a Class B Misdemeanor.

He was arraigned on June 12 in Ennis, and bond was set at \$1,000.

Due to his arraignment being one day after the arrest, the county-owned truck he had driven to Walmart was left overnight in the store's parking lot, and crew retrieved it the following day.

An unnamed source also said the judge originally supposed to arraign Zajic did not do so because he was the same

judge who swore Zajic in as county commissioner weeks earlier.

Zajic did not respond by press time with details of his arrest or to elaborate on his side of the story.

Ennis Police Department posted on social media that they are "actively investigating this incident and cannot release further information at this time."

An update on June 12 by an unnamed source not affiliated with the Ennis PD reported Zajic was accused of shoplifting approximately \$250 worth of tomahawk steaks at the self-checkout.

Reportedly this was caught on store surveillance video, and store personnel spoke with Zajic regarding the unpaid merchandise, but he did correct the issue.

Ellis County Judge John Wray said to his knowledge a

county commissioner arrested for a misdemeanor theft does not automatically lose their office simply because of the arrest.

According to Texas law, it appears an arrest alone does not remove a commissioner from office, and the commissioner may remain in office unless she/he resigns, is convicted of an offense that legally requires removal, or if a court removes the commissioner through a separate removal proceeding.

Texas law does state a county officer could only be immediately removed from office upon conviction of a felony, or a misdemeanor involving official misconduct.

In Texas, a person can file a petition to suspend a commissioner, but a commissioner cannot be removed directly by petition or recall election in Ellis County.



Matthew Zajic, Ellis County Commissioner Precinct 2

Under Chapter 87 of the Texas Local Government Code, a county officer such as a commissioner may be removed through a district court removal proceeding.

However, for a removal action to succeed, there must be legally recognized grounds under Chapter 87.

Texas law presumes a person is innocent until proven guilty.



Ennis Fire Dept. one of 21 locations with Safe Haven Baby Box

By Rita Cook / Freelance Writer

ENNIS – The Ennis Fire Department is one of only 21 locations in Texas that offers

can embark on a safe journey."

There are approximately 491 Safe Haven Baby Boxes in 25 states across the U.S.