

INDICTMENT

CAUSE NO. 50947-B

THE STATE OF TEXAS vs. DEWAYNE WARD

DOB: 09/28/1961

OFFENSE: COUNT ONE - ENGAGING IN ORGANIZED ELECTION FRAUD (F1)
COUNT TWO - UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE WITHOUT REQUEST OF VOTER ENHANCED (F2)
COUNTS THREE – SIX - UNLAWFUL POSSESSION OF BALLOT/BALLOT ENVELOPE (SJF)

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

THE GRAND JURORS, duly selected, empaneled, sworn, charged, and organized as such for the County of Gregg, State of Texas, at the July-December, 2020 term of the 188th District Court for said County, upon their oaths present in and to said Court that from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018, and anterior to the presentment of this Indictment, in the County and State aforesaid, DEWAYNE WARD, hereinafter called Defendant, did then and there

COUNT ONE

Engaging in Organized Election Fraud (F1)

DEWAYNE WARD, hereinafter styled Defendant, from on or about the 22nd day of January A.D., 2018 and continuing until on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there, with the intent to establish, maintain, and participate in a vote harvesting organization, said organization consisting of Shannon Brown, Marlena Jackson, Dewayne Ward, and Charlie Burns, who collaborated in carrying on election offenses under Titles 1 through 7 of the Texas Election Code, knowingly commit, multiple times in the same election, the offenses of unlawful possession of a ballot or carrier envelope without the request of the voter and unlawful possession of a ballot or carrier envelope of another, by committing said offenses as the primary actor or by acting with intent to promote or assist the commission of said offenses by soliciting, encouraging, directing, aiding, or attempting to aid members of said organization to commit said offenses,

COUNT TWO

Unlawful Possession of Ballot/Ballot Envelope without Request of Voter Enhanced (F2)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Tamika Buchanan, without the request of the voter,

COUNT THREE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 24th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Mary Lynn Odom,

COUNT FOUR

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 26th day of February A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Aubrey Durham,

COUNT FIVE

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Keyannia Lister,

COUNT SIX

Unlawful Possession of Ballot/Ballot Envelope Enhanced (SJF)

And further that Defendant, on or about the 6th day of March A.D., 2018 and before the presentment of this indictment, in Gregg County, Texas, did then and there knowingly possess the official ballot or official carrier envelope of a voter, Roderick Smith,

And it is further alleged that Defendant committed the offenses described in Counts Two through Six in the March 6, 2018 Democratic primary election,

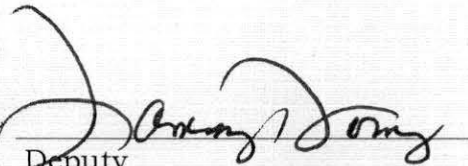
AGAINST THE PEACE AND DIGNITY OF THE STATE.


Foreperson of the Grand Jury

THE STATE OF TEXAS
COUNTY OF GREGG

I, Trey Hattaway, Clerk of the District Court within and for the County and State aforesaid, do hereby certify that the foregoing contains a true and correct copy of the Indictment in Cause No. 50947-B, of the State of Texas vs. DEWAYNE WARD as now on file in this office.

IN TESTIMONY WHEREOF I hereto set my hand and seal, this 23rd day of Sept., A.D. 2020.

By 
Deputy

Trey Hattaway
Clerk of the District Court
Gregg County, Texas

WITNESSES

