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2 Entry 1 – Information Charging Document  
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4 SUPERIOR COURT OF MAJOR FOR LINCOLN COUNTY  
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6 STATE OF MAJOR, )  
7 )  
8 Plaintiff, ) NO. 20-1-02425-1  
9 vs. ) INFORMATION  
10 )  
11 BYRON WARD HOWLAND, )  
12 )  
13 Defendant. )  
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15 )  
16 )

17 COUNT I

18 I, Norm Gamlen, Prosecuting Attorney for Lincoln County in  
19 the name and by the authority of the State of Major, do accuse  
20 BYRON WARD HOWLAND of the crime of **Rape in the Second Degree**,  
21 committed as follows:

22 That the defendant BYRON WARD HOWLAND in Lincoln County,  
23 Major on or about December 1, 20XX-2, by forcible compulsion did  
24 engage in sexual intercourse with another person named Jenny  
25 Sells;

Contrary to RCM 6.44.050(1)(a), and against the peace and  
dignity of the State of Major.

COUNT II

And I, Norm Gamlen, Prosecuting Attorney aforesaid further  
do accuse BYRON WARD HOWLAND of the crime of **Communication with a  
Minor for Immoral Purposes through Electronic Communication**, a  
crime of the same or similar character as another crime charged  
herein, which crimes were part of a common scheme or plan and  
which crimes were so closely connected in respect to time, place  
and occasion that it would be difficult to separate proof of one  
charge from proof of the other, committed as follows:

INFORMATION - 1

**Norm Gamlen**  
Prosecuting Attorney  
W 554 Lincoln County Courthouse  
Georgetown, Major 98103  
(504) 296-0088

1  
2 Entry 1 – Information Charging Document  
3

4 That the defendant BYRON WARD HOWLAND in Lincoln County,  
5 Major during a period of time intervening between August 15, 20XX  
6 -2 through June 1,20XX-1 did communicate with a minor person  
7 named Jenny Sells for immoral purposes through the sending of an  
8 electronic communication;

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10 Contrary to RCM 7.77.090(2), and against the peace and dignity of  
11 the State of Major.

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COUNT III

And I, Norm Gamlen, Prosecuting Attorney aforesaid further  
do accuse BYRON WARD HOWLAND of the crime of **Rape in the Third  
Degree**, a crime of the same or similar character as another crime  
charged herein, which crimes were part of a common scheme or plan  
and which crimes were so closely connected in respect to time,  
place and occasion that it would be difficult to separate proof  
of one charge from proof of the other, committed as follows:

That the defendant BYRON WARD HOWLAND in Lincoln County,  
Major on or about January 15,20XX-1 had sexual intercourse with a  
person named Jenny Sells who was at least fourteen years old but  
less than sixteen years old and not married to the defendant and  
the defendant was at least forty-eight months older than Jenny  
Sells;

Contrary to RCM 6.44.079, and against the peace and dignity of  
the State of Major.

COUNT IV

And I, Norm Gamlen, Prosecuting Attorney aforesaid further  
do accuse BYRON WARD HOWLAND of the crime of **Rape in the Third  
Degree**, a crime of the same or similar character as another crime  
charged herein, which crimes were part of a common scheme or plan  
and which crimes were so closely connected in respect to time,  
place and occasion that it would be difficult to separate proof  
of one charge from proof of the other, committed as follows:

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2 Entry 1 – Information Charging Document  
3

4 That the defendant BYRON WARD HOWLAND in Lincoln County,  
5 Major on or about February 15, 20XX-1 had sexual intercourse with  
6 a person named Jenny Sells who was at least fourteen years old  
7 but less than sixteen years old and not married to the defendant  
8 and the defendant was at least forty-eight months older than  
9 Jenny Sells;

10 Contrary to RCM 6.44.079, and against the peace and dignity of  
11 the State of Major.

12 COUNT III

13 And I, Norm Gamlen, Prosecuting Attorney aforesaid further  
14 do accuse BYRON WARD HOWLAND of the crime of **Rape in the Third**  
15 **Degree**, a crime of the same or similar character as another crime  
16 charged herein, which crimes were part of a common scheme or plan  
17 and which crimes were so closely connected in respect to time,  
18 place and occasion that it would be difficult to separate proof  
19 of one charge from proof of the other, committed as follows:

20 That the defendant BYRON WARD HOWLAND in Lincoln County,  
21 Major on or about January 16, 20XX-1 had sexual intercourse with a  
22 person named Jenny Sells who was at least fourteen years old but  
23 less than sixteen years old and not married to the defendant and  
24 the defendant was at least forty-eight months older than Jenny  
25 Sells;

Contrary to RCM 6.44.079, and against the peace and dignity of  
the State of Major.

NORM MALENG

Lincoln County Prosecuting Attorney

**Ashley Miller**

By: \_\_\_\_\_  
ASHLEY MILLER, WSBA #20777  
Senior Deputy Prosecuting Attorney  
Attorneys for Plaintiff