

IN THE CIRCUIT COURT OF CABELL COUNTY, WEST VIRGINIA

STATE OF WEST VIRGINIA,  
Plaintiff,

vs.

JAN HITE KING,

and

KIMBERLY MAYNARD,  
Defendants.

/s/ GREGORY L. HOWARD, JR.

Case No: 25-M-30  
3 count misdemeanor

Case No: 25-M-31  
3 count misdemeanor

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE  
(W.Va. Code §3-9-3(b))  
(False Swearing)

That on or about the 3<sup>rd</sup> day of February, 2022, in the County of Cabell, State of West Virginia, JAN HITE KING, committed the misdemeanor offense of FALSE SWEARING, by filing a candidacy certificate of announcement, and did by this declaration knowingly make a false statement or representation therein; to-wit, by certifying to the County Clerk of Cabell County that she was a resident of Magisterial District 1, although knowing she was a resident of Magisterial District 2, against the peace and dignity of the State.

COUNT TWO  
(W.Va. Code §3-9-3(b))  
(False Swearing)

That on or about the 3<sup>rd</sup> day of February, 2022, in the County of Cabell, State of West Virginia, KIMBERLY MAYNARD, committed the misdemeanor offense of FALSE SWEARING, by filing a candidacy certificate of announcement, and did by this declaration knowingly make a false statement or representation therein; to-wit, by certifying to the County Clerk of Cabell County that she was a resident of Magisterial District 1, although knowing she was a resident of Magisterial District 3, against the peace and dignity of the State.

**COUNT THREE**  
**(W.Va. Code §3-9-3(b))**  
**(False Swearing – Aiding and Abetting)**

That on or about the 3<sup>rd</sup> day of February, 2022, in the County of Cabell, State of West Virginia, JAN HITE KING, committed the misdemeanor offense of FALSE SWEARING – AIDING AND ABETTING, by counselling, advising, and/or aiding and abetting Kimberly Maynard to knowingly file a false declaration; to-wit, by certifying to the County Clerk of Cabell County by way of a candidacy certificate of announcement that Kimberly Maynard was a resident of Magisterial District 1, although knowing Kimberly Maynard was a resident of Magisterial District 3, against the peace and dignity of the State.


**COUNT FOUR**  
**(W.Va. Code §3-9-3(b))**  
**(False Swearing – Aiding and Abetting)**

That on or about the 3<sup>rd</sup> day of February, 2022, in the County of Cabell, State of West Virginia, KIMBERLY MAYNARD, committed the misdemeanor offense of FALSE SWEARING – AIDING AND ABETTING, by counselling, advising, and/or aiding and abetting Jan Hite King to knowingly file a false declaration; to-wit, by certifying to the County Clerk of Cabell County by way of a candidacy certificate of announcement that Jan Hite King was a resident of Magisterial District 1, although knowing Jan Hite King was a resident of Magisterial District 2, against the peace and dignity of the State.

**COUNT FIVE**  
**(W.Va. Code §61-10-31)**  
**(Conspiracy)**

That on or about the 3<sup>rd</sup> day of February, 2022, in County of Cabell, State of West Virginia, JAN HITE KING and KIMBERLY MAYNARD, committed the misdemeanor offense of CONSPIRACY, by willfully conspiring with each other to commit a misdemeanor violation of W.Va. Code §3-9-3(b) (False Swearing), and one or both persons taking action to effect the object thereof; to-wit, by agreeing and acting in concert with each other to file fraudulent candidacy certificates of announcement, against the peace and dignity of the State.

A TRUE BILL,

  
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SETH S. GASKINS (WV Bar ID 11906),  
SPECIAL PROSECUTING ATTORNEY  
CABELL COUNTY, WEST VIRGINIA

  
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GRAND JURY FOREPERSON

Found upon the testimony of Robert Hanson, West Virginia Attorney General Investigator.