

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

WALTER LEE HOORNSTRA,


Defendant.

Case No. _____

COUNT ONE: (*Interstate Threat*)

18 U.S.C. § 875(c)

NMT 5 Years' Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

\$100 Mandatory Special Assessment

COUNT TWO: (*Threatening Interstate Telephone Call*)

47 U.S.C. § 223(a)(1)(C)

NMT 2 Years' Imprisonment

NMT \$250,000 Fine

NMT 1 Year Supervised Release

Class E Felony

\$100 Mandatory Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times relevant to the indictment, VICTIM-1 was an election official who worked at the Maricopa County Recorder's Office in Maricopa County, Arizona.

COUNT ONE
18 U.S.C. § 875(c)
(INTERSTATE THREAT)

On or about May 19, 2021, in the Western District of Missouri and elsewhere, the defendant

WALTER LEE HOORNSTRA,

with the intent to communicate a true threat to injure another person and with knowledge that the communication would be viewed as a true threat to injure another person, knowingly transmitted a communication in interstate and foreign commerce containing a true threat to kidnap any person and to injure the person of another by stating the following in a voicemail telephone message he

left on the personal cellular telephone for VICTIM-1: “So I see you’re for fair and competent elections, that’s what it says here on your homepage for your recorder position you’re trying to fly here. But you call things unhinged and insane lies when there’s a forensic audit going on. You need to check yourself. You need to do your fucking job right because other people from other states are watching your ass. You fucking renege on this deal or give them any more troubles, your ass will never make it to your next little board meeting.”

In violation of Title 18, United States Code, Section 875(c).

COUNT TWO
47 U.S.C. § 223(a)(1)(C)
(THREATENING INTERSTATE TELEPHONE CALL)

On or about May 19, 2021, in the Western District of Missouri and elsewhere, the defendant

WALTER LEE HOORNSTRA,

did, in interstate and foreign communications, make a telephone call and utilize a telecommunications device, whether or not conversation and communication ensued, without disclosing his identity and with intent to threaten any specific person, by stating the following in a voicemail telephone message he left on the personal cellular telephone for VICTIM-1: “So I see you’re for fair and competent elections, that’s what it says here on your homepage for your recorder position you’re trying to fly here. But you call things unhinged and insane lies when there’s a forensic audit going on. You need to check yourself. You need to do your fucking job right because other people from other states are watching your ass. You fucking renege on this deal or give them any more troubles, your ass will never make it to your next little board meeting.”

In violation of Title 47, United States Code, Section 223(a)(1)(C).

A TRUE BILL.

/s/ [REDACTED]
FOREPERSON OF THE GRAND JURY

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S. Department of Justice

/s/ Tanya Senanayake
TANYA SENANAYAKE
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Dated: 8/16/2022
Kansas City, Missouri