

IN THE CIRCUIT COURT FOR CECIL COUNTY

C7CR 21-669

STATE OF MARYLAND

v.

LORA WALTERS

TRACKING NO.: 21-7007-00016-2

DATE FILED: \_\_\_\_\_

**CHARGES:**

Common Law

CJIS Code 2-0645 Misconduct in Office

Criminal Law Article, § 9-101

CJIS Code 1-5003 Perjury: Witness in Court

Criminal Law Article, § 8-606 (b)(1)

CJIS Code 2-2504 Public Record—False Entry

Criminal Law Article, § 8-606 (b)(2)

CJIS Code 3-2504 Public Record—Destroy Etc.

Election Law Article 16-301

CJIS Code 1-1688 Neglect/Corrupt Election Duties

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**WITNESS:**

Investigator, Cynthia Thomas  
Office of the Maryland State Prosecutor  
300 East Joppa Road, Suite 410  
Towson, Maryland 21286

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**CRIMINAL INFORMATION**

The OFFICE OF THE STATE PROSECUTOR for the State of Maryland, upon oath and affirmation, charges LORA WALTERS, defendant, with having committed the following offenses, and incorporates by reference the following allegations, information, and particulars in the Counts below as therein referred:

**FIRST COUNT**  
(MISCONDUCT IN OFFICE)

THE OFFICE OF THE STATE PROSECUTOR, on its oath and affirmation, charges that from on or about November 5, 2019 through and including July 15, 2020, at Cecil County, Maryland, LORA WALTERS, in violation and perversion of her duties as the sworn Deputy Director for the Cecil County Board of Elections, did corruptly commit misconduct in office by knowingly, willfully, and intentionally, while exercising her duties of office, altering the date on Danielle Hornberger's financial disclosure form to reflect that it had been filed on November 5, 2019 when it had in fact been filed on July 7, 2020, in violation of the common law and against the peace, government and dignity of the State.

Common Law  
CJIS Code 2-0645 Misconduct in Office  
Penalty: Anything not cruel and unusual

**SECOND COUNT**  
(PERJURY)

THE OFFICE OF THE STATE PROSECUTOR, on its oath and affirmation, charges that on August 13, 2020, at Cecil County, Maryland, LORA WALTERS, did, on examination as a witness, duly sworn to testify in *Alan McCarthy v. Danielle Hornberger, et al.*, in the Circuit Court for Cecil County, Case no. C-07-CV-20-261, which said court had authority to administer such

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oath, unlawfully and falsely swear that she did not alter the date on Danielle Hornberger's financial disclosure form from July 7, 2020 to November 5, 2019, the matters so sworn being material, and said testimony being willfully corrupt and false.

Criminal Law Article, § 9-101  
CJIS Code 1-5003 Perjury: Witness in Court  
Penalty: 10 years

**THIRD COUNT**  
(FALSE ENTRY IN PUBLIC RECORD)

THE OFFICE OF THE STATE PROSECUTOR, on its oath and affirmation, charges that on July 7, 2020, at Cecil County, Maryland, LORA WALTERS, did willfully and falsely make a false entry in a public record, to wit: altered the date on Danielle Hornberger's financial disclosure form, which is a record required by the Cecil County Ethics Code, and received and used by both the State of Maryland and Cecil County, to reflect that it had been filed on November 5, 2019 when it had in fact been filed on July 7, 2020, in violation of Criminal Law Article, Section 8-606 (b) of the Annotated Code of Maryland; against the peace, government and dignity of the State.

Criminal Law Article, § 8-606 (b)(1)  
CJIS Code 2-2504 Public Record—False Entry  
Penalty: 3 years/ \$1,000

**FOURTH COUNT**  
(ALTER PUBLIC RECORD)

THE OFFICE OF THE STATE PROSECUTOR, on its oath and affirmation, charges that on July 7, 2020, at Cecil County, Maryland, LORA WALTERS did willfully and without proper authority alter a public record, to wit: altered the date on Danielle Hornberger's financial disclosure form, which is a record required by the Cecil County Ethics Code, and received and used by both the State of Maryland and Cecil County, to reflect that it had been filed on November 5, 2019

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when it had in fact been filed on July 7, 2020, in violation of Criminal Law Article, Section 8-606 (b) of the Annotated Code of Maryland; against the peace, government and dignity of the State.

Criminal Law Article, § 8-606 (b)(2)  
CJIS Code 3-2504 Public Record—Destroy Etc.  
Penalty: 3 years/ \$1,000

**FIFTH COUNT**  
(CORRUPT OR FRAUDULENT ACTS IN THE PERFORMANCE  
OF OFFICIAL ELECTION DUTIES)

THE OFFICE OF THE STATE PROSECUTOR, on its oath and affirmation, charges that on July 7, 2020, at Cecil County, Maryland, LORA WALTERS did, as an election official, engage in corrupt or fraudulent acts in the performance of her official duties as Deputy Director of the Cecil County Board of Elections, to wit: altered the date on Danielle Hornberger's financial disclosure form to reflect that it had been filed on November 5, 2019 when it had in fact been filed on July 7, 2020, in violation of Election Law Article §16-301 and against the peace, government and dignity of the State.

Election Law Article 16-301  
CJIS Code 2-0376 Neglect/Corrupt Election Duties  
Penalty: Not less than \$50 or 30 days imprisonment; not more than \$1,000 or 3 years.

THE OFFICE OF THE STATE PROSECUTOR further avers and alleges that the offenses charged herein above were committed contrary to the form and Acts of Assembly in such case made and provided and against the peace, government and dignity of the State of Maryland.



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CHARLTON T. HOWARD  
MARYLAND STATE PROSECUTOR

By:



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TO THE PERSON CHARGED:

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
  - (A) explaining the charges in this paper;
  - (B) telling you the possible penalties;
  - (C) explaining any potential collateral consequences of a conviction, including immigration consequences;
  - (D) helping you at trial;
  - (E) helping you protect your constitutional rights; and
  - (F) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.2 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. To apply for Public Defender representation, contact a District Court commissioner.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Date/Time