

SECRET

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYLER LEROY HILBERT,
[DOB: 09/16/2002]

Defendant.

Case No. 26-00034-01-CR-W-BCW

COUNT ONE:

Cyberstalking (Minor)

18 U.S.C. §§ 2261A(2)(B), 2261B(a)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT TWO:

Cyberstalking

18 U.S.C. §§ 2261A(2)(B), 2261(b)(5)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT THREE

Interstate Threats

18 U.S.C. § 875(c)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT FOUR

Interstate Threats Involving Explosives

18 U.S.C. § 844(e)

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

COUNT FIVE

False Information and Hoaxes

18 U.S.C. §§ 1038(a)(1), (a)(1)(A)

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years Supervised Release

Class C Felony

\$100 Mandatory Special Assessment

Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE *Cyberstalking (Minor)*

Between on or about August 28, 2023 and December 7, 2023, the dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **TYLER LEROY HILBERT**, defendant herein, with the intent to injure, harass, and intimidate Minor Victim, a minor under the age of 18, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce and facility of interstate commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Minor Victim and the immediate family of Minor Victim, all in violation of Title 18, United States Code, Sections 2261A(2)(B), 2261B(a).

COUNT TWO *Cyberstalking*

Between on or about August 28, 2023 and December 7, 2023, the dates being approximate, in the Western District of Missouri and elsewhere, the defendant, **TYLER LEROY HILBERT**, defendant herein, with the intent to injure, harass, and intimidate Adult Victim, used any interactive computer service and electronic communication service and electronic communication system of interstate commerce and any other facility of interstate or foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Adult Victim and the immediate family of Adult Victim, all in violation of Title 18, United States Code, Sections 2261A(2)(B), 2261(b)(5).

COUNT THREE

Interstate Threats

Between on or about October 12, 2023, and October 13, 2023, the dates being approximate, in the Western District of Missouri and elsewhere, **TYLERY LEROY HILBERT**, defendant herein, knowingly, for the purpose of issuing a threat and with knowledge that the communication will be viewed as a threat, transmitted, in interstate and foreign commerce, a communication containing a threat to injure and kill the person of another, to wit: text messages sent by **TYLER LEROY HILBERT** to Minor Victim stating:

“I’m killing ur mother . . . And ur sister,”

“I’m leaving where I stayed last night and coming to hurt u,”

“I’m taking someone’s life . . . It’s urs,”

“Imma rape you,”

“I’m sending someone to blow ur house up rn. And hurt u no joke. There on their way rn,”

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

COUNT FOUR

Interstate Threats Involving Explosives

Between on or about December 5, 2023 and December 7, 2023, the dates being approximate, in the Western District of Missouri and elsewhere, **TYLERY LEROY HILBERT**, defendant herein, through the use of the telephone and other instruments of interstate or foreign commerce, maliciously conveyed false information, knowing the same to be false, concerning an attempt being made and to be made to unlawfully damage and destroy a building and other real and personal property by means of fire and an explosive, to wit: a bomb in McKinleyville High School, all in violation of Title 18, United States Code, Section 844(e).

COUNT FIVE
False Information and Hoaxes

Between on or about November 28, 2023 and December 7, 2023, the dates being approximate, in the Western District of Missouri and elsewhere, **TYLERY LEROY HILBERT**, defendant herein, engaged in conduct with the intent to convey false and misleading information under circumstances where such information may reasonably have been believed, that indicated that an activity had taken, was taking and would take place that would constitute a violation of Chapter 44 of Title 18, United States Code, namely, Title 18, United States Code, Section 922(q)(2)(A), to wit: the defendant, knowing the information to be false, called law enforcement and school officials in California and made statements to the effect of individuals, to include himself, were located at McKinleyville High School with firearms and were intending to shoot other individuals, all in violation of Title 18, United States Code, Sections 1038(a)(1) and (a)(1)(A).

A TRUE BILL.

January 27, 2026
DATE

SIGNATURE ON FILE WITH USAO
FOREPERSON OF THE GRAND JURY

/s/Teresa A. Moore
Teresa A. Moore
Assistant United States Attorney
Western District of Missouri