

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal No. 1:20-
	:	
HANALEI AIPOALANI,	:	VIOLATIONS:
	:	18 U.S.C. § 666(a)(1)(A)
Defendant.	:	(Federal Programs Embezzlement)

INFORMATION

The United States of America charges that:

COUNT ONE

1. Between in or about May 2018 and in or about May 2019, NON-PROFIT 1 received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.

2. From in or about May 2018 to in or about May 2019, within the District of Columbia and elsewhere, the defendant, HANALEI AIPOALANI (hereinafter “AIPOALANI”), while an agent of NON-PROFIT 1, did embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of any person other than the rightful owner and intentionally misapply property that was owned by and under the care, custody, and control of NON-PROFIT 1 and was valued at \$5,000 or more, that is, AIPOALANI obtained more than \$5,000 in NON-PROFIT 1 funds by falsely representing the funds were required to support NON-PROFIT 1’s AmeriCorps program, when, in fact, AIPOALANI converted the funds to his and others’ personal use.

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 1 of this Information, the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to this offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

The United States will also seek the forfeiture of the following specific property: a 2014 Ford Fusion Hybrid, with Vehicle Identification Number 3FA6P0LU5ER256328.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p)).

MICHAEL R. SHERWIN
ACTING UNITED STATES ATTORNEY

By:



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