IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
	:	
v.	:	**Criminal No. 1:20-cr-00286**
	:	
HANALEI AIPOALANI,	:	**VIOLATIONS:**
	:	**18 U.S.C. § 666(a)(1)(A)**
Defendant.	:	**(Federal Programs Embezzlement)**
	:	
	:	**18 U.S.C. § 666(a)(1)(B)**
	:	**(Federal Programs Bribery)**

SUPERSEDING 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).

COUNT TWO

3. At all times material to this superseding information, the Department of Community Services for the City and County of Honolulu was an agency of a local government that received federal assistance in excess of $10,000 during the one-year period beginning on or about January 1, 2020 and ending on or about December 31, 2020.

4. Defendant was an agent of the Department of Community Services, to wit the CARES Act Program Administrator, whose duties included managing the $166 million allotted to the Department of Community Services under the Coronavirus Relief Fund.

5. On or about September 16, 2020, in the District of Hawaii, Defendant did corruptly solicit, demand, accept and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a transaction and series of transactions of the Department of Community Services involving $5,000 or more.

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

FORFEITURE ALLEGATION

1. Upon conviction of Count One, charging an offense in violation of 18 U.S.C. § 666(a)(1)(A), the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the 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; and

   b. A MONEY JUDGMENT in the amount of $527,000, equal to the value of any property, real or personal, constituting or derived from proceeds traceable to the offense.

SUBSTITUTE ASSETS

2. If any of the property described above, 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;

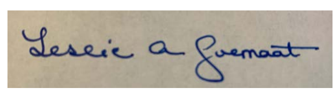
c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

CHANNING D. PHILLIPS
ACTING UNITED STATES ATTORNEY

By: 

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