

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

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Criminal No. 1:20-
	:	
ANGELITA AIPOALANI,	:	VIOLATIONS:
	:	18 U.S.C. § 371
Defendant.	:	(Conspiracy)

INFORMATION

The United States of America charges that:

COUNT ONE

1. In each one-year period from in or about November 2015 to in or about June 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 November 2015 to in or about June 2019, in the District of Columbia and elsewhere, the defendant, ANGELITA AIPOALANI (hereinafter “ANGELITA”), together with HANAIEI AIPOALANI (hereinafter “HANAIEI”) did knowingly combine, conspire, confederate, and agree with each other to commit an offense against the United States, that is, while HANAIEI was an agent of NON-PROFIT 1, to embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to HANAIEI’s, ANGELITA’s, and others’ use, and intentionally misapply, \$5,000 or more in each one-year period that was owned by and under the care, custody, and control of NON-PROFIT 1, in violation of 18 U.S.C. § 666(a)(1)(A).

3. In furtherance of the conspiracy, in or about November 2015, November 2016, and November 2017, ANGELITA signed and caused to be signed AmeriCorps member agreements in which she falsely represented to NON-PROFIT 1 that she would perform service for NON-

PROFIT 1's AmeriCorps program qualifying her for, and on the basis of which she received, payments from NON-PROFIT 1.

All in violation of Title 18, United States Code, Section 371.

MICHAEL R. SHERWIN
ACTING UNITED STATES ATTORNEY

By:



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