IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	:	
	:	
v.	:	**Criminal No. 1:21-cr-**
	:	
STACY HIGA,	:	**VIOLATIONS:**
	:	**18 U.S.C. § 666(a)(1)(A)**
Defendant.	:	**(Federal Programs Embezzlement)**
	:	
	:	**18 U.S.C. § 666(a)(2)**
	:	**(Federal Programs Bribery)**

INFORMATION

The United States of America charges that:

COUNT ONE

1. In each one-year period between in or about July 2016 through the present, the Hawaii Commission received more than $10,000 from AmeriCorps, which is a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance. In total, the Hawaii Commission received more than $1,500,000 in AmeriCorps funds during that time.

2. From in or about February 2018 to in or about September 2020, within the District of Columbia and elsewhere, the defendant, STACY HIGA (hereinafter "HIGA"), while an agent of the Hawaii Commission, 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 the Hawaii Commission that was valued at $5,000 or more, that is, HIGA fraudulently obtained $38,642 in AmeriCorps funds from the Hawaii Commission by causing the Hawaii Commission to fraudulently enter into contracts with COMPANY 1 and COMPANY 2 in order to convert the funds to his own 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 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. HANALEI AIPOALANI 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. From in or about August 2020 through in or around October 2020, HIGA did corruptly give, offer, and agree to give a thing of value to any person intending to influence and reward HANALEI AIPOALANI in connection with a transaction and series of transactions involving $5,000 or more, to wit, authorization of two applications under the CARES Act totaling $845,000 in the names of Company 1 and Company 2.

All in violation of Title 18, United States Code, Section 666(a)(2).

FORFEITURE ALLEGATION

1. Upon conviction of Count One, charging an offense in violation of 18 U.S.C. § 666(a)(1)(A), or Count Two, charging an offense in violation of 18 U.S.C. § 666(a)(2), the defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States will also seek a MONEY JUDGMENT in the amount of $38,642, equal to the value of any property, real or personal, constituting or derived from proceeds traceable to the offense.

SUBSTITUTE ASSETS

3. 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).

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