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Attorneys for the State of Hawaii

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII,) CASE NO
Plaintiff,)) <u>COUNT I</u> :) THEFT IN THE SECOND DEGREE
) (§§708-830 (2) & 708-831 (1)(b), H.R.S.)) (A.G. Rpt. No. 16-5650)
LAARA ALLBRETT,)
Defendant.) <u>COUNT II</u> :) THEFT IN THE SECOND DEGREE) (§§708-830 (2) & 708-831 (1)(b), H.R.S.)) (A.G. Rpt. No. 16-5649)
) <u>COUNT III</u> :) THEFT IN THE SECOND DEGREE) (§§708-830 (2) & 708-831 (1)(b), H.R.S.)) (A.G. Rpt. No. 16-5917)
) <u>COUNT IV</u> :) THEFT IN THE SECOND DEGREE) (§§708-830 (2) & 708-831 (1)(b), H.R.S.)) (A.G. Rpt. No. 16-5671)
) FELONY INFORMATION; EXHIBIT "A"))

FELONY INFORMATION

<u>COUNT I</u>: On or about January 17, 2013, in the City and County of Honolulu, State of Hawaii, LAARA ALLBRETT, did intentionally obtain or exert control over the property of another, by deception, the value of which LAARA ALLBRETT was aware or believed exceeded Three-Hundred Dollars (\$300.00), and which did exceed Three-Hundred Dollars (\$300.00), with intent to deprive another of the property, thereby committing the offense of Theft in the Second Degree, in violation of Sections 708-830(2) and 708-831(1)(b) of the Hawaii Revised Statutes.

"Deception" occurs when a person knowingly creates or confirms another's impression which is false and which the defendant does not believe to be true, or fails to correct a false impression which the person previously has created or confirmed.

The offense alleged herein was not discovered prior to April 16, 2016, by either the State of Hawaii or by a person who had a legal duty to represent the State of Hawaii. Section 701-108(3)(a) of the Hawaii Revised Statutes.

The offense alleged herein is based on misconduct in office by LAARA ALLBRETT, a public officer or employee, at any time that LAARA ALLBRETT was in public office or employment or within two years thereafter. Section 701-108(3)(b) of the Hawaii Revised Statutes.

<u>COUNT II</u>: On or about January 23, 2014, to and including March 15, 2014, inclusive, as one scheme and/or continuous course of conduct, in the City and County of Honolulu, State of Hawaii, LAARA ALLBRETT, did intentionally obtain or exert control over the property of another, by deception, the value of which LAARA ALLBRETT was aware or believed exceeded Three-Hundred Dollars (\$300.00), and which did exceed Three-Hundred Dollars (\$300.00), with

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intent to deprive another of the property, thereby committing the offense of Theft in the Second Degree, in violation of Sections 708-830(2) and 708-831(1)(b) of the Hawaii Revised Statutes.

"Deception" occurs when a person knowingly creates or confirms another's impression which is false and which the defendant does not believe to be true, or fails to correct a false impression which the person previously has created or confirmed.

The offense alleged herein was not discovered prior to April 15, 2016, by either the State of Hawaii or by a person who had a legal duty to represent the State of Hawaii. Section 701-108(3)(a) of the Hawaii Revised Statutes.

The offense alleged herein is based on misconduct in office by LAARA ALLBRETT, a public officer or employee, at any time that LAARA ALLBRETT was in public office or employment or within two years thereafter. Section 701-108(3)(b) of the Hawaii Revised Statutes.

<u>COUNT III</u>: On or about March 8, 2014, in the City and County of Honolulu, State of Hawaii, LAARA ALLBRETT, did intentionally obtain or exert control over the property of another, by deception, the value of which LAARA ALLBRETT was aware or believed exceeded Three-Hundred Dollars (\$300.00), and which did exceed Three-Hundred Dollars (\$300.00), with intent to deprive another of the property, thereby committing the offense of Theft in the Second Degree, in violation of Sections 708-830(2) and 708-831(1)(b) of the Hawaii Revised Statutes.

"Deception" occurs when a person knowingly creates or confirms another's impression which is false and which the defendant does not believe to be true, or fails to correct a false impression which the person previously has created or confirmed.

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The offense alleged herein was not discovered prior to June 30, 2016, by either the State of Hawaii or by a person who had a legal duty to represent the State of Hawaii. Section 701-108(3)(a) of the Hawaii Revised Statutes.

The offense alleged herein is based on misconduct in office by LAARA ALLBRETT, a public officer or employee, at any time that LAARA ALLBRETT was in public office or employment or within two years thereafter. Section 701-108(3)(b) of the Hawaii Revised Statutes.

<u>COUNT IV</u>: On or about December 13, 2013, to and including December 23, 2013, inclusive, as one scheme and/or continuous course of conduct in the City and County of Honolulu, State of Hawaii, LAARA ALLBRETT, did intentionally obtain or exert control over the property of another, by deception, the value of which LAARA ALLBRETT was aware or believed exceeded Three-Hundred Dollars (\$300.00), and which did exceed Three-Hundred Dollars (\$300.00), with intent to deprive another of the property, thereby committing the offense of Theft in the Second Degree, in violation of Sections 708-830(2) and 708-831(1)(b) of the Hawaii Revised Statutes.

"Deception" occurs when a person knowingly creates or confirms another's impression which is false and which the defendant does not believe to be true, or fails to correct a false impression which the person previously has created or confirmed.

The offense alleged herein was not discovered prior to July 22, 2016, by either the State of Hawaii or by a person who had a legal duty to represent the State of Hawaii. Section 701-108(3)(a) of the Hawaii Revised Statutes.

The offense alleged herein is based on misconduct in office by LAARA ALLBRETT, a public officer or employee, at any time that LAARA ALLBRETT was in public office or

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employment or within two years thereafter. Section 701-108(3)(b) of the Hawaii Revised Statutes.

DATED: Honolulu, Hawaii: October 26, 2017.

mS. Fed

VINCE S. KANEMOTO Deputy Attorney General STATE OF HAWAII