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SEALED
BY ORDER OF THE COURT

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Mar 17, 2021, 4:28 pm
Michelle Rynne, Clerk of Court

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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CR. NO. CR 21-00037 JMS
)
Plaintiff,) INDICTMENT
)
vs.) [18 U.S.C. §§ 1343 and 1346]
)
JASON DADEZ,)
)
Defendant.)
_____)

INDICTMENT

The Grand Jury charges:

Counts 1 - 3
Honest Services Wire Fraud
(18 U.S.C. §§ 1343 and 1346)

The Scheme to Defraud

1. In or about and between 2012 and September 2020, both dates being approximate and inclusive, within the District of Hawaii and elsewhere, JASON DADEZ, the defendant, devised and intended to devise a scheme and artifice to defraud and deprive the citizens of the City and County of Honolulu and its Department of Planning and Permitting (“DPP”) of their rights to the honest and faithful services of DADEZ, who was then employed by DPP initially as a Clerk and subsequently as a Building Inspector, through bribery and the concealment of material information.

2. The purpose of the scheme and artifice was for DADEZ to secretly use his official position to enrich himself by soliciting and accepting gifts, payments, and other things of value in exchange for his provision of favorable official action to persons who paid him bribes.

3. The scheme and artifice was carried out by the following manner and means, among others:

a. In or about 2020, DADEZ solicited and accepted gifts, payments, and other things of value from an architect and third-party reviewer (“Architect 1”) and Architect 1’s client who owned a multi-family

residence on Ala Wai Boulevard (“Owner 1”) totaling at least \$1,000.00.

DADEZ provided favorable official action on behalf of Architect 1 and Owner 1 as requested and as opportunities arose, including by nullifying in the DPP violation system a building code violation issued to Owner 1 concerning the residence on Ala Wai Boulevard.

b. From in or about June 2017 to in or about July 2017, DADEZ solicited and accepted gifts, payments, and other things of value from owners of a restaurant in Waipahu (“Owner 2”) totaling \$2,000.00. DADEZ provided favorable official action on behalf of Owner 2 as requested and as opportunities arose, including by processing two applications associated with a wall sign for the restaurant.

c. From in or about 2012 to in or about August 2020, DADEZ solicited and accepted gifts, payments, and other things of value from a solar contractor (“Contractor 1”). DADEZ provided favorable official action on behalf of Contractor 1 as requested and as opportunities arose, including by processing solar project permit applications.

d. DADEZ took steps to hide, conceal, and cover up his activity and the nature and scope of his dealings with persons who paid him bribes, including by taking bribes in cash, using a personal cell phone for communications with persons who paid him bribes, and using a personal

email address for communications with persons who paid him bribes, and by his failure to inform DPP of the bribes received by him in exchange for his provision of favorable official action on behalf of persons who paid him bribes.

The Wire Communications

4. On or about the dates stated below, in the District of Hawaii and elsewhere, and for the purpose of executing the aforesaid scheme and artifice to defraud, and attempting to do so, DADEZ did knowingly transmit, and cause to be transmitted, certain writings, signs, signals, and sounds in interstate commerce, with each such wire communication constituting a separate count of this

Indictment:

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COUNT	ON OR ABOUT	DESCRIPTION OF WIRE COMMUNICATION
1	6/26/2017	Wire communication by Defendant's bank for the clearing and payment of a check from Owner 2 to Defendant for \$1,000.00 deposited into Defendant's account
2	7/18/2017	Wire communication by Defendant's bank for the clearing and payment of a check from Owner 2 to Defendant for \$1,000.00 deposited into Defendant's account
3	1/22/2020	Text message from Defendant to Architect 1 regarding the residence on Ala Wai Boulevard

All in violation of Title 18, United States Code, Sections 1343 and 1346.

Forfeiture Notice

5. The allegations set forth in all paragraphs of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

6. The United States hereby gives notice to Defendant that, upon conviction of the offenses charged in Counts 1 - 3 of this Indictment, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, constituting, or derived from, proceeds traceable to the violation of Title 18, United States Code, Section 1343, alleged in this Indictment.

7. If by any act or omission of Defendant, any of the property subject to forfeiture described in paragraph 6 herein:

- 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 subdivided without difficulty,

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the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 6, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

DATED: March 17, 2021, Honolulu, Hawaii.

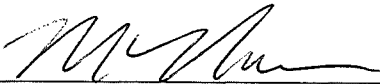
A TRUE BILL

/s/ Foreperson

FOREPERSON, GRAND JURY



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United States v. Jason Dadez
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