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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. <u>CR 21-00036 JMS</u>
)	
Plaintiff,)	INDICTMENT
)	
vs.)	[18 U.S.C. §§ 1343 and 1346]
)	
JOCELYN GODOY,)	
)	
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 September 2019 and November 2020, both dates being approximate and inclusive, within the District of Hawaii and elsewhere, JOCELYN GODOY, 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 GODOY, who was then employed by DPP in its Data Access and Imaging Branch, through bribery and the concealment of material information.

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

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

a. From in or about September 2019 to in or about November 2020, GODOY solicited and accepted gifts, payments, and other things of value from an architect and third-party reviewer (“Architect 1”). GODOY

provided favorable official action on behalf of Architect 1 as requested and as opportunities arose, including by providing electronic copies of DPP documents to Architect 1.

b. GODOY took steps to hide, conceal, and cover up her activity and the nature and scope of her dealings with persons who paid her bribes, including by taking bribes in cash and using a personal cell phone for communications with persons who paid her bribes, and by her failure to inform DPP of the bribes received by her in exchange for provision of electronic copies of DPP documents by persons who paid her 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, GODOY 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	9/25/2019	Text message from Defendant to Architect 1 stating, "Let me know if you want both do it can go on your long tab. Lol."
2	6/10/2020	Text message from Defendant to Architect 1 stating, "***NEW CHARGES*** 1) BP#294218 <5> \$6.75 2) BP#176348 <5> \$6.75 3) TOTAL TO DATE: \$13.50"
3	11/17/2020	Text message from Defendant to Architect 1 stating, "That's It? Ugh [emoji] I thought it would be around \$200.00. Lol [emojis]"

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.

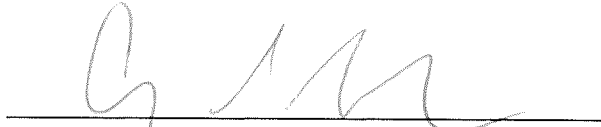
A TRUE BILL

/s/ Foreperson

FOREPERSON, GRAND JURY



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