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### IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

### STATE OF HAWAI'I

STATE OF HAWAI'I

VS.

ROBERT CHAPMAN,

Defendant.

Case No. 1CPC-25-0000730

#### COUNT 1:

UNAUTHORIZED POSSESSION OF CONFIDENTIAL PERSONAL INFORMATION (§708-839.55 HRS) (AG RPT NO. 23-1126-1)

#### COUNT 2:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-2)

#### COUNT 3:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-3)

### COUNT 4:

FORGERY IN THE FIRST DEGREE (\$708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-4)

#### COUNT 5:

IDENTITY THEFT IN THE FIRST DEGREE (§708-839.6(1)(b) HRS) (AG RPT NO. 23-1126-5)

# COUNT 6:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-6)

#### COUNT 7:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-7)

#### COUNT 8:

THEFT IN THE SECOND DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-8)

## COUNT 9:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-9)

#### COUNT 10:

IDENTITY THEFT IN THE FIRST DEGREE (§708-839.6(1)(b) HRS) (AG RPT NO. 23-1126-10)

# COUNT 11:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-11)

#### COUNT 12:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-12)

#### COUNT 13:

IDENTITY THEFT IN THE FIRST DEGREE (§708-839.6(1)(b) HRS) (AG RPT NO. 23-1126-13)

### COUNT 14:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-14)

## COUNT 15:

THEFT IN THE SECOND DEGREE (\$708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-15)

## COUNT 16:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS). (AG RPT NO. 23-1126-16)

### COUNT 17:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-17)

# COUNT 18:

THEFT IN THE FIRST DEGREE (\$708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-18)

## COUNT 19:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-19)

### COUNT 20:

FORGERY IN THE FIRST DEGREE (§708-851(1)(c)(i) and (ii) HRS) (AG RPT NO. 23-1126-20)

#### COUNT 21:

IDENTITY THEFT IN THE FIRST DEGREE (§708-839.6(1)(b) HRS) (AG RPT NO. 23-1126-21)

### COUNT 22:

THEFT IN THE FIRST DEGREE (§708-830.5(1)(a) HRS) (AG RPT NO. 23-1126-22)

**INDICTMENT** 

# **INDICTMENT**

### THE GRAND JURY CHARGES:

COUNT 1: On or about October 19, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally or knowingly possess, without authorization, any confidential personal information of Robert Boulette in any form, including but not limited to mail, physical documents, identification cards, or information stored in digital form, thereby committing the offense of Unauthorized Possession of Confidential Personal Information, in violation of Section 708-839.55 of the Hawaii Revised Statutes. "Confidential personal information" means information in which an individual has a significant privacy interest, including, but not limited to an individual's entire driver's license number or social security number, the entire identifying number of an individual's depository, investment, or credit account, an individual's entire credit card number or a username and password, that, when used in conjunction, provide access to an individual's credit card account, medical records, or depository, investment, or credit account.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 2: On or about October 19, 2018, to and including October 24, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, make, complete, endorse, or alter a written instrument, to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby

committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 3: On or about October 24, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 4: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 5: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did make or cause to be made, either directly or indirectly, a transmission of any personal information of Robert Boulette by any oral statement, any written statant, or any statement conveyed by any electronic means, with the intent to commit the offense of Theft in the First Degree, thereby committing the offense of Identity Theft in the First Degree, in violation of Section 708-839.6(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 6: On or about December 13, 2018, to and including February 15, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$61,249.26, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 7: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use

deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 8: On or about December 13, 2018, to and including February 15, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$4,076.92, the value of which Robert Chapman believed exceeded Seven Hundred Fifty Dollars (\$750), and which did exceed Seven Hundred Fifty Dollars (\$750), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby committing the offense of Theft in the Second Degree, in violation of Section 708-831(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 9: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in

violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 10: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did make or cause to be made, either directly or indirectly, a transmission of any personal information of Robert Boulette by any oral statement, any written statant, or any statement conveyed by any electronic means, with the intent to commit the offense of Theft in the First Degree, thereby committing the offense of Identity Theft in the First Degree, in violation of Section 708-839.6(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 11: On or about December 13, 2018, to and including January 19, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$217,614.97, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 12: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

<u>COUNT 13</u>: On or about December 13, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did make or cause to be made, either directly or indirectly, a transmission of any personal information of Robert Boulette by any oral statement, any written statant, or any statement conveyed by any electronic means, with the intent to commit the

offense of Theft in the First Degree, thereby committing the offense of Identity Theft in the First Degree, in violation of Section 708-839.6(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 14: On or about December 13, 2018, to and including December 31, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$54,120.43, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 15: On or about December 17, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$19,756.64, the value of which Robert Chapman believed exceeded Seven Hundred Fifty Dollars (\$750), and which did exceed Seven Hundred Fifty Dollars (\$750), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby committing the offense of Theft in the Second Degree, in violation of Section 708-831(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 16: On or about February 7, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of Make a Wish Foundation, to wit \$248,217.67, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive Make a Wish Foundation of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

COUNT 17: On or about February 7, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of Elderhostel Inc., to wit \$248,217.67, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive Elderhostel Inc., of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes. S

COUNT 18: On or about February 7, 2019, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of Portland State University Alumni Association, to wit \$248,217.67, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive Portland State University Alumni

Association of the property, thereby committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

COUNT 19: On or about December 5, 2018, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60) years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 20: On or about April 18, 2023, in the City and County of Honolulu, State of Hawaii, Robert Chapman did, with intent to defraud, utter forged instrument(s), to wit, written instrument(s) purported to be the will and codicil of Robert Boulette, which is or purports to be, or which is calculated to become or to represent if completed, all or part of a deed, will, codicil, or other instrument, which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status and Robert Boulette was a person who was sixty (60)

years of age or older and the age of Robert Boulette was known or reasonably should have been known to Robert Chapman, thereby committing the offense of Forgery in the First Degree, in violation of section 708-851(1)(c)(i) and (ii) of the Hawaii Revised Statutes. Pursuant to Section 708-800 of the Hawaii Revised Statutes, "intent to defraud" means an intent to use deception to injure another's interest which has value or knowledge by the defendant that the defendant is facilitating an injury to another's interest which has value.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 21: On or about April 18, 2023, in the City and County of Honolulu, State of Hawaii, Robert Chapman did make or cause to be made, either directly or indirectly, a transmission of any personal information of Robert Boulette by any oral statement, any written statant, or any statement conveyed by any electronic means, with the intent to commit the offense of Theft in the First Degree, thereby committing the offense of Identity Theft in the First Degree, in violation of Section 708-839.6(1)(b) of the Hawaii Revised Statutes.

The offense alleged herein was not discovered prior to January 13, 2023, by either an aggrieved party or a person who has a legal duty to represent an aggrieved party. Section 701-108(3)(a) of the Hawaii Revised Statutes.

COUNT 22: On or about April 18, 2023, in the City and County of Honolulu, State of Hawaii, Robert Chapman did intentionally obtain or exert control over the property of the estate of Robert Boulette, to wit \$362,566.13, the value of which Robert Chapman believed exceeded Twenty Thousand Dollars (\$20,000), and which did exceed Twenty Thousand Dollars (\$20,000), by deception, with intent to deprive the estate of Robert Boulette of the property, thereby

committing the offense of Theft in the First Degree, in violation of Section 708-830.5(1)(a) of the Hawaii Revised Statutes.

A True Bill found this day June 20, 2025

Michael F. Minkin

Deputy Attorney General

Foreperson of the Grand Jury