

CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii



MICHAEL NAMMAR  
MARK A. INCIONG CA BAR #163443  
Assistant U.S. Attorneys  
Room 6100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
Email: Michael.Nammar@usdoj.gov  
Mark.Inciong@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

|                           |   |                             |
|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, | ) | CR. NO. 19-00099 DKW-KJM-03 |
|                           | ) |                             |
| Plaintiff,                | ) | GOVERNMENT'S [REDACTED]     |
|                           | ) | [REDACTED]                  |
| vs.                       | ) | [REDACTED]                  |
|                           | ) | [REDACTED]                  |
| KAULANA FREITAS, (03)     | ) | [REDACTED]; CERTIFICATE     |
|                           | ) | OF SERVICE                  |
| Defendant.                | ) |                             |
|                           | ) | Date: January 16, 2025      |
|                           | ) | Time: 9:00 a.m.             |
|                           | ) | Judge: Derrick K. Watson    |
|                           | ) |                             |

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**GOVERNMENT'S** [REDACTED]

**I. Background**

On March 9, 2022, Freitas pled guilty pursuant to a plea agreement to Counts 1 and 13 of the Third Superseding Indictment charging him with Racketeering Conspiracy and Using a Chemical Weapon, in violation of 18 U.S.C. §§ 1962(d), 229(a)(1) and 229(a)(2). His plea agreement, which is publicly available, contained a cooperation provision. In February 2024, Freitas testified over the course of three days during the trial against co-defendant Michael J. Miske, Jr. At trial, Freitas was subjected to cross-examination [REDACTED]

Freitas testified to Miske's involvement in a number of incidents, including: (1) the 2017 chemical weapons attacks on the District and Ginza night clubs; (2) the assault of Johnathan Fraser; (3) the assault and attempted extortion of Ahmed

Chergui; (4) structuring of financial transactions to avoid IRS scrutiny and cash payments made to Miske workers; (5) the robbery and assault of Mike Char; (6) the robbery of Eric Lum; (7) fraudulent used car sales; (8) ballot stuffing relating to the Hawai'i's Best awards for KTPC; (9) Miske's use of GPS trackers; and (10) Miske's attempts to avoid law enforcement detection.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On July 18, 2024, after a six-month trial, a jury found Miske guilty on 13 counts including racketeering conspiracy, multiple counts related to the murder of Johnathan Fraser, one count of conspiracy to commit assaults in aid of racketeering, and one count of conspiracy to commit kidnapping using a facility of interstate commerce. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The United States is bound by its sentencing stipulation in the plea agreement that the base offense level is 28 and not to seek any upward adjustment pursuant to USSG §2M1.6(b)(3)(i). *See ECF 485 at PageID 3366.* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DATED: January 7, 2025, at Honolulu, Hawaii.

Respectfully submitted,

CLARE E. CONNORS  
United States Attorney  
District of Hawaii

By /s/ Michael Nammar  
MICHAEL NAMMAR  
MARK A. INCIONG  
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below,  
a true and correct copy of the foregoing was served on the following at their last  
known address:

Served via E-Mail:

William C. Bagasol, Esq.  
Attorney for Defendant  
KAULANA FREITAS

attorneybagasol@outlook.com

Sara Nieling  
United States Probation Officer

sara\_nieling@hip.uscourts.gov

DATED: January 7, 2025, at Honolulu, Hawaii.

/s/ Tiani Kaneakua  
U.S. Attorney's Office  
District of Hawaii