

1           100. On or about July 28, 2003, coconspirator Wade purchased  
2 for coconspirator Cunningham two Laser Shot shooting simulators, the  
3 cost of which was paid using an MZM check (no. 3956) to Laser Shot,  
4 Inc., in the amount of \$9,200;

5           101. From on or about August 15 through 18, 2003, defendant  
6 WILKES rented the Hapuna Suite (costing approximately \$6,600 per  
7 night) at the Hapuna Beach Prince Hotel on the Island of Hawaii for  
8 his use along with coconspirator Cunningham and one other guest;

9           102. On or about August 15, 2003, at approximately  
10 5:00 p.m., defendant WILKES instructed an ADCS employee to obtain two  
11 prostitutes for that evening and later provided the employee with \$600  
12 in cash to pay for two hours of their services (not including tip);

13           103. On or about August 15, 2003, at approximately  
14 6:30 p.m., defendant WILKES provided coconspirator Cunningham and  
15 assorted other guests with a dinner served on the private lawn outside  
16 the Hapuna Suite; which consisted of Seafood Gyozas of Kona Lobster,  
17 Shrimp, Scallops, Seared Hawaiian Snapper, "Manoa" Lettuce Leaves, and  
18 an open bar featuring fine wines;

19           104. On or about August 15, 2003, at approximately  
20 11:00 p.m., Prostitutes "A" and "B" and their "driver" arrived at the  
21 Hapuna Suite. Pursuant to defendant WILKES's instructions, an ADCS  
22 employee escorted the prostitutes into the Suite and paid the driver  
23 \$600 in cash;

24           105. On or about August 15, 2003, after approximately  
25 15 minutes in the suite, defendant WILKES and coconspirator Cunningham  
26 escorted Prostitutes "A" and "B" upstairs to separate rooms. At  
27 approximately midnight, WILKES tipped Prostitute "A" \$500 for the  
28 services;

1           106. On or about August 16, 2003, following a catered  
2 breakfast (cost \$18 per person), defendant WILKES organized for  
3 coconspirator Cunningham and his other guests an all-day dive trip on  
4 a chartered boat;

5           107. On or about August 16, 2003, at approximately  
6 5:00 p.m., defendant WILKES hosted a cocktail party (cost \$427.50) for  
7 coconspirator Cunningham and his other guests;

8           108. On or about August 16, 2003, at approximately  
9 6:30 p.m., defendant WILKES provided coconspirator Cunningham and his  
10 other guests with dinner (cost: \$250 set-up fee, plus \$60 per person);

11           109. On or about August 16, 2003, at approximately  
12 11:00 p.m., defendant WILKES arranged to have Prostitute "A" and  
13 Prostitute "C" available for himself and coconspirator Cunningham.  
14 Pursuant to Cunningham's request, WILKES arranged for the Congressman  
15 to get a different prostitute for the second evening;

16           110. On or about August 16, 2003, at approximately  
17 11:00 p.m., Prostitutes "A" and "C" and their "driver" arrived at the  
18 Hapuna Suite. Pursuant to defendant WILKES's instructions, his  
19 employee paid the driver \$600 in cash and escorted Prostitute "C" (who  
20 had not previously been to the suite) to coconspirator Cunningham's  
21 room. At approximately midnight, WILKES again tipped Prostitute "A"  
22 \$500 for the services;

23           111. On or about August 17, 2003, following a catered  
24 breakfast (cost \$21 per person), defendant WILKES organized a golf  
25 tournament for coconspirator Cunningham and his other guests (\$124 per  
26 person) at the Mauna Kea Golf Course;

27           112. On or about August 17, 2003, at approximately  
28 4:00 p.m., defendant WILKES hosted another cocktail party (cost