

KELDEN B. A WALTJEN 9686
Prosecuting Attorney
County of Hawai'i
655 Kilauea Avenue
Hilo, Hawai'i 96720
Tel. No. 961-0466
Email: hilopros@hawaiicounty.gov

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THIRD CIRCUIT
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Attorney for State of Hawai'i

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAI'I

STATE OF HAWAI'I)	CASE ID. _____
)	
vs.)	INDICTMENT
)	
JONATHAN MATTHEW WRIGHT,)	MPRN: 21-111560
)	
Defendant.)	(Hilo)
_____)	

INDICTMENT C*/PN;21-111560

The Grand Jury charges:

On or between December 1, 2020 and November 30, 2021, in the County and State of Hawaii, JONATHAN MATTHEW WRIGHT, other than in the execution of a public duty or as authorized by law, did intentionally or knowingly install or use, or both, in any private place, without consent of the person or persons entitled to privacy therein, any device for observing, recording, amplifying, or broadcasting another person in a stage of undress or sexual activity in that place, thereby committing the offense of Violation of Privacy in the First Degree, in violation of Section 711-1110.9(a), Hawaii Revised Statutes, as amended.

“Nude” means unclothed or in attire, including but not limited to sheer or see-through attire, so as to expose to view any portion of the pubic hair, anus, cleft of the buttocks, genitals or any portion of the female breast below the top of the areola.

“Private place” means a place where one may reasonably expect to be safe from casual or hostile intrusion or surveillance, but does not include a place to which the public or a substantial group thereof has access.


“Public place” means a place to which the public or a substantial group of persons has access and includes highways, transportation facilities, schools, places of amusement or business, parks, playgrounds, prisons, and hallways, lobbies, and other portions of apartment houses and hotels not constituting rooms or apartments designed for actual residence.

“Record” means to videotape, film, photograph, or archive electronically or digitally.

“Sexual conduct” means acts of masturbation, bestiality, sexual intercourse or physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or the breast or breasts of a female for the purpose of sexual stimulation, gratification, or perversion.

Dated: Hilo, Hawai'i, July 26, 2023

A TRUE BILL



Deputy Prosecuting Attorney
County of Hawai'i



Foreperson