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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAII

STATE OF HAWAII

v.

SEBASTIAN MAHKWAN
and PAUL CAMERON,

Defendants.

CASE NO. 1CPC-24-0000091

COUNT 1:

ATTEMPTED MURDER IN THE
SECOND DEGREE
(§§705-500, 707-701.5 and 706-656 HRS)

COUNT 2:

ASSAULT IN THE FIRST DEGREE
(§707-710(1)(a) HRS)

COUNT 3:

ACCOMPLICE TO ATTEMPTED
MURDER IN THE SECOND DEGREE
(§§702-221(2)(c), 702-222(1)(a), 702-
222(1)(b), 705-500, 707-701.5 and 706-656
HRS)

COUNT 4:

ACCOMPLICE TO ASSAULT IN THE
FIRST DEGREE
(§§702-221(2)(c), 702-222(1)(a), 702-
222(1)(b), and 707-710(1)(a) HRS)

COUNT 5:

ATTEMPTED MURDER IN THE FIRST
DEGREE
(§§705-500, 707-701(1)(d) and 706-656
HRS)

COUNT 6:

ATTEMPTED MURDER IN THE FIRST
DEGREE

(§§705-500, 707-701(1)(d) and 706-656 HRS)

COUNT 7:

CONSPIRACY TO COMMIT
ATTEMPTED MURDER IN THE FIRST
DEGREE AND/OR ATTEMPTED
MURDER IN THE SECOND DEGREE,
AND/OR ASSAULT IN THE FIRST
DEGREE

(§§705-520, 705-500, 707-701(1)(d), 707-701.5, and 707-710(1)(a) HRS)

SUPERSEDING INDICTMENT

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT 1: On or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, SEBASTIAN MAHKWAN did intentionally engage in conduct which is a substantial step in a course of conduct intended or known to cause the death of Danying Zhang, thereby committing the offense of Attempted Murder in the Second Degree, in violation of Sections 705-500, 707-701.5 and 706-656 of the Hawai‘i Revised Statutes.

COUNT 2: On or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, SEBASTIAN MAHKWAN did intentionally or knowingly cause serious bodily injury, to wit, bodily injury that created a substantial risk of death in the form of oral injury with airway being compromised and swelling present and/or caused serious, permanent disfigurement in the form of burns to large areas of face and multiple areas of the body; and/or protracted loss or impairment of the function of any bodily member or organ in the form of needing skin grafts of large areas of face and body to Danying Zhang, thereby committing the offense of Assault in the First Degree in violation of Section 707-710(1)(a) of the Hawai‘i Revised Statutes.

“Serious bodily injury” means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ. “Bodily injury” includes physical pain or any impairment of physical condition.

COUNT 3: On or about November 1, 2023 to and including January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, PAUL CAMERON, with the intention of promoting or facilitating the commission of the crime of Attempted Murder in the Second Degree, did solicit and/or aid or agree or attempt to aid in the planning of or the commission of the crime of Attempted Murder in the Second Degree by SEBASTIAN MAHKWAN, who on or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, did intentionally engage in conduct which is a substantial step in a course of conduct intended or known to cause the death of a person, to wit, Danying Zhang, in violation of Sections 705-500, 707-701.5, and 706-656 of the Hawai‘i Revised Statutes, thereby committing the offense of Accomplice to Attempted Murder in the Second Degree, in violation of Sections 702-221(2)(c), 702-222(1)(a), 702-222(1)(b), 705-500, 707-701.5 and 706-656 of the Hawai‘i Revised Statutes.

COUNT 4: On or about November 1, 2023 to and including January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, PAUL CAMERON, with the intention of promoting or facilitating the commission of the crime of Assault in the First Degree, did solicit and/or aid or agree or attempt to aid in the planning of or the commission of the crime of Assault in the First Degree by SEBASTIAN MAHKWAN, who on or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, did intentionally or knowingly cause serious bodily injury to another person, to wit, Danying Zhang, in violation of Section 707-710(1)(a) of the Hawai‘i Revised Statutes, thereby committing the offense of Accomplice to Assault in the First Degree,

in violation of Sections 702-221(2)(c), 702-222(1)(a), 702-222(1)(b), and 707-710(1)(a) of the Hawai‘i Revised Statutes.

The serious bodily injury caused by SEBASTIAN MAHKWAN to Danying Zhang includes, but is not limited to: (1) injury that created a substantial risk of death in the form of oral injury with airway being compromised and swelling present; and/or (2) serious, permanent disfigurement in the form of burns to large areas of face and multiple areas of the body; and/or (3) protracted loss or impairment of the function of any bodily member or organ in the form of needing skin grafts of large areas of face and body.

“Serious bodily injury” means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ. “Bodily injury” includes physical pain or any impairment of physical condition.

COUNT 5: On or about November 1, 2023 to and including January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, PAUL CAMERON did intentionally or knowingly hire SEBASTIAN MAHKWAN to intentionally or knowingly cause the death of a person and PAUL CAMERON, with the intention of promoting or facilitating the commission of the offense of Murder in the First Degree, did solicit the commission of the offense of Murder in the First Degree by SEBASTIAN MAHKWAN, who on or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, having been hired to kill a person, did intentionally engage in conduct which is a substantial step in a course of conduct intended or known to cause the death of a person, to wit, Danying Zhang, by a hired killer, thereby committing the offense of Attempted Murder in the First Degree, in violation of Sections 705-500, 707-701(1)(d) and 706-656 of the Hawai‘i Revised Statutes.

COUNT 6: On or about January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, SEBASTIAN MAHKWAN, having been intentionally or knowingly hired by PAUL CAMERON to intentionally or knowingly cause the death of a person, did intentionally engage in conduct which is a substantial step in a course of conduct intended or known to cause the death of a person, to wit, Danying Zhang, thereby committing the offense of Attempted Murder in the First Degree, in violation of Sections 705-500, 707-701(1)(d) and 706-656 of the Hawai‘i Revised Statutes.

COUNT 7: On or about November 1, 2023 to and including, January 23, 2024, in the City and County of Honolulu, State of Hawai‘i, Co-Conspirator PAUL CAMERON and Co-Conspirator SEBASTIAN MAHKWAN, with the intent to promote or facilitate the commission of a crime, to wit, Attempted Murder in the First Degree and/or Attempted Murder in the Second Degree and/or Assault in the First Degree, did agree with each other, that they or one or more of them would: (1) engage in the conduct specified by the offense of Attempted Murder in the First Degree and/or Attempted Murder in the Second Degree and/or Assault in the First Degree; and/or (2) solicit the conduct specified by the offense of Attempted Murder in the First Degree and/or Attempted Murder in the Second Degree and/or Assault in the First Degree; and/or (3) cause the result specified by the offense of Attempted Murder in the First Degree and/or Attempted Murder in the Second Degree and/or Assault in the First Degree; and/or (4) solicit the result specified by the offense of Attempted Murder in the First Degree and/or Attempted Murder in the Second Degree and/or Assault in the First Degree.

PAUL CAMERON commits the offense of Attempted Murder in the First Degree, if he intentionally or knowingly hires another to intentionally or knowingly cause the death of a person, and with the intention or promoting, or facilitating the commission of the offense of

Murder in the First Degree, solicits the commission of the offense of Murder in the First Degree by a hired killer, who having been hired to kill a person, intentionally engages in conduct which is a substantial step in a course of conduct intended or known to cause the death of a person.

SEBASTIAN MAHKWAN commits the offense of Attempted Murder in the First Degree, if having been hired by PAUL CAMERON to kill a person he intentionally engages in conduct which is a substantial step in a course of conduct intended or known to cause the death of another person.

PAUL CAMERON and SEBASTIAN MAHKWAN commit the offense of Attempted Murder in the Second Degree, if he intentionally engages in conduct which is a substantial step in a course of conduct intended or known to cause the death of another person.

PAUL CAMERON and SEBASTIAN MAHKWAN commit the offense of Assault in the First Degree, if he intentionally or knowingly causes serious bodily injury to another person. "Serious bodily injury" means bodily injury which creates a substantial risk of death or which causes serious, permanent disfigurement, or protracted loss or impairment of the function of any bodily member or organ. "Bodily injury" includes physical pain or any impairment of physical condition.

It was part of said conspiracy that Co-Conspirator PAUL CAMERON and Co-Conspirator SEBASTIAN MAHKWAN would intentionally or knowingly engage in conduct which is a substantial step in a course of conduct intended or known to cause the death of another person and/or intentionally or knowingly cause serious bodily injury to another person.

In furtherance of the conspiracy and to the effect of the objects thereof, the following overt acts were committed on or about November 1, 2023 to and including January 23, 2024 within the City and County of Honolulu, State of Hawai'i:

OVERT ACTS

1. While incarcerated at the Oahu Correctional Community Center (hereinafter “OCCC”) between November 1, 2023 to and including January 23, 2024, PAUL CAMERON (hereinafter “Cameron”) used the Personal Identification Number (hereinafter “PIN”) belonging to SEBASTIAN MAHKWAN (hereinafter “Mahkwan”) to make phone calls. A number of those phone calls were for the purpose of obtaining bail for Mahkwan.
 - a. On December 26, 2023, at 8:29 p.m., Cameron contacted M.H. and offered \$100 to call two people to bail out Mahkwan.
 - b. On December 28, 2023 at 11:51 a.m., Cameron calls and tells M.H. that if Mahkwan gets out, it will make it a lot easier for Cameron to get out.
 - c. On January 9, 2024, at 7:02 p.m., Cameron asks M.H. if she would be willing to co-sign for Mahkwan’s bail. Cameron tells M.H. that Mahkwan is a friend from the outside and the he trusts him. Cameron also says he trusts Mahkwan because Mahkwan is his boyfriend, but Cameron wanted M.H. to keep it secret as it was embarrassing.
 - d. On January 9, 2024 at 7:15 p.m., Cameron provides further information to M.H. regarding bail for Mahkwan and what to say to Art, the bail bondsman.
 - e. On January 12, 2024 at 8:45 p.m., Cameron calls M.H. and tells her he needs to get Mahkwan out by the 15th. Cameron has court on the 15th. Cameron also says that he found out the location of a person that he needs to prove was lying. Cameron tells M.H. that Mahkwan knows the guy. Cameron also asks if M.H. knows anyone that can help co-sign for Mahkwan’s bail.

2. While incarcerated at the OCCC between November 1, 2023 to and including January 23, 2024, Cameron used his own PIN to contact his mother, M.C. A number of those calls were made for the purpose of obtaining bail for Mahkwan.
 - a. On January 17, 2024 at 12:46 p.m., Cameron asks his mom for help contacting a bondsman named Art. Cameron asks M.C. to contact a person named Nikki at IHS to see if she can call Art to send him Mahkwan's food stamp money so Mahkwan can be bailed out. Cameron provided his mom with the numbers for Nikki and Art.
 - b. On January 17, 2024 at 7:08 p.m., Cameron asked his mother to call Art for him about Mahkwan's bail and tell Art that she [M.C.] has the Triumph Motorcycle as collateral. When asked by his mother about the relationship with Mahkwan, Cameron said that Mahkwan was his coworker from outside.
 - c. On January 17, 2024 at 7:20 p.m., Cameron called Art regarding the collateral. Cameron tells Art that his mother is willing to drop off the title for the motorcycle but is unable to drive it. Cameron tells Art he will have his mother call Art.
 - d. On January 17, 2024 at 7:26 p.m., Cameron talks to his mom about arranging to drop off the keys and title for the motorcycle with Art.
 - e. On January 18, 2024 at 7:52 p.m., M.C. confirms that she completed what was asked.
 - f. On January 18, 2024, at 8:06 p.m., Cameron speaks to Art. Cameron confirms with Art that M.C. dropped off the title and keys for the Triumph. Art asks who that was for and Cameron confirms it's for Sebastian Mahkwan and his bail is

- \$8,000. Cameron provided Art with Mahkwan's phone number. Cameron asks when Mahkwan can be bailed out and Art says probably tomorrow. Cameron confirms that he will get his motorcycle back when Mahkwan's trial is done.
- g. On January 20, 2024 at 7:26 p.m., Cameron calls Art regarding pickup of the motorcycle. During the call, Cameron asks Art if it would be possible to have Mahkwan out by Monday. Art agreed.
 - h. On January 24, 2024, at 6:47 p.m., Cameron calls Art to ask if Mahkwan has made contact with Art.
- 3. On January 18, 2024, S.K., an employee of All in 1 Bonding, met with M.C. and received the keys and title to a 2015 Triumph Red Street bike to be used as collateral for Mahkwan's bail.
 - 4. S.K. met with Mahkwan after the \$8,000 bond was posted by All in 1 Bonding in his case, 1CPC-23-0001234 on January 22, 2024. Mahkwan listed Cameron as a reference on his bail bond application and agreement.
 - 5. On or about January 27, 2024, Adult Corrections Officer J.T. (hereinafter "ACO"), discovered documents in an envelope addressed to Paul Cameron during an inspection of the kitchen common area. The documents included instructions and details about an acid attack occurring on April 7, 2023 at the Mililani 24 Hour Fitness. The documents also included instructions regarding the two State witnesses.
 - 6. Cameron authored documents that gave detailed instructions on committing an act like the one for which he was charged. The documents provided details on where to get acid and what to tell law enforcement about the April 7, 2023 acid attack for which Cameron is accused.

7. While both were in custody at OCCC, Mahkwan and Cameron spoke about a planned acid attack that would assist Cameron in his pending case.
8. On or about January 22 or January 23, 2024, Mahkwan borrowed a black hoodie with pointed hood from F.L. Mahkwan told F.L. that he had a job to do at Ala Moana.
9. On the morning of January 23, 2024, Mahkwan told C.G. “later on we take a cruise down Ala Moana.”
10. Between 6:00 p.m. and 7:00 p.m. on January 23, 2024, Mahkwan and C.G. rode on bikes to the Ala Moana area. C.G. waited with Mahkwan’s bike at Ala Moana on the side of Target.
11. Mahkwan waited near the entrance to Planet Fitness Ala Moana until he threw a liquid chemical on Danying Zhang (hereinafter “Zhang”) causing severe chemical burns to Zhang’s face and body.
12. After about 10 minutes of waiting, C.G. saw Mahkwan walking toward her. C.G. saw a person in a jeep yelling that she would call police. C.G. and Mahkwan left separately on their bikes.

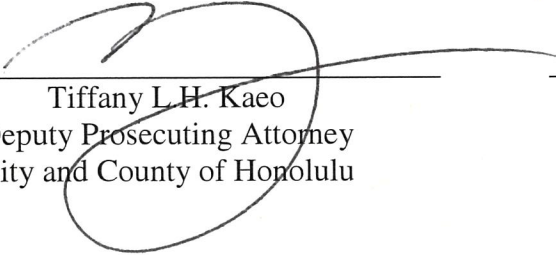
Therefore, Co-Conspirator PAUL CAMERON and Co-Conspirator SEBASTIAN MAHKWAN has committed the offense of Conspiracy to Commit Attempted Murder in the First Degree, and/or Attempted Murder in the Second Degree, and/or Assault in the First Degree, in violation of Sections 705-520, 705-500, 707-701(1)(d), 707-701.5, and 707-710(1)(a) of the Hawai’i Revised Statutes.

Pursuant to Section 706-526 of the Hawai’i Revised Statutes, Conspiracy to Commit Attempted Murder in the First Degree is a class A felony.

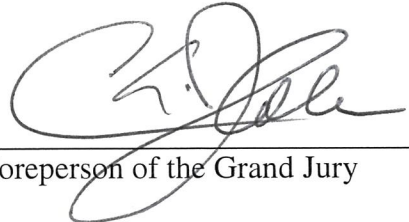
Pursuant to Section 706-526 of the Hawai'i Revised Statutes, Conspiracy to Commit Attempted Murder in the Second Degree is a class A felony.

Pursuant to Section 706-526 of the Hawai'i Revised Statutes, Conspiracy to Commit Assault in the First Degree is a Class C felony.

A True Bill found this day: MARCH 12, 2021



Tiffany L.H. Kao
Deputy Prosecuting Attorney
City and County of Honolulu



Foreperson of the Grand Jury