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## **MUNICIPAL ORDINANCE - HAWAII**

## State v. Abel

Supreme Court of Hawai'i - September 24, 2014 - P.3d - 2014 WL 4745807

Defendant was convicted in the District Court, First Circuit, of solicitation with animals in violation of city ordinance. The Court of Appeals affirmed. Defendant's application for certiorari review was granted.

The Supreme Court of Hawaii held that:

- Ordinance under which defendant was convicted of solicitation with animals required State to prove that an actual request or demand for money or gifts occurred, and
- Evidence was insufficient to establish that defendant made actual requests or demands for money or gifts.

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