



8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARC ALAN CHASE,

15 Defendant.

Case No. 14cr0926 DMJ

I N F O R M A T I O N

Title 18, U.S.C., Sec. 371 -
Conspiracy to Commit Offenses
against the United States
(Misdemeanor); Title 2, U.S.C.,
Sec. 437g(d)(1)(A)(ii) and 441e -
Campaign Contribution by a Foreign
National (Misdemeanor); Title 2,
U.S.C., Sec. 437g(d)(1)(A)(ii) and
441f - Conduit Contribution
(Misdemeanor); Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting

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19 The United States Attorney charges:

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21 Count 1

22 Beginning no later than December 2011, and continuing through
23 December 2013, in the Southern District of California and elsewhere,
24 defendant MARC ALAN CHASE and others conspired together to:

- 25 (1) Knowingly and willfully make foreign national contributions
26 and donations, aggregating \$2,000 and more during a calendar
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1 year in violation of Title 2, United States Code, Sections
2 437g(d) (1) (A) (ii) and 441e; and

3 (2) Knowingly and willfully make contributions to a candidate
4 for federal office in the names of other persons,
5 aggregating \$2,000 and more during a calendar year in
6 violation of Title 2, United States Code, Sections
7 437g(d) (1) (A) (ii) and 441f;

8 And, on about September 27, 2012, to effect the objects of the
9 conspiracy, defendant MARC ALAN CHASE wrote a check in the amount of
10 \$120,000 to an independent expenditure committee in connection with a
11 local election, induced by the knowledge that he would be reimbursed
12 by Jose Susumo Azano Matsura (charged elsewhere), a foreign national;
13 all in violation of Title 18, United States Code, Section 371.
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15 Counts 2-4

16 In about January 2011, in the Southern District of California and
17 elsewhere, defendant MARC ALAN CHASE knowingly and willfully did
18 directly and indirectly make donations by a foreign national,
19 aggregating \$2,000 and more during a calendar year, in connection with
20 a local election, to wit, by dividing cash provided by Jose Susumo
21 Azano Matsura among a series of straw donors, as well as himself,
22 which money he then caused to be donated to a candidate for the office
23 of Mayor of San Diego, California, as set forth below:
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Count	Straw Donor	Amount
2	MARC ALAN CHASE	\$500
	Family Member 1	\$500

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	Administrative Employee	\$500
	Personal Assistant	\$500
3	Salesman 1	\$500
	Salesman 2	\$500
	Salesman 3	\$500
	Salesman 4	\$500
4	Salesman 1's Spouse	\$500
	Salesman 4's Spouse	\$500
	Business Associate	\$500
	Business Associate's Spouse	\$500

in violation of Title 2, United States Code, Sections 437g(d)(1)(A)(ii) and 441e(a)(1) and Title 18, United States Code, Section 2.

Count 5

On about September 24, 2012, in the Southern District of California, and elsewhere, defendant MARC ALAN CHASE knowingly and willfully did directly and indirectly make a contribution by a foreign national aggregating \$2,000 and more during a calendar year in connection with a federal election, to wit, by donating money given to him by Jose Susumo Azano Matsura to a political party committee supporting a candidate for the office of Congressman, in violation of Title 2, United States Code, Sections 437g(d)(1)(A)(ii) and 441e(a)(1).

Count 6

On about September 24, 2012, in the Southern District of California, and elsewhere, defendant MARC ALAN CHASE knowingly and

1 willfully did directly and indirectly make a contribution in the name
2 of another aggregating \$2,000 and more during a calendar year in
3 connection with a federal election, to wit, by contributing money
4 given to him by Jose Susumo Azano Matsura to a political party
5 committee supporting a candidate for the office of Member of Congress,
6 in violation of Title 2, United States Code, Sections
7 437g(d)(1)(A)(ii) and 441f.

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9 Count 7

10 On about September 27, 2012, in the Southern District of
11 California, and elsewhere, defendant MARC ALAN CHASE knowingly and
12 willfully did directly and indirectly make a donation by a foreign
13 national aggregating \$2,000 and more during a calendar year in
14 connection with a local election, to wit, by donating money given to
15 him by Jose Susumo Azano Matsura to a political party committee
16 supporting a candidate for the office of Mayor of San Diego,
17 California, in violation of Title 2, United States Code, Sections
18 437g(d)(1)(A)(ii) and 441e(a)(1).

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20 Count 8

21 On about September 27, 2012, in the Southern District of
22 California, and elsewhere, defendant MARC ALAN CHASE knowingly and
23 willfully did directly and indirectly make a donation by a foreign
24 national aggregating \$2,000 and more during a calendar year in
25 connection with a local election, to wit, by donating money given to
26 him by Jose Susumo Azano Matsura to an independent expenditure
27 committee supporting a candidate for the office of Mayor of San Diego,
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1 California, in violation of Title 2, United States Code, Sections
2 437g(d)(1)(A)(ii) and 441e(a)(1).
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5 DATED: 4/9/14.

CINDY M. CIPRIANI
Acting United States Attorney

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