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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
- - - - - x

UNITED STATES OF AMERICA : INDICTMENT

- v. -

**14 CRIM 034**

DINESH D' SOUZA, :

Defendant. :

- - - - - x

COUNT ONE

(Contributions in the Names of Others)

The Grand Jury charges:

Background

1. The Federal Election Campaign Act of 1971, as amended, Title 2, United States Code, Section 431, *et seq.* (the "Election Act"), limits financial influence in the election of candidates for federal office, including the Office of United States Senator, and provides for the public disclosure of the financing of federal election campaigns:

a. The Election Act limits the amount and source of money that may be contributed to a federal candidate or that candidate's authorized campaign committee.

b. The Election Act prohibits any person from making any contribution in the name of another, including reimbursing a third person, before or after that third person's contribution, as inducement to make that contribution.

**USDC SDNY**

c. In 2012, the Election Act limited both primary and general election campaign contributions to \$2,500 for a total of \$5,000 from any individual to any one candidate.

2. The Federal Election Commission ("FEC") is an agency and department of the United States with jurisdiction to compile and publicly report accurate information about the sources and amounts of contributions.

Statutory Allegations

3. In or about August 2012, in the Southern District of New York and elsewhere, DINESH D'SOUZA, the defendant, willfully and knowingly made and caused to be made contributions of money, aggregating more than \$10,000 during the 2012 calendar year, in the names of others to the campaign of a candidate for the United States Senate, to wit, D'SOUZA reimbursed others with whom he was associated and who he had directed to contribute a total of \$20,000 to the campaign.

(Title 2, United States Code, Sections 441f and 437g(d)(1)(D) and Title 18, United States Code, Section 2.)

COUNT TWO

(Causing False Statements)

The Grand Jury further charges:

4. From in or about August 2012 through in or about July 2013, in the Southern District of New York and elsewhere, in

a matter within the jurisdiction of the executive branch of the Government of the United States, DINESH D'SOUZA, the defendant, willfully and knowingly caused the submission of materially false, fictitious, and fraudulent statements and representations, to wit, D'SOUZA caused the submission by an unwitting authorized campaign committee of a candidate for the United States Senate to the FEC of reports that falsely reported the sources and amounts of contributions to the campaign by certain individuals.

(Title 18, United States Code, Sections 1001(a)(2) and 2.)



FOREPERSON

Preet Bharara  
PREET BHARARA  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

DINESH D' SOUZA,

Defendant.

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INDICTMENT

14 Cr. \_\_\_ ( )

(2 U.S.C. §§ 441f and 437g(d)(1)(D); 18 U.S.C. §§ 1001(a)(2) and 2.)

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PREET BHARARA

United States Attorney.

A TRUE BILL

  
Foreperson.

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