

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

Filed 8-17-07
Clerk, U. S. District Court
Western District of Texas
By [Signature]
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

BERNARDO LUCERO, JR.,

Defendant.

§
§
§
§
§
§
§
§
§
§

INFORMATION

Cause No. EP-06-CR-1369FM-3

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(18 U.S.C. §§ 1349, 1341 and 1346)
CONSPIRACIES TO COMMIT MAIL FRAUD
AND THE DEPRIVATION OF HONEST SERVICES

Beginning on or about January 1, 2002 and continuing through and including July 24, 2007,
in the Western District of Texas and elsewhere, defendant,

BERNARDO LUCERO, JR.,

conspired and agreed together with others known, but not charged herein, and others unknown, to
commit offenses against the United States, that is to knowingly devise a scheme and artifice to
defraud the El Paso Independent School District and the citizens of El Paso living and voting in the
El Paso Independent School District of the right to the honest services of an elected El Paso
Independent School District Trustee in the affairs of the El Paso Independent School District; and
to obtain money and property by means of material false and fraudulent pretenses, representations

and promises; and in furtherance of the scheme to deprive the El Paso Independent School District and the citizens of El Paso living and voting in the El Paso Independent School District of honest services of said elected Trustee and to obtain money and property by material false and fraudulent pretenses, representations and promises the defendant and his uncharged co-defendants conspired to cause to be sent and delivered and caused to be sent and delivered, by United States Postal Service, mail invoices, bills, and other correspondence required as a result of contracts entered into between the defendant and other unindicted co-conspirators and the El Paso Independent School, all in violation of Title 18, United States Code, Sections 1349, 1341 and 1346.

COUNT TWO
(18 U.S.C. §§ 371 and 1014)
CONSPIRACY TO MAKE FALSE STATEMENTS
TO OBTAIN CREDIT

Beginning on or about January 1, 2002 and continuing through and including July 24, 2007, in the Western District of Texas and elsewhere, defendant,

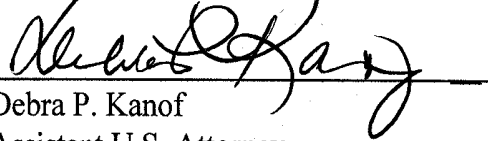
BERNARDO LUCERO, JR.,

conspired and agreed together with others known, but not charged herein, and others unknown to commit an offense against the United States, that is to knowingly in violation of Title 18, United States Code, Section 1014, make and cause to be made a material false statement to a financial institution whose accounts were then insured by the Federal Deposit Insurance Corporation on an application for credit, a loan, and the commitment, release, acceptance and substitution of security for a loan, for the purpose of influencing the action of the financial institution, that is the defendant conspired to submit a letter and a mechanics lien to United Bank of El Paso Del Norte, a financial

institution whose accounts were then insured by the Federal Deposit Insurance Corporation for the purpose of influencing the bank to fund a \$25,000 loan which purported to be a home improvement loan for the remodeling of the residence of a family member of an elected official, when the defendant knew the money was not intended for that purpose, in violation of Title 18, United States Code, Sections 371 and 1014.

JOHNNY SUTTON
UNITED STATES ATTORNEY

By:


Debra P. Kanof
Assistant U.S. Attorney