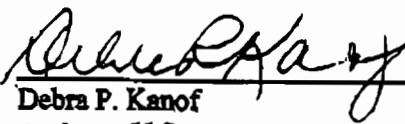


material false and fraudulent pretenses, representations and promises; that is, the defendant and his uncharged co-conspirators agreed that the defendant, in violation of his fiduciary duty as an elected EPISD Trustee, would, and did, receive cash money in exchange for the defendant's support and vote in his official capacity as an EPISD Trustee for agreements between EPISD and a vendor seeking business with the EPISD; and in furtherance of the scheme to deprive the EPISD and the citizens of El Paso living and voting in the EPISD of the honest services of the defendant, CARLOS VILLA CORDOVA, a.k.a. , "COACH" CORDOVA, and to obtain money and property by material false and fraudulent pretenses, representations and promises the defendant and his uncharged co-defendants sent and caused to be sent and delivered, by the United States Postal Service, pricing trip letters, Preliminary Official Statements, Official Statements, Proposals and other correspondence required as a result of contracts entered into between EPISD and the vendors; and in furtherance of the schemes to defraud, the defendant and his uncharged co-conspirators transmitted and caused the transmission by wire, in interstate and foreign commerce, writings, signs, signals, pictures and sounds including electronic mailings of funding analyses and wiring instructions and the wire transmission of large sums of money, all in violation of Title 18, United States Code, Sections 1349, 1341, 1343 and 1346.

JOHNNY SUTTON
UNITED STATES ATTORNEY

By: 
Debra P. Kanof
Assistant U.S. Attorney