

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

Filed 6-18-08  
By \_\_\_\_\_  
Clark, U. S. District Court  
Western District of Texas  
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

ANTONIO DILL,

Defendant.

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INFORMATION

Cause No. EP-06-CR-1369FM-8

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE  
(18 U.S.C. §§ 1341, 1343, 1346 AND 1349)  
CONSPIRACY TO COMMIT MAIL FRAUD, WIRE FRAUD  
AND THE DEPRIVATION OF HONEST SERVICES

Beginning on or about January 1, 2007, and continuing through and including May 17, 2007,  
in the Western District of Texas and elsewhere, defendant,

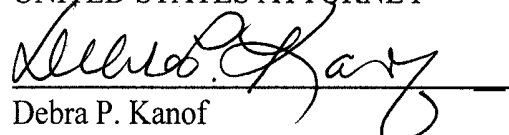
**ANTONIO DILL,**

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 County of El Paso and the citizens of the County of El Paso of the right to the honest  
services of elected members of the El Paso County Commissioner's Court, in the affairs of El Paso  
County; and conspired to knowingly devise a scheme to obtain money and property by means of  
material false and fraudulent pretenses, representations and promises; that is, the defendant and

others agreed to pay cash money to an elected member of the El Paso County Commissioner's Court, and said member of the El Paso County Commissioner's Court agreed to receive cash money in exchange for their support and vote in their official capacity as a member of the El Paso County Commissioner's Court, in violation of their fiduciary duty as an elected member of the El Paso County Commissioner's Court, for agreements between El Paso County and vendors seeking business with El Paso County ; and in furtherance of the scheme to deprive the County of El Paso and its citizens of the honest services of the elected member of the El Paso County Commissioner's Court, 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 El Paso County 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