

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

Filed 12-21-07  
Clark, U. S. District Court  
Western District of Texas  
By AP  
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

ROBERTO GERARDO RUIZ, a.k.a.  
"Bobby" Ruiz,

Defendant.

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INFORMATION

Cause No. EP-06-CR-1369FM-4

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 June of 1992, and continuing through and including November 2, 2007, in the Western District of Texas and elsewhere, defendant,

**ROBERTO GERARDO RUIZ,**

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 (EPISD) and the citizens of El Paso living and voting in the EPISD of the right to the honest services of elected EPISD Trustees, in the affairs of the EPISD; 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 elected Trustees of EPISD, and said Trustees agreed to receive cash money in exchange for the Trustees' support and vote in their official capacity as EPISD Trustees, in violation of their fiduciary duty as elected EPISD Trustees, for agreements between EPISD and vendors 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 elected EPISD Trustees, 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.

**COUNT TWO**  
**(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 June of 1992, and continuing through and including November 2, 2007, in the Western District of Texas and elsewhere, defendant,

**ROBERTO GERARDO RUIZ,**

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 Community College (EPCC) and the citizens of El Paso of the right to the honest services of elected EPCC Trustees, in the affairs of the EPCC; 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 elected Trustees of EPCC, and said Trustees agreed to receive cash money in exchange for the Trustees' support and vote in their official capacity as EPCC Trustees, in violation of their fiduciary duty as elected EPCC Trustees, for agreements between EPCC and vendors seeking business with the EPCC; and in furtherance of the scheme to deprive the EPCC and the citizens of El Paso of the honest services of the elected EPCC Trustees, 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 EPCC 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.

**COUNT THREE**  
**(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 June of 1992, and continuing through and including November 2, 2007, in the Western District of Texas and elsewhere, defendant,

**ROBERTO GERARDO RUIZ,**

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 government and the citizens of the City of El Paso of the right to the honest services of elected El Paso City Council Representatives, in the affairs of the City of El Paso; 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 elected El Paso City Council Representatives, and said Council Representatives agreed to receive cash money in exchange for the Council Representatives' support and vote in their official capacity as El Paso City Council Representatives, in violation of their fiduciary duty as elected representatives of the City of El Paso, for agreements between the City of El Paso and vendors seeking business with the City of El Paso; and in furtherance of the scheme to deprive the City of El Paso and its citizens of the honest services of the elected El Paso City Council Representatives, 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 the City of El Paso 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.

**COUNT FOUR**  
**(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 June of 1992, and continuing through and including November 2, 2007, in the Western District of Texas and elsewhere, defendant,

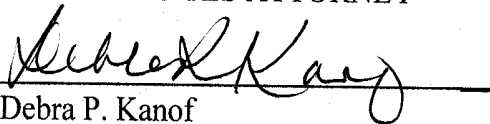
**ROBERTO GERARDO RUIZ,**

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 elected members of the El Paso County Commissioner's Court, and said members 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 members of the El Paso County Commissioner's Court, in violation of their fiduciary duty as elected members 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 members 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