

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

Filed 2-15-08
Clerk, U. S. District Court
Western District of Texas
By [Signature]
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

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INFORMATION

RAYMOND R. TELLES,

Defendant.

Cause No. EP-06-CR-1369FM-7

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 September 29, 2002 , and continuing through and including on or about June 2007, in the Western District of Texas and elsewhere, defendant,

RAYMOND R. TELLES,

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 Socorro Independent School District (SISD) and the citizens of El Paso living and voting in the SISD of the right to the honest services of elected SISD Trustees, in the affairs of the SISD;

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 SISD, and said Trustees agreed to receive cash money in exchange for the Trustees' support and vote in their official capacity as SISD Trustees, in violation of their fiduciary duty as elected SISD Trustees, for agreements between SISD and vendors seeking business with the SISD; and in furtherance of the scheme to deprive the SISD and the citizens of El Paso living and voting in the SISD of the honest services of the elected SISD Trustees, and to obtain money and property by material false and fraudulent pretenses, representations and promises the defendant and his co-conspirators 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 SISD and the vendors; and in furtherance of the schemes to defraud, the defendant and his 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 January 1, 2007, and continuing through and including May 17, 2007,
in the Western District of Texas and elsewhere, defendant,

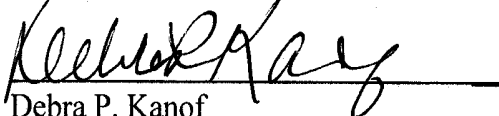
RAYMOND R. TELLES,

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