

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

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

UNITED STATES OF AMERICA,

Plaintiff,

CHRISTOPHER CHOL-SU PAK, a.k.a.,
Chris Pak

Defendant.

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INFORMATION

Cause No. EP-06-CR-1369FM-6

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

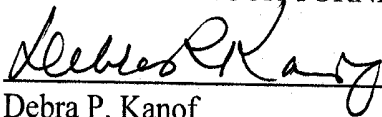
Beginning on or about May 2001, and continuing through and including December 21, 2007,
in the Western District of Texas and elsewhere, defendant,

CHRISTOPHER CHOL-SU PAK, a.k.a., Chris Pak,

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