

United States District Court  
Southern District of Texas  
FILED

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS**

**MAR 25 2008**

**Michael N. Milby, Clerk**

**McALLEN DIVISION**

**GJ 80**

**UNITED STATES OF AMERICA**

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§

**V.**

**CR. NO. M-08-405**

**STEVEN SAMBRANO  
RAMIRO GUZMAN**

**INDICTMENT**

**THE UNITED STATES GRAND JURY CHARGES:**

**INTRODUCTION**

At all times material to this Indictment:

1. **STEVEN SAMBRANO**, was the president of a corporation known as the Sambrano Corporation, commonly referred to as SamCorp, based in El Paso, Texas. SamCorp was contracted to build two elementary schools and a maintenance facility building for the Pharr-San Juan-Alamo Independent School District.

2. **RAMIRO GUZMAN**, was an El Paso, Texas businessman and consultant. GUZMAN was hired by SamCorp to be a consultant for business in the Rio Grande Valley-area of Texas, including for contracts sought and obtained by SamCorp at the Pharr-San Juan-Alamo Independent School District.

3. Pharr-San Juan-Alamo Independent School District (PSJA-ISD) was located in Hidalgo County, Texas.

4. PSJA-ISD was engaged in various aspects of interstate commerce, including funding construction projects with bonds sold in the interstate markets by financial firms engaged in interstate activities. PSJA-ISD also received several million dollars in federal funds in support of a number of student-related programs for all relevant school years herein.

**COUNT ONE**  
**(Conspiracy to Violate Federal Law - 18 U.S.C. § 371)**

**INTRODUCTION**

5. The Grand Jury adopts, realleges, and incorporates herein the Introduction Section of this Indictment.

**THE CONSPIRACY**

6. Beginning in or about August 2000, and continuing until on or about November 2004, in the McAllen Division of the Southern District of Texas,

**STEVEN SAMBRANO**  
**and**  
**RAMIRO GUZMAN,**

defendants herein, did knowingly, combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to

commit an offense against the United States, as follows:

a. to knowingly and intentionally devise and intend to devise a scheme and artifice to defraud, including involving the deprivation of the intangible right of honest services of other persons and, in furtherance of the scheme and artifice to defraud, used and caused the use of the United States Postal Service, in violation of *Title 18, United States Code, Sections 1341 and 1346 (mail fraud involving deprivation of honest services)*; and,

**Manner and Means of the Conspiracy**

7. The manner and means of the conspiracy included, but were not limited to, the following:

a. It was a part of the conspiracy that Defendants SAMBRANO and GUZMAN would and did seek contracts at PSJA-ISD for SamCorp, including successfully obtaining contracts to build two elementary schools and a maintenance facility building;

b. It was a further part of the conspiracy that the Defendants, along with others, did give things of value to elected officials on the board of trustees for PSJA-ISD, before, during and after the award of contracts to SamCorp to build two elementary schools and a maintenance facility building;

c. It was a further part of the conspiracy that the Defendants,

along with others, would and did agree tacitly and implicitly, to deprive the taxpayers and residents of PSJA-ISD and the students attending school in the PSJA-ISD, of the intangible right of honest services related to the contracting process for contracts for school and other district building construction, in breach of: the oath of office taken by the elected trustees receiving items of value and Texas criminal law relating to gifts to public servants and bribery;

d. It was a further part of the conspiracy that the Defendants would and did agree tacitly and implicitly with elected officials receiving items of value from SamCorp, that bids of SamCorp would receive favorable consideration for school and other building construction-related contracts, including these elected officials casting official votes in favor of such contracts;

e. It was a further part of the conspiracy that the Defendants did use and cause the use of the United States Postal Service mail and interstate commercial package carriers;

### **OVERT ACTS**

8. In furtherance of the conspiracy and in order to accomplish its objectives, the following overt acts, were committed in the McAllen Division of the Southern District of Texas and elsewhere:

(1) From in or about August 2000 up through and including on or

about November 2004, Defendant GUZMAN purchased and caused the purchase of items of value for and to the benefit of various public officials at PSJA-ISD.

(2) In or about years August 2000 through November 2004, Defendant SAMBRANO caused reimbursements to be made out of SamCorp accounts to Defendant Guzman for items of value purchased for and to the benefit of various public officials at PSJA-ISD.

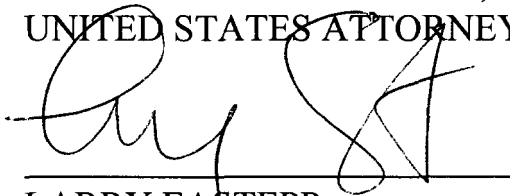
In violation of *Title 18, United States Code, Section 371.*

A TRUE BILL:

  
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~~FOR~~PERSON

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FOR THE GRAND JURY

DONALD J. DeGABRIELLE, JR.  
UNITED STATES ATTORNEY



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LARRY EASTEPP  
Assistant United States Attorney