

United States Courts
Southern District of Texas
FILED

August 22, 2023

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

UNITED STATES OF AMERICA

v.

**ROBERTO RODRIGUEZ
JOSE SANDOVAL
DANIEL DIAZ**

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CRIMINAL NO. M-23-1147

SEALED INDICTMENT

THE GRAND JURY CHARGES:

**Count One
(Bribery of public officials and witnesses)**

Beginning sometime in January of 2021 and continuing until the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

ROBERTO RODRIGUEZ

a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept something of value, in return for being influenced in the performance of an official act and being induced to do an act and omit to do an act in violation of his/her official duty; to wit: defendant ROBERTO RODRIGUEZ, who was then employed as a Loan Specialist with the United States Department of Agriculture (U.S.D.A.) in Starr County, Texas, accepted an amount of United States currency in exchange for referring applicants of the U.S.D.A. Single Family Housing Repair Loan and Grant program (also known as the Section 504 Home Repair Program) to Jose Sandoval and Daniel Diaz, each of whom was a construction contractor, so that each of them would receive money under the U.S.D.A. Single Family Housing Repair Loan and Grant program for work they would perform on property owned by the applicants.

All in violation of Title 18, United States Code, Sections 201(b)(2) and 2.

Count Two
(Bribery of public officials and witnesses)

Beginning sometime in January of 2021 and continuing until the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

JOSE SANDOVAL

did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official with the intent to influence an official act and induce a public official to do an act and omit to do an act in violation of his/her official duty, to wit: defendant JOSE SANDOVAL promised, offered and gave an amount of United States currency to ROBERTO RODRIGUEZ, who was then employed as a United States Department of Agriculture (U.S.D.A.) Loan Specialist in Starr County, Texas, in exchange for ROBERTO RODRIGUEZ referring applicants of the U.S.D.A. Single Family Housing Repair Loan and Grant program (also known as the Section 504 Home Repair Program) to JOSE SANDOVAL, who was a construction contractor, so that JOSE SANDOVAL would receive money under the U.S.D.A. Single Family Housing Repair Loan and Grant program (also known as the Section 504 Home Repair Program) after performing construction work on property owned by the applicants.

All in violation of Title 18, United States Code, Sections 201(b)(1) and 2.

Count Three
(Bribery of public officials and witnesses)

Beginning sometime in January of 2021 and continuing until the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant,

DANIEL DIAZ

did, directly and indirectly, corruptly give, offer, and promise a thing of value to a public official with the intent to influence an official act and induce a public official to do an act and omit to do

an act in violation of his/her official duty, to wit: defendant DANIEL DIAZ promised, offered and gave an amount of United States currency to ROBERTO RODRIGUEZ, who was then employed as a United States Department of Agriculture (U.S.D.A.) Loan Specialist in Starr County, Texas, in exchange for ROBERTO RODRIGUEZ referring applicants of the U.S.D.A. Single Family Housing Repair Loan and Grant program (also known as the Section 504 Home Repair Program) to DANIEL DIAZ, who was a construction contractor, so that DANIEL DIAZ would receive money under the U.S.D.A. Single Family Housing Repair Loan and Grant program (also known as the Section 504 Home Repair Program) after performing construction work on property owned by the applicants.

All in violation of Title 18, United States Code, Sections 201(b)(1) and 2.

NOTICE OF FORFEITURE

Pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code Section 981(a)(1)(C), the United States gives notice to defendants,

**ROBERTO RODRIGUEZ
JOSE SANDOVAL
and
DANIEL DIAZ**

that in the event of conviction, the United States intends to seek forfeiture of all property, real or personal, constituting, or derived from, any proceeds the person obtained directly or indirectly, as a result of such violation.

The property subject to forfeiture for pursuant to the allegations contained in Count One through Count Three of this Indictment includes, but is not limited to, the following property: at least \$45,401.59 in United States currency.

Money Judgment

Defendants are notified that upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of defendant,

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred or sold to, or deposited with, a third party;

(C) has been placed beyond the jurisdiction of the court;

(D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY