

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 17 2017

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
LARRY MENDOZA,)
)
Defendant.)

CRIMINAL NO. 17-3267 MV
Counts 1-3: 18 U.S.C. § 1951(a): Hobbs
Act Extortion Under Color of Official
Right.

INFORMATION

The United States Attorney charges:

At all times material to this information, the defendant, **LARRY MENDOZA**, was employed as a Revenue Agent at the New Mexico Taxation and Revenue Department.

Count 1

On or about February 16, 2017, in Santa Fe County, in the District of New Mexico, the defendant, **LARRY MENDOZA**, did knowingly obstruct, delay and affect, and attempt to obstruct, delay, and affect in any way and degree commerce and the movement of articles and commodities in commerce by extortion, in that the defendant, **LARRY MENDOZA**, obtained and attempted to obtain approximately \$500 in funds not due to him, nor due to his office, from a business owner owing taxes to the State of New Mexico, with that business owner's consent, under color of official right, knowing that the funds were provided in return for official action, namely the reduction of the business owner's tax liability.

In violation of 18 U.S.C. § 1951(a).

Count 2

Between March 29, 2017 and March 31, 2017, both dates being approximate and inclusive, in Santa Fe County, in the District of New Mexico, the defendant, **LARRY**

MENDOZA, did knowingly obstruct, delay and affect, and attempt to obstruct, delay, and affect, in any way and degree, commerce and the movement of articles and commodities in commerce by extortion, in that the defendant, **LARRY MENDOZA**, obtained and attempted to obtain approximately \$500 in funds not due to him, nor due to his office, from a business owner owing taxes to the State of New Mexico, with that business owner's consent, under color of official right, knowing that the funds were provided in return for official action, namely the reduction of the business owner's tax liability.

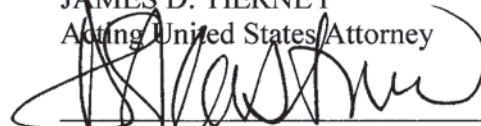
In violation of 18 U.S.C. § 1951(a).

Count 3

On or about May 24, 2017, in Santa Fe County, in the District of New Mexico, the defendant, **LARRY MENDOZA**, did knowingly obstruct, delay and affect, and attempt to obstruct, delay, and affect, in any way and degree, commerce and the movement of articles and commodities in commerce by extortion, in that the defendant, **LARRY MENDOZA**, obtained and attempted to obtain approximately \$1500 in funds not due to him, nor due to his office, from a business owner owing taxes to the State of New Mexico, with that business owner's consent, under color of official right, knowing that the funds were provided in return for official action, namely the reduction of the business owner's tax liability.

In violation of 18 U.S.C. § 1951(a).

JAMES D. TIERNEY
Acting United States Attorney



HOLLAND S. KASTRIN
Assistant United States Attorney
P. O. Box 607
Albuquerque, NM 87103