III. The Bribery and Money Laundering Schemes

10. Beginning at least in or around July 2023, and continuing until in or around March 2026, the defendant, ADA SERRANO, while serving as Consul General of Honduras in Atlanta, Georgia, together with Co-Conspirator #1, Co-Conspirator #2, and Co-Conspirator #3, agreed to and did demand and receive bribes from Individual #1, Individual #2, Consular Services Company, and others in connection with obtaining and retaining business for Consular Services Company, including by, among other things, authorizing, facilitating, and prioritizing access to appointments for Consular Services Company's clients at the Consulate in exchange for the bribes.

11. In general, Honduran nationals, travelers, and citizens living in the United States who sought services at the Consulate—such as obtaining passports and travel documents, notary services, and other civil records—were required to schedule an appointment through the Consulate's online appointment system and attend those appointments with the required documentation and information. Under that system, the Consulate offered a limited number of appointments per day.

12. As part of its business, Consular Services Company scheduled appointments for its clients at the Consulate and provided them with transportation to and from the Consulate and Tennessee. Consular Services Company charged its clients for scheduling the appointments and transporting them to and from the Consulate. Prior to ADA SERRANO's appointment as Consul General, Consular Services Company was not required to pay the

Consulate, or any consular employee, to arrange for their clients to access appointments at the Consulate to obtain consular services.

13. In or around at least July 2023, however, ADA SERRANO instructed Consulate Employee, who was then working as a security guard at the Consulate, to require Individual #1 and Individual #2 to pay a bribe for each person who Consular Services Company transported to the Consulate.

14. In general, Consular Services Company charged each of its clients approximately $300 for assisting them in obtaining services at the Consulate. This amount covered transportation to and from the Consulate and the cost of the bribes demanded by ADA SERRANO.

15. In exchange for the bribes, ADA SERRANO allowed Consular Services Company to gain access to appointments at the Consulate that they would otherwise be denied. This access allowed Consular Services Company's clients to attend the appointments necessary to secure passports, identification documents, and other services from the Consulate. ADA SERRANO directed Consulate Employee and Co-Conspirator #3 to coordinate directly with Individual #1 and Individual #2 to ensure Consular Service Company's clients were allowed into the Consulate after they paid the bribes.

16. In or around October 2023, ADA SERRANO directed Consulate Employee to take various steps to hide the scheme and avoid detection, including limiting Consular Services Company and its clients to a maximum of fifteen (15) consulate appointments per day. In particular:

a. On or about October 9, 2023, ADA SERRANO sent a message to Consulate Employee via Telegram, stating (as translated from the original Spanish) "Hi. I'm here. I'll call you. It's more private that way."

b. Later that same day, also on or about October 9, 2023, ADA SERRANO met with Co-Conspirator #1, Co-Conspirator #2, and Consulate Employee at ADA SERRANO's home. During the meeting, ADA SERRANO stated (as translated from the original Spanish), among other things:

> [F]or now, we have to keep a very low profile. And the short guy—he better not start bringing in more people than the number I told him, right? Up to 15, if possible fewer. . . .
>
> [T]here might be cameras. I'm scared, please be careful. . . .
>
> I want to check under my desk because that's where they put the microphones. . . .
>
> [T]omorrow cover up the vents for me because I have my doubts—I think there are cameras there. And they can see you right there when you're handing me that list. . . .

17. From in or around July 2023, through in or around December 2024, at ADA SERRANO's direction, Consulate Employee collected the bribes from Individual #1 and Individual #2 on ADA SERRANO's behalf.

18. From in or around January 2025 through in or around March 2026, at ADA SERRANO's direction, Co-Conspirator #3 collected the bribes from Individual #1 and Individual #2 on ADA SERRANO's behalf.

19. To conceal the proceeds derived from the scheme, from in or around July 2023, through at least in or around December 2024, ADA SERRANO directed Consulate Employee to distribute most of the cash bribes collected from Individual #1 and Individual #2 to Co-Conspirator #1 and Co-Conspirator #2. Co-Conspirator #1 and Co-Conspirator #2 then made cash deposits of between $100 and $6,000 into their personal bank accounts in the Northern District of Georgia, which Co-Conspirator #1 and Co-Conspirator #2 also used in connection with their businesses.

20. On a few occasions in or around 2024, Consulate Employee delivered the cash bribes collected from Individual #1 and #2 directly to ADA SERRANO.

Count One
(Conspiracy to Violate the Foreign Extortion Prevention Act)

21. Paragraphs 1 through 20 are incorporated by reference.

The Conspiracy

22. From at least in or around August 2024, and continuing through in or around March 2026, in the Northern District of Georgia and elsewhere, the defendant, ADA EVILA SERRANO NUÑEZ, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with others known and unknown to the Grand Jury to commit an offense against the United States, that is, being a foreign official, to make use of the mails and means and instrumentalities of interstate commerce to corruptly demand, seek, receive, accept, and agree to receive and accept, directly and indirectly, anything of value personally and for any other person and nongovernmental entity from a domestic