FILED IN CHAMBERS
U.S.D.C ATLANTA

Date: Nov 15 2026

KEVIN P. WEIMER, Clerk

By: Sonya Nuckolls
Deputy Clerk

United States District Court

NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

v.

MARIO ANTONIO CASTELLANOS VELAZQUEZ,
LUIS EUCEDA SERRANO, and
ANGEL EUCEDA SERRANO

CRIMINAL COMPLAINT

Case Number: 1:26-MJ-1215

I, the undersigned complainant, depose and say under penalty of perjury that the following is true and correct to the best of my knowledge and belief. From at least on or about August 2024 through on or about March 2026, in DeKalb County, in the Northern District of Georgia, and elsewhere, defendants did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with others known and unknown, 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 concern and any officer, director, employee, and agent of a domestic concern, in return for: (a) being influenced in the performance of an act and decision in their official capacity; (b) being induced to do and omit to do an act in violation of their lawful duties; (c) conferring an improper advantage; and (d) using their influence to affect and influence an act and decision of a foreign government and instrumentality thereof, in connection with obtaining and retaining business for and with, and directing business to, any person, contrary to Title 18, United States Code, Section 1352, all in violation of Title 18, United States Code, Section 1349.

I further state that I am an FBI Special Agent and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

Signature of Complainant
Joshua Berrios

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

November 15, 2026
Date

at Atlanta, Georgia
City and State

RUSSELL G. VINEYARD
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

Signature of Judicial Officer

AUSA Garrett L. Bradford / 2023r00650 /
Garrett.Bradford@usdoj.gov

23. 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.

24. From in or around January 2025 through in or around March 2026, at Ada Serrano's direction, MARIO CASTELLANOS collected the bribes from Individual #1 and Individual #2 on Ada Serrano's behalf.

25. 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 LUIS EUCEDA and ANGEL EUCEDA. LUIS EUCEDA and ANGEL EUCEDA then made cash deposits of between $100 and $6,000 into their personal bank accounts in the Northern District of Georgia, which LUIS EUCEDA and ANGEL EUCEDA also used in connection with their businesses.

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

27. In furtherance of the conspiracy:

a. On or about August 9, 2024, Ada Serrano caused Consulate Employee to deliver approximately $4,000 in cash to ANGEL EUCEDA.

b. On or about September 10, 2024, Ada Serrano caused Individual #2 to pay approximately $1,700 in cash to Consulate Employee, which Consulate Employee collected for the benefit of Ada Serrano, LUIS EUCEDA, and ANGEL EUCEDA.

c. On or about October 18, 2024, during a phone call between LUIS EUCEDA and Consulate Employee, Consulate Employee indicated having approximately $4,900 to deliver, and stated that Ada Serrano had asked Consulate Employee to speak to ANGEL EUCEDA to find out what Consulate Employee (as translated from the original Spanish) "should do with the money."

d. On or about October 18, 2024, on a subsequent phone call between ANGEL EUCEDA and Consulate Employee, ANGEL EUCEDA stated that Ada Serrano had told ANGEL EUCEDA (as translated from the original Spanish): "Tell [Consulate Employee] that he should, that he should give me the money."

e. On or about December 22, 2024, in a WhatsApp message and voice note from Ada Serrano, while Ada Serrano was located outside Georgia, to Consulate Employee, while Consulate Employee was located within the Northern District of Georgia, Ada Serrano stated (as translated from the original Spanish) that she was keeping "track of all the appointments that have been made" and instructed Consulate Employee to "save me 2,000 and give it to me when I get there."

CRIMINAL CHARGES

28. Based on the information described above, I believe that probable cause exists for the issuance of a Criminal Complaint charging MARIO CASTELLANOS, LUIS EUCEDA, and ANGEL EUCEDA with conspiracy to violate FEPA (18 U.S.C. § 1349):