

United States v. Margaret Cole, Debra Parris, and Dorah Mirembe (N.D. Ohio 2020)

Nature of the Business.

Margaret Cole, a resident of Strongsville, Ohio, was the Executive Director of an international adoption agency that facilitated adoptions from Uganda and elsewhere for prospective adoptive parents based in the United States.

Debra Parris, a United States citizen, worked for the same adoption agency. She was responsible for managing the agency's Uganda program.

Dorah Mirembe, a Ugandan citizen, provided adoption-related legal services to the agency's clients. She was the co-owner of a law firm based in Kampala, Uganda.

Influence to be Obtained.

According to the DOJ, starting in 2013, the adoption agency allegedly bribed Ugandan officials and defrauded U.S. parents, U.S. authorities, and a Polish regulatory authority in a widespread adoption scheme. The three defendants allegedly took children from their home countries of Poland and Uganda without determining if those children were actually orphaned, and the defendants allegedly bribed Ugandan officials and lied to Polish and U.S. authorities to do so. Cole and Parris also allegedly sought to transfer a child from Poland to Parris's relatives without verifying the adoptive parent's intercountry adoption eligibility.

Parris and Mirembe allegedly paid bribes to social welfare officers in Uganda to issue false welfare reports recommending certain children be put up for adoption, and bribed magistrate judges, court registrars and Ugandan judges to permit their U.S. clients to take the children out of the country for adoption. According to the DOJ, the co-conspirators received more than \$900,000 for their adoption work.

Enforcement.

On August 13, 2020, the DOJ charged Cole with one count of conspiracy to defraud the United States and two counts of false statements in relation to the Poland scheme. The DOJ also charged each of Parris and Mirembe with one count of conspiracy to violate the FCPA and to commit visa fraud, three counts of violating the anti-bribery provisions of the FCPA, one count of conspiracy to commit mail and wire fraud, one count of conspiracy to commit money laundering, and three counts of money laundering. Parris was further charged with one count of mail fraud and one count of conspiracy to defraud the United States.

Charges against all three defendants are currently pending.

Relatedly, Robin Longoria, who also worked for the adoption agency, pleaded guilty in 2019 to charges related to the same alleged scheme.

Key Facts

Citation. *United States v. Cole, et al.*, No. 20-cr-00424 (N.D. Ohio 2020).

Date Filed. August 13, 2020.

Country. Uganda; Poland.

Date of Conduct. 2013 – 2016.

Amount of the Value. Not stated.

Amount of Business Related to the Payment. \$900,000.

Intermediary. Not. Stated.

Foreign Official. Unnamed welfare officer, judges, and court registrars in Uganda.

FCPA Statutory Provision. Anti-Bribery; Conspiracy (Anti-Bribery).

Other Statutory Provision. Conspiracy (Visa Fraud); Conspiracy (Mail Fraud); Conspiracy (Wire Fraud); Mail Fraud; Conspiracy (Money Laundering); Money Laundering; Conspiracy (Defraud the United States); False Statements.

Disposition. Pending.

Defendant Jurisdictional Basis.

- **Cole.** Domestic Concern.
- **Parris.** Domestic Concern; Agent of Domestic Concern.
- **Mirembe.** Agent of Domestic Concern.

Defendant's Citizenship.

Total Sanction. Pending.

Related Enforcement Actions. *United States v. Longoria*.