



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

December 23, 2024

**BY EMAIL**

The Honorable Jeannette A. Vargas  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The Honorable Dale E. Ho  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Eric Adams, 24 Cr. 556 (DEH)*  
*United States v. Erden Arkan, 24 Cr. \_\_\_ (JAV)***

Dear Judge Vargas and Judge Ho:

The Government respectfully submits this letter regarding the two above-captioned cases, which arise out of related conduct and concern two co-conspirators.

On September 27, 2024, defendant Eric Adams was indicted by a grand jury in this District in five counts. Count One charges Adams with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371. Count Two charges Adams with wire fraud, in violation of 18 U.S.C. § 1343. Counts Three and Four charge Adams with soliciting campaign contributions by foreign nationals, in violation of 52 U.S.C. § 30121(a)(2). Count Five charges Adams with soliciting and accepting bribes, in violation of 18 U.S.C. § 666. The conspiracy charged in Count One has multiple objects, of which one object is committing wire fraud through the collection of campaign contributions made under the name of someone other than the true contributor, and the subsequent request for public funds based on the misrepresentation that those contributions originated from the named contributor.

*Adams* was assigned to Judge Ho. Two conferences have taken place before Judge Ho, defense motions have been filed and partly resolved, and a trial date has been set for April 21, 2025.

On December 20, 2024, the Government submitted, with the consent of defense counsel for Erden Arkan, a notice of intent to file an information as to Arkan, charging him with conspiracy to violate the laws of the United States, in violation of 18 U.S.C. § 371. The charged object of that conspiracy is committing wire fraud through the collection of campaign contributions made under the name of someone other than the true contributor, and the subsequent request for public funds based on the misrepresentation that those contributions originated from the named contributor. This conduct forms a part of the conduct charged in Counts One and Two of the *Adams* Indictment, and Arkan is identified in the *Adams* Indictment as “Businessman-5.” (See *United States v. Adams, 24 Cr. 556 (DEH)*, Dkt. 1 at ¶ 30). In connection with this case, Arkan has indicated that he wishes to plead guilty to the above-captioned Information.

*Arkan* has been assigned to Judge Vargas. No proceedings have yet been held.

Respectfully submitted,

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Acting United States Attorney

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