

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ERDEN ARKAN,

Defendant.

INFORMATION

24 Cr. ___ ()

25cr13

COUNT ONE
(Conspiracy to Commit Wire Fraud)

The Acting United States Attorney charges:

1. In or about 2021, in the Southern District of New York and elsewhere, ERDEN ARKAN, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that ERDEN ARKAN, the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, ARKAN agreed to and did direct certain of his employees to make contributions to the 2021 Campaign for New York City Mayor (the "2021 Campaign") of a New York City public official ("Official-1"), while also directing that those employees be reimbursed for their contributions, understanding that the 2021 Campaign

would seek public funds from New York City based on the misrepresentation that the employees were the true contributors, and transmitted and caused to be transmitted electronic communications to and from the Southern District of New York and elsewhere in furtherance of that scheme.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed by ERDEN ARKAN, the defendant, and others known and unknown, in the Southern District of New York and elsewhere:


a. In April 2021, ARKAN attended an event with Official-1, an official of the Turkish Government (the “Turkish Official”), and others known and unknown, at which Official-1 solicited contributions to the 2021 Campaign.

b. In April 2021, ARKAN directed that employees of a corporation where ARKAN served as a principal receive funds from the corporation which the employees would contribute to the 2021 Campaign under the employees’ own names, even though the funds in fact originated from the corporation (the “Straw Donations”).

c. In May 2021, ARKAN hosted a fundraiser also organized by the Turkish Official, among others, where Official-1 knowingly accepted the Straw Donations.

d. In May 2021, Official-1 submitted a false disclosure statement to the New York City Campaign Finance Board for the purpose of obtaining public funds from New York City for the 2021 Campaign, based in part on the false statements that the Straw Donations were funded by ARKAN’s employees.

(Title 18, United States Code, Section 371.)


EDWARD Y. KIM
Acting United States Attorney