



U.S. Department of Justice

United States Attorney
Southern District of New York

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

February 7, 2025

BY EMAIL & ECF

The Honorable Analisa Torres
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, New York 10007

**Re: *United States v. Eric Adams*, 24 Cr. 556 (DEH)
United States v. Erden Arkan, 25 Cr. 13 (DEH)
United States v. Mohamed Bahi, 25 Cr. ___ (AT)**

Dear Judge Torres and Judge Ho:

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

On September 27, 2024, a grand jury in this District returned Indictment 24 Cr. 556 (DEH), charging defendant Eric Adams 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 public conferences and multiple *ex parte* proceedings pursuant to the Classified Information Procedures Act have taken place before Judge Ho, defense motions have been filed and resolved, and a trial date has been set for April 21, 2025.

On January 10, 2025, the Government filed Information 25 Cr. 13 (DEH), charging defendant Erden Arkan in one count 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. *Arkan* was initially assigned to Judge

Vargas, but was transferred to Judge Ho pursuant to the District's related case procedures. Also on January 10, 2025, Arkan pled guilty before Judge Ho to the sole count of the Information. The conduct for which Arkan pled guilty 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 ¶ 30).

On February 6, 2025, the Government filed a notice of intent to file an information charging Mohamed Bahi in a single count with conspiracy to violate the laws of the United States, in violation of 18 U.S.C. § 371. The charged object of that conspiracy, as in *Arkan*, 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. The conduct charged in the *Bahi* information forms part of the conduct charged in Counts One and Two of the *Adams* Indictment, and Bahi is identified in the *Adams* Indictment as "Adams Employee-1." (See *United States v. Adams*, 24 Cr. 556 (DEH), Dkt. 1 ¶ 28.a). In connection with that case, Bahi has indicated that he intends to plead guilty to the sole count of the Information against him.

Bahi has been assigned to Judge Torres. No proceedings have yet been held.

Respectfully Submitted,

DANIELLE R. SASSOON
United States Attorney

by: _____ /s/

Celia V. Cohen
Andrew Rohrbach
Hagan Scotten
Derek Wikstrom
Assistant United States Attorneys
(914) 993-1921 / (212) 637-1944 / 2410 / 1085

cc: Counsel of Record (by ECF)