

## BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER  
1101 14th Street NW, Suite 400  
Washington, DC 20005

v. MUR No. \_\_\_\_\_

ERIC ADAMS and ERIC  
ADAMS 2025  
120 Broadway, 28 Fl.  
New York, NY 10271

ERIC ADAMS 2021  
120 Broadway, 28 Fl.  
New York, NY 10271

### COMPLAINT

1. The Department of Justice’s (“Justice Department” or “DOJ”) recent abandonment — for naked political reasons — of its commitment “to pursue corruption anywhere . . . especially when that corruption takes the form of illegal foreign influence on our democratic system,”<sup>1</sup> underscores, in the starkest of circumstances, the critical importance of the Federal Election Commission’s (“FEC” or “Commission”) statutory mandate to enforce federal campaign finance law and protect the integrity of American elections.
2. Indeed, the need for the FEC’s robust exercise of its independent civil enforcement authority is perhaps nowhere more clear and weighty than here: a grand jury indictment alleges a corrupt, multi-year scheme to invite and facilitate foreign interference in two elections for mayor of New York City, and the Justice Department has abdicated its duty to pursue justice and accountability, and to safeguard the integrity of our elections, in

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<sup>1</sup> *New York City Mayor Eric Adams Charged with Bribery and Campaign Finance Offenses*, Dep’t of Justice, Sept. 26, 2024, <https://www.justice.gov/usao-sdny/pr/new-york-city-mayor-eric-adams-charged-bribery-and-campaign-finance-offenses>.

favor of exploiting serious threats to American democracy as an opportunity to exert political leverage over an allegedly corrupt public official.

3. The evidence here suggests serious, knowing and willful violations of federal campaign finance law by New York City Mayor Eric Adams. Specifically, based on detailed evidence developed by the Federal Bureau of Investigation (“FBI”) and laid out in a grand jury indictment that the Justice Department is now seeking to dismiss, this complaint describes how Adams and his campaign committees engaged in a scheme to solicit and accept illegal campaign contributions from foreign nationals in connection with his 2021 and 2025 mayoral campaigns, in violation of the Federal Election Campaign Act, 52 U.S.C. § 30121 (“FECA” or the “Act”).
4. The federal ban on foreign spending in American elections is one of the most important provisions in federal campaign finance law: prohibiting foreign nationals from spending money on federal, state, or local elections is crucial to protecting our national political community and democratic self-government.<sup>2</sup> The FEC and DOJ have historically recognized the importance of the ban on foreign election spending, imposing serious civil and criminal penalties, respectively, for violations of the law.<sup>3</sup>
5. When announcing Adams’s indictment for these and other criminal violations, including violations of federal bribery and wire fraud laws, the Justice Department expressed deep concern over Adams’s actions, which “put the interests of his benefactors, including a foreign official, above those of his constituents,” and affirmed the Department’s

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<sup>2</sup> See *Bluman v. FEC*, 800 F. Supp. 2d 281 (D.D.C. 2011) (three-judge court), *aff’d*, 565 U.S. 104 (2012).

<sup>3</sup> See *infra* note 107 (collecting examples of FEC and DOJ enforcement of 52 U.S.C. § 30121).

commitment “to pursue corruption anywhere . . . especially when that corruption takes the form of illegal foreign influence on our democratic system.”<sup>4</sup>

6. In recent days, however, the Justice Department has reversed course, pursuing dismissal of its own charges against Adams for political reasons that have nothing to do with “the strength of the evidence or the legal theories on which the case is based.”<sup>5</sup>
7. The FEC is the “independent regulatory agency charged with administering and enforcing the federal campaign finance law,”<sup>6</sup> and its mission to protect the integrity of American elections is singular and not subject to political considerations. Indeed, Congress intentionally structured the FEC in a bipartisan manner to ensure that it would not enforce the law — or decline to enforce the law — in a manner that is political or partisan.
8. The FEC’s jurisdiction over civil enforcement of FECA violations is concomitant and concurrent with the Justice Department’s jurisdiction over criminal violations of the Act. DOJ’s abdication of its duty to protect U.S. elections from corruption places the FEC in the critical and sole position to uphold the ban on foreign funding of U.S. elections.
9. This complaint is thus filed with the FEC pursuant to 52 U.S.C. § 30109(a)(1), and is based on information and belief that New York City Mayor Eric Adams, Eric Adams 2021, and Eric Adams 2025 violated FECA, 52 U.S.C. § 30101, *et seq.* “If the Commission, upon receiving a complaint . . . has reason to believe that a person has

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<sup>4</sup> *New York City Mayor Eric Adams Charged with Bribery and Campaign Finance Offenses*, *supra* note 1.

<sup>5</sup> Memorandum from Acting Deputy Attorney Gen. Emil Bove, U.S. Dept. of Justice, on Dismissal Without Prejudice of Prosecution of Mayor Eric Adams, to Acting U.S. Attorney & U.S. Attorney’s Office for S.D.N.Y. (Feb. 10, 2025), available at <https://www.nytimes.com/interactive/2025/02/10/nyregion/adams-case-dismiss-memo.html> (“Bove Memo”).

<sup>6</sup> *Mission and History*, FEC, <https://www.fec.gov/about/mission-and-history/> (last visited Feb. 17, 2025).

committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”<sup>7</sup>

#### FACTUAL BACKGROUND

10. Eric Adams is currently serving as mayor of New York City.<sup>8</sup> He launched his mayoral campaign while he was serving as Brooklyn Borough President and ultimately won election in 2021.<sup>9</sup> He is campaigning for a second term as mayor in New York City’s 2025 municipal elections.<sup>10</sup>
11. Adam’s campaign committee for his 2021 mayoral election campaign was Eric Adams 2021.<sup>11</sup> His current campaign committee is Eric Adams 2025.<sup>12</sup> Both committees registered with the New York City Campaign Finance Board and opted into the City’s public matching funds program.<sup>13</sup>
12. According to evidence developed by the FBI and detailed in a federal indictment, Adams and his campaign committees engaged in an ongoing, multi-year scheme to solicit and accept numerous illegal donations from foreign nationals in connection with his mayoral election campaigns, in violation of 52 U.S.C. § 30121. The alleged unlawful activities began in 2018 and continued through at least 2024.

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<sup>7</sup> 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

<sup>8</sup> NYC Office of the Mayor, <https://www.nyc.gov/office-of-the-mayor/index.page> (last visited Feb. 14, 2025).

<sup>9</sup> Indictment ¶ 1, United States v. Adams, 1:24-cr-00556-DEH (S.D.N.Y. Sept. 24, 2024), <https://www.justice.gov/d9/2024-09/u.s.-v.-adams-indictment-1.pdf> (“Indictment”).

<sup>10</sup> *See id.* ¶ 44.

<sup>11</sup> *Registered Political Committees (January 15, 2018 to January 14, 2022)*, N.Y.C. Campaign Fin. Bd., <https://www.nyccfb.info/follow-the-money/registered-political-committees/2021> (last visited Feb. 14, 2025).

<sup>12</sup> *Registered Political Committees (January 12, 2022 to January 11, 2026)*, N.Y.C. Campaign Fin. Bd., <https://www.nyccfb.info/follow-the-money/registered-political-committees/> (last visited Feb. 14, 2025).

<sup>13</sup> *See* Indictment ¶ 8; *supra* notes 11-12.

### *Foreign National Contribution Scheme*

13. In 2015, while Brooklyn Borough President, Adams took two trips to Turkey in his official capacity.<sup>14</sup> One of the trips was arranged by a Turkish government official and a Turkish entrepreneur (the “Promoter”).<sup>15</sup> The Promoter’s business involved organizing “events to introduce” clients, primarily “Turkish corporations and businesspeople, to politicians, celebrities, and others whose influence” the clients might seek.<sup>16</sup> Following the trip, Adams maintained a relationship with the Promoter.<sup>17</sup>
14. The other 2015 trip was funded, in part, by a “for-profit educational conglomerate based in Istanbul.”<sup>18</sup> As part of that trip, Adams met with the owner and chairman of the educational conglomerate (the “Turkish University Owner”), who was considering a business venture in New York City and wanted to form a relationship with Adams.<sup>19</sup>

### *Adams Solicits the Turkish Promoter for Foreign National Donations in Connection with His 2021 Campaign*

15. On June 22, 2018, when Adams was running for mayor in the 2021 election, the Promoter offered to raise money for his campaign. The Promoter had the following text message exchange with an Adams staffer:

**Promoter:** “Fund Raising in Turkey is not legal, but I think I can raise money for your campaign off the record.”

**Staffer:** “How will [Adams] declare that money here?”

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<sup>14</sup> Indictment ¶ 10.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *See id.* ¶ 11b.

<sup>18</sup> *Id.* ¶ 10.

<sup>19</sup> *See id.* ¶ 11c.

**Promoter:** “He won’t declare it . . . Or . . . We’ll make the donation through an American citizen in the U.S. . . . A Turk . . . I’ll give cash to him in Turkey . . . Or I’ll send it to an American . . . He will make a donation to you.”<sup>20</sup>

The Promoter also indicated that the contribution could be as much as \$100,000.<sup>21</sup> The staffer cautioned that the transaction could not occur while Adams was in Turkey, and the Promoter replied, “Let’s think.”<sup>22</sup>

16. When the Adams staffer informed Adams of the conversation and asked whether to pursue the foreign contributions, Adams directed the staffer to continue pursuing the illegal foreign contribution scheme.<sup>23</sup>
17. The Promoter went on to facilitate Adams’s solicitation of Turkish nationals, and acceptance of foreign national straw donations, during his 2021 and 2025 campaigns, as explained below.

*Adams Solicits a Turkish Businessman with Legal Troubles for a Foreign National Donation in Connection with His 2021 Campaign*

18. In January 2019, when Adams was on a trip to Istanbul, the Promoter arranged for Adams to meet with a wealthy Turkish businessman who was under suspicion of wrongdoing.<sup>24</sup> During the meeting, Adams solicited campaign contributions from the Turkish businessman, who, in turn, agreed to contribute \$50,000 or more to Adams’s 2021 mayoral campaign, hoping to gain influence with Adams.<sup>25</sup> Afterward, the

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<sup>20</sup> *Id.* ¶ 20a.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *Id.* ¶ 25.

<sup>25</sup> *Id.*

Promoter and the same Adams staffer continued to exchange messages with the Turkish businessman, making plans to funnel the illegal foreign contributions to Adams through straw donors in the United States.<sup>26</sup> However, when the Turkish businessman’s legal troubles became public, Adams declined to meet with him again, and the Turkish businessman — apparently understanding that Adams would not become his ally — did not make the contribution.<sup>27</sup>

*Adams Solicits and Accepts a Foreign National Donation from the Turkish University Owner in Connection with His 2021 Campaign*

19. In November 2018, the Turkish University Owner visited New York City and met with Adams at Adams’s official office.<sup>28</sup> At the end of the meeting, the Turkish University Owner offered to contribute to Adams’s 2021 campaign.<sup>29</sup> Adams directed his staffer, who was present at the meeting, to obtain the offered funds.<sup>30</sup> Adams wrote to the staffer: “[The Turkish University Owner] is ready to help. I don’t want his willing [sic] to help be waisted [sic].”<sup>31</sup> Consequently, the staffer stayed in touch with the Turkish University Owner, communicating through intermediaries.<sup>32</sup>
20. In January 2019, when Adams had still not received any contributions from the Turkish University Owner, he told the staffer via text message to confirm that the Turkish University Owner was still willing to contribute to his campaign.<sup>33</sup>

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<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* ¶ 20b.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> *Id.* ¶ 26.

21. Efforts by the Turkish University Owner to contribute, and by Adams to receive, unlawful foreign contributions continued in July 2021. These efforts included devising a plan for an in-person fundraiser where the Turkish University Owner could funnel the illegal foreign contributions to Adams.<sup>34</sup> In communications between Adams and the staffer, Adams said he would not appear at a fundraiser “for less than \$25K.”<sup>35</sup> Using the Promoter as an intermediary, the Adams staffer inquired about how much the Turkish University Owner would donate.<sup>36</sup> The Promoter responded with an estimate of \$35,000-\$50,000.<sup>37</sup> The Adams staffer replied that the Promoter previously “had mentioned 200K.”<sup>38</sup> The Promoter explained that they were having trouble recruiting the requisite number of straw donors to make a larger contribution, so the Adams staffer offered to help find straw donors to conceal the illegal foreign contribution.<sup>39</sup> The Adams staffer also confirmed that the Promoter would “distribute the money.”<sup>40</sup> Following these exchanges, the staffer told Adams the estimated total amount of the foreign contributions was \$45,000.<sup>41</sup>
22. In August 2021, the Promoter, the staffer, and the president of the Turkish University’s American campus exchanged messages and voice notes to pin down plans to funnel the illegal foreign campaign contributions to Adams.<sup>42</sup> The Turkish University Owner was to provide funds to the University’s U.S.-based employees, and the Promoter assured the

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<sup>34</sup> See *id.* ¶¶ 31-31a.

<sup>35</sup> *Id.* ¶ 31a.

<sup>36</sup> *Id.* ¶ 31b.

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> *Id.* ¶ 31c.



Adams staffer that the employees were U.S. “citizens and green card holders.”<sup>43</sup> The staffer then communicated the plan to Adams, and Adams approved of the plan.<sup>44</sup>

23. On August 27, 2021, the U.S.-based University President messaged the Adams staffer that the Turkish University would donate \$20,000 by “dividing it amongst our employees in appropriate amounts.”<sup>45</sup> When the Adams staffer reminded the University President that Adams would not appear in person for less than \$25,000, the University President said others would also donate to reach the \$25,000 threshold.<sup>46</sup> However, later on the same day, the University President backtracked and said the Turkish University would donate “only \$10,000.”<sup>47</sup>
24. Because Adams would no longer be appearing at an in-person event, the staffer asked one of the Adams campaign fundraisers to set up an online link through which the Turkish University’s straw donors could contribute.<sup>48</sup> Adams, the staffer, and the fundraiser exchanged messages about the link, and Adams — to remind the staffer of how the plan would work — said, “We can’t take any money from people who are not US citizens.”<sup>49</sup> The staffer inquired, “What about green card holders?”<sup>50</sup> The fundraiser responded, “Yes we can,” confirming that the Promoter’s plan to use green card holders as straw donors would work.<sup>51</sup>

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<sup>43</sup> *Id.*

<sup>44</sup> *Id.*

<sup>45</sup> *Id.* ¶ 31d.

<sup>46</sup> *Id.*

<sup>47</sup> *Id.* ¶ 31e.

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> *Id.*

25. On September 27, 2021, three U.S.-based employees of the Turkish University made \$2,000 contributions to the Adams’s mayoral campaign.<sup>52</sup> At the direction of the Turkish University Owner and U.S.-based University President, the straw donors were reimbursed by the Turkish University, a business organized and headquartered in Turkey.<sup>53</sup> The University President and another U.S.-based Turkish University employee made \$2,000 contributions from their own funds, totaling to the anticipated \$10,000.<sup>54</sup>
26. The contributions occurred shortly before Adams’s general election, during a period when his campaign was winding down its fundraising, and they were ultimately refunded.<sup>55</sup> However, the 2021 campaign disclosed receipt of the contributions to the New York City Campaign Finance Board, falsely reporting the names of the straw donors as the true contributors to cover up the illegality.<sup>56</sup>
27. Following Adams’s victory in the 2021 general election, the Promoter texted the Turkish University Owner that the Promoter would “talk to our elders in Ankara about how we can turn this into an advantage for our country’s lobby.”<sup>57</sup> The Turkish University President responded, “That would be nice.”<sup>58</sup>
28. However, Adams was not pleased with the amount of the contribution from the Turkish University Owner.<sup>59</sup> When the Turkish University Owner was visiting New York City in

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<sup>52</sup> *Id.* ¶ 31f.

<sup>53</sup> *See id.*

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> *Id.*

<sup>57</sup> *Id.* ¶ 31g.

<sup>58</sup> *Id.*

<sup>59</sup> *Id.* ¶ 42c.

2021, and requested a meeting with Adams via the Promoter, Adams turned down the meeting, saying, “[T]hey didn’t keep their word.”<sup>60</sup>

*Adams Solicits the Turkish Promoter for Foreign National Donations, and Accepts Foreign National Donations, in Connection with His 2025 Campaign*

29. Following Adams’s election as Mayor of New York City, and his inauguration on January 1, 2022, the Promoter had a January 11 meeting with Adams and the staffer at a high-end restaurant.<sup>61</sup> The Promoter reminded Adams of their efforts to collect campaign contributions in Turkey on behalf of the 2021 campaign, said that they could collect more foreign contributions in the future for Adams’s 2025 reelection campaign, and indicated that it would be easier to raise the money if Adams traveled to Turkey to meet with businesspeople there.<sup>62</sup> Adams welcomed the offer of more foreign contributions and told the Promoter to coordinate with his staffer to arrange the contributions.<sup>63</sup>
30. In summer 2023, the Promoter informed the Adams staffer that the Promoter could secure foreign donations from Turkish nationals if Adams would attend an event with them.<sup>64</sup> The staffer updated Adams, who directed the staffer to work with a campaign fundraiser to create a plan to obtain the illegal donations.<sup>65</sup>
31. The campaign fundraiser suggested that the true foreign donors make their contributions through straw donors considerably in advance of the event, so that the event would not obviously be connected to the contributions.<sup>66</sup> The staffer and Promoter agreed that this

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<sup>60</sup> *Id.*

<sup>61</sup> *Id.* ¶ 42-42a.

<sup>62</sup> *Id.* ¶ 42a.

<sup>63</sup> *Id.*

<sup>64</sup> *Id.* ¶ 45a.

<sup>65</sup> *Id.*

<sup>66</sup> *Id.* ¶ 45b.

plan would work, and Adams approved the plan.<sup>67</sup> They chose September 20, 2023 as the date for the event, scheduling it in a private room at a New York City hotel.<sup>68</sup>

32. In the leadup to the event, the Promoter collected payments of \$5,000 or more from the attendees, many of whom were foreign nationals.<sup>69</sup> The Promoter then used a portion of the payments to provide cash to the Adams staffer.<sup>70</sup> The staffer distributed the cash in \$2,100 increments to at least three straw donors, who each made an online contribution of the same amount to the 2025 campaign.<sup>71</sup> The foreign nationals who used straw donors to contribute attended the September 20<sup>th</sup> event and met with Adams.<sup>72</sup> A video of the event shows the Promoter introducing one of the foreign nationals to Adams and Adams thanking the attendee.<sup>73</sup>
33. In an effort to conceal the existence and nature of the event, the event was never listed on Adams’s public calendar.<sup>74</sup> However, it appeared on his private calendar as a “Fundraiser for Eric Adams 2025,” with the Promoter listed as the host, and a note saying that the total submitted before the event was \$22,800 (with a goal of “25k”).<sup>75</sup> The Promoter even created a PowerPoint presentation billing the event as a dinner hosted by “International Sustainability Leaders” about “Sustainable Destinations,” with a ticket price of \$5,000.<sup>76</sup>

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<sup>67</sup> *Id.*

<sup>68</sup> *Id.* ¶ 45c.

<sup>69</sup> *Id.* ¶ 45d.

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> *Id.* ¶ 45e.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.* ¶ 45c.

<sup>75</sup> *Id.*

<sup>76</sup> *Id.*

***The Department of Justice Indicts Adams for FECA and Other Violations, and then Moves to Dismiss Indictment in Apparent Exchange for Adams’s Conditional Agreement to Assist with DOJ’s Immigration Enforcement Priorities***

34. A grand jury indicted Adams on September 25, 2024, on five corruption-related counts; in addition to the FECA violations detailed above, the charges included bribery, wire fraud, and conspiracy.<sup>77</sup>
35. Following Donald Trump’s election in November 2024, Adams and his counsel made repeated overtures to the then-President Elect in an attempt to avert the ongoing federal prosecution.
36. These meetings reportedly included a “closed door” conversation in December 2024 between Adams and Trump’s then-incoming border czar, Tom Homan,<sup>78</sup> and a January trip by Adams to meet with then-President-elect Trump at his Mar-a-Lago club in Florida.<sup>79</sup>
37. Shortly after Trump took office, Adams’s legal team made a formal written request for a presidential pardon in connection to the federal corruption case.<sup>80</sup>
38. On February 10, 2025, Acting Deputy Attorney General Emil Bove ordered prosecutors in the Southern District of New York to dismiss the criminal charges against Adams.<sup>81</sup> In

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<sup>77</sup> *Id.* ¶¶ 50-63; see also William K. Rashbaum *et al.*, *Eric Adams Is Indicted After Federal Corruption Investigation*, N.Y. Times (Sept. 25, 2024), <https://www.nytimes.com/2024/09/25/nyregion/eric-adams-indicted.html>.

<sup>78</sup> Ivan Pereira, *Mayor Eric Adams Meets with Trump Border Czar to Talk NYC’s Role in New Immigration Policy*, ABC News (Dec. 12, 2024), <https://abcnews.go.com/Politics/mayor-eric-adams-meets-trump-border-czar-talk/story?id=116739472>. After meeting, the mayor said his legal team was in contact with ICE about ways to work together. *Id.* Shortly thereafter, at a December 16, 2024, news conference, Trump said he would consider pardoning Adams if he were convicted on federal corruption charges. Emma G. Fitzsimmons, *Trump Says He Would Consider Pardoning Eric Adams*, N.Y. Times (Dec. 16, 2024), <https://www.nytimes.com/2024/12/16/nyregion/trump-pardon-eric-adams.html>.

<sup>79</sup> Joe Anuta, *With His Federal Trial Looming, Eric Adams Dines with Trump*, Politico (Jan. 17, 2025), <https://www.politico.com/news/2025/01/17/eric-adams-new-york-donald-trump-00199139>.

<sup>80</sup> Michael S. Schmidt *et al.*, *How the Justice Dept. Helped Sink Its Own Case Against Eric Adams*, N.Y. Times (Feb. 13, 2025), <https://www.nytimes.com/2025/02/13/nyregion/adams-lawyers-justice-department-dismissal.html>.

<sup>81</sup> See Bove Memo, *supra* note 5.

his memo issuing the order to dismiss, Bove explicitly disclaimed any concern about “the strength of the evidence or legal theories” underlying the case, but asserted that the prosecution “unduly restricted Mayor Adams’s ability to devote full attention and resources” to deal with “illegal immigration and violent crime.”<sup>82</sup>

39. Bove’s order ignited a firestorm among federal prosecutors. On February 13, the Acting U.S. Attorney in Manhattan, Danielle Sassoon, resigned in protest over the DOJ order, describing it as an improper quid pro quo between the Justice Department and Adams.<sup>83</sup>
40. Sassoon’s resignation was followed by a chain of further resignations as DOJ leadership attempted to compel other federal attorneys to dismiss the Adams case. By February 14, six additional federal prosecutors had also resigned — apparently also in connection with their objections to the order to dismiss the charges against Adams — in what some labeled the “Thursday night massacre.”<sup>84</sup>
41. Hagan Scotten, the lead prosecutor on the Adams case at the Manhattan U.S. Attorney’s office, explained his resignation by invoking the “tradition in public service of resigning in a last-ditch effort to head off a serious mistake,” suggesting that the quid pro quo dismissal of Adams’s indictment was inconsistent with a “system of ordered liberty,” and

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<sup>82</sup> *Id.* at 1-2.

<sup>83</sup> See Letter from U.S. Attorney S.D.N.Y. Danielle R. Sassoon to U.S. Attorney Gen. Pamela Jo Bondi, U.S. Dept. of Justice, Re: United States v. Eric Adams, 24 Cr. 556 (DEH) (Feb. 12, 2025), *available at* <https://www.documentcloud.org/documents/25526481-sassoon-letter/>. Sassoon specifically pointed to a January 31 meeting between Bove, Adams’s attorneys, and prosecutors in Manhattan, stating that “Adams’s attorneys repeatedly urged what amounted to a quid pro quo, indicating that Adams would be in a position to assist with Department’s enforcement priorities only if the indictment were dismissed.” *Id.* at 3 n.1 Sassoon concluded that she did not believe “there are reasonable arguments” for a dismissal of the federal case, given that it was “well supported by the evidence and the law.” *Id.* at 7.

<sup>84</sup> Daniel Hampton, ‘Thursday Night Massacre’: Expert Flags DOJ’s ‘Cascading Scandal’ — That Won’t Go Away, MSN (Feb. 14, 2025), <https://www.msn.com/en-us/politics/government/thursday-night-massacre-expert-flags-doj-s-cascading-scandal-that-won-t-go-away/ar-AA1z10Ed>.

stating that “our laws and traditions do not allow using the prosecutorial power to influence other citizens, much less elected officials, in this way.”<sup>85</sup>

42. On February 14, 2025, DOJ attorneys ultimately moved to dismiss Adams’s criminal case, following reports that DOJ leadership had threatened to fire the Justice Department’s entire Public Integrity Section if compliance were not forthcoming.<sup>86</sup> The motion to dismiss reiterates immigration policy interests in explaining DOJ’s reasons for seeking the dismissal; it does not identify any concern about the merits of the evidence or legal arguments set forth in the indictment.<sup>87</sup>
43. Also on February 14, 2025, Adams and border czar Tom Homan participated in a joint interview on Fox News to discuss their plans to collaborate on immigration efforts. Homan underscored the transactional nature of Adams’s relationship with federal officials, warning, “If [Adams] doesn’t come through, I’ll be back in New York City, and we won’t be sitting on the couch — I’ll be in his office, up his butt, saying, ‘Where the hell is the agreement we came to?’”<sup>88</sup>

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<sup>85</sup> See Email from Assistant U.S. Attorney S.D.N.Y. Hagan Scotten to Acting Deputy Attorney Gen. Emil Bove, U.S. Dept. of Justice, Re: United States v. Eric Adams, 24 Cr. 556 (DEH), *available at* <https://s3.documentcloud.org/documents/25536146/hagan-scotten-resignation-letter.pdf>. Scotten went on to say, “If no lawyer within earshot of the President is willing to give him that advice, then I expect you will eventually find someone who is enough of a fool, or enough of a coward, to file your motion. But it was never going to be me.” *Id.*

<sup>86</sup> Devlin Barrett *et al.*, *In Moving to Stop Adams Case, Career Lawyer Sought to Save Off Deeper Crisis*, N.Y. Times (Feb. 16, 2025), <https://www.nytimes.com/2025/02/16/us/politics/justice-department-trump-eric-adams.html>; Josh Gerstein, *Justice Department in Crisis Over Eric Adams Showdown*, Politico (Feb. 14, 2025), <https://www.politico.com/news/2025/02/14/justice-department-crisis-resignations-adams-00204482>.

<sup>87</sup> See Nolle Prosequi, United States v. Adams, No. 1:24-cr-00556-DEH (S.D.N.Y. Feb. 14, 2025).

<sup>88</sup> Emma G. Fitzsimmons, *Eric Adams Highlights Coordination With Trump’s Border Czar on Fox News*, N.Y. Times (Feb. 14, 2025), <https://www.nytimes.com/2025/02/14/nyregion/adams-homan-fox-interview.html>.

## SUMMARY OF THE LAW

### *Foreign National Prohibitions*

44. Federal law prohibits a foreign national from directly or indirectly making a contribution or donation, or making an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election.<sup>89</sup> All other persons are likewise prohibited from soliciting, accepting, or receiving a contribution or donation from a foreign national.<sup>90</sup>
45. FEC regulations require “knowing” intent to establish a violation of the prohibition on soliciting, accepting, or receiving a contribution or donation from a foreign national.<sup>91</sup> That intent is present when the person has “actual knowledge that the source of the funds solicited, accepted or received is a foreign national;” is “aware of facts that would lead a reasonable person to conclude that there is a substantial probability that the source of the funds” is a foreign national; or is “aware of facts that would lead a reasonable person to inquire whether the source of the funds” is a foreign national but does not “conduct a reasonable inquiry.”<sup>92</sup>
46. Federal law defines a “foreign national” as (1) “an individual who is not a citizen of the United States or a national of the United States,” and “who is not lawfully admitted for permanent residence;” and (2) a “foreign principal,” such as a foreign government or an entity organized in a foreign country “or having its principal place of business in a foreign country.”<sup>93</sup>

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<sup>89</sup> 52 U.S.C. § 30121(a)(1).

<sup>90</sup> *Id.* § 30121(a)(2).

<sup>91</sup> 11 C.F.R. § 110.20(g).

<sup>92</sup> *Id.* § 110.20(a)(4).

<sup>93</sup> 52 U.S.C. § 30121(b)(1)-(2), *cross-referencing* 22 U.S.C. § 611(b).



47. A “donation” includes any “payment, gift, subscription, loan, advance, deposit, or anything of value given to a person.”<sup>94</sup>
48. The term “solicit” means “to ask, request, or recommend, explicitly or implicitly, that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value. A solicitation is an oral or written communication that, construed as reasonably understood in the context in which it is made, contains a clear message asking, requesting, or recommending that another person make a contribution, donation, transfer of funds, or otherwise provide anything of value. A solicitation may be made directly or indirectly.”<sup>95</sup>
49. The purpose of the foreign-national prohibitions is to “protect the United States electoral system from illegal foreign financial influence” and “any effort by foreign nationals to influence federal, State, or local elections with foreign money.”<sup>96</sup>
50. The Supreme Court has upheld the ban on foreign nationals making contributions and donations in connection with elections, affirming a three-judge court’s ruling that the government may constitutionally “exclude foreign citizens from activities that are part of democratic self-government in the United States” in an effort to “prevent foreign influence over the U.S. political process.”<sup>97</sup> That lower court remarked that foreign nationals “have primary loyalty to other national political communities, many of which have interests that compete with those of the United States.”<sup>98</sup>

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<sup>94</sup> 11 C.F.R. § 110.20(a)(2), *cross-referencing id.* § 300.2(e).

<sup>95</sup> *Id.* § 110.20(a)(6), *cross-referencing id.* § 300.2(m).

<sup>96</sup> Indictment, United States v. Parnas, 19-cr-725 (S.D.N.Y. Sept. 17, 2020), <https://www.justice.gov/usao-sdny/press-release/file/1317711/dl>.

<sup>97</sup> *Bluman*, 800 F. Supp. 2d at 283, 288.

<sup>98</sup> *Id.* at 291.

### *Jurisdiction*

51. The FEC has “exclusive jurisdiction with respect to the civil enforcement of” the Act.<sup>99</sup>
52. In enforcement matters, the Commission is empowered to seek civil monetary penalties as well as injunctive relief.<sup>100</sup> When a violation is “knowing and willful,” the Commission may seek enhanced monetary penalties.<sup>101</sup>
53. A violation of FECA is knowing and willful when the “acts were committed with full knowledge of all the relevant facts and a recognition that the action is prohibited by law.”<sup>102</sup> This standard does not require proving knowledge of the specific statute or regulation a person violated.<sup>103</sup> Rather, it is sufficient to demonstrate that a respondent “acted voluntarily and was aware that his conduct was unlawful.”<sup>104</sup> This awareness may be shown through circumstantial evidence, such as a person’s efforts to disguise their actions.<sup>105</sup>
54. “The fact that a person is or was the subject of a DOJ investigation or prosecution does not [ ] preclude the Commission from civilly pursuing that person for violations of the Act, even when the conduct at issue is the same . . . . Also, the FEC may elect to proceed on the civil track at the same time the DOJ is pursuing the criminal case.”<sup>106</sup> In other words, DOJ and the Commission can exercise their civil and criminal authority in tandem, or only one entity might choose to act.

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<sup>99</sup> 52 U.S.C. § 30106(b).

<sup>100</sup> *See id.* § 30109(a)(5)-(6).

<sup>101</sup> *See id.* § 30109(a)(5)(C), (d).

<sup>102</sup> 122 Cong. Rec. H3778 (daily ed. May 3, 1976).

<sup>103</sup> *See United States v. Danielczyk*, 917 F. Supp. 2d 573, 579 (E.D. Va. 2013).

<sup>104</sup> *Id.*

<sup>105</sup> *United States v. Hopkins*, 916 F.2d 207, 213-15 (5th Cir. 1990).

<sup>106</sup> FEC, Guidebook for Complainants and Respondents on the FEC Enforcement Process at 8 (May 2021), [https://www.govinfo.gov/content/pkg/GOVPUB-Y3\\_EL2\\_3-PURL-gpo86381/pdf/GOVPUB-Y3\\_EL2\\_3-PURL-gpo86381.pdf](https://www.govinfo.gov/content/pkg/GOVPUB-Y3_EL2_3-PURL-gpo86381/pdf/GOVPUB-Y3_EL2_3-PURL-gpo86381.pdf).

55. Historically, the FEC and Department of Justice have both recognized the importance of the ban on foreign election spending, imposing serious civil and criminal penalties, respectively, for violations of the law.<sup>107</sup>

## CAUSE OF ACTION

### COUNT I:

#### **ERIC ADAMS, ERIC ADAMS 2021, AND ERIC ADAMS 2025 KNOWINGLY AND WILLFULLY VIOLATED 52 U.S.C. § 30121 BY SOLICITING AND ACCEPTING FOREIGN NATIONAL DONATIONS IN CONNECTION WITH A LOCAL ELECTION**

56. The available information supports finding reason to believe that Adams and his campaign committees, Eric Adams 2021 and Eric Adams 2025, violated 52 U.S.C. § 30121 by knowingly soliciting and receiving contributions from foreign nationals in connection with a local election on at least two recent occasions.
57. On September 27, 2021, Adams and his mayoral campaign committee, Eric Adams 2021, knowingly received a donation from a Turkish University based in Istanbul.<sup>108</sup> Adams had been pursuing this foreign contribution for years. Adams met the Turkish owner and chairman of the University on an official trip to Turkey in 2015.<sup>109</sup> Following the trip, the

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<sup>107</sup> See, e.g., *FEC Issues Record-Breaking Civil Penalty in CLC Foreign National Contribution Ban Complaint*, CLC (Apr. 8, 2022), <https://campaignlegal.org/document/fec-issues-record-breaking-civil-penalty-clc-foreign-national-contribution-ban-complaint> (assessing \$975,000 civil penalty for illegal foreign national contributions); *FEC Conciliation Agreement: Fines for Violation of Foreign National Contribution*, CLC (Mar. 11, 2019), <https://campaignlegal.org/document/fec-conciliation-agreement-fines-violation-foreign-national-contribution> (imposing \$550,000 civil penalty for illegal foreign national contributions); *Lev Parnas Sentenced to 20 Months in Prison for Campaign Finance, Wire Fraud, and False Statements Offenses*, Dep't of Justice (June 29, 2022), <https://www.justice.gov/usao-sdny/pr/lev-parnas-sentenced-20-months-prison-campaign-finance-wire-fraud-and-false-statements#:~:text=PARNAS%2C%2050%2C%20of%20Boca%20Raton,contribution%20by%20a%20foreign%20national> (announcing criminal sentence of Lev Parnas in connection with his involvement in a conspiracy to make and solicit political contributions by a foreign national); Colin Moynihan, *Igor Fruman, Former Giuliani Associate, Is Sentenced to One Year in Prison*, N.Y. Times (Jan 21, 2022), <https://www.nytimes.com/2022/01/21/nyregion/igor-fruman-sentencing.html> (reporting on Fruman's sentencing for soliciting foreign campaign contributions).

<sup>108</sup> Indictment ¶ 31f.

<sup>109</sup> See *id.* ¶¶ 10, 11c.

Turkish University Owner visited New York City in November 2018.<sup>110</sup> The Turkish University Owner met with Adams in Adams's government office and offered to contribute to the 2021 campaign.<sup>111</sup> Adams, knowing that the Turkish University Owner was a foreign national, and knowing that the Turkish University was organized and headquartered in Turkey, nevertheless ordered his staffer to pursue the illegal contribution.<sup>112</sup>

58. While the donation scheme stalled for a while,<sup>113</sup> in July 2021, the Adams staffer, the Promoter, and the Turkish University Owner began making plans for an in-person fundraising event that Adams would attend for purposes of receiving the donations.<sup>114</sup> They planned for the Turkish University Owner to provide funds to U.S. citizens and green card holders working at the University's U.S.-based campus.<sup>115</sup> These lawful donors would make the contributions in their own names to hide the true illegal nature of the contributions.<sup>116</sup> The staffer updated Adams about the plan, and Adams approved it.<sup>117</sup>

59. Ultimately, rather than transmitting the illegal donations via an in-person event, the staffer had the campaign set up an online fundraising link through which the Turkish University Owner could orchestrate the illegal donations.<sup>118</sup> The staffer, Adams, and a campaign fundraiser communicated about the link, with Adams subtly reminding his

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<sup>110</sup> *Id.* ¶ 20b.

<sup>111</sup> *Id.*

<sup>112</sup> *Id.*

<sup>113</sup> At one point in 2019, Adams attempted to move the matter along by asking his staffer to check that the Turkish University Owner was still planning to contribute. *Id.* ¶ 26.

<sup>114</sup> *Id.* ¶¶ 31-31a.

<sup>115</sup> *See id.* ¶¶ 31-31a, 31c.

<sup>116</sup> *See id.*

<sup>117</sup> *Id.* ¶ 31c.

<sup>118</sup> *Id.* ¶ 31e.

team that U.S. citizens (as opposed to the true foreign donor) had to be the ones transferring the donations.<sup>119</sup>

60. On September 27, 2021, three U.S.-based employees of the Turkish University made \$2,000 contributions to the Adams’s 2021 mayoral campaign.<sup>120</sup> The straw donors were reimbursed with funds from the Turkish University,<sup>121</sup> a foreign national within the meaning of the Act.<sup>122</sup>
61. Adams was aware that the donations finally occurred, mentioning to the Promoter later in 2021 that the Turkish University Owner “didn’t keep their word” because the ultimate donation amount was less than originally discussed.<sup>123</sup> This transaction represents a distinct violation of 52 U.S.C. § 30121, which is enough to find reason to believe.
62. However, Adams also accepted further foreign national donations, made via straw donors, in connection with his 2025 mayoral campaign.
63. The Turkish Promoter who Adams met in 2015 offered,<sup>124</sup> during a dinner with Adams in the days following his mayoral inauguration, to obtain Turkish foreign national contributions in connection with his 2025 reelection effort.<sup>125</sup> Adams welcomed the offer and told the Promoter to coordinate with his staffer.<sup>126</sup>

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<sup>119</sup> *Id.*

<sup>120</sup> *Id.* ¶ 31f.

<sup>121</sup> *Id.*

<sup>122</sup> See 52 U.S.C. § 30121(b), *cross-referencing* 22 U.S.C. § 611(b)(3) (defining “foreign national” as a “partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country”).

<sup>123</sup> Indictment ¶ 42c.

<sup>124</sup> *Id.* ¶ 10.

<sup>125</sup> *Id.* ¶¶ 42-42a.

<sup>126</sup> *Id.* ¶ 42a.

64. In summer 2023, the Promoter began planning to make good on the offer.<sup>127</sup> The Promoter informed the staffer that, if Adams agreed to meet with the Turkish foreign nationals interested in contributing, then the Promoter could secure the contributions.<sup>128</sup> The staffer updated Adams, who told the staffer to create a plan to obtain the illegal donations.<sup>129</sup>
65. The Promoter, the staffer, and a campaign fundraiser agreed that the foreign donors should make their campaign contributions through straw donors, and do so in advance of the event so that the contributions would not be obviously connected to Adams's appearance at the event.<sup>130</sup> Adams approved the plan.<sup>131</sup> They arranged for the event to be held at a hotel on September 20, 2023.<sup>132</sup>
66. The Promoter then collected payments of \$5,000 or more from the people who wanted to meet with Adams, many of whom were foreign nationals.<sup>133</sup> The Promoter used a portion of the \$5,000 payments to provide cash to Adams's staffer.<sup>134</sup> The staffer distributed cash in \$2,100 increments to at least three straw donors, who donated the same amount to the 2025 Adams mayoral campaign using an online portal.<sup>135</sup> Therefore, Adams and his 2025 campaign knowingly accepted at least three straw donations funded with money from foreign nationals in summer or early fall 2023.<sup>136</sup>

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<sup>127</sup> See *id.* ¶ 45a.

<sup>128</sup> *Id.*

<sup>129</sup> *Id.*

<sup>130</sup> *Id.* ¶ 45b.

<sup>131</sup> *Id.*

<sup>132</sup> *Id.* ¶ 45c.

<sup>133</sup> *Id.* ¶ 45d.

<sup>134</sup> *Id.*

<sup>135</sup> *Id.*

<sup>136</sup> See 52 U.S.C. § 30121(b)(2).

67. Adams attended the hotel event as planned, and video footage even shows the Promoter introducing Adams to a foreign national attendee and Adams thanking the foreign national.<sup>137</sup>
68. These facts — which the FBI developed through an investigation, and DOJ deemed reliable enough to seek and obtain a federal indictment from a grand jury — provide more than enough reason to believe that Adams and his mayoral campaigns solicited and accepted foreign national contributions, in violation of 52 U.S.C. § 30121.
69. DOJ’s political decision to subsequently seek dismissal of the indictment, for reasons having nothing to do with the weight of the evidence or likelihood of success in front of a jury, cannot bar the FEC from exercising its independent civil jurisdiction to enforce the federal campaign finance laws. In fact, DOJ’s abdication places the Commission in the critical and sole position to uphold the ban on foreign funding of U.S. elections.

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70. Furthermore, these factual allegations support finding reason to believe that the aforementioned violations of FECA were knowing and willful.
71. The evidence here plainly shows that Adams and his campaign committees were aware that seeking and accepting foreign national donations is unlawful, as they went to extremes to cover up their schemes.<sup>138</sup>
72. With regard to the Turkish University donation, Adams ensured that the University contributed its money via straw donors who were U.S. citizens or green card holders to

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<sup>137</sup> Indictment ¶ 45e.

<sup>138</sup> See *Hopkins*, 916 F.2d at 213-15.

hide the illegality.<sup>139</sup> The 2021 campaign also reported the donations in the names of the straw donors, rather than the true source of the funds, when filing a report with the New York City Campaign Finance Board.<sup>140</sup>

73. With regard to the foreign national donations made to the 2025 campaign, Adams again ensured that straw donors were providing the foreign funds to his campaign.<sup>141</sup> He and his agents also made sure to collect the donations online, far in advance of the event, to minimize the risk of anyone connecting the event attendees to the contributions.<sup>142</sup> In addition, the event never appeared on Adams’s public calendar, and the Promoter created materials representing the event to be a dinner about “Sustainable Destinations” hosted by “International Sustainability Leaders,” rather than a campaign fundraiser.<sup>143</sup>
74. Adams was aware that he was accepting money from foreign nationals, and he took steps to disguise the illegal donations as legitimate campaign donations from permissible donors. The coverups — in addition to the fact that Adams was a well-resourced, sophisticated politician who had experience campaigning for office and was aware of basic campaign finance rules — demonstrate that Adams was aware his conduct was unlawful and acted with knowing and willful intent.<sup>144</sup> The Commission should thus impose enhanced civil penalties for Adams’s and his campaign committees’ violations of 52 U.S.C. § 30121.

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<sup>139</sup> See Indictment ¶¶ 31b-c, 31e-f.

<sup>140</sup> *Id.* ¶ 31f.

<sup>141</sup> *Id.* ¶ 45b.

<sup>142</sup> *Id.*

<sup>143</sup> *Id.* ¶ 45c.

<sup>144</sup> See *Danielczyk*, 917 F. Supp. 2d at 579; *Hopkins*, 916 F.2d at 213-15. That DOJ sought and obtained a criminal indictment based on the same facts further supports a knowing and willful finding.



**PRAYER FOR RELIEF**

75. Wherefore, the Commission should find reason to believe that Eric Adams, Eric Adams 2021, and Eric Adams 2025 have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
76. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

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February 18, 2024

VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Shanna M. Ports

Shanna Ports, Esq.

Sworn to and subscribed before me this 19 day of February 2025.

Sophie Grossman

Notary Public

