

**AFFIDAVIT OF**  
**MR. AYAZ QURESHI**

I, Ayaz Qureshi, hereby solemnly swear and affirm, under penalty of perjury, that the following statements I make are true and accurate to the best of my information, knowledge and belief.

1. I am over the age of 18 and competent to make this affidavit.
2. This affidavit and its contents were translated to me in Urdu, my native language, and that I understand its contents as drafted in English.
3. I am submitting this affidavit in support of my Motion to Vacate my guilty plea entered in criminal no. 1:22CR00330-001.
4. During my Rule 11 hearing when I plead guilty, I did not fully appreciate or comprehend the nature of what I was doing.
5. I required the assistance of an interpreter, Urdu, and was never provided one by the Court. I informed my then-attorney that I required one for Court, but was told I did not need one.
6. I was also never advised by my then-attorney of the contents of the plea agreement that I signed. Because I lacked the vocabulary for English legal terms, I could not read it myself and comprehend its contents. My then-attorney also never explained to me the contents of the agreement, the nature of the charges or even the sentencing range under the guidelines.
7. In preparation of my criminal case, I met my then-attorney only 3-4 times, and during these meetings, I asked for an interpreter but was never provided one.
8. Prior to my Rule 11 hearing, my attorney threatened me by saying, *"if I did not plead guilty, he will quit being my lawyer."* Before saying that, my lawyer also told me, *"Ayaz, you are here to plea guilty, when you appear in front of the Judge, what ever he says or reads, don't say anything, except Yes Your Honour."* After that is when he told me that he will quit if I didn't follow his words. I was afraid to say anything because my lawyer told me not to speak or saying anything.
9. I never had a chance to fully comprehend the plea agreement by reading it through or having it translated to me in Urdu. I was also told by my then-lawyer that I had to sign the plea agreement quickly because it was a good opportunity and I had to sign it before the Government *"changes their minds."*
10. I felt extremely pressured to plead guilty because of my then-attorney's statements to

me. My then-lawyer said to me, "*plead guilty, its good for you and for me.*" He also told me when I go in front of the Judge that I should just say, "*Yes, Your Honor,*" to the judge's questions.

11. Had I understood what I was doing and the consequences I now face, I would not have accepted the plea agreement, and instead would have elected to go to trial to prove my innocence.

12. I would have raised the defense that I was a victim of PPP loan fraud, and not the principle actor. I would have raised the defense that I was misled and tricked by Adam into participating in a loan scheme, when I had never had such intent.

13. I would have raised the defense that Adam forged my signatures on my company tax returns, without my knowledge, and that he prepared the supporting documents for the PPP loans, without my knowledge.

14. I would have raised the defense that I had originally met with Adam because he claimed he could help me repair my credit, and then help me obtain a bank approval letter to buy a house. I would have raised the defense that I originally paid him \$900.00 to help me repair my credit.

15. I would have raised the defense that I never originated an intent to obtain an PPP loan, rather it was Adam that suggested I pursue it, and Adam who ultimately prepared applications, documents and exhibits in support, on my behalf without my understanding and appreciation of what he was pursuing.

16. I would have raised the defense that once I received the PPP loan money, I informed Adam that I did not agree to borrow this much money, that I had never agreed to a loan for \$250,000.00.

17. I would have raised the defense that I informed Adam, that all this money should be returned, but Adam told me that was not possible, and that I had to spend the money on payroll.

18. I would have raised the defense that I never had enough employees in my company to support that I needed this much money, and that had I known this was what Adam was doing, I would never have agreed to accept his help.

19. I would have raised the defense that Adam stated for his time and efforts, he would collected a fee of \$75,000.00 from the PPP loan proceeds, and that if I wanted to return all the

money, that I would also have to refund the \$75,000.00 personally, as he would not be refunding any portion of the money he received.

20. My then-attorney never once listened or understood that I was not a principle actor in a conspiracy with Adam. Since learning what the word "conspiracy" meant, I understand now that I did not have any type of agreement between Adam and myself to defraud the federal government through the PPP loan process. Instead, I was misled by Adam and merely followed his advice to apply for what I thought was a business loan to help my company survive through Covid.

**SWORN TO BE TRUE:**

  
Mr. Ayaz Qureshi

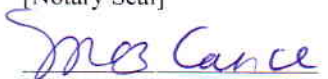
Date: 7-31-23

State of Maryland  
County of Montgomery County, to wit:

On this 31 day of July, 2023, before me, the undersigned officer, personally appeared Mr. Ayaz Qureshi, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purpose therein contained, and attested to the truth of the contents therein.

In witness whereof, I hereunto set my hand and official seal.

[Notary Seal]

  
[Signature of Notary Public]  
M B Cance

[Printed Name of Notary Public]

Notary Public

My Commission Expires: 4/14/26

