

Affidavit of Thomas Maronick Jr Esq.

I am Thomas J Maronick Jr, Esq., and I swear and affirm that the following is true and accurate to the best of my knowledge, information and belief that:

1. I and my office Maronick Law LLC represented Ayaz Qureshi in his federal case in question
2. I was the second attorney who represented him to my knowledge in this same matter, the first being Patrick Smith
3. At all times relevant, Mr. Qureshi was able to speak with me without the assistance of an interpreter, or, in the case of his pre-sentence investigation meeting, with an interpreter as backup
4. That Mr. Qureshi hired me as his second attorney after a plea agreement for the present case had been proposed by the government that he indicated having full knowledge of, and understanding of.
5. Counsel asked during their first meeting if Mr. Qureshi needed an interpreter for any aspect of their work together.
6. Mr. Qureshi indicated that he was an American citizen and understood English, and further never once requested an Urdu interpreter for his meetings with counsel or any other purpose other than as brought on for the Pre-Sentence meeting
7. Mr. Qureshi brought a copy of the initial plea agreement proffered with prior counsel with him to multiple meetings in the e in Glen Burnie where he met this attorney
8. Mr. Qureshi indicated to counsel that he wanted to see if anything could be done to do better than that plea agreement and to explore trial options
9. Present counsel indicated wanting to seek that end and met with him in the office, often with his wife being present, and without need or request for an interpreter
10. After discussion of the case, counsel believed strongly, that it was in the best interests of Mr. Qureshi to consider cooperating with the Government
11. Counsel and Mr. Qureshi worked with the Government in a cooperation situation in which Mr. Qureshi sought to help his chances at sentencing by the minimum of accepting responsibility for his actions
12. In fact, the sentencing in this case was postponed more than once as the Government sought to continue use of Mr. Qureshi for a potential better situation for him
13. At no time did counsel threaten or coerce or force Mr. Qureshi to take a plea, that he felt it was in the Defendant's best interest
14. At no time did counsel tell Mr. Qureshi he would quit if he wouldn't take the plea, but did tell him that the plea was in his interest, and if he wanted to try the case but didn't agree with with counsel's advice, he could certainly hire another lawyer if he felt that his current counsel's advice was not to his satisfaction, so as to not have a philosophical conflict on the case
15. Mr. Qureshi did not indicate any dissatisfaction with counsel until the filing of his Motion to Withdraw Guilty Plea
16. That he went through the entire plea agreement, collectively, in his office with Mr. Qureshi and also discussed the plea agreement over the phone with Mr. Qureshi.



17. Further, while Mr. Qureshi admitted nervousness at the plea hearing, any purported lack of understanding at the plea hearing was entirely addressed by this Court, as the Court went through the plea agreement line by line with Mr. Qureshi so as to ascertain his full and complete understanding
18. Mr. Qureshi had time to discuss any questions or concerns with present counsel, but at the end, agreed to the plea on the record in front of This Court
19. Mr. Qureshi indicated satisfaction with this counsel at the plea hearing on the record
20. Mr. Qureshi was explained every aspect of the plea agreement before signing it and had full understanding of it.
21. Counsel believed his acceptance of funds for a company that had no employees was strong evidence of his involvement and Mr. Qureshi's purported defenses were better as mitigation, or as part of cooperation with the Government and that was conveyed.
22. Counsel had regular contact with Mr. Qureshi both in in-office meetings and through calls
23. While Mr. Qureshi had inaccurate or wrong beliefs about his level of culpability under the law, counsel carefully went through his concerns, questions, and beliefs in making sure all potential defenses were explored before coming to a decision to proceed with a plea.d
24. While counsel can make no representations as to mental fitness, as he's not a doctor, counsel notes that Mr. Qureshi met with him and cooperated with him throughout, responded to his questions, took part in his own defense, discussed strategies, and was fully engaged to counsel's knowledge and belief to be able to participate in his defense.

Signed,

A handwritten signature in black ink, appearing to read 'TJ2', with a long horizontal line extending to the right.

Thomas J. Maronick Jr, Esq. 11/20/23

Handwritten initials 'TJ' in black ink.