FILED
IN OPEN COURT
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CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

MUHAMMAD ADIL QURAISH,

Defendant.

Case No. 1:25-cr-185

STATEMENT OF FACTS

The United States and the defendant, Muhammad Adil Quraish, agree that the following facts are true and correct, and that had this matter proceeded to trial, the United States would have proven them beyond a reasonable doubt with admissible and credible evidence:

From in or about April 2020, and continuing through in or about December 2021, in the Eastern District of Virginia and elsewhere, defendant, MUHAMMAD ADIL QURAISH, did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with others known and unknown to commit offenses against the United States, namely by conspiring to commit wire fraud in violation of 18 U.S.C. §§ 371 and 1343.

Background and Relevant Entities

1. The Defendant, MUHAMMAD ADIL QURAISH, was born in Pakistan. According to Department of Homeland Security records, the Defendant became a naturalized United States citizen on or about May 4, 2011.

2. From July 2017 until October 2022, the Defendant, MUHAMMAD ADIL QURAISH, was a dentist in the U.S. Air Force. For a portion of QURAISH's service, he was assigned to the Pentagon.

3. A2Z Appliance Service Inc. ("A2Z") was an appliance repair business operating in the Eastern District of Virginia.

4. CC-1 was the office manager for A2Z, responsible for the day-to-day operation of the business.

5. CC-2 was also employed by A2Z.

6. American Dental Excellence LLC ("ADE") was a dental services organization, operating in the Eastern District of Virginia.

7. Adil Quraish DDS Waldorf PC ("Dental Care of Waldorf") was a dental practice operating in Waldorf, Maryland.

8. Baja Nonprofit was an international non-profit, headquartered in the Eastern District of Virginia, but operating in Pakistan.

9. Q Investments Group LLC ("QIG") was an international real estate investment group operating in Texas.

10. CC-3 and CC-4 shared responsibility for day-to-day operations of QIG.

11. Each of A2Z, ADE, Dental Care of Waldorf, Baja Nonprofit, and QIG was incorporated prior to February 15, 2020.

12. QURAISH assumed the role as President and/or CEO of A2Z, ADE, Dental Care of Waldorf, Baja Nonprofit, and QIG.

13. QURAISH had access to payroll and financial records of A2Z, ADE, Dental Care of Waldorf, Baja Nonprofit, and QIG. He applied for Paycheck Protection Program ("PPP") and Economic Injury Disaster ("EIDL") loans for these entities and he knew that the numbers of

employees, the identities of the employees, the payroll figures, the revenue figures, and certain supporting documents he was providing to the lenders and the U.S. Government in support of the applications for PPP and EIDL loans were false.

The PPP Loan Fraud Conspiracy

14. From at least in or around April 2020 through at least in or about December 2021, the defendant conspired with CC-1, CC-2, CC-3, CC-4, and others to commit wire fraud. Specifically, the defendant agreed with CC-1, CC-2, CC-3, CC-4, and others to submit materially false applications for PPP funded loans and caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures, and sounds for the purpose of executing the scheme and artifice to defraud.

15. By at least early April 2020, QURAISH learned about PPP and EIDL loans. Shortly thereafter, QURAISH discussed applying for EIDL and PPP loans with co-conspirators with intentionally inflated and falsified payroll information to receive loans that the businesses were not entitled to receive.

16. To qualify for the loans, QURAISH and his co-conspirators agreed to knowingly and intentionally inflate and falsify material information that QURAISH supplied to financial institutions and the SBA in connection with applying for EIDL and PPP loans. QURAISH inflated the numbers of employees each entity claimed. QURAISH materially inflated quarterly and annual payroll figures for several entities. QURAISH created falsified payroll records, created falsified IRS tax forms, and falsely certified or caused to be falsely certified that such forms had been filed with the IRS.

17. As a part of the conspiracy, QURAISH, CC-1, CC-2, CC-3, CC-4, each agreed to falsely claim to be an employee of some of the businesses. For example, QURAISH falsely

claimed that each co-conspirator was an employee, making approximately $90,000 salary at four of the five businesses.

A2Z

18. In February 2020, A2Z had only two salaried employees (CC-1 and CC-2) and paid $7,950 in quarterly wages.

19. In April 2020, QURAISH and CC-1 agreed to submit a fraudulent PPP loan application for A2Z. The PPP loan application falsely claimed 5 employees and quarterly wages of $117,320.76 (over fourteen times the true amount).

20. QURAISH falsified two IRS tax forms to support the fraudulent PPP loan application for A2Z. And on June 9, 2020, A2Z received a $97,700 PPP loan based on the fraudulent loan application.

21. On October 30, 2020, A2Z's accountant emailed CC-1, CC-3, and CC-4. The title of the email was "PPP Loan Forgiveness Problem." In the email, the accountant stated: "I am writing because I am concerned about [A2Z] qualifying for loan forgiveness. It is all very confusing, and I know you thought you had it all calculated out. . . . I don't know what your bank was doing, but $4843.25 should have been the maximum amount for [A2Z's PPP] loan." QURAISH was copied on a reply to this email.

22. Despite the accountant's email, on November 4, 2020, four months after receiving the PPP loan, CC-3 instructed the accountant to process payroll for QURAISH, CC-3, and CC-4, though neither QURAISH, CC-3, nor CC-4 were A2Z employees. QURAISH was copied on this email.

23. In December 2020, QURAISH, CC-1 and CC-3, agreed to fraudulently obtain a second PPP loan for A2Z. In a December 28, 2020 email to CC-1, and CC-3, QURAISH wrote:

"Please take a moment to update yourself on the upcoming 2nd round of PPP. [O]ur objective will be apply again for [an] amount less than 150K."

24. Between April 2021 and December 2021, QURAISH submitted a second fraudulent PPP loan application and two fraudulent forgiveness applications for A2Z.

25. Despite A2Z's accountant's email that only $4,843 would be forgivable, QURAISH requested and received forgiveness for the entire first PPP loan amount ($97,700).

26. On April 6, 2021, QURAISH submitted a second fraudulent PPP loan application for A2Z for $140,827. The second PPP loan application falsely claimed A2Z had 14 employees. And on April 13, 2021, A2Z received a $140,827 PPP loan based on the second fraudulent loan application.

27. Between April 2021 and December 2021, QURAISH submitted two fraudulent forgiveness applications for A2Z. The forgiveness applications repeated the false employee numbers and payroll calculations, and QURAISH falsely certified that he used the loan for payroll costs.

ADE

28. On October 28, 2019, QURAISH opened a TD Bank account for ADE. In the October 28, 2019 application documents, ADE was listed as having just 2 employees.

29. On June 11, 2020, QURAISH falsified two IRS tax forms for ADE. On one of the forms, QURAISH falsely claimed that ADE had 9 employees. And on June 22, 2020, ADE received a $178,300 PPP loan based on the fraudulent loan application.

30. On July 21, 2020, CC-4 wrote QURAISH via text: "I am finishing up the ADP employee info forms. Quick question, did you put us on 2019 W4s or 2020 W4s? Also, I need to know which hire date to put on the ADP form." In response to CC-4's request for payroll

information, QURAISH provided hire dates for CC-1, CC-2, CC-3, and CC-4 of September 1, 2018. However, CC-1, CC-2, CC-3, and CC-4 were never ADE employees.

31. On April 1, 2021, QURAISH submitted a second fraudulent PPP loan application for ADE for $143,805. The second PPP loan application falsely claimed ADE had 14 salaried employees. And on April 14, 2021 ADE received a $143,805 PPP loan based on the second fraudulent loan application.

32. Between June 2021 and December 2021, QURAISH submitted two fraudulent forgiveness applications for ADE. The forgiveness applications repeated the false employee numbers and payroll calculations, and QURAISH falsely certified that he used the loan for payroll costs.

Dental Care of Waldorf

33. On April 8, 2020, an accountant sent QURAISH a document containing the monthly payroll cost from January 1, 2020, to March 31, 2020, for Dental Care of Waldorf. The accountant calculated Dental Care of Waldorf's average monthly payroll as $18,702.67.

34. Between April 8, 2020 and April 10, 2020, QURAISH falsified the payroll calculation in the document to $46,317.60 (approximately 2.5 times the actual monthly payroll cost).

35. QURAISH submitted this false document in his PPP loan application for Dental Care of Waldorf. And on April 27, 2020, Dental Care of Waldorf received a $113,695 PPP loan based on the fraudulent loan application.

36. On May 12, 2020, QURAISH wrote to CC-3, "We are going to resubmit your ppp application and increase the numbers. We are working with [Bank A]. I will finish up the paperwork and get it to you. How much money do you want? I already have the paper work for $113,695. If you want more, I can increase it."

37. On March 22, 2021, QURAISH submitted a second fraudulent PPP loan application for Dental Care of Waldorf for $145,312. The second PPP loan application falsely claimed ADE had an average monthly payroll of $58,125 (approximately 3 times the actual monthly payroll cost).

38. Between March 2021 and December 2021, QURAISH submitted two fraudulent forgiveness applications for Dental Care of Waldorf. The forgiveness applications repeated the false payroll calculations and QURAISH falsely certified that he used the loan for payroll costs.

Baja Nonprofit

39. At no point did Baja Nonprofit have more than two employees. And at no point did Baja Nonprofit have more than $5,000 in monthly salary costs.

40. On April 14, 2020, QURAISH submitted a fraudulent EIDL loan intake application for Baja Nonprofit for $159,900. The EIDL loan falsely claimed that Baja Nonprofit employed 10 employees.

41. On June 16, 2020, QURAISH submitted a fraudulent PPP loan for Baja Nonprofit, claiming 5 employees and $39,568 in monthly payroll.

42. QURAISH falsified two IRS tax forms to support the fraudulent PPP loan application for Baja Nonprofit. And on June 18, 2020, Baja Nonprofit received a $98,900 PPP loan based on the fraudulent loan application.

43. On July 21, 2020, in response to CC-4's request for payroll information, QURAISH provided hire dates for CC-1, CC-2, CC-3, and CC-4 of January 1, 2017. However, CC-1, CC-2, CC-3, and CC-4 were never Baja Nonprofit employees.

44. On April 2, 2021, QURAISH submitted a second fraudulent PPP loan application for Baja Nonprofit for $145,630. The second PPP loan application falsely claimed Baja Nonprofit

had 13 employees. And on April 19, 2021, Baja Nonprofit received a $145,630 PPP loan based on the second fraudulent loan application.

45. Between June 2021 and December 2021, QURAISH submitted two fraudulent forgiveness applications for Baja Nonprofit. The forgiveness applications repeated the false employee numbers and payroll calculations, and QURAISH falsely certified that he used the loan for payroll costs.

QIG

46. Between May 12, 2020 and May 14 2020, QURAISH and CC-3 agreed to submit a fraudulent PPP loan application for QIG.

47. On May 14, 2020, CC-3 wrote QURAISH via WhatsApp, "Hey bud let's go ahead with the PPP app for the same amount you applied for. I will register you, [CC-2], [CC-1], [CC-4] as employees when I get back and start your payroll after receiving the money…Your salaries will each be $99000. . . You[r] assistance with the bank and the paperwork will really help me out[.]"

48. On June 16, 2020, QURAISH submitted a false PPP loan application for QIG. The PPP loan application falsely claimed 8 employees and monthly wages of $43,833 (over seven times the true amount). And on June 18, 2020, QIG received a $109,500 PPP loan based on the fraudulent loan application.

49. On April 6, 2021, QURAISH submitted a second fraudulent PPP loan application for QIG for $138,030. The second PPP loan application falsely claimed QIG had 13 employees. And on April 16, 2021, QIG received a $138,030 PPP loan based on the second fraudulent loan application.

50. Between June 2021 and December 2021, QURAISH submitted two fraudulent forgiveness applications for QIG. The forgiveness applications repeated the false employee

numbers and payroll calculations, and QURAISH falsely certified that he used the loan for payroll costs.

* * * *

51. In total, QURAISH conspired with at least four co-conspirators to submit via interstate wire 10 fraudulent PPP loan application, 10 fraudulent PPP loan forgiveness applications, and 1 EIDL loan application for five different companies.

52. QURAISH and his co-conspirators personally profited $1,471,599 from the fraud conspiracy. And QURAISH used the fraud proceeds to enrich himself by investing in crypto currency among other things, and to enrich his co-conspirators.

53. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

54. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

55. If the defendant breaches the plea agreement, then pursuant to the plea agreement, he waives any rights under Federal Rule of Criminal Procedure 11(f), Federal Rule of Evidence 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the statement of facts in any such proceeding.

Erik S Siebert
United States Attorney

By: Zachary H. Ray
Zachary H. Ray
Assistant United States Attorney

Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Muhammad Adil Quraish, and the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: June 21, 2025

Muhammad Adil Quraish
Defendant

Defense Counsel Signature: I am counsel for the defendant in this case. I have carefully reviewed the above statement of facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: June 23, 2025

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