**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-20363-RAR**

**UNITED STATES OF AMERICA**

**vs.**

**ISSA ASAD,**

**Defendant.**
_____/

**STIPULATION AND CONSENT TO RESTITUTION**

I, **ISSA ASAD,** the Defendant in the above-captioned case, freely and voluntarily and without coercion make the following stipulation and declaration on behalf of myself and 499 Sheridan LLC:

1. The United States Attorney's Office filed an information in this case on August 22, 2024.

2. I pled guilty on October 15, 2024, as did my company, Q Link Wireless LLC ("Q Link"). I pled guilty on behalf of Q Link.

3. I agreed in my signed plea agreement to pay restitution to the Small Business Administration ("SBA") and the Federal Communications Commission ("FCC") in full by the time of sentencing. Q Link agreed in its plea agreement to pay full restitution to the FCC at the time of sentencing as well, joint and several with me.

4. Here is what I owe at the time of sentencing: a forfeiture money judgment in my name ($17,484,118), restitution to the SBA ($1,758,339.25), and restitution to the FCC ($109,637,057). The restitution to the FCC is joint and several with Q Link. To date, I have paid my forfeiture money judgment in full and my restitution to the SBA in full.

5. As for the restitution to the FCC ($109,637,057) (referred to as the "FCC Restitution"), there are certain funds I agree to pay to restitution that have not yet been transferred to the Clerk's Office for the United States District Court, including:

a. A U.S. Treasury check due to me in the amount of $6,095,380 (for tax year 2022) ("Treasury Check 1")
b. A U.S. Treasury check due to me in the amount of $3,967,682.00 (for tax year 2021) ("Treasury Check 2")
c. RBC account 00002-4643854 in my name with the balance of $6,860,103.03 (the "RBC Bank Account").

6. I agree that Treasury Check 1, Treasury Check 2, and the East West Bank Account will be applied to the FCC restitution. I further agree not to dissipate, hypothecate, or transfer Treasury Check 1, Treasury Check 2, or the RBC Bank Account except with the consent of the United States. I agree that the obligation to immediately utilize Treasury Check 1, Treasury Check 2, and the RBC Bank Account for the payment of the FCC restitution shall be incorporated into the Criminal Judgment and be treated as an obligation to pay restitution in accordance with 18 U.S.C. §§ 3572(d)(1), (h)-(i), and, without implied limitation, subject to enforcement pursuant to 18 U.S.C. §§ 3613A, 3614. I agree that the Treasury Check 1, number 4045 73838637 in the amount of $6,095,380 shall be endorsed by Issa Asad and Noha Asad and negotiated as directed by the U.S. Attorney's Office.

7. Upon entry of the restitution judgment the United States shall immediately be authorized to record a restitution lien pursuant to 18 U.S.C. §3613 on the following properties and that I will not contest such lien 514203CM0020 at 499 E Sheridan Street 2; 14203CM0030 at 499 E Sheridan Street 3 (collectively the "East Sheridan Folios"). The East Sheridan Folios are owned by 499 Sheridan LLC of which the owner and my wife is a manager. I also agree that six months after entering a lien on the East Sheridan Folios, unless a different time frame is agreed upon by the parties, the United States will begin to take steps to sell the East Sheridan Folios and that I will not

contest such sale, foreclosure, writ of execution or appointment of receiver utilized to complete the sale of these properties.

8. This stipulation and consent is pursuant to and subject to the terms of my plea agreement both in my name and the name of Q Link.

9. This stipulation and consent is not meant to replace the terms of my plea agreement. Nor does this stipulation and consent preclude the United States from forfeiting other assets or pursuing other assets to satisfy the FCC Restitution (including the East Sheridan Folios and any other assets).

Defendant's Signature: I have read this Stipulation and Consent to Restitution and carefully reviewed each and every part of it with my legal counsel. I understand this Stipulation and Consent to Restitution and voluntarily agree to it.

Date: 7/24/25 By: _____
ISSA ASAD
DEFENDANT

499 Sheridan LLC Signature: I have read this Stipulation and Consent to Restitution on behalf of 499 Sheridan LLC and am an authorized member. I understand this Stipulation and Consent to Restitution and voluntarily agree to it.

Date: 7/24/25 By: _____
499 SHERIDAN LLC

Date: 7/24/25 By: _____
Noha Assad
Manager of 499 SHERIDAN LLC

Defense Counsel Signature: The undersigned counsel has reviewed and discussed this Stipulation and Consent to Restitution with Defendant Issa Asad.

Date: 7/24/25 By: _____
MATTHEW MENCHEL
EVELYN BALTODANO SHEEHAN
ATTORNEYS FOR DEFENDANT

Government's Signature: I have read this Stipulation and Consent to Restitution. I understand this Stipulation and Consent to Restitution and voluntarily agree to it.

Date: 7/24/25 By: _____

ELIZABETH YOUNG
JOHN C. SHIPLEY
ASSISTANT U.S. ATTORNEYS