IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA	CRIMINAL ACTION FILE NO.
V.	1 :21-CR-451- WMR-JKL-5
ALPESH PATEL	

DEFENDANT PATEL'S MOTION FOR EXTENSION OF TIME DUE TO STRATEGIC DISPUTE WITH COUNSEL, REPRESENTATION OF PROFESSIONAL FINANCIAL CAREER, ISSUES AS VICTIM RELATED TO PREVIOUS FRAUD, REQUEST FOR SEVERANCE, AND OR DISMISSAL OF ALL CHARGES, OR MOVING TO CIVIL MATTER

COMES NOW the Defendant, Alpesh Patel, respectfully moves this Honorable Court for the following relief: (1) an extension of time of six (6) months; (2) severance of his case from the other co-defendants; and (3) dismissal of all charges or, alternatively, conversion of the matter to a civil proceeding. In support of this motion, Defendant shows as follows:

1. BACKGROUND AND COUNSEL ISSUES

Defendant is currently represented by attorney Peter L. Goldman of Potomac, Maryland. Over a year before trial, Defendant and Mr. Goldman agreed on a litigation strategy that was central to the case, specifically using display documents such as his resume, letters from companies and prominent people, for deals he has funded, certain mid-size and large financial deals, that Mr. Patel has been a part of or closed thus proving him to be a legitimate financier. In addition, Mr. Goldman was supposed to prove the defendant had been a victim of financial fraud before in the past. These documents are all in the discovery and have been sent on a USB stick along with this document. Defendant relied in good faith on this agreement, continuing to support and fund the strategy through trial preparation.

However, to Defendant's surprise, Mr. Goldman failed to implement the agreed upon strategy during trial, without offering any proper explanation or obtaining Defendant's informed consent. Mr. Goldman didn't display to the jury the Defendant's resume, many past successful financing deals in the last 15 years or evidence that showed he has been a victim of fraud in the past several times. Approximately one month after the trial in March 2025, Mr. Goldman reaffirmed his intention to pursue the original strategy on a phone call. However, in April 2025, after receiving a payment of $16,500 in person, Mr. Goldman reversed his position during an in-person meeting and announced he would no longer pursue the strategy showing that Defendant was victim of fraud and sounded disinterested in using a solid strategy based around Defendant's resume and the more than 30 financial deals he has closed that could prove the Defendant has a legitimate background in financing. The Defendant has included more than 20 financial closings in the discovery.

2. ETHICAL CONCERNS REGARDING COUNSEL

In addition to these strategic inconsistencies, Defendant only recently learned that Mr. Goldman received a public reprimand from the Virginia State Bar on November 6, 2023. This reprimand was for violations of the Virginia Rules of Professional Conduct, including failing to properly withdraw as counsel, failing to comply with court directives, and failing to safeguard client property (Rules 1.15 and 1.16). As part of the disciplinary action, Mr. Goldman was placed on probation and ordered to complete six hours of continuing legal education in legal ethics.

3. MISREPRESENTATION BY COUNSEL

Defendant is deeply concerned about a significant misrepresentation made by Mr. Goldman, which undermines the trust placed in him. On May 16, 2022, Defendant received an email from Mr. Goldman in which he claimed to have represented over 350 clients in Federal Court criminal cases. Whereas this email can be seen in the discovery in the folder "Post Trial Not Put in Discovery" the file labeled "Federal Court Representation May 2022." This claim is particularly troubling because Federal Court criminal cases are complex and require substantial experience and a specialized skill set, especially when dealing with matters such as white-collar crime, wire fraud, or money laundering. In his email, Mr. Goldman stated:

"I have represented over 350 clients in Federal Court criminal cases. I am sure I can help you." This statement was made with the apparent intent to convince Defendant of his qualifications. However, it is highly questionable how Mr. Goldman could have represented such a large number of clients in such a specialized and challenging area of law. Given that Defendant had no immediate way to independently verify this claim, he was left to trust the credentials of his attorney. However, this bold claim seems to be an embellishment, meant to assure Defendant of Mr. Goldman's qualifications, which were not as extensive as initially represented. This misrepresentation has contributed to Defendant's diminished trust in Mr. Goldman and his ability to handle the case competently.

4. FAILURE TO FINALIZE DISCOVERY

Defendant provided several rounds of discovery materials to Mr. Goldman hard copy and digital through email and USB sticks (including in December 2022, April 2023, and May

2024). Despite this, Mr. Goldman failed to finalize the discovery with Defendant, including aligning relevant documents that could be put forth during trial. On May 3, 2024, Defendant upload the files to Dropbox for Mr. Goldman. However, Mr. Goldman neither confirmed the receipt nor moved forward with finalizing the discovery, causing significant issues in trial.

5. FAILURE TO SUBMIT DISCOVERY TO COURT BEFORE TRIAL

Defendant once again provided the final discovery to Mr. Goldman on a USB stick for submission to the Court in early December 2024. However, Mr. Goldman failed to submit the discovery until the day of trial in January 2025, preventing the prosecution from having adequate time to review the materials. Additionally, there were several hard copy financials that Mr. Patel provided to Mr. Goldman that were supposed to be a part of the discovery and requested by the Social Security Administration that Mr. Goldman never provided. When asked about this Mr. Goldman did not provide a direct clear explanation for not providing these files to the parties that requested them. There were also documents that were emailed to Mr. Goldman that were supposed to be put in the discovery that showed Mr. Patel was a victim of fraud before that Mr. Goldman refused to put in the final discovery weeks before the trial despite initially saying he would.

6. FAILURE TO DISCLOSE TRIAL COSTS IN A TIMELY MANNER

After the jury was hung in the first week of February 2025 for the trial, Mr. Goldman mentioned the possibility of a retrial and indicated there would be new cost for this. In late February 2025, Mr. Goldman requested $35,000 to cover fees for retrial preparations. Additionally, Sandra Michaels, an associate attorney, would require an additional $25,000 for her services. This sudden financial demand came as a shock to Defendant, as these costs were never disclosed prior to the first trial. Defendant should have been made aware of this possibility and the procedures a year or months before the first trial so as to adequately prepare himself to gather this money, instead he was told a week after the first trial. Mr. Goldman then agreed to take $10,000 less as he agreed to work with the Defendant on money due to time constraints as Mr. Goldman demanded that he and Ms. Michaels be paid in full a month before the retrial. Defendant was able to come up with another $50,000 in less than three months.

7. PAYMENTS MADE TO ATTORNEY FOR RETRIAL

Defendant has already paid Mr. Goldman and Sandra Michaels $50,000 in anticipation of the retrial. A final $10,000 check was just received from Mr. Goldman on May, 15th, 2025. Mr. Goldman received confirmation of the check and was once again given a chance to allude to the initial trial strategy he agreed upon with the Defendant, but he did not. Defendant feels vulnerable, betrayed and has no choice but to seek new counsel, this will be a substantial investment, but Defendant has no choice and is willing to do so for fair, proper and honest representation.

8. DEFENDANT'S TOTAL FINANCIAL COMMITMENT TO LEGAL REPRESENTATION

For the initial trial the Defendant has paid $93,000 in total for legal representation, including $63,000 to Mr. Goldman and $30,000 to Sandra Michaels. Additionally, $50,000 has been paid for the retrial totaling the Defendant's cost at $143,000. These payments do not account for the additional substantial costs associated with flight travel to Atlanta for the trial, hotel cost, taxi fares, and food expenses, which have exceeded $10,000 in total out-of-pocket expenses to date. Of particular concern is Mr. Goldman requesting $10,000 extra dollars from the Defendant on November 30th, 2024 before the original trial in January 2025 after briefly reviewing his finances and seeing the Defendant had over $791,247 invested in companies, from December 4th, 2020 to May 22nd, 2024. This request for $10,000 was not a part of the original deal and seemed irregular as the original agreement didn't call for this. Furthermore, Mr. Goldman had more than enough time to review all facts and documentation of the case and could have asked for more money three to four months in advance if it was very necessary. The increase in charges was not properly communicated, nor justified by Mr. Goldman, causing financial strain and a lack of clarity regarding his services. These aforementioned ethical violations, combined with the repeated reversal of agreed-upon litigation strategies, have eroded Defendant's trust in current counsel and raised serious concerns about the integrity and direction of the representation.

9. THE ALLEGED MONEY LAUNDERING CHARGE AND LEGITIMATE INVESTMENTS

Defendant was accused of laundering $108,000. However, it is essential to emphasize that none of these funds benefited Patel, no real money was kept by Patel or used for illicit purposes. The Defendant evidence suggests that the Defendant was set up by Vikas Mehta, a known white-collar criminal mastermind, who orchestrated fraudulent transactions designed to implicate Defendant without his knowledge. Even if these funds were passed through Defendant's account, he was specifically sized up and instructed by Mehta to redirect the transfer elsewhere, as Mehta had claimed he had a faster financing strategy to fund business ventures for his clients that the Defendant was told to originally fund. More importantly, Defendant's involvement in legitimate business ventures proves that he has no intent or history of engaging in criminal activity. As part of his ongoing legitimate business operations, Defendant has invested substantial sums into various lawful ventures. These investments have included financing projects for his family office, specifically motels and hotels, and partnerships with companies such as Infinite Power Corporation, V3 Water and Falcon Development International. These transactions, ranging from $20,000 to several million dollars, are fully documented and were conducted in accordance with standard business practices.

Defendant has consistently been involved in financing legitimate business deals through his companies, 9 AM Resource Agency, LLC, and 7 Points Agency, LLC, both of which have functioning websites and verifiable business activities. These investments were undertaken with the goal of growing Defendant's legitimate business interests, not for any criminal or illegal purpose. The notion that Defendant would risk his entire career, reputation, and established business relationships by engaging in a criminal scheme, particularly money laundering, is not only implausible but fundamentally unsupported by any credible evidence.

10. $250,000 INVESTMENT INTO V3 WATER

In addition to his previous investments, Defendant also helped secure a $250,000 investment into V3 Water in June 2024, a company involved in the production of healthy nutrient infused alkaline bottled water that he is the Vice President of along with his President Robert Beam since 2015. This is documented in the Discovery along with a letter from Mr. Beam in the folder "V3 Water – IPC." Defendant played an instrumental role in securing this funding, which was specifically earmarked for securing a lease-to-buy agreement for a bottling plant located in downtown Houston, Texas. This investment was part of Defendant's ongoing efforts to contribute to and grow legitimate business ventures. Mr. Goldman, however, failed to present this key piece of evidence during the trial, despite its relevance in demonstrating Defendant's active involvement in securing funding for legitimate business operations, further undermining the accusations of fraudulent activity. The failure to introduce this evidence at trial significantly hindered Defendant's ability to present his case in its entirety. In addition, there are pictures of the Defendant, the Vice President of V3 Water, Infinite Power Corporation and Falcon Development International with many dignitaries including prime ministers, authors and professional athletes. Naturally the Defendant would not want to jeopardize his reputation, companies or others by engaging in financial fraud.

11. USD $13 BILLION APPRAISAL IN GHANA

Additionally, the Defendant provided an appraisal report dated May 11, 2017, concerning a 55,000-hectare land parcel (136,000 acres) located in the Volta Region, Ghana, which was never utilized by Mr. Goldman during the trial, despite its potential to substantially support Defendant's claims. The appraisal report that is in the discovery in the folder "Falcon Development - Africa - Ghana – Americas" titled "2_Appraisal - Free and Clear - Hatorgodo Land - Volta Region" was conducted by a professional appraiser. The report indicates that the land in question, part of a much larger family estate, holds a market value of USD $13 billion and a forced sale value of USD $8.7 billion. The inclusion of this evidence in the trial could have been pivotal in demonstrating Defendant's financial capacity, bolstering the credibility of his business dealings, and negating any allegations of fraudulent intent. Mr. Goldman initially agreed to use this appraisal as evidence in court and display it to the jury further, reclaiming the Defendant's innocence. To the Defendant's surprise at trial, Mr. Goldman did not use this.

12. DEFENDANT WAS CLOSING €50,000,000 EURO LAND LOAN IN GHANA

The Defendant has suffered irreparable financial and mental health damage because of this. Between 2017 and 2021 the Defendant was in Ghana working with his associate, Joel Rawlings's son of the late great Jerry Rawlings the half Ghanian and Scottish former President of Ghana who led the country for 20 years and was President for 8 years. The Defendant was closing out a €50,000,000 EURO loan to land collateral loan to value commercial development loan for Falcon Development International for who he is the Vice President of along with his associate President Joel Rawling's by collateralizing some of the appraised land in Ghana with the international lender company, HAB & JPR Partners Network LLP that is audited by Solomon Partners WRS Werner Rothschild & Cie, that also act as its Trustee Agent. Their exclusive private bank brochure is in the Discovery under folder "Falcon Development - Africa - Ghana – Americas" is labeled "BrochureHAB_English_2021." We were working directly with Mr. Renzo Foladori and others of the global management team in financial services. Tremendous time and energy had been put into this by everyone involved. There were land appraisals done, loan contracts put in place and many trips from several parties and much money spent. For most of October 2021 to February 2022 the Defendant was in Ghana; he made two tips from American to Ghana.

In late February 2022 Defendant had to come back to America to deal with these fraudulent financing allegations against him and consequently the loan deal with HAB & JPR Partners Network LLP fell apart and didn't conclude because of several factors. Joel Rawling's was not able to conclude this transaction without the help of the Defendant who is his Vice President of his company and encouraged him to setup this venture and provided tremendous financial support for him to do so, additionally a lawyer who helped set up the deal passed away during covid, furthermore the charges against the Defendant complicated matters in closing the large commercial €50,000,000 commercial development loan.

Defendant's associate Joel Rawlings grew frustrated with everything going on and pulled out of the deal despite hundreds of thousands of dollars already committed by all parties. Joel Rawlings has included a letter for the courts in the discovery "Falcon Development – Africa – Ghana – Americas." Additionally, as of January 7th, 2025 Joel Rawling's uncle John Mahama is now the President of Ghana. Mahama has put the Defendant's company Falcon Development of that the Defendant serves as Vice President in a United States of America financing program called White House Interagency Public Private Partnership Initiative (WHIPPI) represented by U.S. Trade Representative Daniel Lee and others. This document can be seen in the discovery in the folder "Post Trial Not Put in Discovery" labeled "White House Falcon Bond Approval." Falcon Development is working with the Ministry of Finance in Ghana and as of April 2025, Falcon Development has submitted the full project plans and awaiting finalization of a $10,000,000 bond approval that will conclude sometime during summer of 2025.

13. MONEY SPENT

In the discovery in the folder "Post Trial Not Put in Discovery / Financials" show the Defendant directed as investments on behalf of his families' companies $791,247 from December 4th, 2020 to May 22nd, 2024. $665,550 was invested into Falcon Development in Ghana. Also $125,747 was invested in Infinite Power Corporation and V3 Water in America. These are companies the Defendant holds executive positions in, and along with his family he holds equity in. The money invested collectively in all three companies is $791,247.

Of particular importance is the proof of $62,800 invested into Falcon Development from December 4th, 2019 to September 10th, 2021. This was money invested before the wire fraud and money laundering charge incident that occurred in early May 2021. This shows the Defendant already had an active investment that he was working on and by no means was he "desperate for money" or looking to launder money as he was involved in serious companies as an executive partner, vice president and director of investor relations for his family and others so he wouldn't want to jeopardize this. At that time the Defendant was also investing in Infinite Power Corporation and V3 Water a year or so before on and off.

13. Legal Argument: Lack of Fraudulent Intent and Consistent Investment Behavior

A. Legitimate Investment Pattern Before and After Alleged Crime

- The defendant directed $791,247 in investments between December 4, 2020, and May 22, 2024.
- Of that, $62,800 was invested into Falcon Development months prior to the alleged incident of wire fraud and money laundering in May 2021.
- This demonstrates a consistent and ongoing pattern of legitimate business activity—not behavior typical of someone acting fraudulently or trying to suddenly launder money

B. Strong Executive Roles and Equity Stake

- The defendant holds executive-level positions (e.g., Vice President, Director of Investor Relations) in all three companies: Falcon Development (Ghana), Infinite Power Corporation, and V3 Water. Additionally, he serves as the Managing Director for his family motel the Loyalty Inn in Louisa, Virginia. A letter from his employer labeled "Loyalty_Inn_Employer_Letter" indicates this in the folder Seven Points Agency in the discovery. Furthermore, in the discovery in the folder "Post Trial Not Put In Discovery/Other Financial Deals" the document entitled "Anjely LLC - Refinance - 2017 to 2021" shows a refinance with New Horizon Bank that the Defendant initially setup as a business loan specialist for his family's Loyalty Inn in 2017 for $550,000 that was then updated in 2021.

- He and his family also hold equity in these aforementioned companies, showing that his actions would never be for personal gain at the expense of others, rather any financial obligation he takes on is always a part of a responsible and long-term investment strategy.

C. No Indicia of "Desperation" or Fraudulent Motive

- A key requirement of fraud or money laundering is intent—typically financial desperation, concealment, or deception.
- The defendant was not financially desperate and was actively engaging in substantial, traceable investments through legitimate channels.
- His executive and investor roles, as well as the presence of actual investments backed by documentation, point to a bona fide business purpose rather than fraudulent intent.

D. Transparent Use of Funds

- The invested funds were not siphoned for personal luxury or hidden in offshore accounts—they went into companies where he held roles and had accountability.
- There is no clear evidence of concealment or misrepresentation typically associated with money laundering or fraud.

E. Pre-Existing Business Ties

- The defendant's relationship with these companies and the flow of money into them, in particular the $62,800 that preceded the date of the alleged fraud, undermines the idea that he created or used 7 Points Agency, LLC as an entity to launder money.
- This is consistent with innocent conduct, rather than a hastily constructed fraud.

F. Timing Shows Ongoing Legitimate Business Activity

- The defendant invested $62,800 into Falcon Development from December 4, 2019 to September 10, 2020.
- The alleged fraud occurred in early May 2021.
- This means the investment occurred just months before the alleged crime and clearly before any fraudulent activity was even alleged.

Why it matters:

This timeline demonstrates that the defendant was already engaged in real, verifiable business activity and was investing his own and his family's money into legitimate ventures. This undermines the idea that he suddenly needed to obtain or move funds through illegal means.

G. Evidence of Intent Matters in Fraud Cases

In any fraud or money laundering case, prosecutors must prove intent—that the person knowingly and willfully tried to deceive or hide the source of money.

- If the Defendant was already putting substantial amounts of money ($62,800) into a company months before the alleged fraud, that indicates he had no intent to deceive or hide anything.
- It shows Defendant was acting in accordance with a long-term investment strategy, not trying to create a fake business or cover for criminal activity.

H. Lack of Desperation

- Here, the Defendant was already financing deals and actively investing in companies where he held executive roles.
- The investment of $62,800 shortly before the alleged fraud makes it implausible that he suddenly became desperate or needed to commit a crime for financial gain.
- There's no sign of shell companies, fake accounts, or hiding of funds, just continued investments in companies and financing of deals.

Conclusion:

The fact that $62,800 was invested into Falcon Development just months before the alleged fraud incident strongly supports the defendant's innocence. It shows he was operating legitimate businesses, had no sudden change in behavior, and had no intent to defraud or launder money as he already had money. His consistent investment pattern before the charges were filed is powerful evidence that his actions were lawful, not criminal. The defendant's long-standing, documented investments in companies he actively worked for, combined with transparent financial activity before, during, and after the alleged criminal act, supports the conclusion that there was no intent to defraud or launder money. Rather, he was engaging in consistent, legitimate investment and business operations that were part of a broader family and corporate structure. The $791,247 invested from December 4th, 2020 to May 22nd, 2024 and well before and after these dates shows constant investment movement. Once again given the Defendant's documented investment of $62,800 into Falcon Development prior to the date of the alleged fraud, and his consistent, transparent role in ongoing business operations, the Government has failed to establish the requisite intent to defraud or launder money. As such, the charges should be dismissed, or, alternatively, the Court should look to move this to a Civil Case.

14. DEFENDANT'S HISTORY AS A VICTIM OF FRAUD

Defendant has a long history of being a victim of fraudulent activity, which further supports his claims of being misled and wrongfully accused. In 2014, Defendant was a victim of fraud and lost $250,000 leading to an FBI investigation led by Jeremy Desor and the eventual indictment and guilty pleas of the perpetrators none of the money was ever recovered for the Defendant. David Lott who was the President of Missouri Holdings who informed Desor of the FBI of the alleged scheme where his client's lost money was the one who attempted to set up the loan. Lott was setting up a commercial development loan for Defendant and his companies that required $250,000 down for a $50,000,000 project loan whereas the projects would also be collateral during and upon completion. Lott's lawyer John Jason Gentry Mullins stole the defendants $250,000 and millions of dollars more from other clients and the commercial loan for the Defendant was never finalized. Desor cleared Lott of any wrongdoing, unfortunately none of the victims including the Defendant ever got their money back.

A detailed FBI report with an email "FBI_250k_Money_Lost_Scam_Email" and other documents attached to a USB stick in the discovery in the file "Post Trial Not Put in Discovery/FBI 250k Scam" confirms that Defendant was a victim in a fraudulent scheme and not complicit in any criminal activity. Despite promises and guarantees by Mr. Goldman that these documents related to the Defendant as a victim of financial fraud and other documents were never put in the final discovery and used in court as evidence; even though Mr. Goldman initially agreed to do so, he then failed to comply. In particular, the investment wires totaling over $791,247 as documented in the discovery in the folder "Post Trial Not Put in Discovery/Financials" were not put in the discovery. On February 28, 2019, Defendant received an email from FBI Special Agent Jeremy Desor, timestamped at 12:56 PM, confirming that the individuals involved in the fraudulent scheme had been indicted and pled guilty. Additionally, Defendant received a follow-up phone call in November 2020 from Agent Desor, further discussing the case and reaffirming Defendant's role as a victim in the fraudulent scheme. These communications further corroborate Defendant's claim of having been deceived by fraudulent people and emphasize that Defendant did not participate in any fraudulent activity, including wire fraud or money laundering.

A. Reinforcing the Nature of Victimhood and Defendant's Integrity

   It is critical to note that individuals who have been victims of fraud are among the least likely to engage in fraudulent activities themselves. Experiencing fraud, especially on multiple occasions, profoundly changes a person's understanding of trust and ethical behavior. When someone has been deceived and financially harmed by fraudulent people, it creates a lasting aversion to fraudulent behavior. Defendant's own experiences with fraud have made him acutely aware of the devastating impact of deceit and dishonesty.

B. Given this personal history, it is implausible and inconsistent with Defendant's character that he would intentionally engage in deceptive conduct such as wire fraud or money laundering. Having been victimized by fraud multiple times, Defendant is far more likely to be vigilant against fraud and to uphold the law rather than break it. The notion that a person who has repeatedly lost money due to fraud would then turn around and engage in fraud themselves is simply untenable. Additionally, the Defendant's close relationship through constant communication with Desor a white collar FBI crime agent, makes it unlikely for the Defendant to knowingly engage in fraud. In particular, the Defendant's last communication with Desor was less than six months from when the alleged crime that the Defendant participated in with Mehta. It would be highly unlikely for the Defendant to participate in any fraudulent financial scheme knowing that a watchful member of the FBI white collar crime Division could conduct a review on him at any time.

15. WIRE FRAUD AND MONEY LAUNDERING CONSIDERATIONS

Defendant respectfully requests the Court consider the evidence provided by Desor of the FBI, which substantiates that Defendant was a victim in the past and therefore did not commit wire fraud or money laundering in this case against him in the Northern District of Georgia United States Federal Court. Defendant did not act with the intent to deceive or defraud others and therefore cannot be held responsible for these alleged crimes with Mehta.

16. ARGUMENT SUPPORTING ALPESH PATEL'S INTEGRITY BASED ON PUBLIC ASSOCIATIONS AND BUSINESS STANDINGS

Alpesh Patel is a high-profile business figure, serving as the Managing Director of the Loyalty Inn in Louisa, Virginia, President of 7 Points Agency, Vice President of several companies, including V3 Water, Infinite Power Corporation, and Falcon Development International. His public presence is well-documented through he and his associates' numerous photographs with esteemed dignitaries, scholars, prime ministers and renowned athletes. These associations reflect not only his established reputation but also the level of trust and access he has earned within both business and governmental circles. In the Discovery in the folder “V3 Water – IPC” and “Falcon Development - Africa - Ghana – Americas” there is a photo with him and his President Robert Beam and Beam with many dignitaries. Additionally, there is a photo with him and Joel Rawlings and photos of his father, former President of Ghana, Jerry Rawlings with many dignitaries.

Individuals involved in financial crimes such as money laundering or wire fraud typically avoid public exposure and high-profile affiliations, as such crimes thrive in anonymity and deception. In contrast, Defendant’s public engagements and personal relationships with reputable figures indicate a commitment to transparency and ethical business practices. The reputational risk alone — to himself, his companies, and the prominent individuals with whom he is seen — would serve as a strong deterrent against any involvement in illicit activities.

Furthermore, as a businessman whose companies fund and take equity in various deals, Defendant’s success is intrinsically tied to long-term credibility and the confidence of partners and investors. Engaging in financial fraud would not only jeopardize his business empire but also risk irreparable damage to his standing in elite circles. For someone with such a visible and prestigious profile, the consequences of unethical behavior would far outweigh any potential short-term gain. High-level individuals and organizations do not align themselves casually; associations with public figures are built on mutual vetting and shared reputations. The company one keeps in business and diplomacy is often reflective of one’s values, conduct, and commitment to ethical standards. Therefore, given his public associations, business stature, and the inherent risks to his reputation, it is highly implausible that Alpesh Patel would engage in financial misconduct.

17. CONSULTATION WITH OTHER LAW FIRMS REGARDING REPRESENTATION COSTS

In light of the issues with his current representation, Defendant sought consultations with several other law firms, including Alston & Bird located at One Atlantic Center, 1201 W Peachtree St NE #4900, Atlanta, GA 30309, Lowther and Walker, located at 101 Marietta Street, NW, Suite 3650, Atlanta, GA 30303, and other legal professionals. These firms conducted a brief review of the case and provided initial feedback on the complexity and scope of the matter. Based on their review, the firms have indicated that the cost of legal representation for a case of this nature—encompassing wire fraud, money laundering, and the associated discovery issues—would typically be in the range of $100,000. This estimation underscores the magnitude of the legal challenge at hand and the financial burden associated with defending against such serious charges.

18. PLAN OF ACTION

Defendant has several plans of action to raise $100,000. One by refinancing his family motel, the Loyalty Inn located at 112 Jefferson Highway Louisa, Virginia 23093. A new appraisal would have to be conducted then a refinance can be concluded. This whole process could take two to three months. The Defendant has already started this process as he is working with his family to conclude the 2024 taxes and profit and loss with their Certified Public Accountant showing $408,000 gross revenue for Loyalty Inn. This will be finalized and submitted before the end of May 2025. The property will then be set up for an appraisal and it should be reappraised at an evaluation of $1.3 million to $1.4 million thus his bank could refinance him up 75% Loan to Value. With only around $540,000 of current debt on the property the refinance will be able to secure up to around $500,000 if necessary. Simultaneously, the defendant will be looking to pull out or recoup money invested in Infinite Power Corporation, V3 Water and Falcon Development International.

19. REQUEST FOR SEVERANCE

Pursuant to Rule 14 of the Federal Rules of Criminal Procedure, Defendant requests severance from co-defendants. Defendant respectfully requests that the Court consider severing Defendant's portion of the case from that of the other defendant. Severance will allow Defendant to address the ongoing issues with counsel, retain appropriate legal representation, and pursue a fair resolution to the case without the distraction or delay caused by the joint trial. As Defendant has no objection to the other defendant's trial proceeding without delay, the severance will promote judicial efficiency and fairness, ensuring each party's interests are adequately represented. Severance will also prevent any undue prejudice to Defendant, who seeks to resolve these legal issues in the best interest of justice.

20. NEED FOR EXTENSION OF TIME

This request is made in good faith and not for purposes of delay. Granting this extension would not unfairly prejudice any party and may, in fact, promote judicial efficiency by allowing each party to proceed appropriately and with full legal support. Given these issues with current counsel and Defendant's background as a fraud victim, Defendant respectfully requests a reasonable extension of time of a minimum of six months to go to trial again and to hire alternative representation that aligns with Defendant's legal goals. This extension will allow Defendant to secure appropriate legal support while also giving counsel time to prepare for the trial, thus ensuring proper resolution of the case.

21. REQUEST FOR DISMISSAL OR RECLASSIFICATION

A. Courts have inherent discretion to dismiss charges where criminal prosecution is not in the interest of justice, or where civil remedies are more appropriate.

B. In the alternative to dismissal, the Court may exercise its equitable authority to recommend or require the resolution of this matter through civil adjudication, especially where no public safety risk or criminal pattern exists.

22. CONCLUSION

For the reasons stated herein — including the absence of criminal intent, the highly public and professional character of the Defendant, the fact he has been a victim of fraud before, his holding of reputable responsible executive positions in companies, his active investments and setting up successful financing deals over the last 15 years, and the fundamentally commercial nature of the alleged conduct — the indictment should be dismissed. Alternatively, the matter should be resolved as a civil dispute under applicable commercial law.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

A. GRANT this Motion to Dismiss the indictment in full;

B. In the alternative, ORDER the reclassification of the proceedings as a civil matter;

C. DISMISS all criminal charges; accordingly, and alternatively

D. Severance of the case

E. Time to hire a new attorney and go to trial, Defendant is asking for a minimum of six months for the new trial date to be set.

F. Grant any other relief deemed just and proper.

Respectfully submitted,

/s/ Alpesh Patel
1117 Reservoir Street
Harrisonburg, VA 23093
(m) 540 - 872 - 1471
Contact@7PointsAgency.com
Dated: 5/19/2025

ATTACHMENT

Defendant has attached USB drives containing the full discovery documentation for the Court's review. The drive includes highlighted evidence relevant to the case, which Defendant believes is crucial for a fair and complete assessment of the claims.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2025, I mailed a true and correct copy of the foregoing motion, along with a USB drive containing discovery evidence, to the following:

AUSA

United States Attorney's Office

Northern District of Georgia

75 Ted Turner Drive, S.W.

Suite 600

Atlanta, Georgia 30303

/s/ Alpesh Patel

Alpesh Patel