ISSUE 61

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INSIDE:

A special 8-page supplement in which FREEDOM tracks the criminal nether world activities of Boston lawyer Michael Flynn through the detailed testimony of two participants in Flynn's bizarre attempt to forge and pass a \$2 million check.

See page 5

The Small Business Administration scrutinizes circumstances surrounding a \$250,000 government-backed loan for Kevin Flynn's Blossoms restaurant in Washington, D.C. See page 13

BOSTON ATTORNEYS LINKED TO UNDERWORLD IN PLOT TO LOOT HUBBARD ESTATE



Boston lawyer Michael Flynn, according to sworn eyewitness statements and other evidence now in the hands of federal investigators, hired a forger to pass a counterfeit \$2 million check.

BOSTON — Two Boston attorneys with ties to organized crime tried to loot the personal estate of New York Times list best-selling author L. Ron Hubbard and blame it on the Church of Scientology, according to documents released by Church President Heber Jentzsch and Los Angeles private investigator Gene Ingram.

The conspiracy hinged on a counterfeit \$2 million check drawn on Hubbard's account at the Bank of New England and later used in the sensationalized Riverside, Calif., probate case in an abortive attempt to seize control of the legendary writer's estate. Hubbard's business managers stopped payment on the check before it was cashed.

According to documented eyewitness accounts filed in a Los Angeles Federal District Court, Boston attorneys Michael Flynn and Wayne Hollingsworth concontinued on page 3

FAMCO: Anatomy of a Conspiracy

by Stacy Young

On August 28, 1980, a bizarre and sinister twist was added to the old "get rich quick" idea when Flynn Associates Management Corporation (FAMCO) was chartered in the Commonwealth of Massachusetts.

FAMCO's incorporation marked the birth of an organization which would figure prominently in the criminal conspiracy described in this issue's lead article.

Prior to FAMCO's incorporation, Michael J. Flynn had a very rocky career as a personal injury attorney. Two of the cases early in his law practice serve as examples of his competence.

In 1973, Flynn's client in a much-publicized case of fraud and bank failure pleaded guilty and

was sentenced to six years in prison.

In another case which dragged on for approximately two years, Flynn's client was sentenced to prison for a year and a day and fined \$5,000.

FAMCO's First Client

The seeds of FAMCO were sown in June 1979 when Lavenda Van Schaick, a former parishioner of the Church of Scientology, made contact with Flynn, apparently hoping he could help her make some money from her former connection with the Church.

Flynn did some research into the Church of Scientology to determine if it would be worth his while to take her case.

Apparently impressed with

what he discovered regarding the Church's assets, he began to formulate the scheme that would later become FAMCO.

Flynn filed a "class action" suit on behalf of Ms. Van Schaick in December 1979. Ms. Van Schaick was the only member of the "class."

Method to His Madness

By promising a rapid rate of return of 200 to 400 per cent, Flynn was able to gather several other attorneys to help him with his anti-Scientology enterprise. By mid-1980, he and the other lawyers had filed 27 more lawsuits, each virtually identical to the Van Schaick suit, but scattered across the country.

Legal experts have observed that it was highly improper and an

abuse of the judicial process for such suits to have been filed separately.

The method to Flynn's madness, however, would soon become clear.

Flynn's associate, Thomas Hoffman, assisted him in filing multiple suits. Within short order, they had it down to an exact science.

Money to Make Money

It takes money to make money, as the saying goes, and Michael J. Flynn needed more to continue his litigation.

FAMCO was the answer.

The new corporation was a family affair. The incorporators and officers of FAMCO were Kevin Flynn (Michael's brother), continued on page 13

DOCUMENTING THE CONSPIRACY

This issue unmasks and documents a criminal conspiracy.

The principal conspirator, Boston lawyer Michael J. Flynn, has been named and described by two of his co-conspirators in their unsuccessful attempt to pass a forged \$2 million check.

In a special eight-page pull-out supplement, FREEDOM presents the detailed sworn statements of these prime participants in the conspiracy.

One of them is the full text, with certain key names deleted, of the 29-page declaration of Ala Fadili Al Tamimi, the forger hired by Flynn for the job.

The other statement is from coconspirator Akil Abdul Amir Al Fadili Al Tamimi, who attempted to pass the forged check at the Middle East Bank in New York City in June 1982. The full text of Akil's 12-page declaration is also reproduced in the supplement.

Attorney Flynn compounded his felonies by introducing the matter of the forged check as "evidence" in the Riverside, California, Superior Court probate case brought in November 1982 by Ronald DeWolf, the estranged, disinherited son of Scientology founder and best-selling author L.

Flynn argued that the incident of the forgery — the crime for which Flynn himself was responsible — was evidence that the Hub- plot, seeking to put the spotlight

"Michael J. Flynn loudly accused others of forging the \$2 million check. Investigation revealed that Flynn himself was behind this plot, seeking to put the spotlight on others for his own crime."

bard estate was not being on others for his own crime. properly looked after.

Painstaking research over many months, in which the editors of FREEDOM played a vital role, have brought the truth of the forgery finally to light.

In their research, FREEDOM investigators discovered the truth of the statement that the criminal accuses others of things which he himself is doing.

Michael J. Flynn loudly accused others of forging the \$2 million check. Investigation revealed that Flynn himself was behind this

Criminal acts by a criminal in our society are reprehensible enough. Criminal acts by an attorney, who has sworn to uphold the law, and who is indeed an officer of the court, are the lowest crimes imaginable. These crimes are vile betrayals of society.

Michael J. Flynn appears to be, by sworn testimony, a criminal. The evidence presented in this issue is but a small portion of the evidence FREEDOM has gathered on Flynn's criminal activities. In future issues, more of this information will be revealed. A

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FORGERY

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spired with Boston underworld figures to counterfeit and pass the check two years ago. Flynn subsequently used his own felony to initiate the sensationalized 1982 probate case brought by Hubbard's estranged son Ronald E. DeWolf in Riverside. Flynn argued that the attempted forgery was proof that the best-selling author's estate was in jeopardy and should be seized. Flynn blamed the Scientologists "to divert attention from himself," the documents state.

The attempt failed, however, when the court threw Flynn's case out and ordered DeWolf, a 50-year-old Nevada apartment house manager, to pay costs. Flynn was found in contempt of court and fined during the proceedings for violating court instructions.

"Common Criminals"

To finance his attack, Flynn created Flynn Associates Management Corporation (FAMCO). He tried to sell shares on the promise that profit would be made by capturing Hubbard's estate through a series of frivolous suits, and by generating so much "adverse publicity" against Scientology and Hubbard that the Church would be forced to settle for millions of dollars. The forgery and probate scheme was but one part of Flynn's conspiracy, details of which are now in the hands of several federal agencies.

Investigator Ingram, along with a team of other private detectives, was hired to find those responsible for the forgery.

According to the declaration filed in federal court, recently uncovered evidence reveals the "evil motivation" of FAMCO and its agents and the "common criminals engaged in a vicious attack upon freedom of religion."

The plot was revealed in papers filed in a suit brought against Flynn's brother Kevin and

FAMCO in Los Angeles Central District Court for violating the civil rights of Scientologist Steve Miller of Los Angeles. Michael Flynn is an officer and director of FAMCO.

After gaining access to the Bank of New England where Hubbard had an account, Flynn illegally obtained sample checks and then hired Ala Tamimi, a known forger, to counterfeit and forge a \$2 million check on Hubbard's account at the Bank of New England in Boston.

The same Bank of New England is currently the center of another \$2 million forgery case. A contact inside the bank allegedly made confidential information available to a disbarred Boston area attorney who fraudulently purchased gems from a Chicago dealer with the stolen cash.

Flynn Promised \$400,000

In a signed, fingerprinted and notarized declaration given in Italy to Ingram and witnessed by his attorney, Ala Tamimi related how Flynn had promised him \$400,000 to pass the check and transfer the \$2 million from the account of the legendary writer to an overseas account that Flynn would later designate. Tamimi then used his brother Akil to try to deposit the forged check in a New York bank.

According to his own sworn statement, also in federal hands, Akil was very nervous during his visit to the bank, failed to produce proper identification papers, and left the \$2 million check at the bank.

Plot Thwarted

Flynn's plot was thwarted when Akil panicked and failed to return. Meanwhile, Hubbard's business managers in Los Angeles learned about the check and quickly alerted the bank to stop payment. Ala Tamimi fled the country while his brother Akil disappeared into



Flynn allegedly used his own felony to initiate a sensationalized probate case.

Maine with the help of one of Flynn's men, according to the filed affidavit.

Flynn later used the results of his abortive plan when he filed the California probate petition with DeWolf in 1982. Flynn tried to put the blame for his felony on Scientologists and claimed that the

crime proved that Hubbard's estate should be seized by the court in order to allegedly protect it from Scientologists.

According to Rev. Jentzsch, the affidavits "are but one small part of the evidence collected. We have eyewitnesses, documents and continued on page 4

"Tamimi related how Flynn had promised him \$400,000 to pass the check and transfer the \$2 million . . . to an overseas account that Flynn would later designate."

continued from page 3

photographs that leave not one shred of doubt."

Attempt to Block Discovery

The declaration was filed in response to an attempt by Flynn's brother Kevin to halt a courtapproved inquiry into the financial transactions of FAMCO and Blossoms, a Washington, D.C., restaurant owned by Kevin Flynn. Miller's attorney Donald Randolph stated in his declaration that Kevin Flynn's motives in "seeking to prevent discovery of his fraudulent and criminal activities" were "transparent and understandable. He does not wish to have this information discovered as it may well subject him to severe penalties."

According to the filed declaration, Kevin Flynn illegally obtained a loan from the Small Business Administration "with fraudulent misrepresentations and misleading information designed to prevent the government agencies involved from obtaining the truth" about the restaurant and his activities with Michael Flynn.

\$100,000 Reward

The investigation of the criminal conspiracy to loot Hubbard's estate was initiated earlier this year with a series of full-page ads placed by Ingram in a number of national newspapers including

"'The boys in town are very mad and they can break his legs,' Hollingsworth told Tamimi."

The New York Times, The Boston Globe and The Wall Street Journal offering a \$100,000 reward for information about the forged check. Private investigators operating in four countries finally uncovered Flynn's conspiracy.

Flynn, an unknown personal injury attorney until he tapped Hubbard's popularity, had earlier demanded that the Church pay him \$1.6 million to stop suing the organization. When the Church refused to pay, Flynn devised and carried out the forgery and probate plot to plunder Hubbard's

Ala Tamimi's participation in the conspiracy was enlisted by

Boston lawyer Wayne Hollingsworth, who works with Flynn. According to Tamimi's sworn declaration, he was at the office of his attorney, Gary Pappas, at Union Wharf, where Flynn also works, when he met Hollingsworth.

According to Tamimi, Hollingsworth said he had worked for the FBI and had "many friends in the federal government" and "knew all the FBI agents in Boston." Hollingsworth related how Tamimi's other brother Amer had incurred a \$40,000 gambling debt to underworld figures in Boston several weeks before and had not repaid any of it.

"They Can Break His Legs"

"The boys in town are very mad and they can break his legs," Hollingsworth told Tamimi, according to the declaration.

In return for his help, Tamimi was told, his brother's debt would be cancelled. Additionally, Tamimi stood to gain 20 per cent of a "deal" which Hollingsworth said would be worth \$2 million or

After a meeting at a small restaurant at a motel on Boylston Street where further arrangements were made, Tamimi met Flynn for breakfast at the Colonnade Hotel. Three other men were present at the meeting, and

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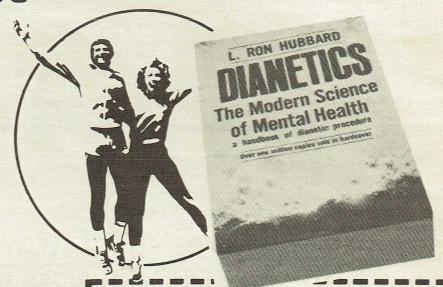
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SPECIAL SUPPLEMENT

Co-conspirators Finger Flynn in \$2 Million Forgery Scheme

The affidavits which appear on the following pages reveal a cold-blooded criminal conspiracy, complicity with organized crime and felonious conduct by members of the legal profession.

They have been reproduced verbatim in this special FREEDOM supplement to provide a sample of evidence already gathered in ongoing investigations of criminal activities. This information is now in the hands of federal investigators.

Ala Fadili Al Tamimi was hired by Michael J. Flynn to forge checks and to locate someone to open a fraudulent bank account in New York City.

Akil Abdul Amir Al Fadili Al Tamimi, Ala's brother, was selected by Ala to open the bank account with the forged checks.

The full text of both affidavits is reproduced here. Passages from the affidavits, arranged so they complement each other, are set in different typefaces for ease in distinguishing the two accounts. Nothing has been changed from the original, however, and the affidavits are in the sequence written by Ala and Akil.

Ala's statements are preceded by Ala:.
Akil's statements are preceded by Akil:.

Criminal conduct by attorneys, as detailed in the Tamimi brothers' statements, would be almost beyond belief were their statements not fully and explicitly corroborated by the affidavits of others involved, by photographs and by additional documentation.

As the documents are in the hands of federal prosecutors, certain names in the affidavits have been blocked out. For the purpose of authenticity, expletives that would not normally appear in FREEDOM have been retained. Ala:

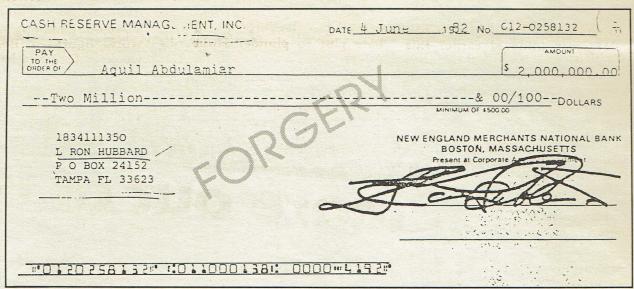
I, Ala Fadili Al Tamimi, declare under the penalty of perjury and under the laws of the United States of America and under the laws of the states of Massachusetts, New York, California, Florida, Oregon and Nevada that the foregoing is true and correct.

Sometime in March/April, 1982, I went to see my lawyer, Mr. Gary Pappas, at his office on Union Wharf in Boston, Massaschusetts. I was welcomed by a woman receptionist on the first floor. She told me that Mr. Pappas was not in his office and that Mr. Pappas' secretary was out of the office having lunch.

The receptionist picked up the phone and told someone that I, Mr. Tamimi, was there. Mr. Wayne Hollingsworth came out into the reception area from his office and said, "Hello Ala." He shook my hand and invited me into his office. Mr. Hollingsworth and I went into his office. The secretary then brought us two cups of coffee. Mr. Hollingsworth introduced the receptionist as his wife, Mrs. Hollingsworth. I thanked her for the coffee.

Hollingsworth then started speaking about the possibility of someday doing business with me. It looked like he was waiting for me to say something.

Mr. Hollingsworth knew a lot about me. He told me about the problems I was having with my partner, Mr. Nick Abraham. He also knew about my dealings with Mr. Jurgens of West Germany. This shook me up because I didn't know if he still had an association with the FBI.



Mr. Hollingsworth is a lawyer. His partner was Mr. Pappas. Mr. Hollingsworth's office is on the ground floor and his wife is his secretary. Mr. Pappas and another lawyer, Danny Lenzo, and their secretary are on the second floor.

This was not the first time I met Mr. Hollingsworth. The first time we met was about three or four months before at the Liberty Bank and Trust Company. This bank is located on School Street in Boston, Massachusetts. Mr. Hollingsworth and Mr. Pappas were at the bank doing business. I also banked there. Mr. Pappas introduced Mr. Hollingsworth to me. After that first meeting, we had said hello to each other when I visited Mr. Pappas and Mr. Lenzo at the Union Wharf offices. Up to that time I had never been involved in any type of business with Mr. Hollingsworth.

Going back to the March/April, 1982, visit in Mr. Hollingsworth's office, Mr. Hollingsworth started asking me all kinds of questions about my business and the things that I had been doing; however, he never gave me a chance to speak. Mr. Hollingsworth then started telling me about himself. He said that he use to work for the FBI and the federal courts. He also said that he has many friends in the federal government. Mr.

Mr. Hollingsworth's phone rang. He answered it and told me that Danny Lenzo just returned to his office. As I began to leave and was shaking hands with Mr. Hollingsworth, he looked right into my eyes, with a small smile on his face, and asked, "How is your brother Amer?" I told him he was fine and asked him why he had asked and how he knew Amer. Mr. Hollingsworth told me that he didn't know Amer; however, his friends knew Amer, and that he and I should discuss Amer. I asked what was going on with Amer. Mr. Hollingsworth then told me to promise to never tell anyone, including Mr. Pappas, Mr. Lenzo, Amer and everyone else, what he was about to tell me. I promised this to him.

Mr. Hollingsworth then told me that my brother, Amer, had been sports gambling with big boys in town. Amer had won about \$80,000. But Amer lost about \$40,000 four weeks ago and has not yet paid the gambling debt. Thus, the boys in town are very mad and they can break his legs. Mr. Hollingsworth asked me if I understood him. Mr. Hollingsworth told me that maybe he could help and asked me to call him. We said good-bye and I left his office.

I then spent about ten minutes with Mr. Lenzo. I then used Mr. Lenzo's phone and called Amer. I told him I would pick him up.

Amer's full name is Amer Fadili Al Tamimi. At this time (1982), he was a student at Northeastern University in Boston, Massachusetts. He was living in the Fellsview Terrace Apartments, Apartment Number 113, in Stoneham, Massachusetts. This building was owned by my older brother Adel Fadili Al Tamimi. Amer is presently (1984) living with my parents in Sharjah, United Arab Emirates.

I then drove in my Cadillac Seville and picked up Amer. We went to the Hilltop Restaurant in Saugus, Massachusetts. I questioned Amer about owing anyone \$40,000. Amer told me that he must pay \$40,000. Amer said that and his people have been after him for three weeks. Amer explained everything to me. Amer wanted to know how I knew about the gambling debt. I merely told him that I had found out. I didn't mentioned that Mr. Hollingsworth had told me.

I then used a pay phone at the restaurant and phoned Mr. Hollingsworth. I asked him if it was possible to meet that night over drinks. Mr. Hollingsworth said yes.

Later that day, at about 7:00 PM, I met Mr. Hollingsworth at a restaurant close to Union Wharf. I believe it's called "Josephes" or something similar. I walked in and he was standing at the bar. We shook hands. Mr. Hollingsworth bought me a drink and started telling me more about Amer and the \$40,000 gambling debt. I told Mr. Hollingsworth that I had spoken with Amer about

because he had to return to his office and meet his wife. Mr. Hollingsworth told me that it was possible that Amer wouldn't have to pay any money to money meant working with lawyers and classy people. He said I could make myself big money. Mr. Hollingsworth then told me, "As I told you before in my office, I know everything about you. You like to play and I have a nice game for you."

Mr. Hollingsworth said that he and his friends knew they could trust me. He asked if I was willing to do some business. He then said that he could arrange a meeting soon because the "game" must be done. Mr. Hollingsworth said that this was big money, more than the German deal. He asked if I knew what he meant. I told him to continue. I then asked him how much money he was speaking about and how much money would I receive. Mr. Hollingsworth told me the deal was for two or three million dollars and maybe even more. He said I would get 20% in my pocket. I asked Mr. Hollingsworth when the deal would happen and who was involved. Mr. Hollingsworth said the deal would take place in the USA and I would make good friends with the people I met. These people would also help me with my German problem with Mr. Jurgens. Mr. Hollingsworth also added that he could help me with my German problem because gambling. I told Mr. Hollingsworth okay and thanks. I then asked what was to happen next. He told me to phone him at about 11:00 AM the next day. He said that he must first clear Amer's problem, and then he would tell me where to go to meet a friend. He said he would take it from there.

Mr. Hollingsworth told me that he had to leave. We both left the restaurant. I asked him if he needed a ride to his office and he said no thank you and I told him I would call him the next day.

The next morning, I called Mr. Hollingsworth at his office. He told me to go to Kenmore Square in Boston and meet would be sitting in a black Mercedes Benz sports car, parked in front of the Greek Restaurant. Mr. Hollingsworth told me that he would be at his office until 6:00 PM and told me to phone him later. He wished me luck and said goodbye.

At noon I drove to Kenmore Square, saw the black Mercedes Benz and pulled up behind it.

driving the Mercedes Benz waved his hand, indicating I should follow him. I followed him. About five minutes later, he pulled into a small parking lot of a motel on Boylston Street. I parked my car next to him. We shook hands and he said hello Ala. He introduced himself as

and I walked into the small restaurant at the motel. We walked over to a gentleman dressed in a dark suit, having a cup of coffee. The man stood up and said, "So you are Ala." He said his name was said he knew my brother Amer. Invited and I to sit with him at his table. We all drank coffee. told me that Amer was a nice boy and he liked him. told me not to worry about Amer and the \$40,000 gambling debt. that Mr. Hollingsworth was a good friend of his who had spoken good things about me. continued talking and told me that he wanted to meet me and tell me personally that no one would bother Amer anymore. also said that Mr. Hollingsworth told him that I was going to join them for some business dealings. I told that I was correct and that I was very happy to do business with him.

money. I answered I sure did. I asked him the same question.

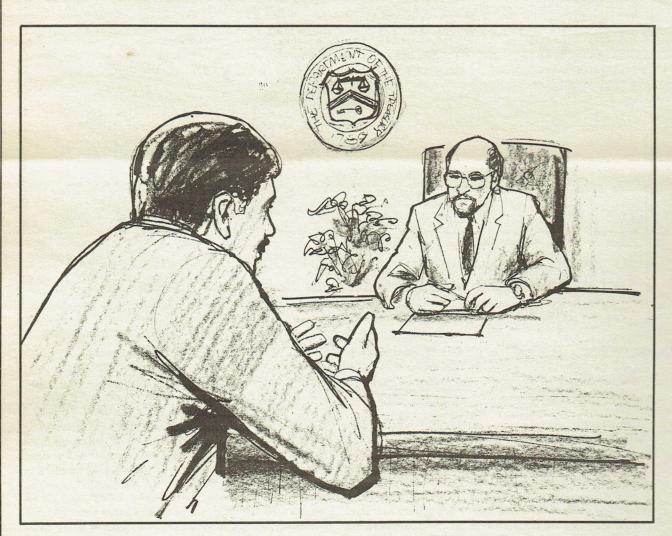
Told me that he wasn't joking. He said that there are big, nice and important people involved in what we were going to do. He said that if I work with them and do good, the deal was a real big one, coming very soon, that was in the millions of dollars. He asked if I knew what he meant. I told that he had lost me and that I didn't know what he was talking about. I asked him what it was that we were doing and what it was that I could do for him.

That was doing it and he knew that I would do the best.

I asked said that the deal was between two and three million dollars in counterfeit checks. He told me that he would introduce me to another friend of his. This friend was a very good friend of his and Mr. Hollingsworth. The friend was also a lawyer with offices on Union Wharf, he told me. I asked for the friend's name. Told me that I would meet him soon. I told him okay.

would be the one who would be in touch with me about the deal. warned me to be careful to never tell anyone about meeting him, not even Amer. He also told me to tell Amer that I had taken care of the \$40,000 gambling debt for him. told me that would phone me the next day at 10:00 AM. He said that we would have another meeting. He stood up and we shook hands. I told him that it was nice meeting him and I left.

phoned me at about 10:00 AM the next day. Sales asked if I could meet him sometime that afternoon. We agreed to meet at 2:00 PM in the parking lot of the Palace Disco Night-club in Saugus, Massachusetts. We met at 2:00 PM and was driving the same Mercedes Benz.



Ala: "Mr. Hollingsworth then started speaking about the possibility of some day doing business with me. It looked like he was waiting for me to say something."

the gambling debt. I told Mr. Hollingsworth that I never mentioned any names to Amer, and that Amer was very worried and that there were people bothering him about the debt. I told Mr. Hollingsworth that Amer had no money to pay the gambling debt. I also told Mr. Hollingsworth that I wasn't going to pay the debt because it was a gambling debt, rather than a debt for something Amer had purchased.

Mr. Hollingsworth then told me to listen to him carefully. He said that he only had a few minutes

he knew all the FBI agents in Boston and most of the United States Attorneys. He said that I would be doing business with smart people and that I would see that what he was telling me was true.

I told Mr. Hollingsworth okay. I told him that I like to make money and I would be happy to meet good, new friends. I then asked about Amer's situation. Mr. Hollingsworth told me not to worry about it for the time being and just leave it all up to him. Mr. Hollingsworth told me to trust him. He also told me to please tell Amer to stay away from

asked if I was free the next day so I could meet

The state of the state of the Colonnade Hotel

The state of the state of

The following day at about 9:30 AM, I parked my car in Quincy Market in Boston. I then went by taxi to the Colonnade Hotel. I arrived at the hotel a few minutes before 10:00 AM. was in the lobby and said good morning to me. I said hello and we both walked into the restaurant. I saw Mr. Hollingsworth, was and another man sitting at a table in the restaurant. I said good morning to everyone and shook hands with Mr. Hollingsworth and was hello to Michael Flynn. I said hello to Mr. Flynn. Mr. Flynn said "Hi Ala, nice to meet you."

We all had breakfast and the others were talking about sports. Then Mr. Hollingsworth asked me how Amer was. I told him Amer was fine.

Said that he liked Amer and that Amer was a nice boy. I told *** thanks.

Just after this, Mr. Flynn looked at me and asked if they were going to make money with me or if I was going to run away with the money. I answered Mr. Flynn by asking him which money he was talking about, and what did he mean. Everyone else at the table was looking at Mr. Flynn and me as we talked. Mr. Flynn told me that he knew more about me than I thought. He said I was a very intelligent and smart man but that I needed good advice before I did my business. Mr. Flynn told me that whatever I did he would like to advise me and make money with me. He said we would have good relations and make good money. Mr. Flynn said that he and everybody at the table all liked me, trusted me and we all had a great chance to make over two million dollars within 45 days. Mr. Flynn told me that if I was willing to work with them and to make money that I would get 20% of the deal. Mr. Flynn told me that if I was ready I must move fast starting today. I told Mr. Flynn I was ready.

Mr. Flynn told me, "Okay Ala, hear me well. First, I trust you so do not f—k us because you have a brother and son in Boston—so let's be friends." Mr. Flynn said, "Hear me well, this is the

It was now about 11:00 AM. Everyone of us was looking at Mr. Flynn and giving him our complete attention. Mr. Flynn was looking at me and started speaking. Mr. Flynn said to me that he had a great connection in the Bank of New England in Boston, and the connection was a man who could be trusted. The man at the bank would give us inside bank information like which accounts were good. Mr. Flynn said that he and his man at the bank were all ready and they know which accounts were good and which accounts we were going to get. Mr. Flynn said that the man at the bank is also going to bring us legitimate checks to make copies of, but, we could only keep these checks for four days. The man at the bank can remove the legitimate checks for us but he must return them so they can be sent back to where they belong. Mr. Flynn was still looking at me and asked me if I understood. I told him I did and said to continue. Mr. Flynn continued telling me that this man at the bank is going to process the counterfeit checks through the computer and clear the checks. The checks will then be held at the bank and no one will find out for about 15 days. Mr. Flynn said that all he cared about is that the checks cleared. Mr. Flynn was still looking at me when he spoke.

Mr. Flynn then said that my part was to find someone who would make the checks. I would only have four days from the day I got the legitimate checks to do the work that had to be done, and the work neded to be done well. Mr. Flynn said that he knew that I had the connections and could do it. Mr. Flynn told me that after I have the checks made he will have to see them and proof them. Mr. Flynn said that was first. Second, he said I must deposit the checks in a bank and make arrangements with that bank to make a telephone transfer to

anywhere I want. He said that to do this I must go to an international bank; but, he said, that was my part of the operation.

Mr. Flynn said that he wanted me to deposit the checks in a bank, leave \$100,000 at that bank and transfer all the rest of the money out. Mr. Flynn said that he would take care of the rest. He said the money would be going outside the USA. Mr. Flynn said that my part would be to make the checks and have them deposited. Mr. Flynn said that his part will be to clear the checks and send the money back

business and has many friends. I told that I had a little business that I wanted him to do for me but he must get me the best printer in town.

dollar. He's always broke. He dresses well but never has any money in his pocket because he spends it on cocaine. I told that I needed someone to make me some bank checks within a two-day time limit and the job must be the best. So I told to go and find the best man for me and tell him to get ready to print the checks for me.



Ala: "At noon I drove to Kenmore Square, saw the black Mercedes Benz and pulled up behind it.

Belle Benz, driving the Mercedes Benz, waved his hand, indicating I should follow him."

to the bank account I opened. Mr. Flynn said that then I would transfer the money from this bank account and he would make the collection arrangements for the cash. Mr. Flynn asked me if I understood the deal. I told him I did.

Mr. Flynn told me to never phone him, Mr. Hollingsworth, I was to never visit them at their offices or keep their names or telephone numbers to make it appear like I never met them or knew them. Mr. Flynn said that we would meet again and have drinks outside the USA. Mr. Flynn told me that would contact me on a daily basis but I was never to speak on the phone. Would phone me and then we would meet in person and conduct business. Mr. Flynn said to me that would be the man who would speak for all of them and asked if I understood this. I said I did.

I asked Mr. Flynn when I would be getting the legitimate checks and who would be paying my expenses. Mr. Flynn smiled and told that he thought I was ready to move that day. Everyone started joking and they had big smiles. Mr. Flynn looked at me and told me that would be calling me in two days and by that time I should have my homework done and should know what I needed. I told Mr. Flynn okay.

I looked at and told him to call me at about 11:00 AM in two days. said okay. The breakfast meeting ended just before 12:00 noon.

The next day, I met with a friend of mine named is in the printing

The following day called me and we met at the Hilltop Restaurant in Saugus. told me I should be getting ready because I would be getting the legitimate checks in about a week. also asked me what I needed. I told said it was too much money. I told so go and ask Michael Flynn for \$25,000 and tell him I need by tomorrow. I needed the money to prepare many things and pay people up front. said okay, but said he thought it was too much money. Told me he would call me that night or the next day.

met at the Hilltop Restaurant in Saugus. brought me \$10,000 cash and told me he would bring me the other \$15,000 soon. We parted.

three times a day for a week to meet his friend the printer. wanted to make the fast dollars for finding me the right printer.

It had now been about a week since the breakfast meeting and I was still waiting for to bring me the legitimate checks.

A day to two later, seems called me in the early morning to set up a meeting. I met him at 4:00 PM in Dunkin' Donuts close to Union Wharf. save me an envelope and told me it contained five checks. He said he had just gotten the envelope and checks from Michael Flynn. said I must return the checks back to him within four days. said Michael Flynn sent his regards, wished him good luck and said to be careful with the

checks.

I then met and for dinner in a restaurant on Newbury Street in Boston. I had the envelope containing the five checks. One check was from Florida. I think it was green and had in the top left corner a picture of fruits, maybe three or four oranges. This Florida check was a cancelled check which had been processed through the bank. It had been signed and had the money numbers on it. The other four checks were from the Cash Reserve Management of the Bank of New England in Boston. One of the four checks was cancelled by the bank. It had been signed, dated and it was in an amount in excess of a million dollars. The other three checks were also from the Cash Reserve Management. These were new checks, but they weren't to be used except to help the printer.

During the dinner with and seems, I showed the checks to the printer. He started looking at them. He said it was not going to be an easy job. how much it was going to cost. I told him that I needed ten checks of each legitimate check, twenty checks total, and I needed all the checks in two days. said it would be impossible to make the checks in two days because the job required special inks and other materials. I explained to that I must return the five checks in three days. said that would be no problem because he could take special photographic pictures by the next night and finish the job after this. said he could return the five checks to me in two days.

I asked was going to charge. He said \$5,000 for his labor. In addition, he needed some materials and didn't know how much they would cost. He thought it would not be more than \$1,000. promised me he would do

excellent work.

We made the deal. I gave \$2,000 in front. also gave \$1,000 and promised that I will give him another \$1,000 when the checks were ready. thanked me and said that he needed the money. then took the five checks in the envelope and the \$2,000 at the dinner table.

We started having dinner and said he was The big boss lives in Florida and does his dirty private work alone at night when all the employees go home. The After dinner, left with the checks and the \$2,000. I made arrangements to meet with and and and two days later in Quincy Market in

Two days later we all met as planned. brought me the checks back along with a list of things he needed.

I had previously made plans to meet sale after We met at the Dunkin' Donuts near Union Wharf about 6:00 AM. I explained to see that the checks were not going to be ready in one week but would be ready in about three weeks because we could not find the ink. I assured that the checks would be done very well when completed. I told III I was done with the five checks and gave them back to him. I told him about the list of things my printer needed. I gave him the list to show it to Michael Flynn. sales asked me to meet him again in one hour at the same Dunkin' Donuts.

walked to Union Wharf. I bought a newspaper from the newspaper box machine. I did not leave Dunkin' Donuts. About forty minutes

later returned. It told me that he just spoke with Michael Flynn and that Mr. Flynn is mad. said Mr. Flynn must speak with the inside man at the bank and would meet me again the next day.

called me the next day and told me he would call me in a few days. He told me that he is going to get everything on seems list for me. said everything was okay and he would be in touch in about a week's time

About ten days later, see called me and asked me to meet him at the Palace Disco parking lot in Saugus. I met and he gave me three boxes. said that the boxes contained everything I asked for and added that everything had to be gotten from outside of Massachusetts. old me that Michael Flynn had said that the checks must be ready before the end May 1982 and that Mr. Flynn also said that I must be ready to open the account and deposit the checks at the beginning of

I am twenty-three years of age. I was born on 7 July 1962. I presently live in the same state that I was born, Sharjah, in the United Arab Emirates. I was the person who took two counterfeit checks in the amounts of Two Million Dollars and One-Half Million Dollars to the Middle East Bank in New York City on, or about, 7 June 1982. I attempted to open an account with these two checks. I told the man who worked in the bank that my name was Aquil Abdulamiar. I endorsed both checks with the name of Aquil Abdulamiar. The following is a chronological explanation of the circumstances surrounding this incident. It is to the best of my knowledge and recollection. I travelled to the United States from the United Arab Emirates about one month before I took the checks into the Middle East Bank. I flew from Dubai to Boston, I had to change planes in Paris. I flew on Air France and British Airways. I had

purchased roundtrip airline tickets in the United



Ala: "... In Dunkin' Donuts, close to Union Wharf, ... gave me an envelope and told me it contained five checks. He said he had just gotten the envelope and checks from Michael Flynn."

June 1982. I asked was to call me in two days.

That night, after getting the boxes from BBBB, I was driving my black 928 Porsche. I had the boxes in my car and had been out all night drinking. The following morning I was driving somewhere in Revere, Massachusetts or in Everett, Massachusetts. I made a wrong turn and the M.D.C. Police stopped me. One officer was white and the other was black. They checked me through the computer, using the radio in the police car. There was a warrant for my arrest.

I, AKIL ABDUL AMIR AL FADILI AL TAMIMI, declare under the penalty of perjury and under the laws of the United States of America and the United Arab Emirates and under the laws of the States of Massachusetts, New York, California, Florida, Oregon and Nevada that the foregoing is true and correct.

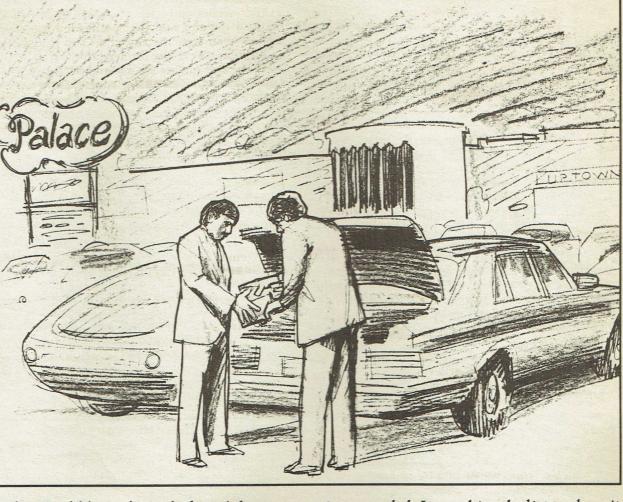
Arab Emirates. My return ticket was for an open return, up to one year later

My brother's name is Ala. Ala was living in Saugus, Massachusetts, during this time. Ala's Boston Attorney, Danny Lenzo, picked me up from the Boston Airport. Danny Lenzo said that Ala had been arrested.

The M.D.C. Police arrested me and checked my car. The police found the different inks and the scale and other things. They asked me what the things were for. I told them the items were samples going to Saudi Arabia. The police took me to the Revere Police Station. I was fingerprinted and photographed and then taken to the Peabody Police Station. I was released the same day.

Akil:

We drove to the jail and bailed out Ala. After this, Danny Lenzo, Ala and I went to the Colonial Hotel in either Lynn or Saugus, Massachusetts, and ate



Ala: "I told him about the list of things my printer needed. I gave him the list to show it to Michael Flynn About ten days later, alled me and asked me to meet him at the Palace Disco parking lot in Saugus. I met and he gave me three

dinner. The hotel is located on Route One.

Two days later, in the evening, I met was, the printer, in a parking lot of a shopping center in Brockton. I gave all the things I got from BERRY He told me everything he needed was there. I asked how long it was going to take him to make the checks. He asked me to call him at work or at home and gave me his two phone numbers. I was in touch with were every day and every night. I also visited him twice at night at work. After about seven days, he finished the job and gave me the checks. The checks were perfect. He did excellent work. I gave him \$3,000 and I gave \$1,000 to

had been calling me every day but I never met with him because the checks were not ready. Finally, I met during the afternoon in the same Dunkin' Donuts. I gave the checks and I asked him to get me \$15,000 that night.

Later, I met with again. again. had a big smile on his face. said Michael Flynn loves the checks and he had asked Mr. Flynn to get the \$15,000 that night. Bees also added that Michael Flynn said the checks were perfect, especially the signatures. said that Mr. Flynn sent his regards to me. we then said that Mr. Flynn said he was going to put the numbers, names and dates on the checks but we must wait for Mr. Flynn's man at the bank to tell us when. said that Mr. Flynn needed to know from me the name that will go on the checks and reminded me that it has to be the same name opening the account at the bank. I told that I would give him the name within two days. I then asked where the money was. said that he was going to get all the money right then. He asked where he could meet me that night. I told him I would be at the Palace Disco in Saugus. came to the Palace Disco that night and gave me the \$15,000.

I had arranged for seems from the

counterfeit checks. I had false identification for him. However, I could not locate him. I don't know where he went. I had no one to use to go to the bank

I had already chosen which bank I was going to use, the Middle East Bank in New York City. This bank is owned by the Al Fotame family, from the United Arab Emirates. They are Arabs. The bank is managed by Pakistanis. Most Pakistanis are stupid and I thought they process the checks. I have met the manager of this bank in the past and had his personal card. I chose the name "Aquil Abdulamiar" to go on the checks and decided to use my brother, Akil Fadili Al Tamimi, to present the checks and open the account at the Middle East Bank. Akil's long Arabian name is Akil Abdul Amir Fadili Al Tamimi. I changed the spelling of Akil to Aquil and changed Abdul Amir to Abdulamiar. This gave the name more of an Italian spelling, yet would still enable Akil to use his real name to open the account or transfer money.

I stayed with Ala in his home. About ten days before I took the checks to the Middle East Bank. Ala began telling me what he wanted me to do Ala told me that a Boston Attorney named Michael Flynn had gotten hold of two legitimate checks from the Bank of New England in Boston. Michael Flynn gave the checks to Ala. Ala had counterfeit copies of the checks made. Ala told me that all I had to do was open the account and deposit the checks. I did not have to cash the checks and receive money. Ala said that he and Michael Flynn were going to make the arrangements to get the money after the checks were cleared in the Bank of New England.

Ala told me that he had decided to use the name "Aquil Abdulamiar" on both counterfeit checks. Ala chose this name because it's very similar to some of the words in my real name. Ala changed the spelling of my real name "Akil" to "Aquil" and North End of Boston, to open the account using the changed the spelling and format of my names



Ala: "... At about 9:30 a.m., I... went by taxi to the Colonnade Hotel ... was in the lobby and said good morning to me. I said hello and we both walked into the restaurant."

"Abdul Amir" to "Abdulamiar." Ala said that this would make it easy for me to use my real passport as I.D. to open the account. All I would have to say was that my name had been misspelled on the checks.

I practiced writing the signature "Aquil Abdulamiar" over and over. I did this in Ala's home, under his supervision. He also told things to do and things to say when I was in the Middle East Bank. We rehearsed these things over and over.

Ala:

A few days after meeting with ********, I told him what name to tell Michael Flynn to put on the checks and to also inform Michael Flynn that I was ready to open the account.

Sometime in early June 1982, I met with \$5,000 and said that is was from Michael Flynn to me.

gave me another envelope from Michael Flynn which had the two counterfeit checks.

also told me that Michael Flynn wanted me to check into the Marriott Hotel in Fort Lauderdale, Florida, one day after the account is opened and the two checks are deposited. Michael Flynn said that he will also be in Florida at this time. Mr. Flynn will contact you at the Hotel.

then said

sends his regards and wishes you good luck.

Two days before the checks were deposited I called the Middle East Bank in New York City and

relationship with him on the phone. Then I told him I would be in touch and would call him again.

The next day I called the bank and spoke with the manager again. I told him I was not sure when I would be coming to New York. My brother's son was a student in the USA and he was going to deposit two checks which I received from people I had sold real estate to. I asked the manager of the bank to deposit the checks and told him the boy's name is Aquil. I asked the manager to help Aquil with what needs to be done to open the account. He said he would. He was very nice and told me that he hoped to see me soon.

Akil:

Ala possessed the business card of a person connected to the Middle East Bank. I cannot remember his name at this time. Ala told me that he had spoke to a person on the phone at the Middle East Bank by the name of Ala said that he told this person that he was a big businessman in Beverly Hills, California. Ala did not give sees his correct name. Ala told **EXECUTE** that he wanted to open an account at the Middle East Bank and dropped the name of some important person who worked at the Middle East Bank. Ala told me that he told that he was too busy to come to the bank himself and asked seeses if it would be all right if his nephew, Aquil Abdulamiar, brought two large checks to the bank and opened the account. Ala told **BEBBB** that Aquil Abdulamiar was a student

Akil: "I practiced writing the signature 'Aquil Abdulamiar' over and over. I did this in Ala's home, under his supervision."

spoke with the manager. I told him my name was Hamedi and I was calling from the Beverly Hills Hotel in Los Angeles, California. I told him that I was from the United Arab Emirates and good friends of the Al Fotame family and I was doing some business in the United States. I told him I would like to open an account with the Middle East Bank but I cannot find the time and I do not know when I'll be in New York. The manager was very nice to me. He said that he wished to see me soon and meet me. I was building some friendly

in Washington.

I drove with someone sitting in a parked car at a prearranged location.

gave me an envelope and said that only I was to ever touch the envelope and its contents. The had a cast on his hand. I noticed it when he handed me the envelope. I took the envelope and took it home. It contained the two counterfeit checks which I

later took to the Middle East Bank.

Ala:

Akil went to the bank and met the manager. Akil gave him the checks and did his best to open the account. Akil either forgot his real identification or decided not to use it. Akil later told me that he was real nervous in the bank. I also had a man go with Akil. This man waited outside. After Akil left the bank, he flew to Florida and met me. I was already in Florida with my bodyguard,

Akil:

I received a phone call from Ala. Ala told me that he was at the Marriott Hotel in Fort Lauderdale, Florida. Ala told me to take the counterfeit checks to the Middle East Bank the following day or the day after. Ala gve me final instructions, including the flying time to New York from Washington and the weather conditions for the last few days in Washington. Ala told me that someone might ask me these questions in the bank. Ala also told me that another person was going to accompany me to New York, but this person was not to be seen by anyone at the bank. Ala said that I was supposed to phone him as soon as I opened the account and just before I was to catch a plane to Fort Lauderdale.

A day or two later, the other person and I flew from Boston to New York. I believe that we purchased the tickets when we were flying on the plane to New York. I think that we flew on Eastern Airlines. See waited for me at La Guardia Airport. We decided on a location to later meet at the airport. Ala had given me the address of the Middle East Bank. I caught a cab at the airport and went directly to the location of the Middle East Bank. I was wearing a grey suit, a white shirt and black shoes. I also had on a tie. I had the business card that Ala had given me and the envelope containing the two counterfeit checks. I entered the building and took the elevator several stories up to the floor where the Middle East Bank was located. There was in the reception room of the bank. She asked if she could help me. I showed her the card I had and asked to speak to **BERRESS**. I told her I was Aquil Abdulamiar. I looked to see if there were any cameras in the bank, as Ala told me to do, but I didn't see any. She phoned somebody and told me that would see me in about five minutes. She asked if I wanted some coffee.

About five or ten minutes later, walked into the reception area from the bank's inner offices located to the right of the reception room. It is greeted me. He appeared to be a Pakastani about thirty-five years of age. He was tall and, compared to most Pakistanis, was light-complected.

office. We walked down the corridor and turned right. We walked down another corridor, I think to the left, and went into his room. I don't recall seeing a window facing outside in his office. I sat down and saked me how my uncle was, and when the last time was that I saw my uncle. I gave him the answers that Ala had rehearsed with me. About this time, another bank Manager walked into same office. I was introduced to this man but I can't remember his name.

the weather was in Washington. I told him the things Ala had told me. I was offered coffee. I answered all of the questions and the other man were asking me, but I never asked them any questions, just like Ala had told me. During the entire time I was with would enter the office and then leave. I cannot recall exactly when he was there and when he wasn't.

him. I handed him the envelope containing the two counterfeit checks. He removed the checks and examined them. He made some kind of joke about me being a rich man.

it between my first and second fingers on my left hand so I wouldn't leave any fingerprints on the check, just like Ala had instructed. I endorsed the check using my right hand and pushed the check across the desk to four fingers on my left hand. I instantly realized that I had just put my four fingerprints on the rear of the check. Ala had told me never to leave any fingerprints on the checks. I was very nervous the whole time I was in the bank. But when this happened, I got even more nervous and I became scared. scared then handed me the second check. I took this between my first and second fingers on my left hand, just like the first check. I turned it over and signed the check. However, I was now so more nervous after placing four of my fingerprints on the first check, that I signed the check wrong. I wrote the name "Aquil" as I was supposed to but wrote the name "Abdulamiar" not as one word as I should have, but as two words. I wrote it as "Abdul Amiar." I just left this check on the desk. I didn't even push it back to picked up this check and handed me a signature card to sign. I signed the card. I signed a total of three things in the bank, the two checks and the signature card.

that I didn't bring any because I thought that it wasn't necessary to show I.D. when all I was doing was opening an account. Louis told me that it was necessary and it was really for my protection. I had my United Arab Emirates passport with me, but I decided not to use it because I was so nervous. I told that the embassy, close to my school, had my passport because they were making some kind of school recognition papers for me. I told that my father always told me to remember my passport number whenever I travel. I then told him my passport number from memory. He wrote it down.

day with I.D. I told him no because I had tests to take at school the next day and I had to fly home right after I left the bank. I left the checks with him. Was was very friendly with me. He even gave me his business card and told me to give his regards to my uncle.

I think I was in the bank for about twenty minutes. I took the elevator to the street, exited the building and turned left. I walked two blocks, as Ala had instructed, and took a cab to La Guardia Airport. I met who flew with me to New York at the prearranged location. He gave me a phone number to call. I phoned Florida and spoke to Ala. I told him that I had left the checks at the bank and the deal was on. I told Ala the flight that who is a substantial was and I were going to take to Fort Lauderdale.

Guardia Airport to Atlanta, Georgia. We changed planes and flew to Fort Lauderdale. When we landed, we were met by Ala's bodyguard, told me that he would watch my belongings and directed me to go outside and talk with Ala. I went outside and saw Ala standing.

Ala and I took a little walk. He asked me what had happened. I told him everything. He got very mad when he found out that I was not given an account number and had left the checks at the bank. Ala told me that after I had phoned him from La Guardia Airport and told him the deal was on, he phoned his people in Boston and told them that the account had been opened and the checks deposited. After a while, Ala calmed down and told me that I had done my best and to not worry. I had never opened an account at any bank in my life and really didn't understand the procedures. I was scared and nervous in the bank.

Hotel in Fort Lauderdale. The person who flew with me shared a room with me. Ala and shared another room. The two rooms had an adjoining door between them. Ala and the rest of us stayed there another four or five nights

before leaving.

Ala:

Two days later, I received a phone call from Michael Flynn. I was at the Fort Lauderdale Marriott Hotel. Mr. Flynn asked to have dinner with me that evening. At 8:00 PM I was waiting outside the front door of the hotel for Mr. Flynn. A long dark American car pulled up. Mr. Flynn was driving. Mr. Flynn stopped the car, came out, shaked my hand and opened the door for me. He

8:00 PM and we would go for a drink. I was a few minutes late and Akil walked me to the front door of the hotel. As we approached the front door, I saw Mr. Flynn standing outside next to his car waiting for me. Akil went to the hotel bar and I walked over to Mr. Flynn. We shook hands. He again opened my door and we drove to the same area as the sea food restaurant. Mr. Flynn took me to a nice bar. He was a combination restaurant and bar. It was on the water and had big windows



Akil: "I instantly realized that I had just put my four fingerprints on the rear of the check. Ala had told me to never leave any fingerprints on the checks. I was very nervous . . . but when this happened, I got even more nervous and I became scared."

was showing respect for me. We left in his car. He drove over a bridge, next to the hotel, and headed towards the Atlantic Ocean. We drove for about ten minutes and arrived at a sea food restaurant. Mr. Michael Flynn told me that the car he was driving was a rented car. The restaurant was on the coast. It was in the same area as a real tall building which I think is a hotel. I think the building has a revolving restaurant.

At the sea restaurant, Mr. Flynn told me he had opened an account in the Cayman Islands. Mr. Flynn said that as soon as the checks clear in Boston, he will know. Then, two days later, the money will be in the New York account. Mr. Flynn said that I would then make the arrangements to transfer the money to the Cayman Islands.

I asked Michael Flynn to give me the details of the Cayman Islands account, the name of the account and the name of the bank. Mr. Flynn said as soon as the money cleared in the Boston bank and his man called him from the Bank of New England, he would give me all the details.

Michael Flynn kept talking throughout dinner. Mr. Flynn told me that I was supposed to meet him and Wayne Hollingsworth in the Grand Cayman Island, after I made the money transfer, and Mr. Flynn would give me half a million dollars in cash. After dinner, Mr. Flynn drove me back to my hotel and said that he would call me.

Michael Flynn phoned me three or four days later at my hotel. He told me he would pick me up at

overlooking the water. We drank champagne and spent about one hour together. Mr. Flynn told me that the checks hadn't yet arrived in Boston and told me that I must call the bank in New York and see what is going on. Mr. Flynn said he would call me in two days. I was back in the hotel by 9:30 PM. I went to the hotel's night club and found my bodyguard, and Akil having drinks. I told Akil that I had just had drinks with Mr. Flynn and that Michael Flynn had told me that the counterfeit checks Akil had deposited still hadn't arrived in Boston. I had on previous occasions informed Akil as to the roles played by Michael Flynn, Wayne Hollingsworth,

Akil:

Twice during the stay, Ala told me that Michael Flynn was going to pick him up in the evening. I asked Ala if I could go with them. Ala said that Michael Flynn had given instructions that I was to never meet him or be seen with him. However, the second evening that Ala and Michael Flynn went out, I

the hotel, next to the lobby. As we got to the front door, I saw Michael Flynn in the driver's seat of a large, dark colored, American car. The car was parked in the driveway, about 20 meters from the front door. The car

As soon as we got to the doorway, he got out of the car, walked behind it and walked to the passenger door.

Ala told me that he was going, indicating

I immediately stopped, about one meter outside the doorway and watched Ala walk over to Michael Flynn. I had

of Ala and Michael Flynn. They shook hands, then Michael Flynn opened the front passenger door for Ala and Ala got in the car. Michael Flynn walked around the front of the car and got in the driver's seat.

I walked thru the lobby and thru the hallway into the nightclub in the hotel. I sat with and About one or two hours later, Ala returned to the hotel and met us in the nightclub. The nightclub has a disco and live entertainment area plus a restaurant.

Ala

The next day, I called the Middle East Bank and spoke with the same manager. He is from Pakistan. I asked if he deposited my checks. He was too nice to me on the phone. He said everything was okay and insisted that I must go to New York and see him. I did not like the way he was pushing. I felt something was wrong. I told him that I would be coming soon to New York and said good-bye.

Two days later, called me at the Marriott Hotel. He gave me a number of a pay phone in Boston and told me to take phone change and call him in one hour from a pay phone. I did this and called him back. told me to forget about the deal because the s—t had hit the fan in the Boston bank. said that Michael Flynn's man in the Bank of New England called in Boston the night before and said that everyone in the bank is talking about the check forgery. told me to be careful.

Akil:

After we checked out of the hotel, Ala and I flew together from Fort Lauderdale to Boston. My

brother, Amer, picked us up at Logan Airport in Boston. He drove us to Ala's home in his 928 black Porsche.

The next day, Ala told me that the checks got caught and that Michael Flynn wanted me to get away from Boston as soon as possible.

Description of the drove me to a ski resort area close to Portland, Maine. I had a room on the first floor of the hotel. I think the hotel was two stories high. There were also small cottages on the property. I stayed there by myself. Because it wasn't the ski season, very few people were staying there. The restaurant wasn't even open.

I stayed there about two weeks. When I was hungry, I had to walk to a delicatessen store about one mile away. About 300 meters past the delicatessen was a small pub where I would occasionally have a drink.

Ala and acouple times. Once, the three of us went for a ride to Vermont. During this ride, I overheard Ala and acouple times talking about Michael Flynn and his involvement in the check forgeries.

About four weeks after this, I flew home to the United Arab Emirates from Boston.

Additional information

I saw Ala get in the car with in Fort Lauderdale, as I have previously stated. I know this man to be Michael Flynn. I have affixed the fingerprint of my right thumb, using purple ink, to the rear of the photograph.

The signatures directly below which read "Aquil Abdulamiar" were written by me. This was how I endorsed the first check in the Middle East Bank in New York City.

In addition, I have affixed all ten fingerprints, in black ink, to the last page of this declaration. This is on Page Twelve. I have also affixed my right thumbprint, in black ink, to the top right corner of each page of this declaration. The previous statements were made freely and voluntarily. They are true and to the best of my knowledge.

Signed in Dubai, United Arab Emirates, this 10th day of May, 1984.

AKIL ABDUL AMIR AL FADILI AL TAMIMI Witnessed by Eugene M. Ingram Private Investigator California License Number AA9387 1212 North Vermont Avenue

Los Angeles, California 90029

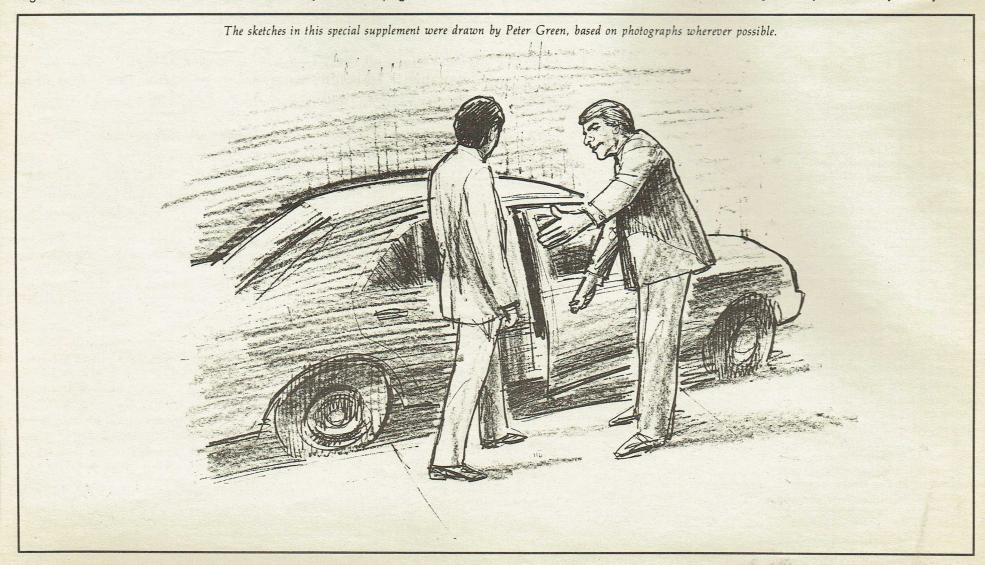
Ala:

WAYNE HOLLINGSWORTH: Boston lawyer office at the Union Wharf, Boston, Massachusetts. He is about 47 years old. He introduced me to and and Michael Flynn. Beautiful He is about wears old, in Massachusetts. Very big bookmaker in Massachusetts. drives a black Mercedes Benz sports car. He is about we years old and works for and does his dirty work. was the contact between myself and and myself and Michael Flynn. MICHAEL FLYNN: Boston lawyer - offices at Union Wharf. He is about 43 years old.

checks. He is company in solution of a printing company in solution of a printing company is about solution years old and works in the printing business. Solution is the one who introduced me to solution, the printer. Solution saw the original checks and he received \$2,000 from me for introduce me to solution the printer.

In referring to the Bank of New England I am also referring to the New England Merchants National Bank, as the bank was previously known, prior to May 1982.

Executed at Naples, Italy on the 5 day of May 1984.



Ala: "Mr. Flynn stopped the car, came out, shaked my hand and opened the door for me. He was showing respect for me."

BLOSSOMS OWNER HIDES CONTROVERSIAL PAST

Alleged Civil Rights Culprit Gains Federal Funding



Kevin Flynn, president of FAMCO, organized brutal "deprogrammings" aimed at boosting business for FAMCO.

by John Lawrence

Kevin Flynn, the subject of multi-million dollar lawsuits for alleged civil rights violations in Massachusetts and California and the brother of alleged criminal conspirator Michael J. Flynn, opened the Blossoms restaurant in late 1983 in the government-owned Post Office Pavilion in Washington, D.C.

The Small Business Administration (SBA) underwrote the Blossoms enterprise to the tune of \$250,000 of taxpayers' money, in the form of a loan guarantee.

Flynn's application to the SBA is under investigation due to some "inconsistencies" regarding his past.

The original application indicated that the Blossoms venture was being taken by the Flynn Company, presumably chartered in Massachusetts. Subsequent searching of records in Massachusetts revealed that no Flynn Company ever existed in the Commonwealth, but there is a Flynn Associates Management Corporation (FAMCO), formed by Flynn and some family members in 1980.

In April 1983, Flynn changed his SB*A application to read that Blossoms was a venture of the General Business Management Corporation (GBMC), of Massachusetts. Flynn also reported that he had been the president of Flynn Company since 1978.

Multi-Million Dollar Legal Action

The multi-million dollar suits against Flynn indicate that while he was with FAMCO, he had been involved in controversial "deprogramming" efforts, attempting to forcibly dissuade people from their religious beliefs.

Those successfully turned away from their commitments were then taken to Flynn's brother, attorney Michael J. Flynn. Michael Flynn then would attempt to persuade the victim to file suit against his former church. According to FAMCO documents, these suits were the corporation's main business.

FREEDOM is investigating the accusation that the same credit card used to pay deprogramming expenses for FAMCO is now being used by Kevin Flynn for GBMC business.

Thomas Hoffman, attorney for GBMC, wrote a letter in September 1983 stating that Kevin Flynn was not involved in any civil litigation. Hoffman, however, was fully aware that Flynn was embroiled in costly court proceedings.

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FAMCO

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Cheryl Flynn (Kevin's wife), and Michael Flynn.

The Flynns soon began outlining their sordid intentions on paper. The purpose of FAMCO, as stated in the corporation's document entitled "Scientology — Review and Planning," written in early 1981, was "to position ourselves such that to fight us would be cost ineffective."

The document described a fourpronged attack:

- 1. Closing Scientology organizations
- 2. Adverse media (against the Church)
- 3. Adverse public reaction (against the Church)
- 4. Federal and state attacks (on the Church).

With the knowledge of FAM-CO's plan, the purpose of filing separate suits in scattered locations suddenly becomes very clear. It was in line with FAMCO's

purpose to make it "cost ineffective" for the Church to fight.

According to an attorney for the Church, the suits were "designed to tax the Church of Scientology to the breaking point, to inconvenience and harass the institution so that it [would] be forced to settle with [Flynn] and to maximize the profits that [would] accrue to the lawyers."

In a promotional mailing sent to attorneys across the country, FAMCO included its "Class Action Case Development Program" in which Flynn promised that 1,000 lawsuits would be filed against the Church of Scientology by the end of 1981.

Conveniently Packaged

The Class Action Case Development Program offered the prospective attorneys a conveniently prefabricated package.

"We provide the clients,

the damages, the pleadings, the memoranda, the documents, the witnesses and virtually everything required for an instantaneous trial with little or no necessity for discovery,"

the document stated.

As an added incentive, the FAMCO plan included instant press coverage. Flynn boldly listed the media outlets which he claimed to have in his pocket:

- a) UPI and AP wire services
- b) "60 Minutes"
- c) TIME magazine
- d) "Prime Time"
- e) The Reader's Digest
- f) The Saint Louis Post-Dispatch
- g) The Las Vegas Review Journal h) ABC TV in San Francisco
- i) The Clearwater Sun
- i) The National Enquirer
- k) the authors of the book Snapping
- 1) The Riverside Free Press
- m) The Los Angeles Times
 n) The Boston Globe
- Flynn also claimed to have wit-

nesses available to assist in corroborating his stories for these media. Omitted from his promotional literature, however, was the fact that several of his "witnesses" had been promised immunity for past crimes in exchange for their "testimony," a fact which would lower their credibility in the eyes of journalists.

Case Thrown Out

Flynn is known to have written "affidavits" and "declarations" which his clients have submitted in court. At least one such document authored by Flynn backfired in his client's face.

Flynn was found in contempt and his client, Ronald DeWolf, was ordered to pay court costs in a Riverside, California, probate case. Flynn had written the original declaration, signed by DeWolf, containing outrageous and scurrilous lies which both he and his client then loudly spread to the media. His lies were exposed,

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FAMCO

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however, when the judge threw the case out altogether.

Loss of Business

Another target on the FAMCO plan to make it "cost ineffective" for the Church to fight was to foment a "loss of business" for the Church itself.

Members were to be induced to

defect from the Church by continued exposure to FAMCO anti-Church propaganda. The defectors were to be organized into groups with FAMCO assistance and make themselves readily available for other "potential defectors."

Kevin Flynn, Deprogrammer Even with such an impressively



Michael Flynn is a central figure in a FAMCO-aided criminal conspiracy.

pre-packaged plan, the Flynn brothers and their FAMCO front corporation could not muster the business they needed to bring their plan to fruition. A more aggressive recruitment method was required.

Influenced by Massachusetts psychiatrist John Clark, well-known for his hatred of religion, the Flynns chose to use a modern psychiatric mind control tool colloquially known as "deprogramming."

This method of "curing" people of their religious convictions had obvious appeal for the Flynn brothers. Deprogramming involves kidnapping, beating, raping and any other physical or mental torture required to "free" the victim of his commitments and beliefs.

Kevin Flynn took charge of these "recruitment" actions. He was a natural for directing FAM-CO's deprogramming actions, according to one investigator, due to his reported connections to certain people with interests in drug dealing and related activities. Kevin put together an effective team of thugs to perpetrate the kidnappings and torture.

Teamwork

The Flynn brothers worked as a team. After a person had been forced through Kevin's depro-

gramming process, he would be taken to Michael to be convinced that he should now sue.

According to Kevin, he brought at least eight such potential clients to his brother Michael.

Their teamwork, however, was unsuccessful. As fate would have it, a number of these deprogramming victims turned around and sued the FAMCO brothers.

Fraud Denied

As the scandalous details of FAMCO's activities became public knowledge, Michael Flynn denied ever having implemented his sinister FAMCO plans to destroy the Church. To have done so, Flynn stated, would have created "the appearance of impropriety."

In spite of Michael Flynn's denials, the activities of the now-infamous FAMCO clearly show that he, his brother and others have followed their plans to the letter.

The fact that they have been wholly unsuccessful in their conspiracy does not cancel the documented evidence that they used their front corporation, FAMCO, and its successor, General Business Management Corporation (GBMC), to commit one of the most vicious and insidious frauds ever perpetrated against a recognized religion in the history of the First Amendment.

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"Flynn told him, 'Do not f——— us because you have a brother and son in Boston'."

FORGERY

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Flynn took the opportunity to threaten Tamimi. According to Tamimi's declaration, Flynn intimated that Tamimi's family would be in danger if Tamimi did not follow through with his end of the bargain.

According to Tamimi's sworn statement, Flynn told him, "Do not f--k us because you have a brother and a son in Boston."

In describing the course of the intensive six-month inquiry, Jentzsch said that investigators had traced the path of the conspi-

racy through more than a dozen cities — from Boston and New York to Clearwater, Florida, the Cayman Islands and finally to Italy and Dubai and Sharjah in the United Arab Emirates. "The documentation is explicit and complete," he added. "We have corroborative witnesses and documents, including photographs, that completely verify the criminal conspiracy."

Breakthrough

A breakthrough came when Ingram located Ala Tamimi and his brother Akil overseas.

Faced with the possibility of an additional federal indictment and lengthy legal proceedings in Italy and the United States, Ala Tamimi

agreed to detail his involvement with the hope that cooperation would lessen the charges against him in the United States.

Every detail in Tamimi's account was fully corroborated by independent investigation in the United States.

Rev. Jentzsch stated, "A portion of the results of the international inquiry were made available to Randolph and his client when Kevin Flynn attacked the Church in the Miller case. The links to organized crime have also been given to the federal prosecutors.

"We have the proof that the entire probate case was not only a fraud but was also based on a felony," Rev. Jentzsch stated. "Flynn is a criminal who will stop at nothing to make a buck. He is worse than immoral. He has defrauded not only the courts but also the media and even his own clients for the sake of his personal greed."

Rev. Jentzsch stated that the Church is continuing its investigation into "other crimes" uncovered during the two-year probe.

"Make My Day"

When asked if he expected Flynn to respond with a libel suit, Rev. Jentzsch said, "Flynn cannot afford to answer these charges under oath. His life cannot survive scrutiny. So give him this message: 'Go ahead. Make my day'." •

Ron: The Master Mariner, Part I

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Kevin Flynn, subject of SBA investigation.

BLOSSOMS

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At the time of his letter, which was included as part of the SBA loan application, Hoffman had appeared and testified in a case against Flynn in California. The SBA application made no mention whatsoever of ongoing litigation by either Flynn or his attorney.

SBA Investigation

Because a stunning 65 per cent of SBA loans in the D.C. region are in what the agency calls "troubled status," the SBA has taken an interest in Flynn's situation. Reports have been generated to other agencies as well, reaching the U.S. Senate Committee on Small Business and even the

White House.

Although the inspector general's office of the SBA is being tight-lipped about the investigation, it has been learned that Flynn may have deliberately lied on his application to hide his previous FAMCO activities.

According to one investigator, the SBA looks into the character of the applicant, and Flynn's dealings while in FAMCO would quite likely have been considered "of a questionable nature."

Looking into the area of FAMCO, the investigator confided, would have led to "findings likely rendering a denial of the loan application."

Making false statements on an SBA loan application is a felony under federal law. •

NEXT ISSUE:

BRIBERY, EXTORTION AND MURDER AT BUTLER CHEVROLET

In the 1970's, the automobile world was shaken by the massive fraud and corruption uncovered after the murder of a General Motors warranty inspector. This article reveals heretofore unknown information regarding Michael Flynn's role in suppressing the true extent of corruption by threats, bribery and intimidation.

THE SECRETS OF WAYNE HOLLINGSWORTH

Underworld connections, criminal conspiracy — these are old hat to Wayne Hollingsworth. This article reveals some of Hollingsworth's startling secrets and leaves you with one question: Would you hire this man as your attorney?

BLOSSOMS: CAN A RESTAURANT BE A LAUNDRY, TOO?

When investigators began to probe the individual investors in one of Washington, D.C.'s newest restaurants, they stumbled on a drug smuggling ring.

MULTI-MILLION DOLLAR CONSPIRACY, PART II

Not all has yet surfaced regarding Michael Flynn's forged check conspiracy and Ronald DeWolf's failed probate bid. This article exposes still more of the conspiracy and the facts behind the probate scam.