

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, Massachusetts. 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.

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.

*X Ala Fadili Al Tamimi X*



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. 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 problem I was having with my partner, Mr.

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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. Hollingworth'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. Hollingworth, 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. Hollingworth 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. Hollingworth 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. Hollingworth 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. Hollingworth asked me if I understood him. Mr. Hollingworth told me that maybe he could help and asked me to call him. We said goodbye and I left his office.

*X Glen Gendle*



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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 Fellview 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 [REDACTED] \$40,000. Amer said that [REDACTED] 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 mention 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

*Amer Fadili Al Tamimi*



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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

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. Hollings-

worth 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

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

not even one dollar, if I did some business with those

boys in town. Mr. Hollingsworth told me that those boys

knew me well and liked me, believe it or not.

Mr. Hollingsworth stated that the "business" meant

working with lawyers and classy people. He said I could

make myself big money. Mr. Hollingsworth then told me,

*X Glen Joseph Tammen X*



"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. Hollingworth 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. Hollingworth 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. Hollingworth 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. Hollingworth when the deal would happen and who was involved. Mr. Hollingworth 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. Hollingworth also added that he could help me with my German problem because 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. Hollingworth okay. I told him that I

*Xqla Jaschik Parnami*



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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 to 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 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 [REDACTED]. [REDACTED] 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 Bens and pulled up behind it. [REDACTED] driving

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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 his. We shook hands and he said hello Ala. He introduced himself as [REDACTED] 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 [REDACTED]. [REDACTED] said he knew my brother Amer. [REDACTED] invited [REDACTED] and I to sit with him at his table. We all drank coffee. [REDACTED] told me that Amer was a nice boy and he liked him. [REDACTED] told me to not worry about Amer and the \$40,000 gambling debt. [REDACTED] said that I was his friend now and that Mr. Hollingworth was a good friend of his who had spoken good things about me. [REDACTED] continued talking and told me that he wanted to meet me and tell me personally that no one would bother Amer anymore. [REDACTED] also said that Mr. Hollingworth told him that I was going to join them for some business dealings. I told [REDACTED] that was correct and that I was very happy to do business with him.

[REDACTED] then asked me if I liked to make big money.

*Ala Judith Pameini*



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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. ██████ said that it wasn't "We" it was "Me" that was doing it and he knew that I would do the best.

I asked ██████ to tell me about the deal.

██████ 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.

██████ then told me that ██████ was his personal friend. ██████ told me that ██████ would be the one who would be in touch with me about the deal. ██████

*John Joseph Durkin*

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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.

██████ 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. ██████ asked if I was free the next day so I could

meet ██████ for breakfast at the Collonaide Hotel

in Boston, Massachusetts, at 10:00 AM. I told ██████ that

was fine. ██████ then said that ██████ had also

instructed that I park my car somewhere in Boston and

take a taxi to the hotel. ██████ and I were together

about five minutes then we each left.

The following day at about 9:30 AM, I parked my

car in Quincy Market in Boston. I then went by taxi

to the Collonaide 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, ██████ and

*X 96m Jusile Tarnemi*



another man sitting at a table in the restaurant. I

said good morning to everyone and shook hands with

Mr. Hollingsworth and [REDACTED] Mr. Hollingsworth

told me to say 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. [REDACTED] said

that he liked Amer and that Amer was a nice boy.

I told [REDACTED] 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 advise 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

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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 needed 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

*Xela Fuchile Damiani*



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 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, [REDACTED] or [REDACTED]. In addition, 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 [REDACTED] would contact me on a daily basis but I was never to speak on the phone. [REDACTED] would phone me and then we would meet in person and conduct business. Mr. Flynn said to me that [REDACTED] 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 [REDACTED] that he thought I was ready to move that day. Everyone started joking and

*John Joseph Darnell*



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they had big smiles. Mr. Flynn looked at me and told me that [REDACTED] 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 [REDACTED] and told him to call me at about 11:00 AM in two days. [REDACTED] said okay. The breakfast meeting ended just before 12:00 noon.

The next day, I met with a friend of mine named [REDACTED]. [REDACTED] is in the printing business and has many friends. I told [REDACTED] that I had a little business that I wanted him to do for me but he must get me the best printer in town.

[REDACTED] is always hungry for a dollar. He's always broke. He dresses well but never has any money in his pocket because he spends it on cocaine. I told [REDACTED] 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 [REDACTED] to go and find the best man for me and tell him to get ready to print the checks for me.

The following day [REDACTED] called me and we met at the Hilltop Restaurant in Saugus. [REDACTED] told me I should be getting ready because I would be getting the legitimate checks in about a week. [REDACTED] also asked me what I needed.

I told [REDACTED] I needed \$25,000 for front expenses. [REDACTED]

*After Jackie Damiano X*

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said it was too much money. I told [redacted] to 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. [redacted] said okay, but said he thought it was too

much money. [redacted] told me he would call me that night or

the next day.

[redacted] called me the next morning and we later met

at the Hilltop Restaurant in Saugus. [redacted] brought me

\$10,000 cash and told me he would bring me the other

\$15,000 soon. We parted.

[redacted] started calling me two or three

times a day for a week to meet his friend the printer.

[redacted] 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 [redacted] to bring me

the legitimate checks.

A day or two later, [redacted] 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. [redacted] gave me an

envelope and told me it contained five checks. He said

he had just gotten the envelope and checks from Michael

Flynn. [redacted] said I must return the checks back to him

within four days. [redacted] said Michael Flynn sent his

Xela Jaidili Damini X



regards, wished him good luck and said to be careful with the checks.

I then met [REDACTED] and [REDACTED] 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 [REDACTED] and [REDACTED], I showed the checks to the printer. He started looking at them. He said it was not going to be an easy job.

[REDACTED]  
[REDACTED]  
[REDACTED]  
how much it was going to cost. I told him that I needed

*Xala Jachil Darnemi*



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ten checks of each legitimate check, twenty checks total,

and I needed all the checks in two days. [REDACTED] said it

would be impossible to make the checks in two days

because the job required special inks and other materials.

I explained to [REDACTED] that I must return the five checks in

three days. [REDACTED] said that would be no problem because

he could take special photographic pictures by the next

night and finish the job after this. [REDACTED] said he could

return the five checks to me in two days.

I asked [REDACTED] how much money he 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. [REDACTED] promised

me he would do excellent work.

We made the deal. I gave [REDACTED] \$2,000 in front. I also

gave [REDACTED] \$1,000 and promised [REDACTED] that I

will give him another \$1,000 when the checks were ready.

[REDACTED] thanked me and said that he needed the money, [REDACTED]

then took the five checks in the envelope and the \$2,000

at the dinner table.

We started having dinner and [REDACTED] said he was [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] The big boss lives in Florida

and [REDACTED] does his dirty private

work alone at night when all the employees go home. The

[REDACTED] After dinner, [REDACTED] left with the checks and the

\$2,000. I made arrangements to meet with [REDACTED] and [REDACTED]

[REDACTED] two days later in Quincy market in Boston.

Two days later we all met as planned. [REDACTED] brought me

the checks back along with a list of things he needed.

I had previously made plans to meet [REDACTED] after the

meeting with [REDACTED] and [REDACTED] We met at the

"Dunkin' Donuts" near Union Wharf about 6:00 AM. I

explained to [REDACTED] 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 [REDACTED] that

the checks would be done very well when completed. I

told [REDACTED] 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. [REDACTED] asked me to meet him again in one hour at

the same "Dunkin' Donuts".

[REDACTED] walked to Union Wharf. I bought a newspaper

from the newspaper box machine. I did not leave "Dunkin'

Donuts". About forty minutes later [REDACTED] returned.

*Yale Joshua Damini*

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told me that he just spoke with Michael Flynn and that

Mr. Flynn is mad. [redacted] said Mr. Flynn must speak with

the inside man at the bank and [redacted] would meet me again

the next day.

[redacted] 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 [redacted] list for me. [redacted] said everything

was okay and he would be in touch in about a weeks time.

About ten days later, [redacted] called me and asked me

to meet him at the Palace Disco parking lot in Saugus.

I met [redacted] and he gave me three boxes. [redacted] said that

the boxes contained everything I asked for and added

that everything had to be gotten from outside of Massa-

chusetts. [redacted] also told 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 begining of

June 1982. I asked [redacted] to call me in two days.

That night, after getting the boxes from [redacted] 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, Massachussetts

or in Everett, Massachussetts. I made a wrong turn and

the M.D.C. Police stopped me. One officer was white and

*Kale Jubile Tamimi*

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the other was black. They checked me through the computer, using the radio in the police car. There was a warrant for my arrest.

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.

Two days later, in the evening I met [REDACTED], the printer, in a parking lot of a shopping center in Brockton. I gave all the things I got from [REDACTED]. He told me every-

thing 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 [REDACTED] every day and every night. I also visited him twice at night at work. After about 7 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 [REDACTED].

[REDACTED] had been calling me every day but I never met with him because the checks were not ready. Finally, I met [REDACTED] during the afternoon in the same "Dunkin' Donuts".

*Xale Jueli Tamini*



I gave [redacted] the checks and I asked him to get me \$15,000 that night.

Later, I met with [redacted] again. [redacted] had a big smile on his face. [redacted] said Michael Flynn loves the checks and he had asked Mr. Flynn to get the \$15,000 that night.

[redacted] also added that Michael Flynn said the checks were perfect, especially the signatures. [redacted] said that Mr. Flynn sent his regards to me. [redacted] 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. [redacted] 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 [redacted] that I would give him the name within two days. I then asked [redacted] where the money was. [redacted] 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. [redacted] came to the Palace Disco that night and gave me the \$15,000.

I had arranged for [redacted] from the North End of Boston, to open the account using the counterfeit checks. I had false identification for him. However, I could not locate him. I don't know where he went I had

X *John Joseph Damiano*



no one to use to go to the bank for me.

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 Potane family, from the United Arab Emirates.

They are Arabs. The bank is managed by Pakistanies. Most Pakistanies 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 Abdulamir to go on the checks and decided to use my brother, Akil Fadili Al Tamini, to present the checks and open the account at the Middle East Bank. Akil's long Arabian name is Akil Abdul Amir Fadili Al Tamini.

I changed the spelling of Akil to Aquil and changed Abdul Amir to Abdulamir. 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.

A few days after meeting with [redacted], 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 [redacted] in Boston. [redacted] gave me an envelope with \$5,000 and said that it was from Michael Flynn to me. [redacted] gave me another envelope from Michael Flynn which had the two counterfeit

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checks. [REDACTED] 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. [REDACTED] then said [REDACTED] 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 spoke with the manager. I told him my name was Ramedí 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 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 bother's son was a student in the USA and he was going to deposit two checks which

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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 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, [REDACTED].

Two days later, I received a phonecall from Michael Flynn. I was at the Port 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, shook my hand and opened the door for me. He 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

*Victor J. Smith*

*Alfred J. Tamara*

700101

EXHIBIT  
PAGE

4  
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Vladimir



Page 27

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 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, [REDACTED], 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, [REDACTED] and [REDACTED].

The next day, I called the Middle East Bank and spoke with the same manager. He is from Pakistan. I asked

*Y. Ali Gulshah Durrani*



Page 20

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, [REDACTED] 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. [REDACTED] told me to forget about the deal because the shit had hit the fan in the Boston bank. [REDACTED] said that Michael Flynn's man in the Bank of New England called [REDACTED] in Boston the night before and said that everyone in the bank is talking about the check forgery. [REDACTED] told me to be careful. [REDACTED] said to forget the whole deal. I said okay.

WAYNE HOLLETSWORTH Boston lawyer - office at the Union Wharf Boston, Massachusetts. He is about 47 years old.

He introduced me to [REDACTED], [REDACTED] and Michael Flynn.

[REDACTED] He is about 31 years old, in [REDACTED], Massachusetts. Very big bookmaker in Massachusetts. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*ale Giulio Termini*

*Unlabeled*

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EXHIBIT A  
PAGE 51



[REDACTED]

[REDACTED] drives a black Mercedes Benz sports car. He is about 32 years old and works for [REDACTED] and does his dirty work. [REDACTED] was the contact between myself and [REDACTED] and myself and Michael Flynn.

MICHAEL FLYNN Boston lawyer offices at Union Wharf. He is about 43 years old.

[REDACTED] is the printer who made the forged checks. He is

[REDACTED] of a printing company in [REDACTED]

[REDACTED] is about 35 years old and works in

the printing business. [REDACTED] is the one who introduced

me to [REDACTED], the printer. [REDACTED] saw the original checks

and he received \$2,000 from me for introduce me to [REDACTED]

the printer.

In refering to the Bank of New England I am also refering 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.

[Signature]  
Witnessed by

Ala Abdul Amir Fadili Al Tanimi  
Ala Abdul Amir Fadili Al Tanimi

Ala Fadili Al Tanimi  
Ala Fadili Al Tanimi (aka)

700105



DECLARATION OF AKIL ABDUL AMIR AL FADILI AL TAMIMI



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.

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 Abdulamir. I endorsed both checks with the name of Aquil Abdulamir. 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 Arab Emirates. My return ticket was for an open return, up to one year later.

*A. Tamimi*

700106

Page Two



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. 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 dinner. The hotel is located on Route One.

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 Abdulamir" 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 changed the spelling and format of my names "Abdul Amir" to "Abdulamir". Ala said that this would make it easy for me to use my real passport as I.D. to open the

*B. T. u. u.*

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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 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 Agha Raoof. Ala said that he told this person that he was a big businessman in Beverly Hills, California. Ala did not give Agha Raoof his correct name. Ala told Agha Raoof 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 Agha Raoof that he was too busy to come to the bank himself and asked Agha Raoof if it would be allright if his nephew, Aquil Abdulamiar, brought two large checks to the bank and opened the account. Ala told Raoof that Aquil Abdulamiar was a student in Washington.

I drove with [redacted] and met someone sitting in a parked car at a prearranged location. [redacted]

[redacted] gave me an envelope and said that only I was to ever touch the envelope and its contents.

[redacted] had a cast on his hand. I noticed it when he handed me [redacted]

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Page Four



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.

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 gave 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. [REDACTED] 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

*A. T. v. m.*

700109



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 Agha Raoof. 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 Agha Raoof would see me in about five minutes. She asked if I wanted some coffee.

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

Agha Raoof asked me to follow him to his 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 Agha Raoof asked 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 Agha Raoof's office. I was introduced to this man but I can't remember his name. *A. T. M. W.*

700110

Agha Raooof asked me about my flight and how the weather was in Washington. I told him the things Ala had told me. I was offered coffee. I answered all of the questions Agha Raooof 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 Agha Raooof, [redacted] would enter the office and then leave. I cannot recall exactly when he was there and when he wasn't.

Agha Raooof asked me if I had something for 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. Agha Raooof told me to endorse the checks and handed me one. I took 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 <sup>with my</sup> ~~right~~ <sup>RIGHT</sup> hand and pushed the check across the desk to Agha Raooof, using the four fingers on my ~~right~~ <sup>LEFT</sup> hand. 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 the whole time I was in the bank. But when this happened, I got even more nervous and I became scared. Agha Raooof 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

*A. T. ...*

760111



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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 Agha Raoof.

Agha Raoof 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.

Agha Raoof then asked me <sup>for</sup> I.D. I told him 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. Agha Raoof 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 Agha Raoof that the embassy, close to my school, had my passport because they were making some kind of school recognition papers for me. I told Agha Raoof 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.

Agha Raoof asked me if I could return the next 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. Agha Raoof 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

700112

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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 [redacted] 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 [redacted] and I were going to take to Fort Lauderdale.

[redacted] and I flew from La Guardia Airport to Atlanta, Georgia. We changed planes and flew to Fort Lauderdale. When we landed, we were met by Ala's bodyguard, [redacted] 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.

[redacted] drove all of us to the Marriott Hotel in Fort Lauderdale.

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The person who flew with me shared a room with me. Ala and Al Fortucci 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.

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 [REDACTED] I decided to walk Ala to the front door of 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 [REDACTED] Michael Flynn was looking in our direction. As soon as we got to the doorway, he got out of the car, walked behind it and walked to the passenger door. [REDACTED] Ala told me that he was going, indicating [REDACTED]. I immediately stopped, about one meter outside the doorway and watched Ala walk over to Michael Flynn. I had [REDACTED] 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. [REDACTED]

I walked thru the lobby and thru the hallway into the nightclub in

7C0114

the hotel. I sat with [redacted] and [redacted] 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.

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. [redacted]

[redacted] picked me up and Ala told me to go with him [redacted] He 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 storys 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 [redacted] visited me at this hotel a couple

*J. Flynn*

700115



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times. Once, the three of us went for a ride to Vermont. During this ride, I overheard Ala and [redacted] 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: [redacted]

[redacted] 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 Abdulamir" were written by me. This was how I endorsed the first check in the Middle East Bank in New York City.

*Aquil Abdulamir*  
*Aquil Abdulamir*

In addition, I have affixed all ten fingerprints, in <sup>black</sup>~~purple~~ ink, to the last page of this declaration. This is on Page Twelve. I have also affixed my right thumbprint, in <sup>black</sup>~~purple~~ ink, to the top

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Page Twelve

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 10 day of May, 1984.

Akil Abdul Amir Al-Fadhli Al-Tamimi  
AKIL ABDUL AMIR AL FADHILI AL TAMIMI

Eugene M. Ingram 10 MAY 1984

Witnessed by Eugene M. Ingram  
Private Investigator  
California License Number AA9387  
1212 North Vermont Avenue  
Los Angeles, California 90029

700117



Blossoms at the Pavilion  
1100 Pennsylvania Avenue  
Washington D.C.

Kevin M. Flynn

April 5, 1983



Mr Thomas Peniston  
Small Business Administration  
1111 Eighteenth Street NW  
Washington, D.C. 20036

Dear Mr Peniston:

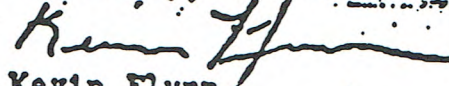
Pursuant to our telephone conversation on Tuesday, April 5,  
I am enclosing to you the following;

1. Signed share subscription agreements and receipts.
2. Notification of corporate name change from Flynn Co.  
to General Business Management Corporation.
3. Corporation filing papers.

If I can be of any further assistance or provide additional  
information please call me at, (617) 893-0666.

Thankyou.

Sincerely,

  
Kevin Flynn  
President, GBM Corporation

KMF/cm  
Encl.

EXHIBIT  
PAGE

B

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760118





*The Commonwealth of Massachusetts*

*Office of the Secretary of State*

*State House, Boston 02133*

MICHAEL JOSEPH CONNOLLY  
SECRETARY OF STATE

February 1, 1984

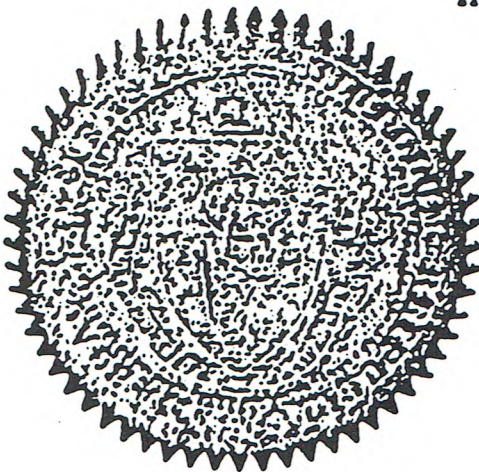
TO WHOM IT MAY CONCERN:

I hereby certify that we fail to find a record of  
an existing or dissolved Massachusetts corporation by the  
name of Flynn Company.

I also certify that no foreign corporation by the  
above name is registered to do business in Massachusetts.

IN TESTIMONY of which, I have hereunto

affixed the Great Seal of  
the Commonwealth on the  
date first above written.



*Michael Joseph Connolly*

Secretary of State

760119



*Law Offices of*  
**THOMAS G. HOFFMAN**  
*Twelve Union Wharf*  
*Boston, Massachusetts 02109*

*Faneuil Hall Office*  
*One Faneuil Hall Marketplace*

*Telephone*  
*(617) 523-1844*

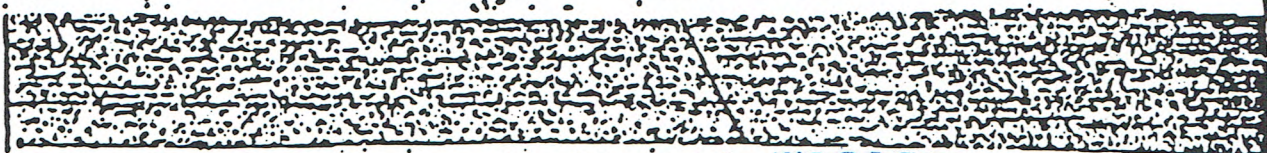
September 6, 1981



Gentlemen:

We have acted as counsel to the Borrower and the Guarantor in connection with the Loan to be made by Lender to the Borrower, guaranteed by the Guarantor, and secured by a Deed of Trust on the Property.

In connection with the Loan, we have reviewed the following documents, which were prepared by your counsel and are to be executed at or in connection with the closing of the Loan:



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EXHIBIT D  
PAGE 55



b. Deed of Trust (the "Deed of Trust"), from the Borrower to \_\_\_\_\_ and \_\_\_\_\_ Trustees for the benefit of Lender, encumbering the Property and securing the Note.

c. Collateral Assignment as security for loan from Borrower to Lender, securing the Note.

d. Financing Statements from the Borrower to Lender, covering certain of the personality and fixtures located at the Property and securing the Note.

e. Continuing Guaranty from Guarantor to Lender.

The foregoing documents are collectively referred to as the "Loan Documents".

We have also examined originals or conformed copies of such other documents and have made such examinations of applicable law as we have deemed necessary for purposes of the opinions expressed herein. We have assumed the genuineness of all documents presented to us as conformed copies. We assume that all documents in connection with the Loan which have been executed or are to be executed by parties other than Borrower or Guarantor were or will be properly and validly executed by persons duly authorized and having the legal capacity to do so and that those other parties to such documents have the right, power and authority to enter into the Loan transaction. We further assume that all of the Loan Documents which are to be recorded or filed in the Land or UCC Records of District of Columbia or elsewhere, will be properly recorded or filed. Based upon such examinations and the assumptions stated herein, and in our capacity as counsel for the Borrower and the Guarantor, we are of the opinion that:

1. The Borrower is a CORPORATION and the Guarantor is an INDIVIDUAL, each of which is duly organized, validly existing and in good standing under the laws of COMM of MASSACHUSETTS, and are legally authorized to carry on their business.

2. The Borrower and the Guarantor have all requisite power and authority to carry on its or their business; to own, lease, encumber and operate its or their properties, to execute

700121



3. The Borrower and the Guarantor have taken all necessary actions for the authorization of the borrowing on documents necessary or appropriate for purposes of the Loan. The signature of KEVIN FLYNN as the PRESIDENT of the Borrower is binding upon the Borrower as the act of the Borrower. The signature of KEVIN FLYNN as the \_\_\_\_\_ of the Guarantor is binding upon the Guarantor as the act of the Guarantor.

4. All of the loan Documents, upon due execution and delivery by the Borrower and the Guarantor, will be valid, legal, binding, and enforceable in accordance with their respective terms, subject to applicable bankruptcy, insolvency and other laws or governmental authority relating to or affecting creditors' rights, or subject to the exercise of judicial discretion.

5. We have not conducted any search of the public records or made any other inquiry concerning the state of title to the Property, and we render no opinion with regard to the title to the Property or to the priority of the liens created against the Property in your favor by certain of the Loan Documents. Nor do we opine as to the lien priority attaching to sums advanced by you pursuant to the Loan Documents, whether in excess of the stated principal amount of the Note or within such amount. We understand that as to such matters, you will rely on a mortgagee title insurance policy covering the Property. We are not aware of any encumbrances against the Property which are not reflected as an exception to coverage in the commitment for title insurance which has been issued to you, a copy of which has been provided to us and which we have reviewed.

6. To the best of our knowledge, based upon due inquiry of the Borrower and the Guarantor, the execution and delivery of the Loan Documents and any actions, undertakings or agreements by the Borrower or the Guarantor in connection therewith will not (i) violate any restriction, term, condition



Bank of Commerce  
June 6, 1983

of the documents creating or regulating the Borrower  
ntor; (ii) violate any provision of any law, rule,  
order, writ, judgment, injunction, decree,  
n or award presently in effect which is known to us  
applicable to the Borrower or the Guarantor; or  
vene, result in a breach of, or constitute a default  
ndenture, note, loan or credit agreement or any other  
ontract, lease or instrument to which the Borrower or  
r is a party or by which they or the Property may be  
ected.

Based upon the factual representations contained in  
uments and the facts and circumstances presented to  
the Borrower nor the Guarantor may avail itself of  
of usury under the laws of the District of Columbia  
avoid the obligation to repay principal, interest,  
due under the Loan Documents.  
To the best of our knowledge, based upon due  
he Borrower and the Guarantor, neither the Borrower  
antor is in default with respect to any existing  
, and there are no judicial or administrative  
ts or proceedings or other claims pending or  
against or affecting the Borrower or the Guarantor.

Very truly yours,

By: 

700123



# VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing

and know its contents.

## ☒ CHECK APPLICABLE PARAGRAPH

☐ I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am ☐ an Officer ☐ a partner ☐ a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. ☐ I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. ☐ The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

☐ I am one of the attorneys for a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on, 19, at California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Type or Print Name

Signature

## ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT

(other than summons and complaint)

Received copy of document described as

on 19.

Type or Print Name

Signature

## PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California.

I am over the age of 18 and not a party to the within action; my business address is:

10951 West Pico Blvd., Suite 300, Los Angeles, CA 90064

On July 23 19 84 I served the foregoing document described as

PLAINTIFFS MOTION TO STRIKE AFFIDAVIT OF KEVIN M. FLYNN IN  
OPPOSITION TO DISCOVERY;

on interested parties

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

RICHARD STILZ, ESQ.  
STILZ, BOYD, LEVINE & HANDZLIK  
2049 Century Park East  
12th Floor  
Los Angeles, CA 90067

700124

☐ (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at, California.

Executed on, 19, at, California.

☒ (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

Executed on July 23, 19 84, at Los Angeles, California.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Deborah C. Lambe

Type or Print Name

*D. Charles*

Signature