L'aw Offices of

MICHAEL J. FLYNN

Twelve Union Wharf

Fancuil Hall Office One Fancuil Hall Marketplace Boslon, Massachusells 02109

(617) 523-1644

Telephone

January 24, 1984

Sherman Lenske, Esquire Lenske, Lenske, Heller & Magasin Woodland West Building, Suite 315 6400 Canoga Avenue Woodland Hills, CA 91367

John Peterson, Esquire 4676 Admiralty Way Marina del Rey, CA 90291

Eugene M. Ingram, Private Investigator Ingram Investigations 1212 North Vermont Avenue Los Angeles, CA 90029

Dear Sirs:

You are hereby placed on notice that Eugene Ingram, expressly acting as the agent of L. Ron Hubbard, Sherman Lenske and John Peterson, has made the following statements to at least 10 individuals. Several of the statements were made recently to reporters for the Boston Globe and the Boston Herald for the purpose of publication:

- (1) Michael Flynn and Kevin Flynn were "involved in" or "participated in" the forgery of a two million dollar check belonging to L. Ron Hubbard;
- (2) Michael Flynn and/or Kevin Flynn were involved in the theft of checks belonging to L. Ron Hubbard; and Kevin Flynn was seen in the check processing department of the Bank of New England where said checks were maintained;
- (3) Eugene Ingram is part of an "official investigation" by the "F.B.I." and the "Treasury Department" and that he is "working with" those offical agencies. Ingram made the foregoing statements

Sherman Lenske, Esquire John Peterson, Esquire Eugene M. Ingram, Private Investigator January 24, 1984 Page 2

for the purpose of obtaining information from numerous individuals;

- (4) Michael Flynn is the "target" and/or "focus" of an investigation by the F.B.I. and the Treasury Department;
- (5) Michael Flynn has been selling shares in Flynn Associates Management Corporation for the purpose of illegally acquiring funds to deprogram people and to "attack" the Church of Scientology;
- (6) Michael Flynn has been receiving money "skimmed off" the profits of a restaurant corporation which is financing litigation against the Church of Scientology.

Each and every one of the foregoing statements constitutes libel and slander, are totally false, and have been made by Ingram solely for the malicious purpose of destroying the reputation of Michael Flynn.

On Monday, January 23, 1984, Ingram, on behalf of Hubbard, Lenske and Peterson placed a full-page ad in the Boston Globe for the purpose of soliciting telephone calls, generating publicity, and disseminating the libelous statements made in the foregoing numbered paragraphs. Further, the combination of placing the ad in the newspaper for the purposes stated together with the libelous statements of Ingram constitutes a conspiracy to "frame" and/or implicate Michael Flynn and Kevin Flynn in the commission of a crime.

Finally, Ingram, Lenske, Peterson and Hubbard are fully cognizant of the fact that the forgery of L. Ron Hubbard's check which is the alleged purpose of Ingram's investigation, was done by high-ranking members of the Church of Scientology in May-June 1982 immediately after Lenske prepared a will and trust for Hubbard; and Lenske, David Miscavige, Lyman Spurlock, and James Issacson assumed control over all of the financial affairs of L. Ron Hubbard.

Sherman Lenske, Esquire John Peterson, Esquire Eugene M. Ingram, Private Investigator

You are hereby notified to do the following:

- (a) Retract forthwith any and all statements and/or innuendo set forth in paragraphs (1) through
 (6) hereof by writing to each and every person to whom the statements have been made;
- (b) desist from all further harassment of Michael J. Flynn and Kevin Flynn;
- (c) desist from soliciting information from individuals responding to the ad placed in the <u>Boston Globe</u> on the basis that Michael J. Flynn is the "suspect" in the foregery of Hubbard's check or the "target" of an "official" investigation.

Your failure to comply with each of the items requested will result in full invocation of all available remedies under civil and criminal law.

Michael J. Flynn

Enclosure
cc: The Honorable Joseph L. Tauro
The Honorable David Nelson
The Honorable Thomas Morse

Suffolk County District Attorney

Harvey Silverglate, Esquire

MJF/let

The Honorable W. Arthur Garrity
Boston Office - Federal Bureau of Investigation
New York Office - Federal Bureau of Investigation
Bank of New England
The Boston Globe
The Boston Herald