

1 AFFIDAVIT OF MICHAEL J. FLYNN

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3 I, MICHAEL J. FLYNN, swear under the pains and
4 penalties of perjury under the laws of Massachusetts, California,
5 Nevada, Florida and the United States, that the statements
6 made in this affidavit are true.

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8 1) On Monday, July 23, 1984, I received a telephone
9 call from a reporter from the Boston Globe who advised me
10 that affidavits were being filed on that date in the case of
11 Miller v. Flanagan, Los Angeles Federal District Court, re-
12 lating to claims by an individual named Ala Tamimi, that I
13 had participated with him in the attempted forgery of a two-
14 million dollar check drawn on an account of L. Ron Hubbard.
15 Up to that date, I had never heard the name Ala Tamimi.
16 To this date, I have never met with him, seen him, talked to
17 him on the telephone, or had any involvement with him of any
18 nature or description. He is a total stranger to me. The
19 meetings, conversations, and involvements described by
20 Tamimi in his affidavit with respect to me are completely
21 false. As to Tamimi's participation in the check incident,
22 I have no knowledge of what he did or did not do, but the
23 first information that I have ever received relative to his
24 participation in this incident was on July 23, 1984, when
25 the reporter called me on the telephone and advised me of
26 Tamimi's affidavit.

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1 2) I first learned of an attempt to pass a two-
2 million dollar check drawn on the account of L. Ron Hubbard
3 on June 14, 1982, while I was staying at the Holiday Inn
4 Surfside in Clearwater Beach, Florida. I was in Florida at
5 that time as special counsel to the City of Clearwater for
6 the purpose of dealing with various matters in the aftermath
7 of the hearings held before the Clearwater City Commission
8 in May 1982, relative to L. Ron Hubbard and the Church of
9 Scientology. While at the Holiday Inn Surfside, I received
10 a telephone call or calls from Mr. Joseph Snyder of Security
11 Management Services, Inc., Boston, Massachusetts, who had
12 been retained by the Bank of New England for the purposes of
13 finding L. Ron Hubbard and obtaining information from Hubbard
14 as to the circumstances surrounding the two-million dollar
15 check. Mr. Snyder informed me that approximately one week
16 prior to his phone call, someone had attempted to pass a
17 two-million dollar check on an account of L. Ron Hubbard in
18 the Middle East Bank in New York City.

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20 3) I had met Mr. Snyder for the first time many
21 months prior to his calling me in Florida, when I delivered
22 a speech concerning L. Ron Hubbard and the Church of Scien-
23 tology to a group called the American Society for Industrial
24 Security. The speech was well received and related to the
25 intelligence/espionage tactics of Scientology which kindled
26 the interest of many of the investigators present including
27 Mr. Snyder. The speech to the group of which Mr. Snyder was
28 a part was the only involvement with him that I had ever had

1 of any nature or description up until the time that I re-
2 ceived the phone call from him in June 1982 concerning the
3 check.

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5 4) When Mr. Snyder called me on or about June 14,
6 1982, he said that he had attended the speech that I had
7 given relative to Hubbard and the Church of Scientology and
8 that he was working in the employ of the Bank of New England
9 for purposes of finding Hubbard. He was reluctant to give
10 me any details on the telephone but agreed to pick me up at
11 Logan Airport in Boston when I arrived back from Clearwater,
12 Florida. After returning from Florida, I met with Mr.
13 Snyder and his colleague, Andrew Fink, on several occasions,
14 provided them all of the information that I could relative
15 to Hubbard and Scientology, and thereafter I had a telephone
16 conversation with Mr. Kevin Sheehan, an executive at the
17 Bank of New England relative to the check incident.

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19 5) In November 1982, as a result of several factors
20 set forth below, Ronald DeWolf, the oldest son of L. Ron
21 Hubbard, decided to bring a "missing person" petition in
22 Riverside Probate Court in order to obtain a judicial
23 determination of his father's legal status. I represented
24 Mr. DeWolf in this petition. During the pendency of the
25 petition, I was contacted by numerous individuals both
26 inside the Church of Scientology and outside relative to
27 circumstantial evidence suggesting that some of L. Ron
28 Hubbard's closest aides may have been involved with the

1 check incident. This information included the fact that one
2 Jan R. Goergen, president of Intercap, Ltd., L. Ron Hubbard's
3 primary investment advisor, had received large sums of
4 money from the same Hubbard account at the Bank of New
5 England on which the 2 million dollar check was drawn, and
6 that Goergen was involved in several gem transactions in-
7 volving L. Ron Hubbard. Most significantly, the vice
8 president of that company, David Delozier, had been indicted
9 by an Arizona Grand Jury and Delozier was then being inves-
10 tigated for his contacts with organized crime.

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12 6) During the pendency of the Probate petition
13 relative to Hubbard's missing person's status, and in other
14 litigation in the United States relative to Hubbard and the
15 Church of Scientology, substantial evidence was produced
16 that Hubbard's name had been forged on several legal documents,
17 that David Miscavige had allegedly notarized Hubbard's
18 signature during a period when both the Church of Scientology
19 and Hubbard's attorneys had claimed that there were no means
20 to communicate with Hubbard, that no one had communicated
21 with him since February 1980 and that no one connected with
22 the Church of Scientology had seen him since that period of
23 time. However, David Miscavige was then the highest ranking
24 official of the Church of Scientology. Additionally, Mary
25 Sue Hubbard had filed affidavits in various cases stating **700282**
26 that she had not seen her husband since late 1979. However,
27 evidence was adduced that she and her husband had purportedly
28 signed powers of attorney together in July 1980, in Los

1 Angeles, approximately seven months after she had allegedly
2 last seen Hubbard. The foregoing facts, together with the
3 indictment of Inter-cap's principal, David Delozier, together
4 with the attempted passing of the two million dollar check,
5 which was attempted at the same time that large sums of
6 money were paid to Inter-cap by Hubbard, together with the
7 fact that Hubbard had been defaulted in the Cooper case and
8 was about to be defaulted in other cases, and lastly based
9 on the fact that Hubbard's own attorney, Alan Goldfarb,
10 stated that Hubbard was a missing person, all warranted a
11 finding that Hubbard was indeed missing. However, the day
12 before the Riverside Probate Court was going to rule on
13 Hubbard's missing person's status in connection with a
14 motion for summary judgment filed by Mary Sue Hubbard, a
15 declaration purportedly signed by L. Ron Hubbard was pro-
16 duced stating that his affairs were being handled by Author
17 Services, Inc. Based on the declaration of L. Ron Hubbard,
18 the Court adjudicated that L. Ron Hubbard was not a missing
19 person.

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21 7) During the pendency of the Probate proceeding
22 relative to Hubbard's missing person's status, Hubbard's
23 attorneys retained Eugene M. Ingram. Ingram had previously
24 been dismissed from the Los Angeles Police Department for
25 pandering, pimping, conspiring to run a house of prostitution
26 and aiding narcotics dealers. Ingram was also indicted for
27 conspiracy to obstruct justice and on the pimping, pandering
28 and prostitution charges, but the indictment was later

1 dismissed.

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3 8) Between May 1983 and the present, Ingram,
4 other private investigators including Andrew Palermo of
5 Boston, Massachusetts, and various Scientology agents, have
6 engaged in a consistent course of conduct to harass, intimidate
7 and to "frame" me for the check incident. This conduct
8 includes close constant surveillance by as many as four
9 automobiles at a time following me in Boston, Los Angeles,
10 and other locales, contacting my clients and informing them
11 that I was a drug dealer, that I was connected to organized
12 crime, and that together with my brother, Kevin Flynn, I
13 had attempted to pass L. Ron Hubbard's two million dollar
14 check, for which I was going to be indicted, that I was
15 going to be disbarred, and similar statements.

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17 9) In January 1984, Ingram placed full-page ads
18 in the Washington Post, the New York Times and the Boston
19 Globe offering a one hundred thousand dollar reward for
20 information leading to the arrest and conviction of the
21 person or persons responsible for the two million dollar
22 check incident. Individuals responding to the advertisement
23 including several newspaper reporters such as Beverly Ford
24 of the Boston Herald and Glen Fowler of the New York Times
25 were told that the primary suspects in the check incident
26 were Michael Flynn and his brother, Kevin Flynn and that
27 evidence existed to prove that Kevin Flynn had trespassed
28 into various areas of the Bank in order to steal checks of

1 L. Ron Hubbard. Ingram used the reward offer as a means
2 to pay Ala Tamimi and his brother, Akil Tamimi a large sum
3 of money (at least \$25,000) for purposes of signing a false
4 affidavit. Tamimi is currently wanted in four countries,
5 and he has been indicted for fraud, and in two separate
6 cases for perjury.

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8 10) On Monday, July 23, 1984, Hubbard, and the
9 Church of Scientology through its attorneys John Peterson
10 and Donald Randolph, launched an international "black propaganda"
11 campaign against me by filing the false declarations of Ala
12 Tamimi and Akil Tamimi in the Los Angeles Federal District
13 Court, issuing press releases throughout the United States
14 which were sent to most of my clients and friends, and
15 holding press conferences in Los Angeles, Boston, New York,
16 and Clearwater, Florida. In the press releases, the press
17 conferences, television and radio appearances, and in private
18 interviews with individuals from the media, Ingram, Heber
19 Jentsch and John Peterson have falsely stated that I offered
20 \$400,000 to Ala Tamimi to forge one of L. Ron Hubbard's
21 checks. This media blitz to destroy my reputation based on
22 completely false testimony of an indicted perjurer, (Tamimi)
23 procured by Eugene Ingram, a known sex offender, and paid
24 off by the Church of Scientology whose top eleven leaders
25 have all been convicted of a variety of crimes for which
26 they were incarcerated in Federal prison, is despicable
27 beyond description. The media blitz was timed to defuse the
28 recent judicial findings made by Judge Paul Breckenridge of

1 the Los Angeles Superior Court in the case of Church of
2 Scientology v. Armstrong, C.A. No. C 420 153, wherein Judge
3 Breckenridge ruled that Hubbard was a "pathological liar"
4 and that the Organization was a "massive fraud" that engaged
5 in a "form of blackmail and extortion against its members."
6 Similarly, a high court judge in London in a 50-page opinion,
7 ruled that Scientology was "immoral, corrupt and sinister"
8 and that its methods were "grimly reminiscent of the ranting
9 and bullying of Hitler and his henchmen." In an effort to
10 counter the growing world-wide awareness of Scientology, its
11 methods and practices, Hubbard, Peterson, Ingram, and agents
12 of Hubbard have implemented the familiar policy of "attack
13 the attacker" for purposes of destroying my reputation based
14 on knowingly false testimony.

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16 11) As a result of the constant, close and harassive
17 surveillance, and as a result of the frame-up now being en-
18 gineered against me, which is being disseminated in the news
19 media world-wide, my family and I have suffered extreme
20 emotional anguish, great loss of reputation, and substantial
21 interference with my law practice.

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23 12) The pattern of conduct now engaged in by
24 Hubbard and his agents is similar to past activities they
25 have engaged in against their critics, including the frame-
26 ups of Gene Allard, Paulette Cooper, and Gabriel Cazares,
27 the mayor of Clearwater, as well as numerous harassive
28 activities taken against judges, lawyers, the American

1 Medical Association, reporters, and anyone who has attempted
2 to speak out against Hubbard and his Organization. For some
3 examples of this type of conduct, I have attached the
4 "Sentencing Memorandum" of the United States Government
5 hereto, as Exhibit A.
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7 13) The Church of Scientology and Hubbard through
8 its agent, Eugene Ingram, have also procured an affidavit
9 from George Edgerly stating that I offered a bribe to Edgerly
10 not to testify in his own defense in exchange for the payment
11 of \$500.00 per week to Edgerly's wife, that Edgerly accepted
12 this proposal and that I paid him \$1,000.00 several weeks
13 later. The statements of Edgerly are completely false.
14 Edgerly has been convicted of first degree murder and is
15 presently serving a life prison sentence in Massachusetts.
16 He has also been convicted of fraud, and he had previously
17 been indicted for the murder of his wife. He is a well-
18 known and infamous criminal in Massachusetts. The fact that
19 Hubbard and Scientology would accept as true the statements
20 of a convicted murderer is indicative of the desperate measures
21 that they are now willing to employ in order to rebut the
22 truthful findings of Judge Breckenridge in the Armstrong case
23 and of Judge Latey in England.

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25 14) The Edgerly and the Tamimi affidavits both
26 procured from infamous criminals by Eugene Ingram in exchange
27 for the payment of large sums of money is a transparent attempt
28 to frame me as Hubbard and his Organization have previously

1 done or attempted with Paulette Cooper, Gabriel Cazares,
2 and Eugene Allard. See for example, documents attached
3 hereto as Exhibit B, reflecting "operations" against the
4 above named people by Scientology. Hubbard and his Organization
5 have also attempted to victimized judges and lawyers who
6 have fought to bring them to justice. See for example, the
7 article attached hereto as Exhibit C, "Scientologists' War
8 Against Judges."

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10 In sum, the recent "attack" against me by Ingram and
11 Hubbard based on the false declarations of convicted criminals,
12 both of which are now serving time in prison, is transparent
13 and outrageous. I have turned the entire matter over to the
14 United States Attorney's Office in Boston, Massachusetts and
15 have requested that criminal charges be brought against Ingram,
16 and others responsible for manufacturing this outrageous attempt
17 to frame me.

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19 Finally, the Church of Scientology and the Hubbards
20 have unsuccessfully attempted to disqualify me from representing
21 my clients in other Scientology related proceedings. I
22 have attached hereto as Exhibit D, a copy of the Los Angeles
23 Superior Court's ruling in the recent case of Church of Scien-
24 tology v. Armstrong, No. C 420 153, in which disqualification
25 was denied. I have also attached hereto as Exhibit E a copy
26 of the Court's decision in that case.

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1 Signed under the pains and penalties of perjury
2 this 10th day of August, 1984.

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5 MICHAEL J. FLYNN

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