

U. S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20537

TO: Zuckerman, Spaeder, Moore, Taylor & Kolker
Attorneys at Law
1201 Connecticut Avenue, Northwest
Washington, D. C. 20036

Date: March 18, 1983

Attention: Mr. Lawrence A. Katz

Your inquiry March 15, 1983

Re: The Estate of
L. Ron Hubbard
Case No. MISC 43-9

RE: LAFAYETTE RON HUBBARD
FBI Number 244 210 B

- Attached furnished in reply to your inquiry.
- Attached furnished in compliance with request from
- Only record(s) available attached.
- This matter is receiving attention and you will be advised at an early date.
- Supplementing FBI Laboratory report dated
- Records FBI #
- are furnished since there is a possibility that one may pertain to the subject in whom you are interested.
- Fingerprint files fail to disclose

- Confirming FBI wire of
- A wanted notice has not been placed as subject appears to be in custody. Clear or cancel (CW or XW) your NCIC record.
- When you no longer desire your notice maintained, please advise.
- If you determine subject to be in custody, please advise so that your notice may be canceled.
- Subject of your inquiry searched in name indices only. Enclosed record(s) possibly identical. If identical, resubmit request and wanted (or flash) notice will be placed.
- If it is determined that the subject of this record is not the individual in whom you are interested, please advise.
- Your communication is returned.
- The subject of this Identification Record has a Computerized Criminal History Record entered in the National Crime Information Center (NCIC) which is not enclosed and is not covered by this certification.
- For your information, most court authorities take judicial notice of the FBI Identification Record and accept it as the valid arrest record of an individual, as maintained by the Federal Bureau of Investigation, without requiring a certification. However, if deemed necessary or if an agency/department is acting under instructions of a court to obtain a certified copy of an identification record, the FBI will honor such a request.
- The attached is furnished in compliance with your telephonic request of
-

Enc. (2) (1 blue certification cover sheet; and copy of 1 fingerprint card.)

Copy to:

RWS
hi
AM
ck
RWS:bjg

XXXXXX
XXXXXX
XXXXXX

FEDERAL BUREAU OF INVESTIGATION
FOIPA DELETED PAGE INFORMATION SHEET

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62-94080-213 pg. 10 + 11

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Memorandum



Exec AD Adm. _____
 Exec AD Inv. _____
 Exec AD LES _____
 Asst. Dir.:

To : MR. STAMES

Date 3/21/83

From : Conrad S. Banner *CSB*

Subject : LAFAYETTE RON HUBBARD,
 aka L. RON HUBBARD
 FOUNDER OF THE CHURCH OF SCIENTOLOGY

PURPOSE: To advise the Criminal Investigative Division of a request for Hubbard's fingerprints.

DETAILS: By a letter dated 3/15/83 (copy attached), Mr. Lawrence A. Katz of the law offices of Zuckerman, Spaeder, Moore, Taylor and Kolker, 1201 Connecticut Avenue, N. W., Washington, D. C. 20036, forwarded a subpoena for deposition issued by the Civil Division of the Superior Court of the District of Columbia, 500 Indiana Avenue, N. W., Washington, D. C., directing you to appear for a deposition on 3/22/83 at those law offices, and to bring with you a certified copy of Hubbard's fingerprints.

The subpoena was issued pursuant to a "Commission" from the Superior Court of the State of California for the County of Riverside, California. The Commission appointed the law firm, as attorneys for Mary Sue Hubbard in the case of "In re the Estate of L. Ron Hubbard," to depose you. However, Mr. Katz's letter advised that you did not have to appear in person as long as the subpoenaed document was received by the law firm prior to 3/22/83.

Accordingly, a certified copy of a fingerprint card for Hubbard dated 12/16/52 (copy attached) was prepared and delivered to Mr. Katz's representative on this date, 3/21/83.

RECOMMENDATION: That this memorandum be forwarded to the Criminal Investigative Division for information purposes.

Enclosures

- 1 - Mr. Revell
- 1 - Mr. Stames
- 1 - Mr. M. D. Mercer

CSB: [Redacted]
 (5) *b7c*

APPROVED: _____
 Adm. Servs. _____
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CHURCH OF SCIENTOLOGY
NATIONAL PUBLIC AFFAIRS OFFICE
2125 S St., N.W.
WASHINGTON, D.C. 20008
(202) 797-9828

FOUNDER:
L. RON HUBBARD

Handwritten signature

re: Church of Scientology

Dear Sir,

Enclosed is information for your files relative
to Church of Scientology, Dianetics and L. Ron Hubbard.

FREEDOM

ISSUE 61

THE INDEPENDENT JOURNAL PUBLISHED BY THE CHURCH OF SCIENTOLOGY

INSIDE

A special 4-page feature went to which FREEDOM tracks the criminal and world activities of Boston lawyer Michael Flynn through the federal testimony of two participants in Flynn's bizarre attempt to force and pass a \$2 million check.

The Small Business Administration's activities and circumstances surrounding the government's refusal to fund loans for some Washington, D.C. businessmen.

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 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 hinges 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 con-

continued 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 unmask 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 co-conspirator 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. Ron Hubbard.

Flynn argued that the incident of the forgery — the crime for which Flynn himself was responsible — was evidence that the Hub-

"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 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 plot, seeking to put the spotlight

on others for his own crime.

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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FREEDOM

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FORGERY continued from page 1

spirited 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."

62-94080-215

FORGERY

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 court-approved 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 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 probable plot to plunder Hubbard's estate.

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 more.

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 Colonade Hotel. Three other men were present at the meeting, and

continued on page 15

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

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FREEDOM

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 Fadli Al Tammami 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 Asir Al Fadli Al Tammami, 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 Tammami 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.

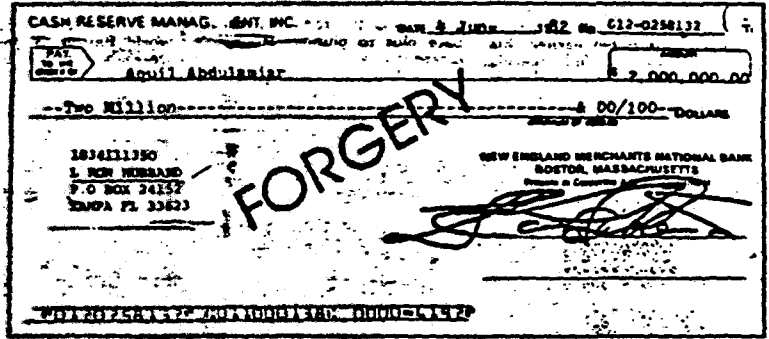
Ala:
I, Ala Fadli Al Tammami, declare under the penalty of perjury and under the laws of the United States of America and under the laws of the states of Massachusetts, New York, California, Florida, Oregon and Nevada that the foregoing is true and correct.

Sometime in March/April, 1962, 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 said someone that I, Mr. Tammami, 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 worked 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 office. Up to that time I had never been involved in any type of business with Mr. Hollingsworth.

Going back to the March/April, 1962, visit to 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 was 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 him so.

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.

62-94080-215

Amer's full name is Amer Fadh Al Tamimi. At this time (1982), he was a student at Northeastern University in Boston, Massachusetts. He was living in the Fallview Terrace Apartments, Apartment Number 112, in Stoneham, Massachusetts. This building was owned by my older brother Adel Fadh 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 Scituate, Massachusetts. I questioned Amer about owing anyone \$40,000. Amer told me that he must pay \$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 it's called "Joseph's" 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 [redacted], 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, "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 [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 Benz and pulled up behind it. [redacted] 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 [redacted].

[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 not to worry about Amer and the \$40,000 gambling debt.

[redacted] said that I was his friend now and that Mr. Hollingsworth 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. Hollingsworth 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. I answered I sure did. I asked him the same question. [redacted] 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 [redacted] 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. [redacted] said that it wasn't "we" it was "me" that was doing it and he knew that I would do the best.

I asked [redacted] to tell me about the deal. [redacted] 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 [redacted] for the friend's name. [redacted] told me that I would meet him soon. I told him okay.

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

[redacted] phoned me at about 10:00 AM the next day. [redacted] 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 Scituate, Massachusetts. We met at 2:00 PM and [redacted] was driving the same Mercedes Benz. [redacted]



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 talking 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