

According to documented eyewitness accounts, Boston personal injury attorney Michael Flynn, long time critic of the church, secretly hired a forger to pass a counterfeit \$2 million check against Hubbard's account. Flynn then used his own felony to initiate the sensationalized 1982 probate case brought by Hubbard's estranged son Ronald E. DeWolf to argue that the best selling author's estate was in jeopardy and should be seized.

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 all costs. Flynn was found in contempt of court during the proceeding for violating court instructions.

"COMMON CRIMINALS"

To finance his attack, Flynn created Flynn Associates Management Corporation (FAMCO) and tried to sell shares on the promise that profit would be made by capturing Hubbard's estate through a series of frivolous suits, 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 now in the hands of several federal agencies.

According to the declaration filed in federal court,

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"portions of evidence, some recently uncovered" reveal the "evil motivation" of FAMCO and its agents and the "common criminals engaged in a vicious attack upon Freedom of Religion" with "every conceivable type of misrepresentation and accusation

The plot was revealed by Randolph in papers filed in a suit brought by Steve Miller against Flynn's brother Kevin and FAMCO in 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 residing in Boston, to counterfeit and forge a \$2 million dollar check on Hubbard's account at the Bank of New England in Boston.

In a signed, fingerprinted and notarized declaration given in Italy and witnessed by his attorney, now in the possession of federal prosecutors, 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 and cash the forged check in New York.

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 saying he would return with proper identification the following day.

PLOT THWARTED

Flynn's plot was thwarted when Akil panicked and failed to return. Meanwhile, Hubbard's business managers learned about the check and quickly alerted the bank to stop payment. Ala Tamimi fled the country while his brother Akil disappeared into Maine with the help of one of Flynn's men, according to the filed affidavit.

Flynn later used his aborted plan to file 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.

Church of Scientology attorney John Peterson stated that a portion of the results of the international inquiry were made available to Randolph and his client when Kevin Flynn had attacked the church in the case.

According to Peterson, the affidavits "are but one small

part of the evidence collected. We have eyewitnesses, documents and photographs that leave not one shred of doubt."

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. 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 had 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 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, schemed, devised and carried out the forgery plot and the probate petition 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, Hollingsworth informed him in April 1982 that Tamimi's other brother Amer had incurred a \$40,000 gambling debt to underworld figures in Boston several weeks before, and had not paid anything.

"THEY CAN BREAK LEGS"

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

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

or more.

At a subsequent meeting, Hollingsworth introduced Tamimi to Flynn, and Flynn, according to Tamimi's declaration, described what would be needed for the \$2 million check forgery conspiracy to be successful.

Two other men were present at the meeting, according to the declaration, and Flynn took the opportunity to threaten Tamimi.

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

"Flynn's language was blunt," Peterson said, "According to Tamimi's sworn declaration, Flynn told him, 'Do not f--k us because you have a brother and son in Boston'."

In describing the course of the intensive six month inquiry, Peterson said church investigators traced the path of the conspiracy through more than a dozen cities, from Boston and New York to Clearwater, Florida, the Cayman Islands and finally to Italy and Dubai and Sharjah in the United Arab Emirates. "The documentation is explicit and complete," he added. "We have corroborative witnesses and documents including photographs that completely verify the criminal

conspiracy."

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

BREAKTHROUGH

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

After a number of visits with Ala Tamimi and his attorney, the investigators obtained Tamimi's agreement to document his involvement in the conspiracy. Because of his fears for the safety and well-being of his family, and for his own life, Peterson stated, "Tamimi protected himself." Peterson would not elaborate.

Peterson said the information obtained on the probate-forgery conspiracy, FAMCO and Blossoms are "but a small percentage of what we have unearthed."

Church of Scientology attorney John Peterson stated that a portion of the results of the international inquiry were made

available to Randolph and his client when Kevin Flynn had attacked the church in the case.

"The entire check forgery, probate fraud and the broader FAMCO scheme of which it is clearly a part, proves that Flynn and his cronies, entirely motivated by greed, will stop at nothing to create chaos for profit," Peterson said. "He is a despicable criminal - the totally unprincipled lawyer accusing others of his own crimes. He breaks the law and then amorally tries to use it as false evidence in court to generate sensationalized press to extort money. He is a disgrace to the legal profession and should be disbarred."

"MAKE MY DAY"

When asked if he expected Flynn to respond with a libel suit, Peterson said, "Flynn would have to answer these charges under oath. Give him this message: Go ahead, make my day."

Peterson stated that the church is continuing its investigation into "other crimes" uncovered during the two year probe.