

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 Abdulaniar. I endorsed both checks with the name of Aquil Abdulaniar. 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*



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

*Handwritten signature or initials, possibly "Aquil Abdulamir" or similar.*



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

I drove with [redacted] and met *A. T. M. v. v.* 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

*A. T. M. v. v.*



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. ...*



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 [redacted] <sup>12</sup> 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 Abdulaniar. 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 complected.

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, <sup>12</sup> 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. Raoof*



Agha Raof 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 Raof 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 Raof, [redacted] would enter the office and then leave. I cannot recall exactly when he was there and when he wasn't.

Agha Raof 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 Raof 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>U.P.T.</sup> using my ~~right~~ <sup>RIGHT</sup> hand and pushed the check across the desk to Agha Raof, 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 Raof 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. ...*



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 Raof. Agha Raof 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 Raof then asked me <sup>For</sup> ~~an~~ I.D. *V.A.F.* 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 Raof 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 Raof 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 Raof 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 Raof 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 Raof 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

*V.A.F.*

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 bodyguards, [redacted] [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.

*A. [redacted]*





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]

[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

*J - Tal... 6.1.1.*



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 stories 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*



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

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*A. T. 11*

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<sup>th</sup> day of May, 1984.

Abdul Amir Al-Fadhli Al-Tamimi  
ABUL ABDUL AMIR AL FADHLI AL TAMIMI

Eugene M. Ingram 10 MAY 1984

Witnessed by Eugene M. Ingram  
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