

I, Ala Fadili Al Tamini, 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, 1982, 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 told someone that I, Mr. Tamini, 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.

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.

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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 banked 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 offices. Up to that time I had never been involved in any type of business with Mr. Hollingsworth.

Going back to the March/April, 1982, visit in 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 use to work for the FBI and the Federal Courts. He also said that he has many friends in the Federal Government. Mr. 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 problem I was having with my partner, Mr.

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Ala Gadili Damini



Wick 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'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 this to him.

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 goodbye and I left his office.

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Gloria Judith Pappas

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.

Amer's full name is Amer Fadili Al Tamimi. At this time (1982), he was a student at Northeastern University in Boston, Massachusetts. He was living in the Fellowship Terrace Apartments, Apartment Number 113, in Stoneham, Massachusetts. This building was owned by my older brother Adel Fadili 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 Saugus, Massachusetts. I questioned Amer about owing anyone \$40,000. Amer told me that he must pay [REDACTED] \$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

Adel Fadil Tamimi

Hollingsworth

it's called "Joseph" 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 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 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,

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John Joseph Pannun

"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 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 telling me was true.

I told Mr. Hollingsworth okay. I told him that I

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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 to 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 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

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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 his. We shook hands and he said hello Ala. He introduced himself as [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 to not 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.

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Handwritten signature: "Ala Judile Panemi" with an "X" above it.

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]

Ala Indira Dumeni



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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.

██████████ told me that ██████████ 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.

██████████ phoned me at about 10:00 AM the next day.

██████████ 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 Saugus, Massachusetts.

We met at 2:00 PM and ██████████ was driving the same Mercedes

Benz. ██████████ asked if I was free the next day so I could

meet ██████████ for breakfast at the Collonaide Hotel

in Boston, Massachusetts, at 10:00 AM. I told ██████████ that

was fine. ██████████ then said that ██████████ had also

instructed that I park my car somewhere in Boston and

take a taxi to the hotel. ██████████ and I were together

about five minutes then we each left.

The following day at about 9:30 AM, I parked my car in Quincy Market in Boston. I then went by taxi to the Collonaide Hotel. I arrived at the hotel a few minutes before 10:00 AM. ██████████ was in the lobby and said good morning to me. I said hello and we both walked into the restaurant. I saw Mr. Hollingsworth, ██████████ and

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another man sitting at a table in the restaurant. I said good morning to everyone and shook hands with Mr. Hollingsworth and [redacted] Mr. Hollingsworth told me to say hello to Michael Flynn. I said hello to Mr. Flynn. Mr. Flynn said "Hi Ala, nice to meet you".

We all had breakfast and the others were talking about sports. Then Mr. Hollingsworth asked me how Amer was. I told him Amer was fine. [redacted] said that he liked Amer and that Amer was a nice boy. I told [redacted] thanks.

Just after this, Mr. Flynn looked at me and asked if they were going to make money with me or if I was going to run away with the money. I answered Mr. Flynn by asking him which money he was talking about, and what did he mean. Everyone else at the table was looking at Mr. Flynn and me as we talked. Mr. Flynn told me that he knew more about me than I thought. He said I was a very intelligent and smart man but that I needed good advise before I did my business. Mr. Flynn told me that whatever I did he would like to advise me and make money with me. He said we would have good relations and make good money. Mr. Flynn said that he and everybody at the table all liked me, trusted me and we all had a great chance to make over two million dollars within

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Ala Judith James

45 days. Mr. Flynn told me that if I was willing to work with them and to make money that I would get 20% of the deal. Mr. Flynn told me that if I was ready I must move fast starting today. I told Mr. Flynn I was ready.

Mr. Flynn told me, "Okay Al, hear me well. First, I trust you so do not fuck us because you have a brother and son in Boston - so let's be friends". Mr. Flynn said, "Hear me well, this is the baby".

It was now about 11:00 AM. Everyone of us was looking at Mr. Flynn and giving him our complete attention.

Mr. Flynn was looking at me and started speaking.

Mr. Flynn said to me that he had a great connection in the Bank of New England in Boston, and the connection was a man who could be trusted. The man at the bank would give us inside bank information like which accounts were good. Mr. Flynn said that he and his man at the bank were all ready and they know which accounts were good and which accounts we were going to get. Mr. Flynn said that the man at the bank is also going to bring us legitimate checks to make copies of, but, we could only keep these checks for four days. The man at the bank can remove the legitimate checks for us but he must return them so they can be sent back to where they belong. Mr. Flynn was still looking at me and asked me

J. Harold Jones

X Gle Yuchin Jammit



if I understood. I told him I did and said to continue.

Mr. Flynn continued telling me that this man at the bank is going to process the counterfeit checks through the computer and clear the checks. The checks will then be held at the bank and no one will find out for about 15 days. Mr. Flynn said that all he cared about is that the checks cleared. Mr. Flynn was still looking at me when he spoke.

Mr. Flynn then said that my part was to find someone who would make the checks. I would only have four days from the day I got the legitimate checks to do the work that had to be done, and the work needed to be done well. Mr. Flynn said that he knew that I had the connections and could do it. Mr. Flynn told me that after I have the checks made he will have to see them and proof them. Mr. Flynn said that was first. Second, he said I must deposit the checks in a bank and make arrangements with that bank to make a telephone transfer to anywhere I want. He said that to do this I must go to an international bank, but, he said, that was my part of the operation.

John J. ...

Mr. Flynn said that he wanted me to deposit the checks in a bank, leave \$100,000 at that bank and transfer all the rest of the money out. Mr. Flynn said that he

X John Joseph Damiani X



would take care of the rest. He said the money would be going outside the USA. Mr. Flynn said that my part would be to make the checks and have them deposited. Mr. Flynn said that his part will be to clear the checks and send the money back to the bank account I opened. Mr. Flynn said that then I would transfer the money from this bank account and he would make the collection arrangements for the cash. Mr. Flynn asked me if I understood the deal. I told him I did.

Mr. Flynn told me to never phone him, Mr. Hollingsworth,

██████████ or ██████████ In addition, I was to never visit them at their offices or keep their names or telephone numbers to make it appear like I never met them or knew them. Mr. Flynn said that we would meet again and have drinks outside the USA. Mr. Flynn told me that ██████████ would contact me on a daily basis but I was never to speak on the phone. ██████████ would phone me and then we would meet in person and conduct business. Mr. Flynn said to me that ██████████ would be the man who would speak for all of them and asked if I understood this. I said I did.

I asked Mr. Flynn when I would be getting the legitimate checks and who would be paying my expenses. Mr. Flynn smiled and told ██████████ that he thought I was ready to move that day. Everyone started joking and

Handwritten signature: William J. Harrison

Handwritten signature: X John Joseph Dammuni

they had big smiles. Mr. Flynn looked at me and told me that [redacted] would be calling me in two days and by that time I should have my homework done and should know what I needed. I told Mr. Flynn okay.

I looked at [redacted] and told him to call me at about 11:00 AM in two days. [redacted] said okay. The breakfast meeting ended just before 12:00 noon.

The next day, I met with a friend of mine named [redacted]. [redacted] is in the printing business and has many friends. I told [redacted] that I had a little business that I wanted him to do for me but he must get me the best printer in town.

[redacted] is always hungry for a dollar. He's always broke. He dresses well but never has any money in his pocket because he spends it on cocaine. I told [redacted] that I needed someone to make me some bank checks within a two day time limit and the job must be the best. So I told [redacted] to go and find the best man for me and tell him to get ready to print the checks for me.

The following day [redacted] called me and we met at the Hilltop Restaurant in Saugus. [redacted] told me I should be getting ready because I would be getting the legitimate checks in about a week. [redacted] also asked me what I needed.

I told [redacted] I needed \$25,000 for front expenses. [redacted]

John Joseph Damico

John Joseph Damico

said it was too much money. I told [redacted] to go and ask Michael Flynn for \$25,000 and tell him I need by tomorrow. I needed the money to prepare many things and pay people up-front. [redacted] said okay, but said he thought it was too much money. [redacted] told me he would call me that night or the next day.

[redacted] called me the next morning and we later met at the Hilltop Restaurant in Saugus. [redacted] brought me \$10,000 cash and told me he would bring me the other \$15,000 soon. We parted.

[redacted] started calling me two or three times a day for a week to meet his friend the printer.

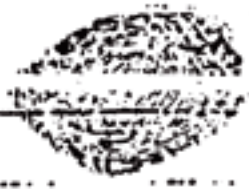
[redacted] wanted to make the fast dollars for finding me the right printer.

It had now been about a week since the breakfast meeting and I was still waiting for [redacted] to bring me the legitimate checks.

A day or two later, [redacted] called me in the early morning to set up a meeting. I met him at 4:00 PM in "Dunkin' Donuts" close to Union Wharf. [redacted] gave me an envelope and told me it contained five checks. He said he had just gotten the envelope and checks from Michael Flynn. [redacted] said I must return the checks back to him within four days. [redacted] said Michael Flynn sent his

Handwritten signature: *James J. ...*

Handwritten signature: *Xqla Jaidili Jamini*



regards, wished him good luck and said to be careful with the checks.

I then met [redacted] and [redacted] for dinner in a restaurant on Newbury Street in Boston.

I had the envelope containing the five checks. One check was from Florida. I think it was green and had in the top left corner a picture of fruits, maybe three or four oranges. This Florida check was a cancelled check which had been processed through the bank. It had been signed and had the money numbers on it. The other four checks were from the Cash Reserve Management of the Bank of New England in Boston. One of the four checks was cancelled by the bank. It had been signed, dated and it was in an amount in excess of a million dollars. The other three checks were also from the Cash Reserve Management. These were new checks, but they weren't to be used except to help the printer.

During the dinner with [redacted] and [redacted], I showed the checks to the printer. He started looking at them. He said it was not going to be an easy job.

[redacted]
[redacted]
[redacted]

how much it was going to cost. I told him that I needed

Xavier Gabriel Ramirez

James Joseph N.



ten checks of each legitimate check, twenty checks total, and I needed all the checks in two days. [redacted] said it would be impossible to make the checks in two days because the job required special inks and other materials.

I explained to [redacted] that I must return the five checks in three days. [redacted] said that would be no problem because he could take special photographic pictures by the next night and finish the job after this. [redacted] said he could return the five checks to me in two days.

I asked [redacted] how much money he was going to charge. He said \$5,000 for his labor. In addition, he needed some materials and didn't know how much they would cost. He thought it would not be more than \$1,000. [redacted] promised me he would do excellent work.

We made the deal. I gave [redacted] \$2,000 in front. I also gave [redacted] \$1,000 and promised [redacted] that I will give him another \$1,000 when the checks were ready. [redacted] thanked me and said that he needed the money, [redacted] then took the five checks in the envelope and the \$2,000 at the dinner table.

We started having dinner and [redacted] said he was [redacted]

[redacted]
[redacted]
[redacted]

Handwritten signature or name, possibly 'D. J. ...'

After Justice Damini X



[redacted] The big boss lives in Florida
and [redacted] does his dirty private
work alone at night when all the employees go home. The

[redacted] After dinner, [redacted] left with the checks and the
\$2,000. I made arrangements to meet with [redacted] and [redacted]
[redacted] two days later in Quincy market in Boston.

Two days later we all met as planned. [redacted] brought me
the checks back along with a list of things he needed.

I had previously made plans to meet [redacted] after the
meeting with [redacted] and [redacted]. We met at the
"Dunkin' Donuts" near Union Wharf about 6:00 AM. I
explained to [redacted] that the checks were not going to be
ready in one week but, would be ready in about three weeks

because we could not find the ink. I assured [redacted] that
the checks would be done very well when completed. I
told [redacted] I was done with the five checks and gave them
back to him. I told him about the list of things my
printer needed. I gave him the list to show it to Michael
Flynn. [redacted] asked me to meet him again in one hour at
the same "Dunkin' Donuts".

[redacted] walked to Union Wharf. I bought a newspaper
from the newspaper box machine. I did not leave "Dunkin'
Donuts". About forty minutes later [redacted] returned.

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Yale Justice Damini

told me that he just spoke with Michael Flynn and that Mr. Flynn is mad. [redacted] said Mr. Flynn must speak with the inside man at the bank and [redacted] would meet me again the next day.

[redacted] called me the next day and told me he would call me in a few days. He told me that he is going to get everything on [redacted] list for me. [redacted] said everything was okay and he would be in touch in about a weeks time.

About ten days later, [redacted] called me and asked me to meet him at the Palace Disco parking lot in Saugus. I met [redacted] and he gave me three boxes. [redacted] said that the boxes contained everything I asked for and added that everything had to be gotten from outside of Massachusetts. [redacted] also told me that Michael Flynn had said that the checks must be ready before the end May 1982 and that Mr. Flynn also said that I must be ready to open the account and deposit the checks at the beginning of June 1982. I asked [redacted] to call me in two days.

That night, after getting the boxes from [redacted] I was driving my black 928 Porsche. I had the boxes in my car and had been out all night drinking. The following morning I was driving somewhere in Revere, Massachusetts or in Everett, Massachusetts. I made a wrong turn and the M.D.C. Police stopped me. One officer was white and



Handwritten signature or scribble, possibly reading 'M. J. ...'

Handwritten signature: Xale Giulio Damini

the other was black. They checked me through the computer, using the radio in the police car. There was a warrant for my arrest.

The M.D.C. Police arrested me and checked my car.

The police found the different inks and the scale and other things. They asked me what the things were for.

I told them the items were samples going to Saudi Arabia.

The police took me to the Revere Police Station. I was fingerprinted and photographed and then taken to the Peabody Police Station. I was released the same day.

Two days later, in the evening I met [redacted], the printer, in a parking lot of a shopping center in Brockton. I gave all the things I got from [redacted]. He told me everything he needed was there. I asked how long it was going to take him to make the checks. He asked me to call him at work or at home and gave me his two phone numbers. I was in touch with [redacted] every day and every night. I also visited him twice at night at work. After about 7 days, he finished the job and gave me the checks. The checks were perfect. He did excellent work. I gave him \$3,000 and I gave \$1,000 to [redacted].

[redacted] had been calling me every day but I never met with him because the checks were not ready. Finally, I met [redacted] during the afternoon in the same "Dunkin' Donuts".

Kale Jadhli James

Victor

I gave [redacted] the checks and I asked him to get me \$15,000 that night.

Later, I met with [redacted] again. [redacted] had a big smile on his face. [redacted] said Michael Flynn loves the checks and he had asked Mr. Flynn to get the \$15,000 that night.

[redacted] also added that Michael Flynn said the checks were perfect, especially the signatures. [redacted] said that Mr. Flynn sent his regards to me. [redacted] then said that Mr. Flynn said he was going to put the numbers, names and dates on the checks but we must wait for Mr. Flynn's man at the bank to tell us when. [redacted] said that Mr. Flynn needed to know from me the name that will go on the checks and reminded me that it has to be the same name opening the account at the bank. I told [redacted] that I would give him the name within two days. I then asked [redacted] where the money was. [redacted] said that he was going to get all the money right then. He asked where he could meet me that night. I told him I would be at the Palace Disco in Saugus. [redacted] came to the Palace Disco that night and gave me the \$15,000.

I had arranged for [redacted] from the North End of Boston, to open the account using the counterfeit checks. I had false identification for him. However, I could not locate him. I don't know where he went I had

X Glen Joseph Damiano

[Handwritten signature]



no one to use to go to the bank for me.

I had already chosen which bank I was going to use, the Middle East Bank in New York City. This bank is owned by the Al Potase family, from the United Arab Emirates. They are Arabs. The bank is managed by Pakistanies. Most Pakistanies are stupid and I thought they process the checks. I have met the manager of this bank in the past and had his personal card. I chose the name Aquil Abdulamir to go on the checks and decided to use my brother, Akil Fadili Al Tamini, to present the checks and open the account at the Middle East Bank. Akil's long Arabian name is Akil Abdul Amir Fadili Al Tamini. I changed the spelling of Akil to Aquil and changed Abdul Amir to Abdulamir. This gave the name more of an Italian spelling, yet would still enable Akil to use his real name to open the account or transfer money.

A few days after meeting with [redacted], I told him what name to tell Michael Flynn to put on the checks and to also inform Michael Flynn that I was ready to open the account.

Sometime in early June 1982, I met with [redacted] in Boston. [redacted] gave me an envelope with \$5,000 and said that it was from Michael Flynn to me. [redacted] gave me another envelope from Michael Flynn which had the two counterfeit

Witness of world

X Akil Fadili Tamini

checks. [redacted] also told me that Michael Flynn wanted me to check into the Marriott Hotel in Fort Lauderdale, Florida, one day after the account is opened and the two checks are deposited. Michael Flynn said that he will also be in Florida at this time. Mr. Flynn will contact you at the Hotel. [redacted] then said [redacted] sends his regards and wishes you good luck.

Two days before the checks were deposited I called the Middle East Bank in New York City and spoke with the manager. I told him my name was Ravedi and I was calling from the Beverly Hills Hotel in Los Angeles California. I told him that I was from the United Arab Emirates and good friends of the Al Fofane family and I was doing some business in the United States. I told him I would like to open an account with the Middle East Bank but I cannot find the time and I do not know when I'll be in New York. The manager was very nice to me. He said that he wished to see me soon and meet me. I was building some friendly relationship with him on the phone. Then I told him I would be in touch and would call him again.

Handwritten signature

The next day I called the Bank and spoke with the manager again. I told him I was not sure when I would be coming to New York. My bother's son was a student in the USA and he was going to deposit two checks which

X Abu Fadih Tamimi

Page 25

I received from people I had sold real estate to. I asked the manager of the bank to deposit the checks and told him the boy's name is Aquil. I asked the manager to help Aquil with what needs to be done to open the account. He said he would. He was very nice and told me that he hoped to see me soon.

Akil went to the bank and met the manager. Akil gave him the checks and did his best to open the account. Akil either forgot his real identification or decided not to use it. Akil later told me that he was real nervous in the bank. I also had a man go with Akil. This man waited outside. After Akil left the bank, he flew to Florida and met me. I was already in Florida with my bodyguard, [REDACTED].

Two days later, I received a phonecall from Michael Flynn. I was at the Fort Lauderdale Marriott Hotel. Mr. Flynn asked to have dinner with me that evening. At 8:00 PM I was waiting outside the front door of the Hotel for Mr. Flynn. A long dark American car pulled up. Mr. Flynn was driving. Mr. Flynn stopped the car, came out, shook my hand and opened the door for me. He was showing respect for me. We left in his car. He drove over a bridge, next to the hotel, and headed towards the

Atlantic Ocean. We drove for about ten minutes and

Victor J. Daniels
Alvin Judith Tamara

and we would go for a drink. I was a few minutes late and Akil walked me to the front door of the hotel. As we approached the front door, I saw Mr. Flynn standing outside next to his car waiting for me. Akil went to the hotel bar and I walked over to Mr. Flynn. We shook hands. He again opened my door and we drove to the same area as the sea food restaurant. Mr. Flynn took me to a nice bar. He was a combination restaurant and bar. It was on the water and had big windows overlooking the water. We drank champagne and spent about one hour together. Mr. Flynn told me that the checks hadn't yet arrived in Boston and told me that I must call the bank in New York and see what is going on. Mr. Flynn said he would call me in two days. I was back in the hotel by 9:30 PM. I went to the hotel's night club and found my bodyguard, [REDACTED], and Akil having drinks. I told Akil that I had just had drinks with Mr. Flynn and that Michael Flynn had told me that the counterfeit checks Akil had deposited still hadn't arrived in Boston. I had on previous occasions informed Akil as to the roles played by Michael Flynn, Wayne Hollingsworth, [REDACTED] and [REDACTED].

The next day, I called the Middle East Bank and spoke with the same manager. He is from Pakistan. I asked

Witnessed by

Alex Gushik-Dominici

if he deposited my checks. He was too nice to me on the phone. He said everything was okay and insisted that I must go to New York and see him. I did not like the way he was pushing. I felt something was wrong. I told him that I would be coming soon to New York and said good bye.

Two days later, [redacted] called me at the Marriott Hotel.

He gave me a number of a pay phone in Boston and told me to take phone change and call him in one hour from a pay phone. I did this and called him back. [redacted] told me to forget about the deal because the shit had hit the fan in the Boston bank. [redacted] said that Michael Flynn's man in the Bank of New England called [redacted] in Boston the night before and said that everyone in the bank is talking about the check forgery. [redacted] told me to be careful. [redacted] said to forget the whole deal. I said okay.

WAYNE HOLLINGSWORTH Boston lawyer - office at the Union Wharf Boston, Massachusetts. He is about 47 years old. He introduced me to [redacted], [redacted] and Michael Flynn. [redacted] He is about 41 years old, in [redacted], Massachusetts. Very big bookmaker in Massachusetts. [redacted]

Unterschiedlich

[redacted]

[redacted]

[redacted]

ala Ferdie Ferrini

[redacted] drives a black Mercedes Benz sports

car. He is about 35 years old and works for [redacted]

and does his dirty work. [redacted] was the contact between

myself and [redacted] and myself and Michael Flynn.

MICHAEL FLYNN Boston lawyer offices at Union Wharf. He

is about 43 years old.

[redacted] is the printer who made the forged checks. He is

[redacted] of a printing company in [redacted]

[redacted] is about 35 years old and works in

the printing business. [redacted] is the one who introduced

me to [redacted], the printer. [redacted] saw the original checks

and he received \$2,000 from me for introduce me to [redacted]

the printer.

In referring to the Bank of New England I am also referring

to the New England Merchants National Bank, as the bank

was previously known, prior to May 1982.

Executed at Naples, Italy on the 5 day of May 1984.

[Signature]
Witnessed by

Ala Fadili Tanami
Ala Abdul Amir Fadili Al Tanami

Ala Fadili Tanami
Ala Fadili Al Tanami (aka)