
From: Richard Kahn <[REDACTED]>
Sent: Tuesday, December 5, 2017 8:32 PM
To: jeffrey E.
Subject: Fwd: Income tax payments due

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
tel [REDACTED]
fax [REDACTED]
cell [REDACTED]

Begin forwarded message:

From: =/b>Deborah Pechet Quinan <[REDACTED]>

Subject: =/b>RE: Income tax =ayments due

Date: December 5, 2017 at 3:34:48 PM EST

To: =/b>Richard Kahn <[REDACTED]>

Cc: "Noam Chomsky ([REDACTED])" =lt;[REDACTED]> <mailto:[REDACTED]>, "Valeria Chomsky ([REDACTED])" <[REDACTED]>

Richard,

Thank you for your emails below.

When the =rust made the tax payments for 2015 I sent Max the estimated tax =ouchers and he remitted them with payment directly from the trust to =he taxing authorities. Since Nick does not have all of the =information he needs to calculate the 2017 tax and prepare the vouchers, =ow should this be handled? Please let me know what to ask Nick =or in this regard.

Can you =lease clarify what you mean below by "the =eimbursement".

In addition, please confirm that by "extra tax =or last year" you mean that I should be asking for a =istribution to Noam of 100% of his and Valeria's 2016 tax =iability that was paid from Noam's IRA.

I appreciate the clarifications.

Thanks,
Deborah

Deborah Pechet Quinan, Esq. LL.M.
Shareholder
Chair, Trusts & Estates Group
255 State Street, 7th Floor | Boston, MA 02109
Direct: [REDACTED] | Cell: [REDACTED]
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e-mail: [REDACTED] | www.riw.com <<http://www.riw.com/>> | BIO

From: Richard Kahn [mailto:[REDACTED]]
Sent: Tuesday, December 05, 2017 1:58 PM
To: Deborah Pechet Quinan
Subject: Re: Income tax payments due

Tell Max that he can pay to treasuries with Noam's written approval

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
tel: [REDACTED]
fax: [REDACTED]
cel: [REDACTED]

On Dec 5, 2017, at 1:49 AM, Richard Kahn <[\[REDACTED\]](mailto:[REDACTED])>
<[mailto:\[REDACTED\]](mailto:[REDACTED])> wrote:

Deborah ask for 150k for this year and the reimbursement plus extra tax for last year that Nick should give you

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor

New York, NY 10022

tel [REDACTED]

fax [REDACTED]

cell [REDACTED]

On Dec 5, =017, at 1:27 PM, Deborah Pechet Quinan <[REDACTED] <mailto:[REDACTED]>> wrote:

Dear Richard,

Further to my previous =esponse to Nick's email, please let me know your thoughts =egarding the discussed email to Max with the demand for tax payments, =s it appears that we do not have an accurate figure yet.
=

In =ddition, Nick's suggestion that he calculate a split for the =payments between the IRA (to avoid penalties) and other resources (i.e. =he marital trusts) seems reasonable to me but incurs taxable income for =he IRA distribution, instead of paying the liability 100% from the =arital trusts. I think we can better assess his suggestion =hen we have some numbers to work with.

I look forward to your =houghts and am available for another call today except between 2:00 and =:00 this afternoon.

Deborah

Deborah =echet Quinan, Esq. LL.M.
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255 State Street, =th Floor | Boston, MA 02109
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e-mail: [REDACTED] <mailto:[REDACTED]> | www.riw.com <http://www.riw.com/> | BIO
<image001.gif>

From: Nick Nichols [mailto:[REDACTED]]
Sent: Tuesday, December 05, 2017 =:11 PM
To: Deborah Pechet Quinan
Cc: Noam Chomsky ([REDACTED]); =aleria Chomsky ([REDACTED]
<mailto:[REDACTED]>); Richard Kahn ([REDACTED])
Subject: RE: Income tax payments =ue

Dear Deborah,

If I send you something today, it would be with the major =aveat that we don't have nearly enough information to calculate = Q4 payment with accuracy.

And more importantly, I've =uggested several times since August/September and as recently within =he past week, that I recommend that we make an additional IRA =istribution that is applied 100% to tax withholding. And I =mphasized that we need to do that before 12/31. Of course I =an't quantify the saving precisely, but it would save a =-figure federal underpayment penalty. A quarterly payment now =ould only "stop the clock" going forward on the penalty =alculation; but withholdings are deemed to be prorata throughout the =ear, hence no penalty and the hoped for cash savings.

We =on't have an estimate of their royalty incomes for 2017 (they =ere greater in 2016 than in 2015), Noam's income from teaching =n Arizona, etc, etc. Hopefully we will get some more information =hortly and we can update the projections.

I am not aware of any other significant =ources of cash to be able to make Q4 estimated payments. Noam =amp; Valeria, if you have some available cash that can be set =ide to be applied as Q4 estimated payments so that we don't =ave to incur more taxable income with an IRA distribution, it would be =elpful. Let us know how much is available, and we can calculate =he ideal balance of IRA distribution (more taxable income) and other =esources (without additional taxable income).

Do you =now if the accounts have moved from Bainco yet? The last we knew =n September, they had not. If not we will want to coordinate the =ax payment/distribution with Bainco.

Thanks,
Nick

From: Deborah Pechet Quinan [mailto:████████]
Sent: Tuesday, December 5, 2017 =2:27 PM
To: Nick Nichols <████████>
Cc: Noam Chomsky (████████) <████████>; Valeria Chomsky
████████, Esq. <████████> <mailto:valeria.chomsky@email.com> <████████>; Richard Kahn
████████ <mailto:████████>) <████████>
Subject: Income tax payments due
Importance: High

Dear Nick,

Could you please send me, at your very earliest convenience, =he estimated tax vouchers and payment amounts for Noam and Valeria, for =he tax payments that are currently due?

Best,
Deborah

Deborah =echet Quinan, Esq. LL.M.
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