
From: jeffrey E. <jeevacation@gmail.com>
Sent: Thursday, December 21, 2017 6:09 PM
To: Valeria Chomsky
Subject: Re: FW: Estimated Tax Payment Voucher Needed

im aware , this is a good thing , =ust give him the assurance. it will help us get rid of h=m

On T=u, Dec 21, 2017 at 1:05 PM, Valeria Chomsky [REDACTED] wrote:

It seems Max i= war with us.
But I am not willing to give any of the informatio= he is requesting.

Valeria
=div>

----- Forwarded message -----

F=om: Deborah Pechet Quinan [REDACTED]
Date: Thu, Dec 21, 2017 at 12:56 PM
Subject: FW: Estimated Tax=Payment Voucher Needed
To: "Noam Chomsky" [REDACTED]

"Valeria Chomsky" [REDACTED]

Cc: "Richard Kahn" [REDACTED]
[REDACTED]

Dear Noam and Valeria,=u>

</=pan>

Below is the brief ema=l correspondence I had with Max yesterday evening that I referenced in the=email I just sent you.

</=pan>

Best,

Deborah =/span>

</=pan>

Deborah Pechet Qui=an, Esq. LL.M. =A0

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Direct: [REDACTED] <tel:[REDACTED]> |

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Assistant - Jayne Mahoney: [REDACTED] <tel:[REDACTED]>

Office: [REDACTED] <tel:[REDACTED]> =/span> | Fax: [REDACTED] <tel:[REDACTED]>

e-mail: [REDACTED] www.rlw.com <<http://www.rlw.com/>> | BIO

<<http://www.rlw.com/attorney/deborah-pechet-quinan/>>

</=pan>

From: Max Kohlberg [mailto:m [REDACTED]]

Sent: Thursday, December 21, 2017 9:48 AM

To: Deborah Pechet Quinan

Subject: RE: Estimated Tax Payment Voucher Needed

Deborah --</=>

</=pan>

Did you have the opportunity to speak with Noam and Valeria about the matter of financial disclosures (after our conversation on Monday)? If you did, and if you were able to bring them around to the idea of making some level of disclosure along the lines we discussed, then that would make it much easier for me to get comfortable with taking care of the payment of MA estimated taxes.

</=pan>

Thanks,<=span>

</=pan>

Max

</=pan>

</=pan>

A. Max Kohlenberg</=>

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From: Deborah =echet Quinan [mailto:]
Sent: Wednesday, December 20, 2017 5:22 PM
To: Max Kohlenberg
Subject: RE: Estimated Tax Payment Voucher Needed

Hi Max,<=span>

</=pan>

I'm sorry my r=collection differs from yours re the Mass estimate. I have a clear r=collection of discussing it with you and coming away from that discussion =nder the distinct impression that if they decided to pay a Massachusetts estimate you were amenable to adding it to the curr=nt federal payment. I communicated this to Noam as well. This =pproach made sense in our discussion as it is consistent to pay a Mass and=fed estimate at the same time. I cannot speak for the lack of payments earlier this year but if you could see your=way clear to accommodating this much smaller tax payment distribution as w=ll under the same theory as the one applied to the federal estimate I woul= be very appreciative.

</=pan>

Best,

Deborah<=span>

</=pan>

Deborah Pechet Qui=an, Esq. LL.M. =A0
Shareholder
Chair, Trusts & E=tates Group

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<<http://www.rlw.com/attorney/deborah-pechet-quinan/>

</=pan>

From: Max Kohl=nberg [REDACTED]

Sent: Wednesday, December 20, 2017 5:15 PM

To: Deborah Pechet Quinan

Subject: RE: Estimated Tax Payment Voucher Needed

Deborah --</=>

</=pan>

I am addressing this e=ail to you alone, for circulation as you see fit. In your prior requ=sts and in our conversation on Monday no mention was made of paying estima=ed Massachusetts taxes – only federal tax payments were discussed. When I received the federal tax voucher fro= Matt I noted that in the comments section of the voucher he recommended t= Noam and Valeria that they make a MA payment, but I confirmed with Matt t=his morning that his message was addressed to them, not to me. I have at no time agreed to make an estimated pa=ment to MA and doing so would not be consistent with what I believe we agr=ed upon in our call on Monday (i.e. no further distributions of principal =ithout some reasonable disclosure).

</=pan>

It is dismaying to lea=en that no federal or MA estimated taxes were paid by Noam and Valeria in 2017,=as well as to hear from Matt that Noam and Valeria have not been responsiv= to Matt or Nick when they've attempted to address tax planning wi=h Noam and Valeria over the course of the year.

</=pan>

I have confirmed with =ainco that the federal voucher and payment were mailed to the IRS today.

</=pan>

Max

</=pan>

</=pan>

A. Max Kohlenberg</=>

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Direct

Main

Fax:

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From: Deborah Pechet Quinan [REDACTED]
Sent: Wednesday, December 20, 2017 4:41 PM
To: Max Kohlenberg
Cc: Noam Chomsky [REDACTED] Matthew Mazotas; [REDACTED]
Subject: FW: Estimated Tax Payment Voucher Needed
Importance: High [REDACTED]

Dear Max,

</=pan>

I attach a Massachusetts fourth quarter estimated tax voucher in the amount of \$30,000 forwarded from Matthew Mazotas at Nick Nichols' office. As we discussed on Monday, please make the payment directly to the MDOR, when you make the federal estimate. As you know the Massachusetts estimate also needs to be paid before 12/31. If you could please confirm when both estimated tax payments have been made and provide copies to Matthew, that would be very helpful.

</=pan>

Thanks,

Deborah

Deborah Pechet Quinan, Esq. LL.M.
Shareholder
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Assistant - Jayne Mahoney: [REDACTED]
Office: [REDACTED] tel: [REDACTED] | Fax: [REDACTED] tel: [REDACTED]
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</=pan>

From: Matthew =azotas [mailto:[REDACTED]]
Sent: Wednesday, December 20, 2017 1:35 PM
To: Noam Chomsky
Cc: Deborah Pechet Quinan; Richard Kahn [REDACTED]
Valeria Cho=sky [REDACTED] Nick Nichols
Subject: RE: Estimated Tax Payment Voucher Needed
Importance: High

Share=ile Attachments

Expires June 18, 2018</=pan>

Choms=y- 2017 Q4 MA Estimated Tax Voucher.pdf

177.6 KB

<=pan style="font-size:10.5pt;color:white;text-decoration:none">Download A=tachments

Matthe= Mazotas uses ShareFile to share documents securely. Learn More. <https://www.sharefile.com/?src=system-email-outlookplugin-new&=mp;utm_medium=system-email&utm_source=outlookplugin-new>

Hi Noam,

Attached please find the prepared Massachusetts 80 fourth quarter estimated tax voucher. It should be paid before December 31st according to the included instructions. Please send confirmation of payment and/or a copy of the check once the payment has been made.

Regards,

Matt Mazotas

ALL CPAs

Tax – Accounting – Advisory

Tel: [REDACTED]

From: Noam Chomsky [REDACTED]

Sent: Wednesday, December 20, 2017 1:25 PM

To: Matthew Mazotas <[REDACTED]>

Cc: Deborah Pechet Quinan [REDACTED]

Richard Kahn [REDACTED]

Valeria Chomsky [REDACTED]

Nick

Nichols [REDACTED]

Subject: Re: Estimated Tax Payment Voucher Needed

Yes, please proceed as you indicate.</=>

Noam

On Wed, Dec 20, 2017 at 11:04 AM, Matthew Mazotas [REDACTED]

[REDACTED] wrote:

Hello all,

Has there been a decision made about the state estimated tax payment?

Since the new tax bill has just passed, the federal deduction for state income tax and real estate tax payments will be limited to \$10,000. An estimated state tax payment should be made in 2017 to capture this valuable federal deduction while it is still available. This payment needs to be made before December 31st.

Based on rough projections, a \$30,000 estimated payment to Massachusetts would save about \$10,000 in 2017 federal tax.

Please let me know immediately and I can prepare a voucher to be paid.

Regards,

Matt Mazotas

=u>

ALL CPAs

Tax – Accounting – Advisory

Tel: [REDACTED] <tel:[REDACTED]>

From: Matthew Mazotas

Sent: Monday, December 18, 2017 11:40 AM

To: 'Deborah Pechet Quinan' [REDACTED]

Cc: Noam Chomsky [REDACTED]

Valeria Chomsky [REDACTED]

Nick Nichols [REDACTED]

Subject: RE: Estimated Tax Payment Voucher Needed

Shareable Attachments

Expires June 16, 2018=u>

2017 =4 Fed Est- Chomsky.pdf

209.1 KB

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Hi All,

Max, attached please find the requested 2017 Q4 Federal Estimated Tax Voucher for the Chomsky's.

Please be aware that in raising cash to make this payment from the trust, it may create income that might be taxed to Noam due to the trust distribution.

A state estimated tax payment should be made in 2017 to take advantage of the deduction for state tax payments. This deduction will be severely limited if the new tax bill is enacted. Please advise on an amount that the Chomsky's would like to pay in order to take advantage of this deduction. We had recommended \$30,000 when we prepared their 2016 return, based on safe harbor amounts.

Regards,

Matthew Mazotas

Supervisor

ALL CPAs

Tax – Accounting – Advisory

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[REDACTED]; Matthew Mazotas [REDACTED]

Cc: Noam Chomsky [REDACTED]

Valeria Chomsky [REDACTED]

< [REDACTED] >; Richard Kahn [REDACTED]
< [REDACTED] t;

Subject: Estimated Tax Payment Voucher Needed
Importance: High

Dear Nick and Matt,

Richard Kahn has advised, and Noam has agreed, that = \$150,000 federal estimated tax payment needs to be made asap. Max K=hlenberg has agreed to make this tax payment from the marital trust(s). Therefore, please prepare an estimated tax voucher=reflecting this and please send it directly to Max at your earliest conven=ence, copying myself, Noam, Valeria and Richard on your transmission.</=>

Max's email address is contact information i= as follows:



Please let me know if you have any questions.=u>

Thank you,

Deborah

Deborah Pechet Qui=an, Esq. LL.M. =A0
Shareholder
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