
From: Richard Kahn <[REDACTED]>
Sent: Monday, May 21, 2018 8:41 PM
To: jeffrey E.
Subject: max

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>Max Kohlenberg <[REDACTED]>

Subject: =/b>Re:

Date: =/b>May 21, 2018 at 4:40:19 PM =DT

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

In a meeting Rich, so =brief answers. There is no prohibition, but specific IRS rules and =ease law to acknowledge and comply with. Not something to be done =ithout trust lawyers involved. I have not calculated what the =axes would be if done wrong - not an acceptable outcome for =nyone.

Sent from my Verizon, Samsung Galaxy =martphone

----- Original =essage -----

From: Richard Kahn <[REDACTED]>
Date: =/21/18 4:07 PM (GMT-05:00)
To: =ax Kohlenberg <[REDACTED]> <mailto:[REDACTED]>>
Subject: Re:

i am aware of the rule as we =iscussed but this is hardly a difficult issue and certainly not a =rohibition. that is nonsense.

also have you =alcuated the amount. as i do not know the original =mounts?

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

> On May 21, 2018, at 3:45 PM, Max =ohlenberg <[REDACTED]>
<mailto:[REDACTED]> > wrote:
>
> Rich =
>
> Sorry for the delay on the income distribution =nformation. I'll try to get that for you tomorrow.
>
> I'm afraid I disagree (as does Harry's attorney) as to =he existence of legal issues relating to liquidation of the =trusts. As you know, the trusts avoided federal and Massachusetts =state tax at Carol's death by virtue of qualifying for the marital =education. Unless the termination is handled properly the deferred =ax could be triggered on the entire remaining balance. It's not =n insurmountable problem, but it needs to be done right and Noam's =ttorneys and Harry's attorney and I need to be on the same page about =hatever settlement is worked out (and how it's documented) or we could =ll be in big trouble over taxes.
>
> I =eally do hope that Noam can be prevailed upon to let his attorneys =peak with Harry's. I'm in the middle here and whether or not I'm =ued by anyone there won't be a settlement until the real "parties in =nterest" start communicating.
>
>
> A. Max =ohlenberg
> Howland Evangelista Kohlenberg Burnett, =LP
> One Financial Plaza - Suite 1600
>=Providence, Rhode Island 02903
> Direct: [REDACTED]
> Main: [REDACTED]
> Fax: [REDACTED]
> [REDACTED]
> www.hekblaw.com
>
>
> This email and any attachments thereto are intended only =or use by the addressee(s) named herein and may contain legally =rivileged and/or confidential information. If you are not the =ntended recipient of this email, you are hereby notified that any =issemination, distribution or copying of this email, and any =tchments thereto, is strictly prohibited. If you have received =his email in error, please immediately notify me by return email and =ermanently delete the original and any copy of this message or =tchment. Thank you.

>
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>
> -----Original Message-----
> From: Richard Kahn [mailto: [REDACTED]]
> Sent: =onday, May 21, 2018 3:29 PM
> To: Max Kohlenberg
> Subject:
>
> max,
>
> you were going to provide me proof of all the income =oing to noams account? thx
> harry has =tated that there are legal issues preventing him from =iquidation NONSENSE
> if I =ere you i would weigh in sooner rather than in another forum..
>
> Richard Kahn
> HBRK Associates Inc.
> 575 Lexington Avenue 4th Floor
> New =ork, NY 10022
> tel [REDACTED]
> =ax [REDACTED]
> cell [REDACTED]
>
>
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>
>

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