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To: Leon Black <[REDACTED]>, Melanie Spinella <[REDACTED]>
Subject: Fwd:
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please read until end

1 Leon- had I known from the beginning what i know now, I would never have gotten involved with Ana s issue never ! ever! . / I have 40 years of experience dealing with the IRS , I never have cheated ,evaded or crafted ridiculous returns . I am maniacal in taking carefully crafted thoughtful positions that even if I don't receive the full benefit (i have no recollection of any total loss on any position.) I get most of it. . Hence my credibility with the IRS is quite unique and one of my most important assets. as you know my research is detailed , the case laws relevant and though the arguments are sometimes hot there is great respect on both sides. . Anas situation is emblematic of my warning s and advice that it appears still continues to go unheeded. . I have repeatedly told you that these girls , all want to show how clever they are. they , come from countries where taxes are rarely paid and on top of that , they have no experience with real rules, money or biz . they often push the envelope beyond the pale unfortunately usually ending up getting the principal in serious trouble. . (sometimes by design, I assume not in this case, though she would not be unhappy to see Debra find out about it .). For six months I have asked you , her and her gay bookkeeper if there was something i didn't know or wasn't being told , as I found this particular audit highly unusual.- highly ! - not helpful that you with the usual voice of authority telling me in no uncertain terms "what the agent really wants" . I continue to be amazed how you , Barry, and brad share very strong detailed views without having even one day of true experience. and relying on joslin and toms pronouncements . I will review with you the ugly facts only on the phone .

2. I can easily ignore the fact that your repeated regarding the detectability of the first 100 million that saved your financial life. and provided a resurrection of 3 billion dollars of grats that had died is never balanced by the recognition of what you received and frankly not to date- paid for . Each time you have chosen not to pay what we agreed. or what has been written by me in many emails BEFORE the transactions are complete. you tell me that tom and joslins advice is one of the reasons that you feel you shouldn't pay the amount owed written or agreed. (mind you , this only happens AFTER you have received the benefits of my advice) In the big transaction - you then add the easily refuted and silly argument that it was Alan's idea. BTW It is , and would have been super easy for you to set a meeting if you had chosen to get to the bottom of this farce. . you have met with brad. there are memos. there are emails (which you choose not even to look at , for , I can only assume . for fear that ihis fabrications is as clear as I suggest it to be .). NOW - lets assume that i show you that alan had only an irrelevant minuscule involvement ,at the very end . way after the fact , no serious involvement in the crafting or execution of the idea - in a transaction that saved your family 600 million dollars. or re detectability that in fact the first hundred or the full 175 actually now gets you a benefit that you have been going on about . . what then ?! will there be more reasons that r , why agreed amounts should not be paid. or is this an exercise solely for amusement . not mine

3 It seems you have forgotten that it was you, that asked for my HELP! . Gigi, Carlyn, audit , gift tax audit audit. 8865, gagosian contract. underpayment of Apollo offshore. tax. now AF and A . - it is wholly unfair that after I tell you what I will charge , you say , don't worry _ as you know we always work it out, complete the transaction to your benefit and then and only then you decide not to pay , you then categorically state ,(true) that I never agreed to your emails or even read them, or agreed to follow our agreement which I unilaterally considered null and void . however as i previously state this only happens AFTER the fact. The amount of time

and effort is immense to try to get these things right. It is not magic!!, it is focused very hard and meticulous work.

4 Frankly, I find it stranger that after helping you save millions and millions on the Giacometti. (including now for the first time , having to record a personal 5 million dollar loss in my trust . you have forgotten failed to even buy me lunch . or ask if there was anything you could do for me. something is wrong. im not sure what it is . but it is clearly not the normal you.

As of now. I do not have an easy timely solution to even propose re ana. A needle has to be carefully threaded between ugly alternatives. There are many considerations . putting the toothpaste back in the tube unlikely. most not for email I can talk only after 630 or if better for you . tomorrow. as i might then have more info.
--ps

barry suggestion re airplane given by " lawyers and E and Y" - -what lawyers ? who at E and Y.? do they have real world experience with billionaire returns. ? similar to ana trying to deduct 9 dollars. . on real estate. allocating her purchase of pilates equipment to R AND D , (i kid you not) or attempting to deduct a rental dress as marketing expense. . both examples way too silly for me to be involved

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