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CC:SB:3:MIA:TMaher
TL-13808-04

Captain E.S. Geary
Geary Associates
P.O. Box 1246
Fajardo, PR 00738-1246

In re: Koblick v. Commissioner
Docket No. 13808-04

Dear Captain Geary

On behalf of the Office of Chief Counsel, we wish to express our gratitude to you for the expert assistance you rendered in connection with the United States Tax Court case identified above.


As you know, this case involved the valuation of a truly unique vessel - Jules Undersea Lodge ("JUL"). Due to the absence of vessels comparable to JUL, you undertook extensive research and analysis of the subject in order to render an estimate of fair market value. Your assignment was further complicated by the fact that the valuation date was some 10 years removed from the present date. Notwithstanding these impediments, the report that you prepared was thoroughly researched and was far superior to the report prepared by the taxpayers' expert.

In addition to preparing an expert report, you rendered considerable services to the government during all phases of trial preparations. For instance, you assisted the government's trial counsel with the preparation of formal discovery requests. You critically reviewed the taxpayers' appraisals and identified weaknesses in the same. You also assisted in the preparation of cross examinations for several of the taxpayers' witnesses. You made yourself available at all times, including evenings and weekends. You were, in short, an invaluable source of guidance and information.

Based in no small part on your contributions to this case, we are confident that the government will prevail when the Court issues its opinion.

It was a pleasure to have worked with you and we are grateful for the knowledge which you graciously imparted. We will keep you in mind in the future should the need arise and will most definitely recommend your services to anyone who might inquire.

Sincerely,
WILLIAM L. BLAGG
Associate Area Counsel

By: 

Timothy Maher
Attorney