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September 7, 2026

Via Email Only:
soshins@oshins.com

Steven J. Oshins, Esq.
Law Offices of Oshins & Associates, LLC
1645 Village Center Circle, Suite 170
Las Vegas, Nevada 89134

Re: Demand To Cease and Desist, Retract, Correct, And Preserve — False Statements Concerning Blake Harris, Esq. and Blake Harris Law, LLC

Dear Mr. Oshins:

This firm is counsel to Blake Harris, Esq. and Blake Harris Law, LLC (collectively, "Harris Law"). It is my understanding that you have published false and defamatory statements about Harris Law and their clients, and have furthermore misrepresented case-law and other materials which unlawfully and deceptively cast foreign asset protection trusts in a false light.

Certainly, you are entitled to your opinions concerning foreign asset protection trusts and your preference for domestic structures; however, when you make false assertions of fact, which you were advised of, and knew to be false, prior to republishing the false statements, your actions become legally actionable.

I. False & Defamatory Statements

In your post dated August 10, 2026[1], you wrote:

(1) "Your post/threat itself is much more misleading than my chart."

(2) "I was threatened on LinkedIn by Florida attorney Blake Harris three days ago!!!"

(3) "Yes, threatened! He even included a video threat along with the typed threat!"

Notably, Harris Law made no threats to you and this statement was patently false and defamatory.

[1] linkedin.com/feed/update/urn:li:activity:7492591845793759232

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In your update to that post dated August 11, 2026, you wrote:

> **(4)** "Blake Harris responded below threatening to report me to the Nevada Bar for providing links to three other people's websites with information he doesn't believe is accurate."

In another public post published August 18, 2026[2] you wrote "Dear Blake,":

> **(5)** "Your posts and your website about it are substantially more inaccurate than the chart itself."

Harris Law's post and website are not inaccurate, and your statement to the contrary was false and defamatory. Moreover, for months you circulated your misleading chart, which you presented to the profession and to the public as proof that foreign trusts fail. Notably, several of the cases you cite involve no offshore trust at all. Your entry for *In re Cyr* describes scrutiny of offshore trust transfers, however, the trust at issue was a *domestic* Texas trust created by the debtor's in-laws. The ruling in that case came on a motion to dismiss, so nothing was decided on the merits. Your entry for *SEC v. Cook* states that the settlor lost control of his offshore trust assets; however, the court's decision concerned offshore bank accounts and entities he controlled *personally*, with no off-shore trust involvement. Similarly, *Chadwick v. Green* involved no trust at all; rather, the dispute involved money which sat in offshore annuities and a Panamanian bank account he controlled and refused to repatriate. Also on your chart, which purports to support your position that foreign asset protection trusts fail, you deceptively and inaccurately list *Fortney v. Kuipers*, in which the transfers were entirely domestic; *FTC v. Fortuna Alliance*, *U.S. v. Plath*, in neither of which was a foreign asset protection trust implicated; the Jerome Schneider matter, which concerned sham offshore banks and corporations; and *In re Omegas Group*, which the Sixth Circuit reversed. Two entries duplicate other entries: *Morris v. Wroble* duplicates *Morris v. Morris*, the same Merry Morris dispute, and *In re Brooks* duplicates *Sattin v. Brooks*. Two further entries, *In re Steering Committee* and *In re Tinsley*, could not be located despite extensive research. Both Morris entries appear under your chart's "Contempt of Court" heading, and both Brooks entries under "Bankruptcy Fraud," so the duplication is apparent on the face of the document itself. Notably, your own LISI Asset Protection Planning Newsletter #450, published August 13, 2025, lists the Morris matter as a single case; your earlier publication therefore contradicts your chart. Harris Law's published review at 45FAPT.com addresses each of these entries individually, with the underlying decisions attached.

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[2] linkedin.com/feed/update/urn:li:activity:7495494779657519104

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II. You Knew, or Should Have Known, that Your Statements Were False

Your actions are furthermore troubling and actionable because you made, and continued to make and affirm, statements which you knew, or should have known to be false. For instance, on November 18, 2025, Mr. Harris wrote to you privately, identified his concerns about your public assertions on foreign asset protection trusts, and invited correction. You replied the same day that you did not believe anything you said or wrote was misleading, and declined. On or about August 8, 2026, you wrote publicly: "Those 45 cases came from multiple sources. I agree that some of them aren't actual trust cases. I haven't read them all." Thereafter, on August 10, 2026, you wrote that you had "not posted that chart since you brought to my attention (by tagging me on LinkedIn posts) that some of the cases do not belong," and, in the comments to the same post, that you had "agreed with you a long time ago that some of the cases do not belong on that list."

Thus, you admitted that the chart was erroneous yet you continued to perpetuate false and misleading characterizations of veracity of the 45 cases listed on your chart. Each of these admissions preceded your August 18, 2026 post asserting that Harris Law's work was inaccurate.

III. The Three Articles You Directed Readers to are Similarly Misleading and Deceptive.

On August 10, 2026, in the same post in which you announced that you had removed the chart, you directed readers to three articles by other authors:

- McCullough Law, "Court Cases Defeating Offshore Trusts," mlutah.com/court-cases-defeating-offshore-trusts/, last modified March 16, 2020;
- Derren Joseph / HTJ Tax, "Court Cases Against Offshore Trusts," htj.tax/2025/07/thinking-of-cook-islands-nevis-and-belize-list-of-court-cases-defeating-offshore-trusts/, published July 26, 2025; and
- Paul Deloughery / Sudden Wealth Protection Law, suddenwealthprotectionlaw.com/cases-defeating-offshore-trusts/.

These are not three independent authorities. The McCullough page opens, "The following is a list of over 2 dozen court cases detailing how US Courts defeat offshore trusts," and names twenty-eight decisions. The HTJ Tax page names substantially the same decisions in the same chronological order, with additions. Presented to readers as corroboration, they present one list three times.

They carry the defects you had conceded two days earlier. The HTJ Tax list counts *Morris v. Morris* and *Morris v. Wroble* as separate entries, the same duplicate that appeared on your chart. Both lists include *In re Brooks*. Both include *Chadwick v. Green*, *FTC v. Fortuna Alliance*, *U.S. v. Plath* and *FTC v. Direct Benefits Group*, in none of which was a foreign asset protection trust before the court. The McCullough page, by contrast, lists the Morris matter as a single entry, the same dispute your chart counts twice.

Removing a list because it contains entries that do not belong, and on the same day directing readers elsewhere to find those same entries, is a deceptive "correction". Notably, Harris Law subsequently published line-by-line marked copies of all three articles at 45FAPT.com and told you it had done so. You have not identified an error in any of those markups. Two of the three articles have since been altered, and the publisher of the third has advised Harris Law that it is being removed: the HTJ Tax page was modified on August 26, 2026 and now carries Mr. Harris's corrections within it; the Deloughery page was rewritten on August 29, 2026 under a new title with a different case list; and McCullough Law has advised Harris Law in writing that its page is being taken down. Harris Law holds captures of all three articles as they stood on August 13, 2026.

IV. Demands

In an effort to resolve these matters without initiating formal litigation, demand is hereby made for full compliance with the following terms, within seven (7) days of the date of this letter:

1. Remove from LinkedIn, and from every other place you have published them, the post of August 18, 2026, the illustration published with it, and every false, defamatory, and libelous statement identified hereinabove.
2. Remove every other statement you have published concerning Mr. Harris or Blake Harris Law, LLC that asserts or implies (i) that their published work is inaccurate, misleading, dishonest or the product of improper motive, (ii) that Mr. Harris is unfit to be trusted with client matters, should not be placed in front of a client, or is regarded adversely by the profession, or (iii) that he is obsessed with you or acting from an improper motive. This obligation extends to posts, comments, replies, updates and direct messages, whether published before or after the date of this letter, and to any republication by you on any platform.
3. Publish a correction, with language to be approved by Harris Law, in a standalone post of comparable prominence and not as a comment or an edit note, retracting your prior statement that Mr. Harris and Blake Harris Law, LLC's published analysis is more inaccurate than your chart, and withdrawing the statements concerning Mr. Harris's standing with the profession and with your professional network.

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4. Withdraw your referral/reference to the three articles identified in Section III, or publish a statement that you have not verified their contents against the underlying decisions.

5. Identify every location where the "45 FAPT Cases Gone Wrong" chart, or any list substantially derived from it, remains published, whether by you or by any person to whom you provided it.

6. Permanently cease and desist from publishing false statements of fact about Mr. Harris, Blake Harris Law, LLC, or their published work that you have not verified.

7. Confirm in writing that the preservation obligations in Section V will be complied with.

V. Preservation of Evidence

Unless the demands stated above are promptly complied with in full, litigation is reasonably anticipated. Therefore, you are requested and directed to preserve, and to instruct anyone acting in concert with you or on your behalf, to preserve all evidence, including, but not limited to, all documents and electronically stored information relating to the subject matter of this letter, including without limitation:

- every post, comment, reply, update and message identified in Section I, in every version, including all edit history;
- the illustration, and all communications with the illustrator, including instructions, drafts and invoices;
- all communications with any third party concerning Mr. Harris or Blake Harris Law, LLC, whether public or by direct message;
- the "45 FAPT Cases Gone Wrong" chart in every version, and all materials showing when it was created, published and republished;
- all materials showing the sources from which the entries on the chart and on Newsletter #450 were taken, and any review of the underlying decisions;
- all communications with Leimberg Information Services concerning Newsletter #450, including any draft, edit or correction;
- all communications with McCullough Law, Derren Joseph or HTJ Tax, and Paul Deloughery or Sudden Wealth Protection Law concerning any of the three articles, including any request that an article be created, altered or removed; and
- the deleted post on which Mr. Harris's earlier comments appeared, and any archived or backup copy of it.

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VI. Reservation of rights

All rights and remedies are expressly reserved, including the right to seek injunctive relief, compensatory damages, and punitive damages. This letter is not intended and shall not be construed as an offer of compromise or as a statement admissible under any rule limiting the use of settlement communications.

This offer of resolution shall remain open for 7 days from the date of this letter unless previously revoked. I look forward to your response and to working with you towards an agreeable resolution to this unfortunate dispute.

Very Truly Yours,

KUNG & BROWN

A.J. Kung

A.J. Kung, Esq.

cc: Client (via email Only)