

**From:** Dan Neidle dan@taxpolicy.org.uk  
**Subject:** Re: Request for comment - Arka Wealth  
**Date:** 24 February 2025 at 17:10  
**To:** Setu Kamal setukamal@email.com

Dear Mr Kamal,

That is not how either journalism or defamation law work. I have no obligation to “give you access to my subscriber base”. Our practice of usually publishing responses in full is unusual; most outlets publish only limited excerpts.

I will be saying that you appear to have a business relationship with the individuals behind Arka Wealth, are publicly backing a highly aggressive tax avoidance structure, and have permitted Arka Wealth to make claims about you, your expertise and track record which are false. I will also be noting your referral to the Bar Standards Board.

If you think any of this is wrong or unfair then this is your opportunity to say so. You are under no obligation to respond but, if you don't, you are in a poor position (both morally and legally) to complain after the event.

Yours sincerely,

Dan Neidle

On 24 Feb 2025, at 16:57, Setu Kamal  
<setukamal@email.com> wrote:

Dear Dan,

I am trying to respond but I need access to the subscriber base. You must include your reluctance when you publish anything about me, else it may be prejudicial to transparency and possibly also defamatory.

With best wishes,  
Setu

Setu Kamal LLM Tax  
[www.setukamal.eu](http://www.setukamal.eu)

This letter is intended only for the addressee and its contents are confidential

**Sent:** Monday, February 24, 2025 at 6:46 PM  
**From:** "Dan Neidle" <dan@taxpolicy.org.uk>  
**To:** "Setu Kamal" <setukamal@email.com>  
**Subject:** Re: Request for comment - Arka Wealth

Dear Mr Kamal,

I am not asking you to do anything for free. I am giving you the opportunity to respond to an article we will be publishing. It is up to you whether you respond.

In addition to the points below, we will be noting that you appear to have a business relationship with the individuals behind Arka. If that is not correct, please let me know.

Yours sincerely,

Dan Neidle

On 24 Feb 2025, at 16:43, Setu Kamal <setukamal@email.com> wrote:

That's your choice, Dan. You came to me asking me to do something for free, I asked the same of you.

I did not ask you to present it as representing your views, you could make clear that it was my response.

With best wishes,  
Setu

Setu Kamal LLM Tax  
[www.setukamal.eu](http://www.setukamal.eu)

This letter is intended only for the addressee and its contents are confidential

**Sent:** Monday, February 24, 2025 at 1:25 PM  
**From:** "Dan Neidle" <dan@taxpolicy.org.uk>  
**To:** setukamal@email.com  
**Subject:** Re: Request for comment - Arka Wealth

Dear Mr Kamal,

No journalist agrees in advance to publish something they haven't read.

I am stating an opinion as to Arka Wealth's structure. That opinion is shared by our team, which includes some of the country's leading trusts/tax experts. Honest opinion is an absolute defence to defamation. There is also a clear public interest.

Yours sincerely,

Dan Neidle

Dan Neidle

On 24 Feb 2025, at 10:19, setukamal@email.com wrote:

Thank you, Dan. May I understand the objection to it being on your personal account as requested?

I am concerned that you may have now defamed Arka Wealth btw.

Best wishes,  
Setu

Sent using the mobile mail app

On 24/02/2025 at 11:26, Dan Neidle wrote:

From: "Dan Neidle"  
<dan@taxpolicy.org.uk>  
Date: 24 February 2025  
To: "Setu Kamal"  
<setukamal@email.com>  
Cc:  
Subject: Re: Request for comment -  
Arka Wealth

Dear Mr Kamal,

Thank you for your email. I infer from your response that you do act for Arka Wealth. This is very disappointing, given that their structure is based on false legal and tax claims, and appears to be little more than a scam.

We publish our reports on the Tax Policy Associates website. The reports are usually put up permanently. We summarise the reports on social media; those are also normally permanent. It is our usual practice to publish responses we receive, but I can't say in advance what will go into the report or the summary.

Yours sincerely,

Dan Neidle

On 24 Feb 2025, at 09:19, Setu Kamal <setukamal@email.com> wrote:

Dear Dan,

How are you? Long time no see.

Could you please commit to posting my reply on your personal X account on settings so that it is consistently capable of being viewed by each of your subscribers for a period of six months? In asking this question, I do not undertake to provide any response and, furthermore, any response would be without prejudice to legal privilege and any obligations under the GDPR. However, if I did reply, then that would be in return for your consideration above.

With best wishes,  
Setu

Setu Kamal LLM Tax

This letter is intended only for the addressee and its contents are confidential

**Sent:** Friday, February 21, 2025  
at 11:52 AM

**From:** "Dan Neidle"  
<dan@taxpolicy.org.uk>

**To:** setukamal@email.com

**Subject:** Request for comment -  
Arka Wealth

Dear Mr Setu,

We have been investigating a business called "Arka Wealth". They promote a scheme called "work for your trust" which our panel of KCs and senior tax advisers regards as an aggressive tax avoidance scheme which has no realistic prospect of success.

Arka Wealth make a succession of wild claims, including that, whilst UK trusts are subject to the 20% chargeable lifetime transfer and ongoing 6% principal ten-yearly charge, Cypriot trusts are not. They

appear to not have noticed the existence of the offshore trust rules. Nor have they noted the existence of DOTAS - we understand that the structure has not been disclosed.

And Arka Wealth also make the surprising claim that the same structure works across Europe.

It therefore seems to us that Arka Wealth are either incompetent or a simple scam. I don't know which.

I am writing to you because Arka Wealth cite you as the authority for he claims they are making. They describe you as their "legal partner" on this page: <https://arkawealth.com/legal-partner/>.

They say that HMRC has never disagreed with your analysis, or been successful in challenging it, and that you have a 100% win record. I expect you will agree that these claims are factually incorrect.

I'd therefore be grateful if you could confirm whether you are in fact advising Arka Wealth on the "work for your trust" structure, and (if so) whether you have authorised Arka Wealth to make the above claims about you and your record.

Yours sincerely,

Dan Neidle  
Tax Policy Associates Ltd

