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Fighting California and Nevada for Howard Hughes's Estate Taxes

The Howard Hughes case provided a major test of my determination to replace the passive reputation of the attorney general's office with a dynamic culture that attracted talented lawyers capable of holding their own against the legal profession's best.

The Hughes empire had been represented by the powerhouse firm of Andrews, Kurth, Campbell, and Jones, then a seventy-five-year-old pioneer Houston law firm with impeccable credentials as a resource for corporate clients; Hughes's father had hired them when he formed Hughes Tool Company in 1909. In the 1960s, Hughes also hired a New York lawyer, Chester C. Davis, who became a member of Hughes's small inner circle through his membership on the board of directors of Summa Corporation, the Hughes holding company.[1]

These lawyers were tough and tenacious. All of those traits were essential to accommodating this client's enormous wealth, impetuous and aggressive management style, notoriety, and compulsive behavior that had generated dozens of punishing court battles over several decades—litigation that so bedeviled Hughes he left the United States in 1970 to avoid testifying.

Hughes did not return to America alive. His lifeless and gaunt seventy-year-old body arrived at the Houston airport on April 5, 1976, aboard a chartered jet from Acapulco and accompanied by three aides. It was claimed by a cousin he had not seen since 1938.[2]

So mysterious was his existence that the Internal Revenue Service, which circulated an internal memo as early as 1972 speculating that Hughes's insiders may have used a double to disguise the fact Hughes had been dead since 1970, ordered fingerprints lifted from the cadaver.[3] They were transmitted to Washington for comparison with those submitted in the 1930s with his airplane pilot's license application. The Federal Bureau of Investigation confirmed his identity six hours after his remains