From:	Richard Joslin ████████████
Sent:	Tuesday, February 25, 2014 6:44 PM
To:	Ada Clapp
Cc:	Eileen Alexanderson; Jeffrey Epstein; Richard D'Agostino; ████████
Subject:	RE: Decanting the 1997 trust to APO2

As I understand this decanting, the distributing trust and receiving trust =re both grantor trusts and have the same owner before and after. As such =he receiving trust is a continuation of the distributing trust, ie same ta= ID number for income tax purposes.   While two assets may have negative=tax basis in 2014 (Blue Sunshine had negative tax basis a/o 12/31/2012 o= $(300K); AP Energy Partners LLC had a negative tax basis a/o 12/312012 of=$(10K) - we do not have K-1's FY 2013), the decanting should not trigger a=y gain on transfer.

On a related vein, I'd like to get Ada/Alan input on not using LDB SSN for =he grantor trusts and getting EIN's and reporting annually Form 1041 with =rust letter.   I would like to have annual 1041 filing for the trusts vs =o reporting other than included on 1040 directly.

-----Original Message-----
From: Ada Clapp
Sent: Tuesday, February 25, 2014 8:33 AM
To: Richard Joslin; Richard D'Agostino
Cc: Eileen Alexanderson; Jeffrey Epstein
Subject: Decanting the 1997 trust to APO2

We are planning to send the Decanting Notice to the beneficiaries of the 19=7 trust today. Just checking to be sure there are no tax or other issues f=r our accounting team. If so, please let me know as soon as you can. Thank=.

Sent from my iPad
```
<?xml version=.0" encoding=TF-8"?>
<!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">
<plist version=.0">
<dict>
        <key>date-last-viewed</key>
        <real>0.0</real>
        <key>date-received</key>
        <real>1393353855</real>
        <key>flags</key>
        <integer>8590195713</integer>
        <key>gmail-label-ids</key>
        <array>
                <integer>5</integer>
                <integer>18</integer>
        </array>
        <key>original-mailbox</key>
        <string>imap://jeevacation@imap.gmail.com/%5BGmail%5D/All%20Mail</string>
        <key>remote-id</key>
        <string>391901</string>
</dict>
</plist>
```