
From: Barry J. Cohen <[REDACTED]>
Sent: Saturday, August 19, 2017 2:14 PM
To: Jeff Epstein
Subject: Fwd: Planning

> Apollo flight is one that qualifies for Apollo reimbursement and Apollo pays for.
>
> Pro forma depends on when Apollo gives us data. Hopefully very soon.
>
> Gift tax case wasn't "advice". Just a blurb Joe read in a publication. =e might well have got it wrong. It was just something he thought he remembered and mentioned in passing. He was making the point that it might be a =ad idea for a tax return to have info that is factually wrong even if the =ax is right. Whether the case exists or not, that advice hardly seems craz=.
>
> Joe V is the best person we saw and is doing a great job. We have hired t=p lawyers and accountants. Always glad to see better people but we are not=finding them. And very hard to find jacks of all trades. We tend to see n=rrow expertise.
>
> S&C reviewed our estate planning and basically said everything we are doi=g is fine. EY reviewed our income tax planning and has been helpful, but h=s not had great suggestions for changing anything.
>
> If you see specific things we should be doing differently let us know wha= they are. If you know of people who will have greater insight than the on=s we are using, we are eager to talk to them.
>
> I too wish Leon would sell more art. We may have losses to partially off=et art gains. To the extent we do not, as you have pointed out, getting a =tep up on death may be preferable for the pieces with gain. In any event, =e don't know if Leon is willing to sell. So we cannot plan around that. My=goal is to be able to tell him "If you sell certain art you will achieve t=e following benefits." Not quite there yet.
>
> On the CLATs, I hear you that no one has experience with art. But as you =ave pointed out, Leon's situation is unique. Unless we hear specific reaso=s why it doesn't work it is hard to ignore the unanimous chorus of opinion= that it is a sound planning tool.
>
> Sent from my iPhone
>
> On Aug 19, 2017, at 7:44 AM, jeffrey E. <jeevacation@gmail.com<mailto:jeevacation@gmail.com>> wrote:
>
> what is an apollo flight . . ? when will we have the proforma ? the=gift tax paid but still fraud fable is just that . cant be found be=use it doesnt exist. you are getting childish advice and data. ? sor=y. I was very clear with leon that you need a senior tax advisor . per=on. Joe V is not it. you have bookkeepers , accountants and enad = compliance. you going around to others to see how they work is in my=opinion the height of silliness. I consider you tthe best thing that =appened to elysium . and have been quite vocal about it. hire the best =people . they cost money. This biz is leons most important asset that h= will leave to his kids. . It will be responsbile for a whole host of fam=ly , estate. operating issues .
> i have not gottten involved in the documentation , of what is there . =nd its acccesibility. i would guess pretty good now. For ex , my =iscussions with other clients are a give and take , of laws mecahnisms.=tactics strategys.. audit prep. . case law.. a joint composition of=high level planning . reporting. analysis, alternatives. hearing=about an

article that your guy might have read in his dentitst office. th=t turns out to be bogus. is emblematic of the office. I am confient tha= you will grow into the job, . re clats I only asked if any of your s= called advisors have actually done one so they understand its true and =pracitcal pitfalls. your response that the art will be sold quickly. =and that there is a chapter in lerners book about it , the same book that =eon relied on to his detriment before. (1031) . was suprising, if =he art is to be sold quickly (not sure leon would sign on.) , DO it =before he dies. not after. art delays the closing of the estate. le=n is the "BEST seller. , know the market etc. gains can be dealt with =

>

> I real tax advisor should demand at least 1m per year. up to 3. al= the big firms have a mandatory retirement at age 60. high level peopl= all on the street. my friends biz that only grosses 60 m just hired =ne for a mllion. guys that have hand filled out PERSONAL tax returns =TRUST returns . planned strategies years in advance. . Audit experienc= preferable large case. . some tax court experience helpful. . fille= out estate tax docs (VERY IMPORTANT)

>

> On Sat, Aug 19, 2017 at 7:20 AM, Barry J. Cohen <bcohen@apollolp.com<mail=o:bcohen@apollolp.com>> wrote:
> Some trips for Apollo are not 135 compliant due to minor issues of crew r=st or otherwise. So occasionally we have to fly Part 91 on Apollo flights.= Hard to do without Apollo being operator.

>

> Sent from my iPhone

>

>> On Aug 18, 2017, at 10:57 PM, Jeffrey Epstein <jeevacation@gmail.com<mai=to:jeevacation@gmail.com>> wrote:

>>

>> Apollo?

>>> On Aug 18, 2017, at 10:56 PM, Barry J. Cohen <[REDACTED]> wrote:

>>>

>>> We are factoring this into our structure recommendations. Lots of con=straints. Apollo doesn't want to be an owner or an operator. Makes 91 opera=ions for Apollo tricky.

>>>

>>> Sent from my iPhone

>>>

>>> On Aug 18, 2017, at 8:23 PM, jeffrey E.

<jeevacation@gmail.com<mailto:j=evacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail= com>>> wrote:

>>>

>>> ex

>>> ----- Forwarded message -----

>>> From: Melanie Spinella

>>> <[REDACTED]>

>>> @ [REDACTED]

>>> Date: Thu, May 21, 2015 at 2:54 PM

>>> Subject: Plane

>>> To: "jeffrey E."

>>> <jeevacation@gmail.com<mailto:j=evacation@gmail.com><mailto:jeevacat

>>> [REDACTED]>

>>>

>>>

>>> Jeffrey – Leon asked me to ask you. Debra is going to Chicago May

>>> 30=h – back and forth the same day. Here is the response from Jet

>>>

>>> Hi Melanie,

>>>

>>> For May 30th with the 12pm departure out of Teterboro and 11pm departur= out of Chicago the duty day is at 15hrs18min. For 135 trips crew cannot e=ceed 14hr duty day. If you wish to operate this flight as 135 we must do

a=crew swap in Chicago. If we were to operate this flight as 91 with a Chief =ilot approval we could extended the duty day to 16hrs. Please let me know =ow you wish to proceed.

>>>

>>> Can we switch to 91 – Here is what they said about the difference:

>>>

>>> When operation 91 the owner has operation control and we have a little =it of flexibility with extending the duty day as long the chief pilot appr=ves it.

>>> When operation 135 its consider business and the rules are a lot strict=r. We are not able to extend the duty day.

Two pilots can only be on duty =p to 14hrs and no more than 10hrs of flight time.

>>> Thank you!

>>>

>>> [REDACTED]

>>> [REDACTED]

>>> Executive Assistant to Leon D. Black This email and any files transmitted with it are confidential and inten=ed solely for the person or entity to whom they are addressed and may cont=in confidential and/or privileged material. Any review, retransmission, di=semination or other use of, or taking of any action in reliance upon this =nformation by persons or entities other than the intended recipient is pro=hibited. If you have received this email in error please contact the sender=and delete the material from any computer.

>>> Apollo Global Management, LLC

>>>

>>>

>>>

>>> --

>>> please note

>>> The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com<mailto:jeevacation@=mail.com><mailto:jeevacati on@gmail.com<mailto:jeevacation@gmail.com>>, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved This email and any files transmitted with it are confidential and inten=ed solely for the person or entity to whom they are addressed and may cont=in confidential and/or privileged material. Any review, retransmission, di=semination or other use of, or taking of any action in reliance upon this =nformation by persons or entities other than the intended recipient is pro=hibited. If you have received this email in error please contact the sender=and delete the material from any computer.

>>> Apollo Global Management, LLC

>>>

>>

> This email and any files transmitted with it are confidential and

> intende= solely for the person or entity to whom they are addressed
> and may contai= confidential and/or privileged material. Any review,
> retransmission, diss=mination or other use of, or taking of any action
> in reliance upon this in=ormation by persons or entities other than
> the intended recipient is prohi=ited. If you have received this email
> in error please contact the sender a=d delete the material from any
> computer. Apollo Global Management, LLC
>
>
>
>
>
> --
> please note
> The information contained in this communication is confidential, may
> be attorney-client privileged, may constitute inside information, and
> is intended only for the use of the addressee. It is the property of
> JEE Unauthorized use, disclosure or copying of this communication or
> any part thereof is strictly prohibited and may be unlawful. If you
> have received this communication in error, please notify us
> immediately by return e-mail or by e-mail to
> jeevacation@gmail.com<mailto:jeevacation@gm=il.com>, and destroy this
> communication and all copies thereof, including all attachments.
> copyright -all rights reserved This email and any files transmitted
> with it are confidential and intende= solely for the person or entity
> to whom they are addressed and may contai= confidential and/or
> privileged material. Any review, retransmission, diss=mination or
> other use of, or taking of any action in reliance upon this
> in=ormation by persons or entities other than the intended recipient
> is prohi=ited. If you have received this email in error please contact
> the sender a=d delete the material from any computer. Apollo Global
> Management, LLC
>
<?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>
 <integer>0</integer>
 <key>date-received</key>
 <integer>1503152016</integer>
 <key>flags</key>
 <integer>8590195717</integer>
 <key>gmail-label-ids</key>
 <array>
 <integer>5</integer>
 <integer>18</integer>
 </array>
 <key>remote-id</key>
 <string>740763</string>
</dict>
</plist>