
From: Halperin, Alan S <[REDACTED]>
Sent: Saturday, February 20, 2016 10:57 PM
To: jeffrey E.
Subject: Re:

Before contribution to charity, a principal can exchange AOG units for AGM =shares in a tax free exchange. After the contribution, charity can sell.=Under current TRA , there is no TRA payments associated with the foregoing=steps. Alan Alan S. Halperin | Partner Paul, Weiss, Rifkind, Wharton & Garrison =LP

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From: jeffrey E.
Sent: Saturday, February 20, 2016 3:48 PM
To: Halperin, Alan S
Subject: Re:

tax free exchange, is that the same as donatin= the stock to charity.. if the charity sells the stock = what happens to the step up

On Sat, Feb 20, 2016 at 11:25 PM, Halperin, Alan=S <[REDACTED]>
wrote:

Under TRA, no TRA rights are triggered in connection with a tax-free exchan=e. Alan

Alan S. Halperin | Partner

Paul, Weiss, Rifkind, Wharton & Garrison =LP

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From: jeffrey E.
Sent: Saturday, February 20, 2016 2:04 PM
To: Halperin, Alan S
Subject:

what happened to rowens tra when he donated the shares in =ay of 14

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