
From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, October 5, 2016 8:00 PM
To: Leon Black
Subject: Fwd:

sent nov 15

----- forwarded message -----

From: jeffrey=E. <jeev=cation@gmail.com <mailto:jeevacation@gmail.com> >
Date: Tue, Oct 4, 2016 at 8:42 PM
Su=ject:
To: Jeffrey Epstein <<mailto:jeevacation@gmail.com> >

june) is really ,no further ahead, ,consultants up the kazoo but nothing at all done.(the office was told that i cannot even see the proposals=20 received without brads specific authorization) - brad has no idea ev=n as to what questions to ask. he knows little of finance, is run roughshod over by almost everyone in the office. he is a little man ,=20 using your power, to appear larger . Eileen was self aware enough to know she was over her head , that is a huge difference. bad inf= is rampant ie 3 million in deductions Im told are taken for art space but on closer examination i= turns out they cannot be used at all. (ZERO benefit) though you will be told=20 yes they were deducted on the return they said that is the question=20 they get asked ! " were they deducted " not -" i= there a benefit " !! I asked for the balance sheet and P and L for Regan arts , a basic first step in order to check your financials. =C2 "sorry we never got one?" though 9.8 million invested, no p&l, =A0 nothing , a construction project run amok , no budget, the coo fired aft=r only 3 months. , no clue . I can add that artspace

As yo=r friend and in order toturn the page. I will try to be constructive=br>The following is a list of things I think would be in your=interest to get done asap .but definitely not by me .

=A0

i suggest you form new grats. =A0 , hire a high level tax partner. use your trading accoun=s as they remain the paramount requirement 16 months after i emailed to you the=r importance. , I suggest you consider having the 49percent of <=pan>phaid=n merged into artspace and have Richard buy artspace. re-do bank loans. no need to pay interest at higher rates on b=at or plane. . as Richard is now no longer trustee. re- do will, =A0 make suydam executor , with Barry, =nd john as back up. pay 1 million a year for executor role. =A0 get rid of Judy Black trust, deal with gifts and their=tax returns, . review amounts to kids at fixed ages. put more protec=ions in for Alex and Victoria. , distribute some money to kids let them make decisions. =, decide art division with children in attendance . have fire drill done=on estate. fill out estate returns as if you and Debra died today, choos= advisers=/span> - rick bronstein said the only 1040 he ever=filled out was his own. (this is brads chosen advisor??!) Halperin has a conflict that should be addressed., Debra should enter a tenants in common agreement with kids. you have airplane consultants tax consultants it consultants. plan= operation consultant. . boat consultants. architects, lighting , art, =A0 legal, . foundation , deal with TRA , BRH , rationalize investments. cash flow. reporting, gaming disclosures.=20 foreign, gift. . prepare tax projections for 15 and 16, . deal with neg basis (tufts gain, debt financed. art partnership, pledges. se=l stock , art, deal with phaidon debt. athene,? income , capital , foreign , exit, corporate, insurance regs, out and inbound issues, basis, appropriate discount rates. = terminations. control. , qualified dividends. corporate tolls, inversion rule=. , issues, short swing and other sec disclosur=s, Rothsh=ild bank, 150 b they have a distribution network with no products = private bank Rockefeller Rothschild. financial service. deal with UK=20 visa issue sooner rather than later. we can talk about Rowen request =e Athene , 2 billion in taxes on transaction. ?!

<iv> the facts as i see them

in June and then again Sept, we both agreed to a confidential that both the debt, and the artspace. plus) In my dining room, you were surprised when I said that I require most people to pay their advisory fee up front so that I am assured that I will be properly compensated for my work when strategies that I devise are implemented. you may recall that you appeared offended and said "are you suggesting that I would go back on my word" I said no, of course not! you are my closest of friends, but my experience is that when amounts get large, people tend to get unhappy when it actually comes time for them to pay.

From day zero a 50 - 60 million price was attached as the fair price of the transaction just completed. though this amount was already substantially less than our agreed and negotiated formula. - I was never told that this was out of range. in fact, alternative methods of payment. plane-in-kind etc, were discussed (ie keeping the 30m portion of A0 fee outstanding till March), I provided as requested a detailed C2 step by step execution plan and reviewed all documents that I was given access to. (Phaidon was not forthcoming) in order to make my many corrections. I was then told that Alans involvement warranted a discount. Even in the best of light, though it is beyond question that not one, not one time in the years has he ever proposed a unique idea. (including the new tenant in common idea,) and lets say he made a contribution to the plan and even that it was 50%. though no one could posit such a large amount unless they were wearing a brightly colored clown suit. the price of doing the deal was known. It had both sent in writing and spoken about on the phone numerous times, a detailed execution plan was provided. A0 then and only then after all was laid out for the group I was told that after a number of conversations with Brad Karp that only 20m would be paid, (and even that was more than originally contemplated) for both transactions. I feel it was remarkably unfair. Did Brad even know of our prior agreement? A0 I called him and he said he was never told. I would ask that you I and Brad Karp sit together if you think it would be helpful. I would like to send him this email, with your consent of course. If the transactions were never consummated, I would not be owed a dime, however, the price was known up front, the detailed step by step plan was followed and overseen by me, the price that had been requested before the transaction was begun, and had already heavily discounted, out of friendship, A0 from our agreement. I believe the decision re paying only 20 m has frankly left me feeling quite uneasy.

since you asked since last Nov. I found 11 million dollars in dormant accounts. 4 million dollars in Eileens drawer. went through cash flows for Phaidon showing that John Murph is not an accountant. redid your gagosian contract, A0 organized structure in case of divorce. set up gift trust. stopped Ada from including multiple times things not in your interest. dealt with bad sales tax use tax income tax. created 8 million in deductions C2, 500k in mistakes, found bank of Scotland Fbar problems, reorg bad art purchases, funds taken, Charitable deductions, helped with FinCen statement gaming commissions filing. boat deductions, rescued stock from Grats. May 1 after months of Brad not finding anyone I sent an email saying you would have to pay more. on April 15. I sent an email detailing payments owed if I could figure out the basis issue, C2 please see attached.

questions you might ask your team C2 ask them to provide a balance sheet or P&L for REganarts. doesnt exist

ask either Wechsler or Haperin to tell you what BRH is, or how the transaction works. ? ask Bronstein to tell you why the proposed Phaidon transaction DOES not work. ask them to give you a plan for the plane. ? ask them to show you the cash mgmt for over 100 million dollars. ask them to show you the IT system progress after one year. the approval process for payables. the cash flow projections? assumptions? ask for a comparative review of investments. ask Haperin to describe to you in any detail BRH, the major asset of his two biggest clients. tax basis, disposition in the estate. etc. ask Brad to show you the liquidation of the intervening art space cos? .

Last year you asked, for my help I told you I preferred not as we would be better off having no financial interactions. the risk was not worth it. You told me that as my friend I had to do it A0 I agreed., here we are in what I find to be an awkward situation. the transactions that I devised were used, our agreement was ignored. and I am not sure how to respond.

<=pan>

--

<=font>

--

=lease note

The information contained in this communication is c=nfidential, may be attorney-client privileged, may constitute inside in=ormation, and is intended only for the use of the addressee. It is the =roperty of JEE Unauthorized use, disclosure or copying of this co=munication or any part thereof is strictly prohibited and may be unlawf=l. If you have received this communication in error, please notify us i=mediately by return e-mail or by e-mail to jeevacation@gmail.com <mailto:jeevacatio=@gmail.com> , and destroy th=s communication and all copies thereof, including all attachments. copy=ight -all rights reserved

--

=A0 please note

The information contained in this commu=ication is confidential, may be attorney-client privileged, may cons=itute inside information, and is intended only for the use of the addre=see. It is the property of JEE Unauthorized use, disclosure or copyi=g of this communication or any part thereof is strictly prohibited a=d may be unlawful. If you have received this communication in error, pl=ase notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, a=d destroy this communication and all copies thereof, including all a=tachments. copyright -all rights reserved