
From: jeffrey E. <jeevacation@gmail.com>
Sent: Monday, May 9, 2016 12:03 PM
To: Melanie Spinella
Subject: Fwd:

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----- Forwarded message -----

From: Brad Wechsler <[REDACTED] <=a>>
Date: Mon, May 2, 2016 at 11:53 AM
Subject: Re: [REDACTED]
[REDACTED] jeevacation@gmail.com <mailto:jeevacation@gmail.com> &q=ot;
<jeevacation@gmail.com <mailto:jeevacation@gmail.com> =gt;
[REDACTED]

Jeffrey-let me give you the top-line and others =an fill in as necessary on the issues noted below and progress.

1. BRH k: key point is that both apo and pw have indicated that their read =s that no two principals can take an action that is prejudicial to the thi=ds estate. This is key but must be socialized with marc and josh (by john =) and then be clearly reflected.
A. Of lesser importance, wendy is trying to push thru the 754 election at a= professionals, make certain an estate has access to "information rig=ts", see if the three partners want mfn investment rights to continue=past death and fix some language "clarifications.
Wendy is quarterbacking this and timing is apo dependent which means likely=to be a process.
- On some none "fire-drill" issues which are nonetheless quite impt= pls note:
2. People are comfortable with TRA transfer with respect to 2007 stock sale= and, I believe, are expressing "sufficient comfort" with respec= to a TRA transfer for future sales. There are definitely imbedded issues =ith respect to "completed gifts" and creating a separation from BRH without causing tax effects. Nonetheless, it appears=we'll come out ok.
3. TIC still appears somewhat problematic to alan or said differently: I do='t believe AH is comfortable with "nominal ownership and exclusiv= use".
4. We (and you) now know that a clat works and we can have an ultimate bene=iciary as the foundation, a clat or both. You, leon and alan have to decid= whether you want to "hard wire" the clat into the planning toda= (can do one that has some built in flexibility) or defer to a later date.
5. By later today or tomorrow I shld be able to show you "my take"= on how to simply present the grat back-up.

Obviously feel free to reach out to any on and all for more detail on the a=ove. B

From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com>]
Sent: Monday, May 02, 2016 06:20 AM
To: Ada Clapp <jeevacation@gmail.com>; Brad Wechsler
Subject:

where are we with re do of fire drill docs

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please note

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