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**From:** Richard Joslin <[REDACTED]>  
**Sent:** Thursday, February 11, 2016 2:37 PM  
**To:** Jeffrey E.; Brad Wechsler  
**Cc:** Richard J Bronstein; Melanie Spinella; [REDACTED]; John Castrucci; Joe Avantario  
**Subject:** RE: Re:

The 42 hours include both Part 91 and Part 135 hours. Part 135 is the charter component and that gives rise to charter revenue.

From: Jeffrey E. [mailto:jeevacation@gmail.com]  
Sent: Thursday, February 11, 2016 9:21 AM  
To: Brad Wechsler <[REDACTED]>  
Cc: Richard J Bronstein <[REDACTED]>; Melanie Spinella <[REDACTED]>; John Castrucci <[REDACTED]>; Joe Avantario <[REDACTED]>; Richard Joslin <[REDACTED]>  
Subject: Re:

it says charter revenue only 312 but letter says apollo hours were 42 at 18k each hour?

On Tue, Feb 9, 2016 at 6:41 PM, Brad Wechsler <[REDACTED]> > wrote:

MEMORANDUM

ATTORNEY-CLIENT PRIVILEGE

TO: Rick Bronstein CC: John Castrucci

Leon Black Joe Avantario

Rich Joslin

FROM: Brad Wechsler Jeffrey Epstein

DATE: February 9, 2016

Leon,

1. Attached, please find the January 26th memo on the airplane which was sent to you previously. It deals with Part 91 vs. 135 and attendant costs and income tax benefits. The office feels that with respect to income tax, Part 135 is more favorable, but not significantly so, i.e., between 0 and \$400K depending on use.

2. Also included are detailed operating costs. These were previously sent to Jeffrey but not previously not sent to you.

3. The final note details the FET and sales tax consequences of moving from the current structure to a simplified structure. Were we to move to a very simple Part 91 only structure you could likely save \$200K/year but would have to own and operate the plane in your personal name (your insurance is sufficient, but there would be a certain lack of privacy). If you held the plane in a sole purpose LLC the aforementioned savings would disappear. If Jeffrey wants to take a deep dive, we have much detailed material and we would also suggest he speak to Rich J and our aviation attorney.

4. Bottom-line, a lot of work has been done and there is not a compelling answer, one way or another. Taking into account income tax attributes, sales tax attributes and ease of use attributes it's almost a push, though I would probably marginally favor Part 135. I believe Jeffrey favors Part 91, which in my mind, is a sufficient reason to go that route. We should discuss.

Thanks

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please note

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