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**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Thursday, February 11, 2016 2:44 PM  
**To:** Richard Joslin  
**Cc:** Brad Wechsler; Richard J Bronstein; Melanie Spinella [REDACTED]; John Castrucci; Joe Avantario  
**Subject:** Re: Re:

it says charter and OTHER , where is the apollo reimbursement then ? what is the amount ?

On Thu, Feb 11, 2016 at 9:37 AM, Richard Joslin [REDACTED] > wrote:

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]>; 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: =C2 Rick Bronstein =C2 =A0 =C2 CC: =A0 John Castrucci

=A0 Leon Black =C2 =A0 =C2 =A0 =C2 Joe Avantario

=A0 =C2 =A0 =C2 =A0 =C2 =A0 Rich =oslin

FROM: Brad Wechsler =A0 =C2 =A0 =C2 =A0 Jeffrey Epstein

DATE: February 9, 2016

Leon,

1. Attached, please find the January 26th memo on the airplane which wa= 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 se=t to Jeffrey but not previously not sent to you.

3. The final note details the FET and sales tax consequences of moving =rom 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 wou=d 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 a=orementioned 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.=/u>

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

Thanks

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please no=e

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JEE

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please =ote

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