
From: jeffrey E. <jeevacation@gmail.com>
Sent: Monday, April 27, 2015 10:29 PM
To: Heather Gray
Subject: Re: Dante - kids' trusts

draft?

On Mon, Apr 27, 2015 at 2:30 PM, Heather Gray

Hi Jeffrey,

With respect to the purchase of the Dante by the kid=' trusts (Yggdrasil Trust, Rollo Tomasi Trust, Tron Trust and Gand=If Trust), I just mentioned to Brad that each child is the grantor of his =r her respective trust, so if the trusts purchase the Dante and then contribute their interests in the Dante to AP =arrows LP in exchange for limited partnership interests, AP Narrows will b= treated as a partnership for income tax purposes (not a pass-through enti=y).

I'm not sure where you and Leon came out on =he question of whether you would prefer for AP Narrows to be a disregarded=entity for income tax purposes or taxed as a partnership, so I just wanted=to flag this to you.

Best,

Heather

Heather Gray

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please note

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