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**From:** Halperin, Alan S <[REDACTED]>  
**Sent:** Monday, September 29, 2014 4:36 PM  
**To:** jeffrey E.  
**Subject:** RE: Re:

Sounds right (given the fact that hundreds of millions, if not in excess of a billion, was transferred).

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From: jeffrey E. [mailto:jeevacation@gmail.com]  
Sent: Monday, September 29, 2014 12:32 PM  
To: Halperin, Alan S  
Subject: Re:

88000?

On Mon, Sep 29, 2014 at 12:24 PM, Halperin, Alan S <[REDACTED]> <mailto:[REDACTED]> > wrote:

The GRATs are very close to being zeroed out, but our practice is to leave a very tiny portion as a taxable gift.

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From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ]  
Sent: Monday, September 29, 2014 12:22 PM  
To: Halperin, Alan S  
Subject:

tom tells me that the grats don't zero out because of the discounted value of the annuities? true?

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please note

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