
From: Jeffrey Epstein <jeevacation@gmail.com>
Sent: Monday, May 20, 2013 1:22 PM
To: Fenn, Patrick
Subject: Re: FW: Early Termination Calculation

can we distribute out amh? I want to end up owning t=e holder and the debt. in different pockets.

On Mon, May 20, 2013 at 9:08 AM, =enn, Patrick [REDACTED] <mailto:[REDACTED]> wrote:

Ok. Yes, thinking through possibilities.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com>]
Sent: Monday, May 20, 2013 08:19 AM
To: Fenn, Patrick
Subject: Re: FW: Early Termination Calculation

could they run the calcuations at a 30 and 35 dollar price=for apo , thanks, also have you given tought to
refreshing the=basis in amh.? new loan,? partnership, guaranteed either payments=or assignment of tra in whole?

On Mon, May 20, 2013 at 7:46 AM, Fenn, Patrick <=pan dir="ltr"> [REDACTED]
<mailto:[REDACTED]> wrote:

Jeffrey,

<=p>

Calculation from Brian Kn=dson at E&Y. Note that this relates only to the unexchanged unit=, and does
not include the existing TRA payments.

<=p>

Regards

<=p>

Hi Patrick,

Attached is the calculation that we put together for Leon. As we discussed, this only calculates the estimated early termination payment with respect to the APP units held by Leon - it does not yet calculate the estimated early termination payment with respect to remaining TRA benefits related to the 2007 exchange. I have added an assumption tab to the workbook outlining many of the items that we discussed. Thanks=

Brian

Brian Knudson | Partner | National Tax - Partnership and Joint Ventures

Ernst & Young LLP

200 South Sixth Street, Suite 1400, Minneapolis, Minnesota 55402, United States of America

Office: +1 612 371 6387 <tel:%2B1%20612%20371%206387> | Mobile: +1 612 849 0339
<tel:%2B1%20612%20849%200339> | [REDACTED] <mailto:[REDACTED]>

Website: www.ey.com <http://www.ey.com>

Assistant: Lenora Wold | Phone: [REDACTED] <tel:[REDACTED]> | [REDACTED]
<mailto:[REDACTED]>

Thank you for considering the environmental impact of printing emails.

Any U.S. tax advice contained in the body of this e-mail was not intended or written to be used, and cannot be used, by the recipient for the purpose of avoiding penalties

The information contained in this message may be privileged and confidential and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it from your computer.

Notice required by law: This e-mail may constitute an advertisement or solicitation under U.S. law, if its primary purpose is to advertise or promote a commercial product or service. You may choose not to receive advertising and promotional messages from Ernst & Young LLP (except for Ernst & Young Online and the ey.com website, which track e-mail preferences through a separate process) at this e-mail address by forwarding this message to [REDACTED] <mailto:[REDACTED]>. If you do so, the sender of this message will be notified promptly. Our principal postal address is 5 Times Square, New York, NY 10036. Thank you. Ernst & Young LLP

IRS Circular 230 Notice Requirement: This communication is not given in the form of a covered opinion, within the meaning of Circular 230 issued by the United States Secretary of the Treasury. Thus, we are required to

inform =ou that you cannot rely upon any tax advice contained in this communication for the purpose of avoiding United States federal tax penalties. In addition, any tax advice contained in =his communication may not be used to promote, market or recommend a transaction to another party.

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. If you have received this communication in error, please notify us immediately by e-mail= and delete the original message.

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com <<mailto:jeevacation@gmail.com>> , and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

IRS Circular 230 Notice Requirement: This communication is not given in the=form of a covered opinion, within the meaning of Circular 230 issued by the= United States Secretary of the Treasury. Thus, we are required to inform =ou that you cannot rely upon any tax advice contained in this communication= for the purpose of avoiding United States federal tax penalties. In addition, any tax advice contained in this communication may not be used to promote, market or recommend a transaction to another party.

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. If you have received this communication in error, please notify us immediately by e-mail= and delete the original message.

--

*****=*****

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com , and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved