
From: Jeffrey Epstein <jeevacation@gmail.com>
Sent: Wednesday, February 26, 2014 5:29 PM
To: Ada Clapp
Cc: Alan S Halperin; Christopher L Hurtado; Eileen Alexanderson; Richard Joslin
Subject: Re: GRATs

let them decide . i do not want to influence their outcome

On Wed, Feb 26, 2014 at 12:46 PM, Ada Clapp [REDACTED] <mailto:[REDACTED]> > wrote:

I did ask Empire about doing the valuations that way and was told they did not do their valuations in this manner because it did not take into account a discount associate with the percentage involved. Should we insist?<u>

Ada Clapp</=>

Elysium Management LLC

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Direct Dial: [REDACTED] <tel:[REDACTED]>

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From: Alan S. Halperin [mailto:[REDACTED]] <mailto:[REDACTED]>]
Sent: Wednesday, February 26, 2014 11:39 AM
To: Ada Clapp
Cc: Christopher L Hurtado; Eileen Alexanderson; jeevacation@gmail.com <mailto:jeevacation@gmail.com>; Richard Joslin
Subject: Re: GRATs

As to your description of the required valuations, I agree. Please bear in mind that this is a fluid process. Accordingly, if we wish to adopt another format -- such as a valuation of a 1% interest in BFP -- I am sure that Empire would accommodate us. But I am okay with the format you have described. Alan

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<[REDACTED]>

From: "Ada Clapp" <[REDACTED]> <mailto:[REDACTED]>>
To: Alan [REDACTED]
Cc: "Eileen Alexanderson" <[REDACTED]> <mailto:[REDACTED]>, "jeevacation@gmail.com" <jeevacation@gmail.com <mailto:jeevacation@gmail.com>>, "Richard Joslin" <[REDACTED]> <mailto:RJoslin@elysllc.com>>
Date: 2/26/2014 10:18 AM
Subject: GRATs

Hi Alan and Chris,

As you know, Leon is due to receive his first annuity payment from the APO1 GRAT No. 2 (dated December 4, 2013) on March 3, 2014. Please prepare the assignment form. We will let you know the cash portion of the annuity after the dividend is paid.

At Rich J.'s request, we would like the APO1 GRAT No. 3 to be dated March 4, 2014 (this will align the annuity payments for GRATs 2 and 3). Would you please prepare a new GRAT agreement and assignment form. I am assuming that Leon wishes to re-GRAT the BFP interests he received from the APO1 GRAT on January 24th and the BFP interest he will receive from the GRAT No. 2 on March 3rd. Jeffrey-can you confirm that my understanding is correct?

Regarding valuations, Leon will require a full valuation report for his gift to GRAT No. 3. Since Empire does not prepare its valuations showing the value of a 1% interest in BFP but rather the value of the entire interest transferred, if Leon re-GRATs BFP interests received on both January 24th and March 3rd, GRAT No. 2 will need a separate restricted use valuation report (RUV) for its in-kind distribution of the annuity payment to Leon on March 3rd. Likewise, the APO1 GRAT will need a RUV for the January 24th in-kind distribution. Do you agree?

Thanks in advance!

Ada Clapp
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