
From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, September 10, 2014 8:39 PM
To: Ada Clapp
Subject: Re: Weil Gotshal Memorandum

do you see any mention of sales taxx

On Wed, Sep 10, 2014 at 4:2= PM, Ada Clapp <[REDACTED]> <mailto:[REDACTED]> > wrote:

I have only this from 201= which shows that Narrows was to contribute only fine art. Thi= is really a follow up to the question: does Leon need to contribute assets other than art to the new Narrows? I believe he does not. =A0 In fact, if we follow through with the current plan, he will. The=plan is for (i) Black Family Partners to create a new LLC to hold its non-=pollo related investments and to distribute out interests in this LLC to its partners (including Leon and the GRATs), (ii)=for the GRATs to distribute out these interests to Leon as part of the ann=ity payments and (iii) for Leon to contribute these interests into the new=Narrows.

Ada Clapp

Elysium Management LLC=/u>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED] <mailto:[REDACTED]>

This communication and=any attachment is for the intended recipient(s) only and may contain infor=ation that is privileged, confidential and/or proprietary. If you are not the intended recipient, you are hereby notified that furthe= dissemination of this communication and its attachments is prohibited. =A0 Please delete all copies of this communication and its attachments and =otify me immediately that you have received them in error. Thank you.

From: jeffre= E. [mailto:jee=acation@gmail.com <mailto:jeevacation@gmail.com>]

Sent: Wednesday, September 10, 2014 3:58 PM
To: Ada Clapp
Subject: Re: Weil Gotshal Memorandum

As I said not 2012 Way before my time
On Wednesday, September 10, 2014, Ada Clapp <[REDACTED]> <mailto:[REDACTED]> > wrote:

Hi Jeffrey,

Here is the Weil Gotshal memorandum I mentioned yesterday (it is from 2005!= and a later email from Elyse illustrating that they were focusing on the =ales tax issue.

Ada Clapp
Elysium Management LLC

[REDACTED]

Email: [REDACTED]

This communication and any attachment is for the intended recipient(s) only=and may contain information that is privileged, confidential and/or propri=tary. If you are not the intended recipient, you are hereby notified=that further dissemination of this communication and its attachments is prohibited. Please delete all copies of this =ommunication and its attachments and notify me immediately that you have r=ceived them in error. Thank you.

-----Original Message-----

From: scanner@elysllc.com [mailto:scanner@elysllc.com]
Sent: Wednesday, September 10, 2014 3:32 PM
To: Ada Clapp
Subject:

Scanner

--

please no=e

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 JEE

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

--

=C2 please note

The information co=ntained in this communication is confidential, may be attorney-client pr=vileged, may constitute inside information, and is intended only for

JEE

Unauthorized use= disclosure or copying of this communication or any part thereof is str=ctly prohibited and may be unlawful. If you have received this commu=ication in error, please notify us immediately by return e-mail or by e=mail to jeevaca=ion@gmail.com <mailto:jeevacation@gmail.com> , and destroy this communication and all copies thereo=, including all attachments. copyright -all rights reserved

</=iv>