

---

**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Monday, July 24, 2017 1:06 PM  
**To:** Leon Black

<https://www.irs.gov/charities-non-profits/private-foundations/disqualified-persons> <<https://www.irs.gov/charities-non-profits/private-foundations/disqualified-persons>> =A0

I assume no one told you that if your children control the clat they cant be part o= the private foundation. . who is going to do it? =C2 the kids will have no money from this for 15 or 20=years. no control? or little? if the art does not apprec=ate. THEY get NOTHING. !! where =s the art kept. . now that it is a private foundation they cant keep=it in their houses did anyone provide spread sheet for you on=interst rates and needed returns for them to get anything? art=valuation board of irs aside. many more issues bu= they are all emblematic of theory vs reality. =A0

Fire drill , still not done. nor agr=eements reviewed with a goal in mind. . =A0 your 1. 5 billion dollar note. gets transfered=C2 with no tax. . not paying tax is the goal .=C2 the CLATS involve monstrously complicated taxes to be pa=d, over time with the Gov't as your full partner. =A0 all silly, structured the way it is, by people with n= real life experience with large art oollections used .  
=div>

--

=C2 please note

The informat=on contained in this communication is confidential, may be attorney-cli=nt privileged, may constitute inside information, and is intended only =or the use of the addressee. It is the property of JEE Unauthoriz=d use, disclosure or copying of this communication or any part thereof =s strictly prohibited and may be unlawful. If you have received this

return e-mail o= by e-mail to j=evacation@gmail.com <mailto:jeevacation@gmail.com> , and destroy this communication and all copies =hereof, including all attachments. copyright -all rights reserved </=iv>  
--001a114c8a3e0513cc05550fe07c-- conversation-id 36982 date-last-viewed 0 date-received 1500901554 flags 8590195713 gmail-label-ids 7 remote-id 733574