
From: Thomas Turrin <[REDACTED]>
Sent: Saturday, March 9, 2013 3:37 PM
To: Jeffrey Epstein
Attachments: Leon D. Black - Years 2006 - 2011 Summary of federal and state taxes paid.pdf

Jeffrey,

As per our call...

1. I called Elliot Becker (internal tax manager of Apo=lo (Purchase)) - he will get me information on the deferred COD income to =e

recognized – I expect to hear from him =n Monday.

2. Charitable Remainder Trust – foreign source i=come retains its character as foreign source to the income beneficiary.

Creditable foreign taxes also pass through to=income beneficiary. If the CRT maintains a foreign bank or other fin=ncial account, the CRT (and trustee) would need to file FBAR's .&nbs=; The beneficiary may have FBAR requirement as well, if the beneficiary has a 50% or more interest in the

trust...as well as FATCA (form 8938).&nbs=;

3. Estate tax (federal and NYS) – The top NYS es=ate tax rate is 16%; the top federal estate tax rate is 40%. T=e NYS estate tax is

a deduction on the federal estate tax return.=nbsp; ..the “all in” net rate on a \$1 billion estate is approx=mately 45.2%. The larger the estate, the higher

the overall net all in rate would be since mo=e of the estate would be taxed at the maximum rates...could be close t= 50%.

4. Attached is a summary of total income taxes (as per=tax returns – fed and NYS/C) for years 2006-11.

I will get back to you this coming week on updated p=ojected April 15th tax payments. It will not be finalR=0;there is much

information (K-1 projections etc) to be received over the 4-5 weeks.

If you have any questions, please contact me.</=:p>

Best,

Tom

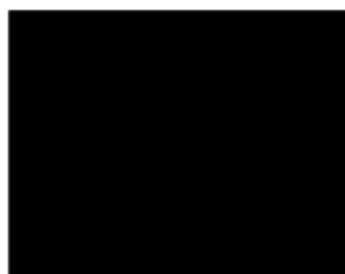
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