
From: Erika Kellerhals [REDACTED]
Sent: Friday, January 4, 2013 7:26 PM
To: Jeffrey Epstein
Subject: Re:
Attachments: 7B8B96A5-A17A-4855-9256-43BDEEA09109[129].png; 7B8B96A5-A17A-4855-9256-43BDEEA09109[123].png

I'll send response – but right now working on tax court petition due today.

Erika A. Kellerhals

Partner

Kellerhals Ferguson Fletcher Kroblin LLP

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Office: [REDACTED]

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From: Jeffrey Epstein <jeevacation@gmail.com>

Date: Friday, January 4, 2013 9:38 =M

To: Erika Kellerhals [REDACTED]



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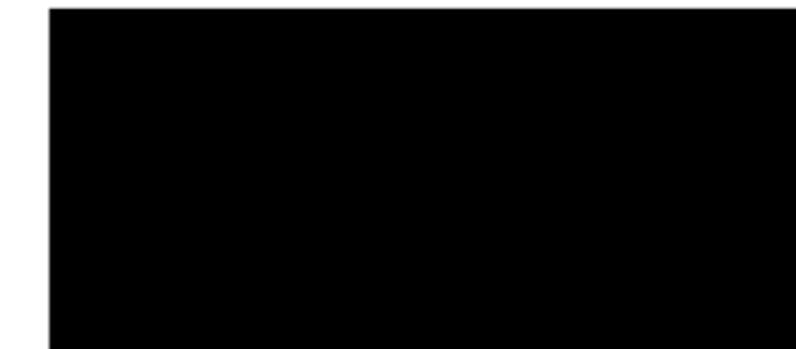
From: Jeffrey Epstein <jeevacation@gmail.com</=>>
Date: Friday, January 4, 2013 8:49 =M
To: Erika Kellerhals [REDACTED]
Subject: Re:

so if us residents own common shares in our new bank,? why is my holding of a 100 percent intrest as a us person not included,

On Fri, Jan 4, 2013 at 8:32 AM, Erika Kellerhals= <ekellerhal=@kffklaw.com <mailto:ekellerhals@kffklaw.com> > wrote:

An entity =ncorporated in the USVI is considered a foreign corporation for the purpos=s of the unmirrored Internal Revenue Code. Therefore, when U.S. shareholders control a USVI =orporation under the 50% rule (U.S. shareholders own more than 50% of the=combined voting power of its stock or more than 50% of the total value of the stock) the USVI corporation is treated as a CFC (a="USVI CFC"). To the extent that a USVI CFC invests its earnings in United States =property or earns subpart F income in the form of foreign base company sale= income, foreign base company services income, or foreign personal holding=company income, its United States shareholders are taxed on such investment in United States property and su=part F income to the same extent as if such corporation were formed in a f=reign country

Erika A. Kel=erhals



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From: Jeffrey Epstein <jeevacation@gmail.com</>>
Date: Thursday, January 3, 2013 7:00 PM
To: Erika Kellerhals <[REDACTED]>
Subject: <no subject>

how do the cfc rules apply to us residents holding shares in vi corp.<=r clear="all">

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Jeffrey Epstein

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