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Sent: Friday, May 29, 2015 12:54 AM
To: Melanie Spinella
Subject: ulysses 2.0

I realize it is only due to a lack of understanding of the job ahead. and not out of any sense of unwillingness to pay

- as opposed to merely hiring people to set up a family office, someone will have to do the following- separate from the art partnership which is my responsibility. there still needs to be a huge amount of work done for 2015,16. not to mention that brad at the moment is going to have to train the incoming team? your call

strategic decisions re estate and other planning, sale of phaidon etc. in addition setting up for the accounting for each strategy is:

income, estate, gift, sales and use, transfer excise picasso, 031 calder. review and detailed oversight of IRS SEC AMING NYS. real estate, entity valuations (many) tax filings- disclosures, follow up of grats, trusts, defective trusts, llcs corps, trustees, partnerships. foreign corps. C2 100 bank account need to be rationalized, not only having brad step in to children investments. gift taxes, trust, loans, notes. payables. expenses allocations. insurance. (life, art, split dollar), cashflows, operating biz, investments, contingent liabilities. (funds, miami), commitments funds and charities, dividend treatment -important review of transactions relating to BRH (amendments) TRA sale (nuanced), shareholder agreements, bank loan agreements new bank relationships. wills, construction accounting and oversight, contracts planning permits etc.. employee rules, regs, checking account reconciliations, credit cards. jewelry, cost basis, (art stock etc.) foundations regs, brokerage accts, stock options, (ie environmental solutions still not done!). estate tax calculation fixed fee, (note, basis etc) review of boat expenses plane expenses, depreciation issues refunds etc. rationalize all outside counsel and accounting firms Paul Weiss, Mcdermott Will, Macfarlane. Price Waterhouse, Reich, withers bergman, Empire, akin gump, bbd seidman, Apollo in house counsel.

set up and oversee brokerage accounts at JPM DB GS and thoughtful trade

. new IT system from top to bottom full time person

new accounting system - on-line banking coordinated with reports. fire drills as per caruci (he sounds good) and audit system, review of john murphy? joslin? dag? eva?.

in house, review household (12million) review, filings- partnership accounting, familiarity with grats, trusts etc. audit system put in place. that should be the easy part. then strategy re:

As new facts on the ground develop, phaidon debra, children meetings, involvement, trustees adjusted, stock sale sale of art, apt (large gain), 1031 trade in, plane depreciation, boat sale. construction, C2 brad will oversee brokerage and investment, ?? pe?. real estate, publishing, grats, tra, brh (death). foundation, museum, tax projections cash flow projections, coordination with team from apollo. etc

you are sitting on over 100 m of cash???!!

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=A0 please note

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