

Thank you both for your time this afternoon
Conversation was very useful and I look forward to presenting PPVA to my principal
I will be back in touch tomorrow or Monday
Have a nice evening

Rich

From: Brian Gartner <[REDACTED]>
Date: Thu, 5 Jun 2014 22:43:14 +0000
To: Richard Kahn <richardkahn12@gmail.com>
Cc: [REDACTED], Michael Liebeskind <[REDACTED]>
Subject: Private Placement Variable Annuity (PPVA) Investment Account

Rich,

It was nice speaking with you today.

As promised, directly below is Michael's contact information. I have also attached his v-card for your convenience.

Michael B. Liebeskind
Winged Keel Group
1700 Broadway, 34th Floor
New York, NY 10019

[REDACTED]

Also, when we got off the call, Michael and I thought it may be helpful for you to have the Willkie Farr & Gallagher Tax Memorandum at your fingertips for when you meet with the Principal tomorrow (see "Willkie Farr & Gallagher LLP Memorandum," attached). We asked Willkie Farr & Gallagher to research the tax treatment of the charitable legacy application of a Private Placement Variable Annuity (PPVA) Investment Account. They were able to confirm the tax results we had anticipated, namely that all taxes on investment gains are eliminated to the extent that the PPVA Investment Account is bequeathed to a tax-exempt charity or private foundation. We hope you find this helpful for your conversation tomorrow.

Please let us know if you have any questions prior to your discussion with the Principal or if any arise as a result of tomorrow's conversation.

Brian

From: Brian Gartner
Sent: Thursday, June 05, 2014 4:47 PM
To: [REDACTED]
Cc: Michael Liebeskind <[REDACTED]>
Subject: FW: Private Placement Variable Annuity (PPVA) Investment Account

Paul and Rich,

The third attachment to this email is the reporting example Michael was referring to. Here is a brief description of the document: