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**From:** Kirschner, Elyse [REDACTED]  
**Sent:** Friday, April 26, 2013 6:17 PM  
**To:** Jeffrey Epstein  
**Subject:** RE: Re:

We drafted the partnership agreement, but Akin Gump was heavily involved as well. They prepared that transfer instrument I just sent you.

Interestingly, AIF IV Management, Inc. was added as a partner at the last minute. The unsigned Word version of the partnership agreement I have on my firm's network does not have AIF IV Management listed as a partner. But the signed copy does.

I tried to reach out to Wendy Dulman, who was at Akin Gump at the time this partnership was formed, to see if she has any recollection of this issue with AIF IV Management. She said she didn't remember.

If AIF IV Management had an economic interest in the underlying fund at the time the partnership was created, it may have been decided to add AIF IV as a partner at the last minute to avoid Section 2701 concerns. That's why I want to see a copy of the partnership agreement of Apollo IV Management LP. Ada and Eileen are trying to locate it for me.

/o:p>

Elyse G. Kirschner = Partner  
McDermott Will & Emery LLP | 340 Madison Avenue, New York, NY 10173

[REDACTED]  
+www.mwe.com

From: </=pan>  
Sent: Friday, April 26, 2013 2:07 PM  
To: Kirschner, Elyse  
Subject: Re: Re:

<=iv>

did it have value,, a capital account etc, did you set up the partnership?

&=bsp;

On Fri, Apr 26, 2013 at 2:03 PM, Kirschner, Elyse <<mailto:[REDACTED]>> wrote:

I don't think that the 1988 trusts were grantor trusts.

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Elyse G. Kirschner | Partner

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`=p class=MsoNormal style='mso-margin-top-alt:auto;mso-margin-bottom-alt:auto'` Jeffrey Epstein

`[mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ]`

`Sent: Friday, April 26, 2013 2:01 PM`

`To: Kirschner, Elyse`

`Subject: Re:`

Am I correct to think that all other partners would be liable for income tax purposes and therefore not a true partnership?

`<=o:p>`

On Fri, Apr 26, 2013 at 1:56 PM, Kirschner, Elyse `<a href="mailto: [REDACTED] target="_blank"> [REDACTED] <a>> wrote:`

I don't recall that being the reason.

I found the attached document (page A-3). It shows that AIF IV Management, Inc. transferred an interest in Apollo Management IV, LP to BFP when BFP was formed. I've asked Ada to see a copy of the LP agreement for Apollo Management IV. We'd like to see who the other partners of Apollo Management IV were.

`=/o:p>`

Elyse G. Kirschner | Partner

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`<=div style='border:none;border-top:solid #B5C4DF 1.0pt;padding:3.0pt 0in 0in 0in'`

From: Jeffrey Epstein [mailto:jeevacation@gmail.com <mailto:jeevacation@gm=il.com> ]  
Sent: Friday, April 26, 2013 1:28 PM  
To: Kirschner, Elyse  
Subject:

is it possible that the only reason that ap iv ltd was added as an lp. was to make sure that all entities were not disregarded for tax purposes, and that a partnership requires at least two entities, ? ? even though it is a sub s , for lp purposes i believe it qualifies as a non disregarded entity, any memories?

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