
From: Ada Clapp [REDACTED]
Sent: Wednesday, August 21, 2013 10:07 PM
To: Jeffrey Epstein
Subject: Further to our conversation

Hi

Thinking more about our discussion earlier of having the Heritage Trust be under Leon's revocable trust and creating a separate trust for purposes of decanting the 06 and 97 Trusts. I recalled having had a similar discussion with Alan after we moved to the current structure. He just reminded me that the bulk of the assets the kids will be inheriting are the assets in the 06 and 97 Trust. What is left in Leon's estate after both Leon and Debra die will be cut in half by estate taxes. So, if we want those "heritage trust provisions" to apply to the bulk of the kids' inheritance, the provisions have to be in an irrevocable trust to which we can decant the 06 and 97 Trusts.

If Leon decides he no longer can live with those provisions, we can always decant Heritage Trust #1 into a new Heritage Trust (#2) with provisions Leon likes--but he would not want to decant too often. The other alternative (which I don't love but like better than serial decanting) is to give the independent Trustees the power to amend certain trust provisions. I think Alan would be comfortable with this but again, we would have to create space between amendments and they could not come from Leon (only the independent trustee).

What do you think?

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