

To: jeffrey E.[jeevacation@gmail.com]
Cc: lawrence delson [REDACTED]
From: Richard Joslin
Sent: Fri 7/25/2014 12:11:42 PM
Subject: RE: Ben Black gift tax notice from IRS

Note that Josh transferred a note with face of \$5,120,000 on 12/19/2012 to the Tron Trust. As this is same transaction as Ben's, we may have similar inquiry for Josh's 2012 gift tax return.

From: Richard Joslin
Sent: Thursday, July 24, 2014 10:21 AM
To: 'jeffrey E.'
Cc: lawrence delson
Subject: Ben Black gift tax notice from IRS

Attached are four documents:

1. IRS notice request for copy of promissory note (gift to Yggdrasil Trust)
2. Ben Black 709 – gift tax return FY 2012
3. Promissory note BEB 2011 Trust to Ben Black
4. Assignment of promissory note from Ben Black to Yggdrasil Trust

I have confirmed the address on the notice to be a bona fide Treasury office.

30 days to respond.

Richard Joslin

CFO

Elysium Management LLC

