

To: Jeffrey Epstein[jeevacation@gmail.com]
Cc: Kirschner, Elyse [REDACTED]
From: McCaffrey, Carlyn
Sent: Sun 5/26/2013 10:40:32 AM
Subject: RE:

Dear Jeffrey,

The answer depends on Leon's objectives. If he's interested in selling the art and deferring tax on the gain, we could consider a Nimcrut. But his charitable deduction would likely be limited to his basis.

If he's interested in obtaining a full income tax deduction, and is not looking to retain any economic interest in the art, we could consider outright gifts to one or more museums to a private operating foundation controlled by him. In each case, the donee would agree to use the donated art in furtherance of its charitable purpose.

I'll be back in the US next Friday if you'd like to discuss this topic.

Best

Carlyn

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From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Saturday, May 25, 2013 3:05 PM
To: McCaffrey, Carlyn
Subject:

what structure do you like now for leon giving some of his art to charity, nimcrut? etc?

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