

**To:** Thomas Turrin [redacted] McCaffrey, Carlyn [redacted]; Eileen  
Alexanderson [redacted]  
**Cc:** Jeffrey Epstein[jeevacation@gmail.com]  
**From:** Kirschner, Elyse  
**Sent:** Mon 11/19/2012 7:49:11 PM  
**Subject:** RE: Leon Black - form 709

I think we should still consider whether Leon wants to make a taxable gift subject to gift tax to the Black 1997 Family GST Exempt Trust to use the remainder of his GST exemption.

Elyse G. Kirschner | Partner  
McDermott Will & Emery LLP | [redacted]  
[redacted]

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**From:** Thomas Turrin [mailto:[redacted]]  
**Sent:** Monday, November 19, 2012 2:45 PM  
**To:** McCaffrey, Carlyn; Eileen Alexanderson  
**Cc:** Kirschner, Elyse; Jeffrey Epstein  
**Subject:** RE: Leon Black - form 709

Carlyn,

Leon has nothing left of his lifetime exemption. His year 2012 gifts to date are slightly over 2.5 million.

Best,

Tom

**THOMAS TURRIN, CPA**

**Partner**

**Raich Ende Malter & Co. LLP**



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**From:** McCaffrey, Carlyn [mailto: [REDACTED]]  
**Sent:** Saturday, November 17, 2012 7:46 AM  
**To:** Thomas Turrin; Eileen Alexanderson  
**Cc:** Kirschner, Elyse; Jeffrey Epstein  
**Subject:** [WARNING: MESSAGE ENCRYPTED]FW: Leon Black - form 709

Leon's 709 shows that he still had \$1.74 million of gift tax credit left at the beginning of 2012. Can one of you check to see if he's made any taxable gifts during 2012 so that we know how much he has left.

If he hasn't made any further gifts, the simplest approach is probably to have him make a gift to his 1997 GST exempt trust.

Carlyn S. McCaffrey | Partner  
McDermott Will & Emery LLP | [REDACTED]

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**From:** Kirschner, Elyse  
**Sent:** Friday, November 16, 2012 5:58 PM  
**To:** McCaffrey, Carlyn  
**Subject:** FW: Leon Black - form 709

Here's Leon's 2011 gift tax return (the code to open the return is 10018).

Leon used \$1.0 million of his gift tax credit through 2010. In 2011, he made taxable gifts of \$2.374 million. So, he still has about \$1.74 million of his credit left.

He used \$3.5 million of his GST exemption.

He should just make a gift of \$1.5 million to his 1997 GST exempt trust.

Elyse G. Kirschner | Partner  
McDermott Will & Emery LLP | [REDACTED]

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**From:** Thomas Turrin [mailto:[REDACTED]]  
**Sent:** Friday, November 16, 2012 5:34 PM  
**To:** Kirschner, Elyse  
**Subject:** RE: Leon Black - form 709

Elyse,

The p/w is [REDACTED]

I will send Debra's on Monday.

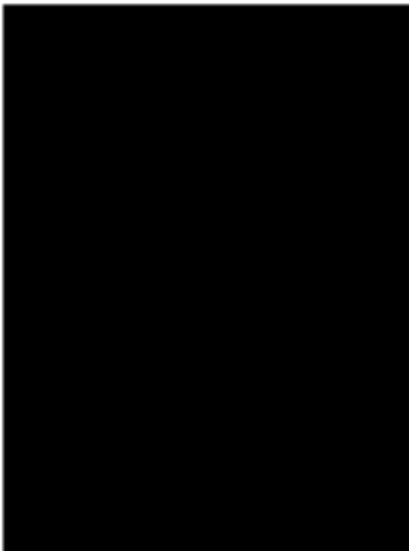
Best,

Tom

**THOMAS TURRIN, CPA**

**Partner**

**Raich Ende Malter & Co. LLP**



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**From:** Kirschner, Elyse [mailto:[\[REDACTED\]](#)]  
**Sent:** Friday, November 16, 2012 3:55 PM  
**To:** Thomas Turrin

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**Subject:** RE: Leon Black

Thanks. Can you send me Debra's too?

Elyse G. Kirschner | Partner  
McDermott Will & Emery LLP | 

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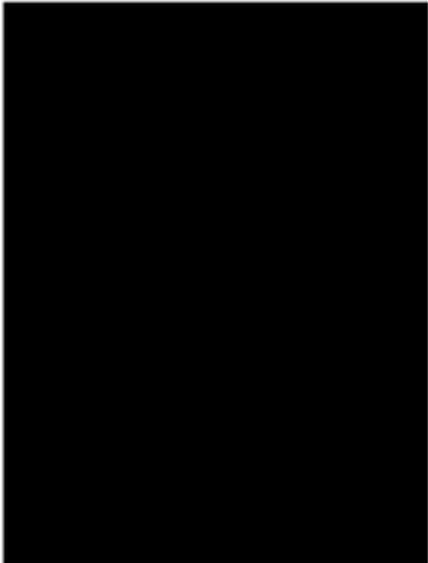
**From:** Thomas Turrin [mailto:  
**Sent:** Friday, November 16, 2012 3:54 PM  
**To:** Kirschner, Elyse  
**Subject:** RE: Leon Black

I will forward it to you a little later.

**THOMAS TURRIN, CPA**

**Partner**

**Raich Ende Malter & Co. LLP**



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**From:** Kirschner, Elyse [mailto: [REDACTED]]  
**Sent:** Friday, November 16, 2012 3:21 PM  
**To:** Thomas Turrin  
**Subject:** Leon Black

Tom,

Do you have a copy of Leon's 2011 gift tax return?

Thanks.

Elyse

Elyse G. Kirschner | Partner  
McDermott Will & Emery LLP | [REDACTED]  
[REDACTED]

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