

Ada,

I agree with you on making affirmative allocations of GST.

We have always make affirmative allocations of gst with all relevant details.

The gift tax returns will be on extension. I will send you the drafts of the returns when ready.

Best,

Tom

**THOMAS TURRIN, CPA**

**Partner**

**Raich Ende Malter & Co. LLP**

1375 Broadway

New York, New York 10018

[REDACTED] (ext 404)

[REDACTED] (Direct line)

[REDACTED] (Fax)

[REDACTED] (Cell)

Email: [REDACTED]

Website: [www.rem-co.com](http://www.rem-co.com)

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**From:** Ada Clapp [mailto: [REDACTED]]  
**Sent:** Monday, April 08, 2013 6:19 PM  
**To:** Elyse G. Kirschner; Thomas Turrin  
**Cc:** Eileen Alexanderson; Jeffrey Epstein  
**Subject:** Black Family 2012 Gift Tax Reporting Obligations

Hi Elyse and Tom,

I wanted to follow up with you regarding the need to report the gifts each of Debra, Ben, Josh, Alex and Victoria made to new trusts they each created in 2012, as outlined in Elyse's attached memorandum. The memorandum implies that the family members will rely on the automatic allocation rules under the Treasury regulations for the allocation of GST exemption to their gifts. My preference is to make an affirmative allocation of GST exemption on the gift tax return reporting the gift, where that is the intention, rather than relying upon the automatic allocation rules. Not only is that the "safer" route, but it avoids confusion later as to how much GST exemption was used by an individual, as you have created a record for all involved to refer back to.

If you elect to rely on the automatic allocation rules, would Elyse kindly confirm that the rules will apply to allocate GST exemption to 100% of each family member's 2012 gift (e.g., that they are indirect skips to "GST trusts" under the regs). If instead, the gift tax returns will make affirmative allocations of each family member's GST exemption, I would like the opportunity to review the allocation language.

Thanks in advance for your response.

Best regards,

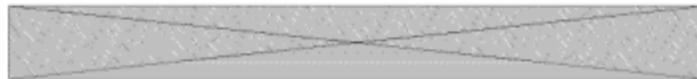
**Ada Clapp**  
Black Family Partners  
c/o Apollo Management  
9 W 57th Street  
New York NY 10019  
phone: [REDACTED]  
email: [REDACTED]

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