

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: estate liquidation
Date: Tue, 19 May 2020 12:25:28 +0000

Good for me. We can call you then.

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, May 19, 2020 8:09 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: estate liquidation

I can't do 10. I could probably do 11.

On May 19, 2020, at 7:58 AM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Me too. 10? 11?

Sent from my iPhone

On May 18, 2020, at 6:57 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Good for me.

Sent from my iPhone

On May 18, 2020, at 5:54 PM [REDACTED] (USANYS) <[REDACTED]> wrote:

Sure. Perhaps tomorrow morning?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, May 18, 2020 4:46 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: RE: estate liquidation

See below re: Epstein properties. If you have some time, I'd like to talk whether/how best to elevate.

From: [REDACTED] <[REDACTED]>
Sent: Monday, May 18, 2020 4:18 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: estate liquidation

[REDACTED]

We wanted to follow up on our email from May 2 about the estate letting us know that they plan to move forward with taking steps to prepare for sales of the New York and Florida properties, particularly in light of the estate's upcoming tax deadline. The trustees' counsel contacted us today to follow up on that and to let us know that they expect to start taking those steps formally in the near future, including by retaining a broker and listing the New York property.

As we mentioned in that prior email, the estate tried to get the IRS to hold off on the tax enforcement until the estate settles its (massive) contingent liabilities, but the IRS is taking the position that the estate has to pay the taxes and then recoup any overpayment based on the subsequent expenditures on liabilities that would have retroactive tax implications. And in particular for the New York house, they think there may be interest from museums in purchasing that property. The attorneys wanted to let us know so we weren't taken by surprise in the event their initial steps are picked up by media. As always, we think it would be productive to engage with the estate to start the ball rolling on whatever the Office wants to achieve (this being one of the subjects where perhaps there's an ultimate goal we're not privy to), but in the meantime we've continued to only receive information from the estate.

In any event, we wanted to make sure that the brass was updated on this, as well as the info we conveyed previously, and please let us know if there's anything Geoff wants us to convey to them.

thanks,



Assistant U.S. Attorney
Southern District of New York
