

**From:** Darren Indyke <[REDACTED]>

**To:** [REDACTED]

**Subject:** Fwd: issues for conference call

**Date:** Mon, 12 Aug 2013 16:31:00 +0000

**Inline-Images:** image001.jpg

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FYI

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\*\*\*\*\*  
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\*\*\*\*\*

Begin forwarded message:

**From:** Gina Bryan <[REDACTED]>

**Date:** August 12, 2013 11:55:41 AM EDT

**To:** Erika Kellerhals <[REDACTED]>, "Dlugash, Alan" <[REDACTED]>

**Cc:** "Darren K. Indyke ([REDACTED])" <[REDACTED]>, Richard Kahn <[REDACTED]>, "Guzman, Marylyn" <[REDACTED]>

**Subject:** RE: issues for conference call

Good Morning.

Friday at 11:00am EST is fine.

Please confirm.

Thank you.

Gina

 *Description: Description: Description:  
Kellerhals Ferguson Fletcher Kroblin LLP*

**GINA M. BRYAN**  
**OFFICE MANAGER**

9100 PORT OF SALE MALL, STE 15  
ST THOMAS, VI 00802-3602

Office: [REDACTED]  
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**From:** Erika Kellerhals  
**Sent:** Monday, August 12, 2013 11:39 AM  
**To:** Dlugash, Alan  
**Cc:** Darren K. Indyke ([REDACTED]); Richard Kahn; Guzman, Marylyn; Gina Bryan  
**Subject:** Re: issues for conference call

I'll be unavailable for the next few hours so please coordinate with my assistant Gina at [REDACTED] or by phone with what works for you. [REDACTED].

Sent from my iPhone

On Aug 12, 2013, at 11:32 AM, "Dlugash, Alan" <[REDACTED]> wrote:

Erika,

Unfortunately I am not available from 10AM – 4PM tomorrow (Tuesday), and I leave Wednesday at 1:45 PM for Panama where I'll be through Monday. I am OK with trying to call in from Panama Thursday or Friday at 11AM, but the calls are not always reliable. What is your preference?

Alan

**Please note my new mailing address:**

**Alan J. Dlugash**

Marks Paneth & Shron LLP

EFTA00385808

685 Third Avenue, New York, NY, 10017  
P. 646 571 2424 F. 212-503-6359 C. 914.629.5658  
E. [REDACTED]  
<image001.gif>

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**From:** Erika Kellerhals [mailto:[REDACTED]]  
**Sent:** Monday, August 12, 2013 6:40 AM  
**To:** Dlugash, Alan  
**Cc:** Darren K. Indyke ([REDACTED]); Richard Kahn  
**Subject:** Re: issues for conference call

Alan,

Thank you for your email. I am happy to address all of the issues you noted below – however – I now find myself in the situation where I learned last night that I have to fly to the states this morning. Is it possible for us to reschedule the call for either tomorrow at noon or Thursday between 9 and 12 or Friday between 9 and 1:30.

I apologize for the last minute notice – but I only just learned that I would have to leave this am.

Please advise.

**Erika A. Kellerhals**  
**Member**

<image002.jpg>

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**From:** <Dlugash>, Alan <[REDACTED]>  
**Date:** Monday, August 12, 2013 12:04 AM  
**To:** Erika Kellerhals <[REDACTED]>  
**Cc:** 'Darren Indyke' <[REDACTED]>  
**Subject:** issues for conference call

Dear Erika,

I am very much looking forward to our call Monday at noon. As I am still in the familiarization process with STC and the related personal tax issues, I am hoping to learn much from the call and anticipate that we can complement each other with issues going forward.

To assist with the call, I have listed below some issues that I hope we can cover in an overview level to help me along with USVI issues. I will also be glad to provide you with assistance in any area that you think I can help with.

1) Conditions related to USVI benefits, including concepts of 90% tax exemption, separate interest and dividend tax exemption, nature of business required to be conducted, sourcing of income issues, requirement of clients outside USVI, etc.

2) Complications related to the mirror concept of taxation, including possible issues relating to:

- a) LLC's
- b) trusts, including grantor trusts
- c) concept of nominee
- d) meaning of "foreign"

- e) Private Foundation and Not-for Profit entities
- 3) USVI taxing authority guidance, assistance, letter rulings, etc.
- 4) US state taxation issues
- 5) C corporation issues

I would also like to know of any issues and concepts of which you think I should be aware.

Alan

**Alan J. Dlugash**

Marks Paneth & Shron LLP  
685 Third Avenue, New York, NY, 10017  
P. 646-571-2424 F. 212-503-6359 C. 914.629.5658  
E. [REDACTED]

 Marks, Paneth & Shron

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