

From: Brad Wechsler <[REDACTED]>
To: Ada Clapp <[REDACTED]>, Richard Joslin <[REDACTED]>
CC: Joe Avantario <[REDACTED]>, John Castrucci <[REDACTED]>, Jeffrey Epstein <jeevacation@gmail.com>
Subject: Re: S-Corp Election
Date: Thu, 10 Dec 2015 23:16:23 +0000

Guys-even on the small stuff can start copying jeffrey. Thx
Sent from my Verizon Wireless BlackBerry

From: Ada Clapp <[REDACTED]>
Date: Thu, 10 Dec 2015 22:45:25 +0000
To: Richard Joslin <[REDACTED]>
Cc: Joe Avantario <[REDACTED]>; Brad Wechsler <[REDACTED]>; John Castrucci <[REDACTED]>
Subject: S-Corp Election

Hi Rich,

As part of the year-end planning, we will create a new S-Corp the stock of which will be sold to the APO1 Trust. As long as it is a grantor trust, APO1 is eligible to hold Sub S Stock. However, Alan and I think we should make a protective Sub S election just in case an unexpected event should cause grantor trust status to cease. Paul Weiss tells me the election can be made any time before March 15th. Kindly put this item on your "to do" list.

Thanks!

Ada Clapp
Chief Legal Officer
Elysium Management LLC
445 Park Avenue
Suite 1401
New York, New York 10022
Direct Dial: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

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From: Orol, Zoey F [mailto:[REDACTED]]
Sent: Thursday, December 10, 2015 5:26 PM
To: Ada Clapp <[REDACTED]>
Cc: Halperin, Alan S <[REDACTED]>
Subject: RE: Transaction Documents

Hi Ada,

The election can be made any time before March 15th.

Zoey

Zoey F. Orol | Associate

Paul, Weiss, Rifkind, Wharton & Garrison LLP

1285 Avenue of the Americas | New York, NY 10019-6064

[REDACTED] (Direct Phone) | [REDACTED] (Direct Fax)

[REDACTED] | [REDACTED]