

**From:** Juliana Minsky <[REDACTED]>  
**To:** Jeffrey Epstein <jeevacation@gmail.com>  
**Cc:** Marvin Minsky <[REDACTED]>, Margaret Minsky <[REDACTED]>, Gloria Rudisch Minsky <grudisch@brooklinema.gov>  
**Subject:** Re: Minsky foundation questions  
**Date:** Tue, 25 Feb 2014 17:30:05 +0000

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Yes: below is the extent of the info we have from bbva in response to the question - can they split the distribution:

Dear Prof. Minsky,

I am pleased to reply to your inquiries regarding the tax aspects of the Frontiers award, and indeed to any future questions or comments you might have.

Having consulted this matter with our tax advisors, we have to inform you that the award has been granted to you in person, and it is therefore you, as winner, who will receive the prize money of 400,000 euros.

Our Foundation must also comply with the legal requirement to inform the Spanish tax authorities of your identity as award winner, providing your name, tax address and the economic amount of the prize. To this end, we will need the details requested in our e-mail of January 20.

Please note that the entire amount is payable to yourself, and although the award is tax exempt in Spain it may be taxable in your country of residence, in which case the beneficiary will have sole and exclusive responsibility for meeting the corresponding tax obligations.

It bears mention also that the double taxation agreement in force between Spain and the USA establishes a mechanism for the exchange of information between the two countries.

The above notwithstanding, the BBVA Foundation will be happy to pay the prize money or, as you intend, part of the same to any organization you stipulate, providing you send us a letter to this effect, in your capacity as award winner, relieving the Foundation of any further payment liability. Ideally, you should get this letter to us as soon as possible, and certainly no later than May 2014 (one month before the date envisaged in the entry conditions for the formal presentatoin ceremony), so our tax advisors can check through the details.

We will then be in a position to order a bank transfer (for the entire or partial amount), dated on the day of the award ceremony, from Fundación BBVA to the organization you specify, with the message: *On behalf of Professor Marvin Minsky.*

In sum, you will still be the awardee in the records of the BBVA Foundation and the Spanish tax authorities, and the Foundation will confine itself to making a payment on your behalf to the designated organization.

On Tue, Feb 25, 2014 at 9:24 AM, Jeffrey Epstein <jeevacation@gmail.com> wrote:  
did the bbva provide any docs?

On Tue, Feb 25, 2014 at 1:13 PM, Juliana Minsky <[REDACTED]> wrote:  
Dear Jeffrey,

My folks said you could take a look at the attached draft of a trust formation.  
The BBVA Foundation which is awarding the prize money is able to split the distribution of the money between a personal distribution and a distribution directly to a foundation/trust, but any money going into

the foundation is considered a donation from/on behalf of Marvin. So he is considered the donor not them.. They have made that 100% clear.

My folks said you thought it might be advantageous to put all of the prize into a foundation, but our concern is how Marvin that would accomplish his goals of retaining some of the prize money for personal use.

Could any of his salary as a researcher be taken through a nonprofit structure and would there be any tax advantage to that, etc. .I'm not what other questions to ask but we look forward to your thoughts about this.

Thank you,  
-Julie Minsky

  
[\(805\) 689-6618](tel:8056896618)

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