

From: "Ada Clapp" <[REDACTED]>
To: "Jeffrey Epstein" <jeevacation@gmail.com>
Subject: RE: RE-GRAT-ing
Date: Thu, 23 Jan 2014 23:15:58 +0000

Thanks.

Ada Clapp

Elysium Management LLC
445 Park Avenue
Suite 1401
New York, New York 10022
Direct Dial: 646-589-0303
Fax: 646-589-0330
Email: [REDACTED]

IRS Circular 230 Disclosure: Pursuant to IRS regulations, I inform you that any tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, by any person or entity for the purposes of (i) avoiding tax related penalties imposed by any governmental tax authority, or (ii) proposing, marketing or recommending to another party any transaction or matter discussed herein. I advise you to consult with an independent tax advisor on your particular tax circumstances.

This communication and any attachment is for the intended recipient(s) only and may contain information that is privileged, confidential and/or proprietary. If you are not the intended recipient, you are hereby notified that further dissemination of this communication and its attachments is prohibited. Please delete all copies of this communication and its attachments and notify me immediately that you have received them in error. Thank you.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Thursday, January 23, 2014 5:39 PM
To: Ada Clapp
Subject: Re: RE-GRAT-ing

no, re grat thanks

On Thu, Jan 23, 2014 at 6:31 PM, Ada Clapp <[REDACTED]> wrote:

OK-good. Thanks. I just spoke with David Thompson at Empire and he thought it would be closer to a \$30 discount from the stock price. So, if \$34/share get discounted to \$24 Share, Leon would get closer to a 3% BFP interest (or about 3 million shares). Do you think this would change Leon's decision to re-GRAT? Shall I point this out? This is all such rough justice I am not sure it merits taking up his time. What do you think?

Ada Clapp

Elysium Management LLC
445 Park Avenue
Suite 1401
New York, New York 10022
Direct Dial: [646-589-0303](tel:646-589-0303)
Fax: [646-589-0330](tel:646-589-0330)
Email: [REDACTED]

IRS Circular 230 Disclosure: Pursuant to IRS regulations, I inform you that any tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, by any person or entity for the purposes of (i) avoiding tax related penalties imposed by any governmental tax authority, or (ii) proposing, marketing or recommending to another party any transaction or matter discussed herein. I advise you to consult with an independent tax advisor on your particular tax circumstances.

This communication and any attachment is for the intended recipient(s) only and may contain information that is privileged, confidential and/or proprietary. If you are not the intended recipient, you are hereby notified that further dissemination of this communication and its attachments is prohibited. Please delete all copies of this communication and its attachments and notify me immediately that you have received them in error. Thank you.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Thursday, January 23, 2014 5:01 PM
To: Ada Clapp
Subject: Re: RE-GRAT-ing

yes

On Thu, Jan 23, 2014 at 5:35 PM, Ada Clapp <[REDACTED]> wrote:

Hi Jeffrey,

Did Leon confirm in your meeting today that he wants to re-GRAT the BFP interests he will receive tomorrow? We are operating under the assumption that he will do so based on your recommendation. Alan and I just want to double check.

Thanks.

Ada Clapp
Elysium Management LLC
445 Park Avenue
Suite 1401
New York, New York 10022
Direct Dial: [646-589-0303](tel:646-589-0303)
Fax: [646-589-0330](tel:646-589-0330)
Email: [REDACTED]

IRS Circular 230 Disclosure: Pursuant to IRS regulations, I inform you that any tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, by any person or entity for the purposes of (i) avoiding tax related penalties imposed by any governmental tax authority, or (ii) proposing, marketing or recommending to another party any transaction or matter discussed herein. I advise you to consult with an independent tax advisor on your particular tax circumstances.

This communication and any attachment is for the intended recipient(s) only and may contain information that is privileged, confidential and/or proprietary. If you are not the intended recipient, you are hereby notified that further dissemination of this communication and its attachments is prohibited. Please delete all copies of this communication and its attachments and notify me immediately that you have received them in error. Thank you.

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein
Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein
Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved