

From: "jeffrey E." <jeevacation@gmail.com>
To: Melanie Spinella <[REDACTED]>
Subject: Fwd:
Date: Mon, 02 May 2016 15:59:37 +0000

brads going to present me his ideas on presentation. ? . re tra fire drill review. needs a goal. . not merely see what categories things fall into . amendments should be tailored for benefit. not just clarified.

----- Forwarded message -----

From: Brad Wechsler <[REDACTED]>
Date: Mon, May 2, 2016 at 11:53 AM
Subject: Re:
To: "jeevacation@gmail.com" <jeevacation@gmail.com>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Jeffrey-let me give you the top-line and others can fill in as necessary on the issues noted below and progress.

1. BRH k: key point is that both apo and pw have indicated that their read is that no two principals can take an action that is prejudicial to the thirds estate. This is key but must be socialized with marc and josh (by john s) and then be clearly reflected.

A. Of lesser importance, wendy is trying to push thru the 754 election at ap professionals, make certain an estate has access to "information rights", see if the three partners want mfn investment rights to continue past death and fix some language "clarifications.

Wendy is quarterbacking this and timing is apo dependent which means likely to be a process.

On some none "fire-drill" issues which are nonetheless quite impt, pls note:

2. People are comfortable with TRA transfer with respect to 2007 stock sales and, I believe, are expressing "sufficient comfort" with respect to a TRA transfer for future sales. There are definitely imbedded issues with respect to "completed gifts" and creating a separation from BRH without causing tax effects. Nonetheless, it appears we'll come out ok.

3. TIC still appears somewhat problematic to alan or said differently: I don't believe AH is comfortable with "nominal ownership and exclusive use".

4. We (and you) now know that a clat works and we can have an ultimate beneficiary as the foundation, a clat or both. You, leon and alan have to decide whether you want to "hard wire" the clat into the planning today (can do one that has some built in flexibility) or defer to a later date.

5. By later today or tomorrow I shld be able to show you "my take" on how to simply present the grat back-up.

Obviously feel free to reach out to any on and all for more detail on the above. B

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Monday, May 02, 2016 06:20 AM
To: Ada Clapp <[REDACTED]>; Brad Wechsler
Subject:

where are we with re do of fire drill docs

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