

From: "jeffrey E." <jeevacation@gmail.com>
To: Melanie Spinella <[REDACTED]>
Subject: Fwd: Fair Market Value Deduction Denied for Charitable Contribution
Date: Fri, 27 Mar 2015 14:33:18 +0000

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

From: Ada Clapp <[REDACTED]>
Date: Fri, Mar 27, 2015 at 9:50 AM
Subject: RE: Fair Market Value Deduction Denied for Charitable Contribution
To: "jeffrey E." <jeevacation@gmail.com>
Cc: Brad Wechsler <[REDACTED]>, "Halperin, Alan S" <[REDACTED]>

I read the CCA. Discussed it with Brad and we thought it was prudent to ask Alan's view on how it might affect our planning. Alan indicated that he wanted an associate to review the underlying cases and rulings so they could gage its application. We agreed. Once the associate did so, he memorialized his research and I asked that it also provide some guidelines.

Ada Clapp

Chief Legal Officer

Elysium Management LLC

[REDACTED]

[REDACTED]

[REDACTED]

Email: [REDACTED]

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From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Friday, March 27, 2015 9:36 AM

To: Ada Clapp

Cc: Brad Wechsler; Heather Gray; Richard Joslin; Halperin, Alan S

Subject: Re: Fair Market Value Deduction Denied for Charitable Contribution

was this communication initiated by us? or are they sending it to all their art clients. ??

On Fri, Mar 27, 2015 at 9:22 AM, Ada Clapp <[REDACTED]> wrote:

PRIVILEGED AND CONFIDENTIAL -ATTORNEY WORK PRODUCT

Attached is a memorandum prepared by Paul Weiss with respect to the recently issued Chief Counsel Advisory 201443019. For your information, the CCA is attached at the back of the memorandum.

Ada Clapp
Chief Legal Officer
Elysium Management LLC

[REDACTED]

Direct Dial: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

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