

From: Jeffrey Epstein <jeevacation@gmail.com>
To: Erika Kellerhals <[REDACTED]>
Subject: Re: EDC Certificate
Date: Tue, 18 Jun 2013 23:23:12 +0000

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On Tue, Jun 18, 2013 at 7:03 PM, Erika Kellerhals <[REDACTED]> wrote:

Jeffrey - we have received the Governor's approval and must now pick a commencement date for benefits to start. Technically - a beneficiary has a year from the date the Governor approves, but since STC has already started generating income that is, at the very least, subject to gross receipts tax, we should indicate a date prior to his approval. Jeanne suggested February 1, 2013 as I believe that STC was generating income that would be subject to the GRT at that point.

You do have the option to stagger the benefits. For example, you could elect to commence GRT benefits as of February 1, 2013 but elect a later date for the commencement of the income tax benefit if you believe that you will have a loss at year end. This means that while your GRT benefit would expire on January 31, 2023, the income tax benefit would continue until a date 10 years from the commencement date.

Please let me know your thoughts.

 Kellerhals Ferguson Fletcher Kroblin LLP

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