

From: "Fenn, Patrick" <[REDACTED]>
To: "[REDACTED]" <jeevacation@gmail.com>
Subject: Re:
Date: Fri, 28 Jun 2013 12:59:35 +0000

He appreciates that but is focused on timing of TRA payment on preferred (at death) vs TRA payment under current structure (on exchange). Can't separate TRA from preferred and basis step up in preferred only if part of estate. Transfer by estate to private foundation?

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Friday, June 28, 2013 05:21 AM
To: Fenn, Patrick
Subject:

you might point out to mark that the preferred can achieve the step up. without the tufts gain trigger, if one dies the estate tax consequence is funky, tra payment to estate? , no flexibility,

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