

**From:** Ada Clapp <[REDACTED]>  
**To:** "jeevacation@gmail.com" <jeevacation@gmail.com>  
**Subject:** RE: Gifts Before April 1, 2014-Change in NY law.  
**Date:** Mon, 03 Mar 2014 13:32:09 +0000

---

Hi Jeffrey-OK to move forward with this?

---

**From:** Ada Clapp  
**Sent:** Wednesday, February 26, 2014 11:20 AM  
**To:** jeevacation@gmail.com; [REDACTED]  
**Cc:** Eileen Alexanderson; Christopher L Hurtado; Richard Joslin  
**Subject:** Gifts Before April 1, 2014-Change in NY law.

Hi Jeffrey and Alan,

As you may know, New York currently does not impose a gift tax. However, Governor Cuomo's recent budget bill includes proposed changes to New York law that would generally have the effect of subjecting gifts made after March 31, 2014 to New York estate tax by including such gifts in the taxable estate for New York State estate tax purposes. The bill is expected to be passed by the New York legislature by April 1<sup>st</sup>.

In light of this possible change in the law, we should suggest to Debra that she make a gift to the Mallory Trust before the end of March of her available lifetime gift tax exemption (and also her GST tax exemption) amount. I understand from Tom that she would be able to make a gift of \$220,000 to which she could allocate both gift and GST tax exemption. **Do you agree?**

As per Tom, Leon has no Federal gift tax exemption available as the balance was fully utilized by taxable gifts Leon made in January and February of this year.

**Ada Clapp**  
Elysium Management LLC  
445 Park Avenue  
Suite 1401  
New York, New York 10022  
Direct: [REDACTED]  
Fax: [REDACTED]  
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.