

From: "jeffrey E." <jeevacation@gmail.com>
To: Ada Clapp <[REDACTED]>
Subject: Re: FW: Split Interest Purchase
Date: Fri, 06 Jun 2014 16:28:59 +0000

he can send

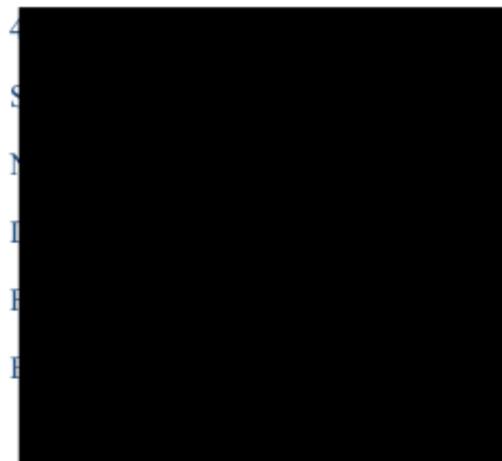
On Fri, Jun 6, 2014 at 10:23 AM, Ada Clapp <[REDACTED]> wrote:

Hi Jeffrey,

Attached are the slides Alan prepared to describe the townhouse purchase to Leon. Do you want him to send this directly to Leon or shall you or I simply forward to Leon?

Ada Clapp

Elysium Management LLC



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.

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From: Halperin, Alan S [mailto: [REDACTED]]
Sent: Friday, June 06, 2014 10:24 AM
To: Ada Clapp
Cc: Hurtado, Christopher L
Subject: Split Interest Purchase

Here is a brief summary of the planning strategy. Best. Alan

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Alan S. Halperin | Partner
Paul, Weiss, Rifkind, Wharton & Garrison LLP



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