

From: "jeffrey E." <jeevacation@gmail.com>
To: Melanie Spinella <[REDACTED]>
Subject: ulysses 2.0
Date: Fri, 29 May 2015 00:53:37 +0000

I realize it is only due to a lack of understanding of the job ahead. and not out of any sense of unwillingness to pay

- as opposed to merely hiring people to set up a family office, someone will have to do the following- separate from the art partnership which is my responsibility. there still needs to be a huge amount of work done for 2015,16. not to mention that brad at the moment is going to have train the incoming team?? your call

strategic decisions re estate and other planning, sale of phaidon etc. in addition setting up for the accounting for each strategy ie.: income, estate, gift, sales and use, transfer excise picasso, 1031 calder. review and detailed oversight of IRS SEC GAMING NYS. real estate, entity valuations (many) tax filings- disclosures, follow up of grats, trusts, defective trusts, llcs corps, trustees, partnerships. foreign corps. 100 bank account need to be rationalized, not only having brad step in to children investments. gift taxes, trust, loans, notes, payables, expenses allocations, insurance (life, art, split dollar), cashflows, operating biz, investments, contingent liabilities (funds, miami), commitments funds and charities, dividend treatment -important review of transactions relating to BRH (amendments) TRA sale (nuanced), shareholder agreements, bank loan agreements new bank relationships. wills, construction accounting and oversight, contracts planning permits etc. employee rules, regs, checking account reconciliations, credit cards, jewelry, cost basis, (art stock etc.) foundations regs, brokerage accts, stock options, (ie environmental solutions still not done!). estate tax calculation fire drill, (note, basis etc) review of boat expenses plane expenses, depreciation issues refunds etc. rationalize all outside counsels and accounting firms

Paul Weiss, Mcdermit Will, Macfarlanes, Price Waterhouse, Reich, withers bergman, Empire, akin gump, bbd seidman, Apollo in house counsel.

set up and oversee brokerage accounts at JPM DB GS and thoughtfully trade

. new IT system from top to bottom full time IT person

new accounting system - on-line banking coordinated with reports. fire drills as per caruci (he sounds good) and audit system, s.

review of john murphy? joslin? dag? eva?

in house, review household (12million) review, filings- partnership accounting, familiarity with grats, trusts etc. audit system put in place. that should be the easy part. then strategy re:

As new facts on the ground develop, phaidon debra, children meetings, involvement, trustees adjusted, stock sale sale of art, apt (large gain), 1031 trade in, plane depreciation, boat sale. construction, brad will oversee brokerage and investment, ?? pe?. real estate?, publishing, grats, tra, brh (death). foundation, museum, tax projections cash flow projections, coordination with tax from apollo. etc

you are sitting on over 100 m of cash????!!

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of

JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved