To: Jes Staley [redacted] Erdoes, Mary E [redacted]
Cc: Boris Nikolic [redacted]
From: Jeffrey Epstein
Sent: Wed 7/27/2011 11:41:41 PM
Subject: outline

	Private Foundation	**gates /jpm**
Valuation for charitable deduction: closely held stock s corp or c corp. or real estate,,	Cost Basis	Fair Market Value
Valuation of publicly traded securities	Fair Market Value	Fair Market Value
Income tax deduction - percentage of AGI, with 5 year carry over	30% for cash, 20% for appreciated assets	50% for cash, 30% for appreciated assets
Excise tax on investment income	1-2% of income	No excise tax
Set up expense and operations	takes money away from charity,	Je will pay set up. jpm operations
IRS approval process	Time consuming	none
Annual distribution requirement	5%	None
Investment options	need to hire , or use someone elses	worlds best managers, silos.
Preparation of tax returns, IRS compliance, accounting, grants management, fiduciary oversight, legal and audit , trustees , estate planning	Donor must arrange for these services	Provided by jpm world s most respected bank
Confidentiality	*None - All information is publicly available via form 990-PF	Donor has flexible options: Full recognition, or partial, or full anonymity

*Private foundations provide little confidentiality. . Today, anyone can access Guidestar (www.guidestar.org) to gain information on any private foundation, including a scanned version of its 990-PF. Available information includes balance sheet detail (including investment holdings, a listing of directors (including contact information), every grant that is made (organization name and amount), and detail of administrative and investment management expenses.

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