

To: McCaffrey, Carlyn [REDACTED]
From: Jeffrey Epstein
Sent: Wed 4/3/2013 2:53:13 AM
Subject: Re: Re:

understood , but in an audit situation would that open up the 97 trust and its amendments as opposed to waiting until after the final payment in aug?

On Tue, Apr 2, 2013 at 10:51 PM, McCaffrey, Carlyn <[REDACTED]> wrote:

If we decant the 97 trust into a new trust before the Judah Trust ends, the Independent Trustees can amend the Judah Trust so that its profits are distributed to the same trust that has received the assets of the 97 Trust.

Carlyn S. McCaffrey | Partner

McDermott Will & Emery LLP | 340 Madison Avenue, New York, NY 10173
[REDACTED]

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Tuesday, April 02, 2013 6:52 AM
To: McCaffrey, Carlyn
Subject: Re:

thanks as always .. also as the judah trust currently pours into the 97 trust ? , would you find it more reasonable to restate or decant after that event or can we make many amendments before aug. I thought tha might open up the old later on?

On Tue, Apr 2, 2013 at 6:49 AM, McCaffrey, Carlyn <[REDACTED]> wrote:

No - What you're describing is a purchase of the BFP interests for a note secured by the art. That's not a sale of the art.

Carlyn S. McCaffrey | Partner
McDermott Will & Emery LLP | 340 Madison Avenue, New York, NY 10173
[REDACTED]

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]

Sent: Monday, April 01, 2013 11:00 PM
To: McCaffrey, Carlyn
Subject:

would you see anything wrong with leon substituting a collateral note for the stock held by the trust. if the art was collateral for example?

--

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 Jeffrey Epstein
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

IRS Circular 230 Disclosure: To comply with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained herein (including any attachments), unless specifically stated otherwise, is not intended or written to be used, and cannot be used, for the purposes of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter herein.

This message is a PRIVILEGED AND CONFIDENTIAL communication. This message and all attachments are a private communication sent by a law firm and may be confidential or protected by privilege. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained in or attached to this message is strictly prohibited. Please notify the sender of the delivery error by replying to this message, and then delete it from your system. Thank you.

Please visit <http://www.mwe.com/> for more information about our Firm.

--

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 Jeffrey Epstein

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

--

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 Jeffrey Epstein

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