To: Jeffrey Epstein[jeevacation@gmail.com]
From: McGraw, Thomas
Sent: Wed 1/30/2013 11:03:08 PM
Subject: RE: happy new year

Been at offsite & just looking at your e-mail...... I think not. NY tax law incorporates by reference federal tax law as starting point and then makes various modifications. In brief review I see no changes under NY sales & use tax statutes that would trump/modify otherwise applicable fed law including grantor statutes incorporated into NY tax law. Hence substitution of identical value in grantor should not create a "sale" transaction or event for sales tax to apply.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Saturday, January 26, 2013 8:58 AM
To: McGraw, Thomas
Subject: happy new year

if i excahnge art held in his own name for stock held in the trst , do i have a sales tax. it is not a purchase-- as it is under a right of substituion of collateral provision, it is a defe gran trust so to capital gain, , if i put it in a partnership with wife first and excahnge part interests,? no sales tax?

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