To: Jeffrey Epstein[jeevacation@gmail.com]
From: Richard Joslin
Sent: Thur 12/12/2013 8:28:16 PM
Subject: just an fyi
Pilgrim'sPrideDiv.Dawson.TC.WPD.pdf

this Tax Court case indicates 1234A applies to the abandonment of actual capital assets and is not limited solely to the abandonment of derivative rights with respect to capital assets. The holding will shoot down argument that an abandonment of a partnership interest or a non-security gives rise to an ordinary loss. Abandoning a partnership interest will be a sale or exchange of a capital asset. *Echols* and Rev Rul 93-80 is moot

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Richard Joslin
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c/o Apollo Management
[redacted]