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**From:** Brad Wechsler [REDACTED]  
**Sent:** Friday, June 5, 2015 12:36 PM  
**To:** 'jeevacation@gmail.com'; 'r [REDACTED]'; [REDACTED]  
**Subject:** Re: to create a boat file

Jeffrey-thank you; this is extremely helpful. We had a paralegal put together a loose leaf binder but we'll use this (a) as a guide to fill in the gaps and (b) as back-up for our dialogue with Rick Bronstein of PW who is going to help us nail down correct tax treatment in context of our overall discussion the other day. B

From: jeffrey E. [mailto:jeevacation@gmail.com]  
Sent: Friday, June 05, 2015 08:19 AM  
To: Brad Wechsler; Richard Joslin [REDACTED] Melanie Spinella [REDACTED]  
Subject: to create a boat file

1. Statement of taxpayer's boating experience.
2. Copies of potential charterers.
3. Purchase agreement, Bill of Sale and Invoice, and all canceled checks showing verification of yacht purchase.
4. Statement of actions taken to investigate boat 5. Name and address of all charterers and their lease agreement.
6. Schedule of fees or charges billed to charters.
7. Copies of original loan agreements/promissory notes on financed portion of property.
8. Insurance policy(s) on yacht and its contents (collision and liability).  
  
Note to examiner: Does policy cover rental of boat?
9. Copy of First Preferred Ship Mortgage.

10. Promotional materials and charter sailing brochures for yacht.
11. Invoices and ad copies for advertisements on availability of yacht for rental.
12. Copies of any management agreements or management contracts for boat supervision, maintenance, or operation.
13. Ships log(s) for engine and/or boat use.
14. Maintenance records and service check performance records.
15. Certificate of Origin.
16. Certification of Documentation from U.S. Coast Guard.
17. Copy of commercial captain's license.

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please note

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