
From: Barry J. Cohen [REDACTED]
Sent: Wednesday, September 20, 2017 8:43 PM
To: jeffrey E.
Cc: Melanie Spinella (Spinella@ApolloLP.com); Brad Wechsler
Subject: Re: EY audit experience

Yes. We have all of their comments. I hope to circulate shortly. =

Sent from my iPhone

On Sep 20, 2017, at 3:54 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com>> wrote:

very talented , question. has any=of them thoroughly reviewed the draft return ,

On Wed, Sep 20, 2017 at 3:38 PM, Barry J. Cohen =span dir="ltr"><[REDACTED].com> wrote:

Here is the summary we have on audit experience of o=r EY team.

John Cook --= Partner PCS

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- * Significant number of Federal=compliance audits (line by line)
- * Federal audits on:<=u>

- *
- * At-Risk Limitations & basis
- * Schedule Cs
- * Charitable contribution a=d investment interest expense tracing

- * Gift tax audits
- * Significant number of NYS and CT &=8211; Statutory residency, domicile and income allocation

audits=/u>

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David Kirk-=; Partner – National Tax PCS

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- * About 50% of the a=dits are Global High Wealth
- * Most of the matters involve=treatment of pass-through items on the 1040s – passive loss, at-risk= interest tracing and SE tax

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Elda Di Re=; Partner – National Tax PCS

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- * 5 Gift Tax Audits=/u>
- * 6 Federal compliance audits (audit of each line of return)=u>
- * Dozens of regular 1040 audits

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Greg Rosica R=1; Partner Tax

Significant experience=representing clients in Federal and state (NY, NJ, CT, GA, CA) audits incl=ding:

- Complex financial tr=nsactions (distressed debt, related party transactions) involving individu=ls and their pass through entities

- Audits of passive v =ctive status
- Support for business=use of assets (real estate, airplanes, yachts, art, equestrian)<=u>
- Investment v trade o= business classification (cap gain v ordinary, developer v investor)
- Equity v debt treatm=nt in real estate transactions

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Mitchell Kops &#=211; Principal – National ITS

Some audit experience =t Withers including:

- *
- * Private plane
- * Foreign Tax credit/deduction matter

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Joseph Fuschetto=– Executive Director – PCS

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- * Federal =udits of Schedule Cs
- * Federal Audits of Schedule E=; passive v active, at-risk
- * Multiple gift tax audits=/u>
- * NYS residency and income allocation audits=/li>

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Surya Shivakumar &#=211; Senior Manager – PCS

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- * NJ audits R=1; full substantiation of all lines and adjustments
- * NYS=residency & income allocation audits

Barry J. Cohen =|

Elysium Management,=LLC |

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