
From: Barry J. Cohen [REDACTED] >
Sent: Wednesday, September 20, 2017 7:38 PM
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Cc: Melanie Spinella [REDACTED]; Brad Wechsler
Subject: EY audit experience

Here is the summary we have on audit experience of our EY team.

John Cook — Partner PCS

- * 2 or 3 High Wealth Audits
- * Significant number of Federal compliance audits (line by line)
- * Federal audits on:
 - * Passive versus active
 - * At-Risk Limitations & basis
 - * Schedule Cs
 - * Charitable contribution and investment interest expense tracing
- * Gift tax audits
- * Significant number of NYS and CT – Statutory residency, domicile and income allocation audits

David Kirk — Partner – National Tax PCS

- * Spends 75-100 hours a year on audits
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- * Most of the matters involve treatment of pass-through items on the 1040s & passive loss, at-risk, interest tracing and SE tax

Elda Di Re — Partner – National Tax PCS

- * 5 Global High Wealth Audits
- * 5 Gift Tax Audits
- * 6 Federal compliance audits (audit of each line of return)
Dozens of regular 1040 audits

Greg Rosica — Partner Tax

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

- Complex financial transactions (distressed debt, related party transactions) involving individuals and their pass through entities

- Audits of passive v active status

- Support for business use of assets (real estate, airplanes, yachts, art, equestrian)

- Investment v trade or business classification (cap gain v ordinary, developer v investor)

- Equity v debt treatment in real estate transactions

Mitchell Kops – Principal – National ITS

Some audit experience with Withers including:

- * Tax shelters, passive versus active
- * Private plane
- * Foreign Tax credit/deduction matter

Joseph Fuschetto – Executive Director – PCS

- * Many Federal compliance audits (line by line)
- * Federal audits of Schedule Cs
- * Federal Audits of Schedule E – passive v active, at-risk
- * Multiple gift tax audits
- * NYS residency and income allocation audits

Surya Shivakumar – Senior Manager – PCS

- * Federal compliance audits (line by line)
- * NJ audits – full substantiation of all lines and adjustments
- * NYS residency & income allocation audits

Barry J. Cohen –

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