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

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

John Cook -- Partner PCS

- \* 2 or 3 High Wealth Audits
- \* Significant number of Federal compliance audits (line by line)</i>
- \* Federal audits on:
  - \* Passive versus active
  - \* At-Risk Limitations & basis
  - \* Schedule Cs
  - \* Charitable contribution and investment interest expense tracing<=li>
- \* 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
- \* Most of the matters involve treatment of pass-through items on the 1040s &#=211; 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)
  - <=i class="MsoListParagraph" style="color:#1F497D; margin-left:-15.6pt; ms=-list:l1 level1 lfo2"> Dozens of regular 1040 audits

Greg Rosica R=1; Partner Tax

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

- 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 at 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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