
From: jeffrey E. <jeevacation@gmail.com>
Sent: Tuesday, August 25, 2015 9:55 PM
To: Brad Wechsler
Subject: Re: Boat

Be10?

On Tuesday, August 25, 2015, Brad Wechsler <[REDACTED]> wrote:

Jeffrey,

Just to be clear:

1. A0 The boat is owned by a foreign corporation.<u>
2. A0 The boat is currently treated as a partnership for US tax purposes.
3. A0 We intend to change that status to a foreign corporation for US tax purposes.
4. A0 This will enable us to deduct our capital loss on sale
5. A0 As per Rich J, we will file the following election and disclosure forms: 8832 and 926 (reflecting our conversion for tax purposes from a partnership to a foreign corporation) and, then, until sale of boat 926 and 5471 (which is an information return for US persons with respect to certain foreign corporations).
6. A0 If there are issues to discuss, particularly with respect to the 2014 taxes and the 14-day issue, let's do it quickly with Rich Joslin, Rick Bronstein and Glenn Stanke (maritime tax).</>

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C2 please note

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