
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:=br>

Je=frey,

Ju=t 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 =ax purposes.
3. =A0 We intend to change that status to a foreign corporati=n 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 resp=ct to the 2014 taxes and the 14-day issue, let's do it quickly wit= Rich Joslin, Rick Bronstein and Glenn Stankee (maritime tax).</=>

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=C2 please note

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