
From: jeffrey E. <jeevacation@gmail.com>
Sent: Monday, March 9, 2015 5:01 PM
To: Melanie Spinella
Subject: Fwd: FW: Ben's 2012 Gift Tax Return

Tweedle dum and dee still in loop

-----=Forwarded message -----

From: Ada Clapp <A[REDACTED]>
Date: Monday, March 9, 2015
Subject: FW: Ben's 2012 Gift Tax Return
To: "jeffrey E." <jeevacation@gmail.com>
Cc: Brad Wechsler <[REDACTED]> <[REDACTED]>

FYI

</=pan>

</=pan>

From: Ada Clapp
Sent: Monday, March 09, 2015 12:03 PM
To: Thomas Turrin; Richard Joslin
Cc: Halperin, Alan S; Brad Wechsler; Eileen Alexanderson
Subject: RE: Ben's 2012 Gift Tax Return

Michael Shenker called Alan today in connection with the IRS's audit of Ben's gift tax return. Michael wanted Alan to confirm for him that he understood the facts surrounding the Note and the gift. After Alan did so, Michael indicated that he wanted to think about it further but was inclined toward a "no change" determination.

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Alan will keep us posted if he hears anything further. We would appreciate it if you would do the same.

</=pan>

Thanks!<=span>

</=pan>

Ada Clapp=</u>

Chief Legal Officer=</u>

Elysium Management LLC=>

445 Park Avenue=>

Suite 1401<=>

New York, New York 100=2

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From: Thomas Turrin [ma=ltc<[REDACTED]>];>]
Sent: Wednesday, February 04, 2015 6:40 PM
To: Ada Clapp
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson; Brad Wech=ler
Subject: Re: Ben's 2012 Gift Tax Return

I agree...I normally let them get =ack to me. If we had not responded, he most likely would have =ontacted me.

Sent from my Verizon Wireless 4= LTE DROID

Ada Clapp <AClapp@elysllc.com <javascript:_e(%7B%7D,'cvml','AC=app@elysllc.com');> > wrote:

No need (unless you th=nk it advantageous to do so). Just wondered. Thanks.

Ada Clapp

Chief Legal Officer

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New York, New York 10022

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From: Thomas Turrin (mailto:[REDACTED])
Sent: Wednesday, February 04, 2015 6:20 PM
To: Ada Clapp
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson; Brad Wechsler
Subject: RE: Ben's 2012 Gift Tax Return

Ada,

I have not heard from the agent.

I will follow up tomorrow.

Tom

THOMAS TURRIN, CPA

Partner

Raich Ende Malter & Co. LLP

1375 Broadway

New York, New York 10018



Email: [Redacted]

Website: www.rem-co.com <<http://www.rem-co.com>>

From: Ada Clapp [mailto:AClapp@elysllc.com]
Sent: Wednesday, February 04, 2015 6:12 PM
To: Thomas Turrin
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson; Brad Wechsler
Subject: RE: Ben's 2012 Gift Tax Return

Hi Tom,<=>

Hope you are well. =A0 Any response from the auditor?

Ada Clapp

Chief Legal Officer

Elysium Management LLC

445 Park Avenue

Suite 1401

New York, New York 10022



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From: Thomas Turrin [mailto:[REDACTED]]
Sent: Thursday, January 08, 2015 12:49 PM
To: Ada Clapp
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson
Subject: RE: Ben's 2012 Gift Tax Return

Ada,

Attached is copy of complete response – the original is being mailed today via certified mail.

The password to the pdf is my office zip code. ..below.

Tom</=>

THOMAS TURRIN, CPA

Partner


Raich Ende Malter & Co. LLP

1375 Broadway

New York, New York =0018

Email:  >

Website: www.rem-co.com <<http://www.rem-co.com>>

From: Ada Clapp [mailto:
Sent: Thursday, January 08, 2015 11:08 AM
To: Thomas Turrin
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson
Subject: RE: Ben's 2012 Gift Tax Return

Thank you!</=>

Ada Clapp

Chief Legal Officer

Elysium Management LLC

445 Park Avenue

Suite 1401

New York, New York 10022

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From: Thomas Turrin [mailto:];>]
Sent: Thursday, January 08, 2015 10:56 AM
To: Ada Clapp
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson
Subject: RE: Ben's 2012 Gift Tax Return

Ada,

I think the response is fine as is. Will include cc to Ben on letter.

Rich is sending POA today...just got his email.

I will forward complete copy to you for your file.

Tom

THOMAS TURRIN, CPA

Partner

Raich Ende Malter & Co. LLP

1375 Broadway

New York, New York 10018



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Website: www.rem-co.com <<http://www.rem-co.com>>

From: Ada Clapp [mailto:[REDACTED]]
Sent: Thursday, January 08, 2015 10:48 AM
To: Thomas Turrin
Cc: Halperin, Alan S; Richard Joslin; Eileen Alexanderson
Subject: RE: Ben's 2012 Gift Tax Return

Hi Tom,<=>

Just checking in to see if you would like any changes to the audit response letter (as a reminder= I am out next week). Also, would you kindly add Ben as a "c=" to the letter. I would be grateful if you would also send me a copy of the final letter, with attachments for our files.=C2

Do you now have the Form 2848?

Best regards,

Ada Clapp

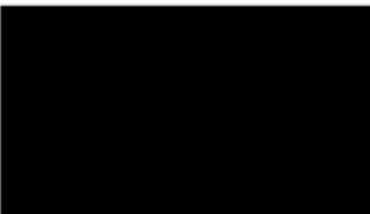
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From: Ada Clapp

Sent: Tuesday, January 06, 2015 11:09 AM

To: CPA Thomas Turrin (tturrin@rem-co.com <javascript:_e(%7B%7D,'cvml','tturrin@rem-co.com');>)=br> Cc:

Halperin, Alan S

Subject: Ben's 2012 Gift Tax Return

Importance: High

Hi Tom,

Happy new year! We haven't spoken in a while and I hope that you have been well.

I just left you a voicemail regarding the audit of Ben's 2012 Gift Tax Return. Attached is a proposed response to Michael Shenker's most recent request for information. As you know, our reply is due by January 15th. Alan and I prepared the attached letter for your signature (that is, if you approve of it, of course). As you can see, the proposed reply is as brief as possible while still being responsive to Mr. Shenker's requests. Given the complex series of steps involved in the issuance of the \$5.12 million note, Alan and I are pretty certain Shenker will have additional questions and ask for additional documents. I just wanted to be sure that you were familiar with all the background.

I am available this week (but out of the country all next week), should you wish to discuss or to have me make changes to the letter. In my absence, please speak with Alan.

Rich J. is getting Ben to sign the IRS power of attorney in favor of you and Alan. I assume you will need to send that with the attached letter, so I have referenced it therein. Please follow up with Rich to obtain the 2848.

Thanks!

Ada Clapp

Chief Legal Officer

Elysium Management LLC

445 Park Avenue

Suite 1401

New York, New York 10022



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=C2

=C2

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