
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 <[REDACTED]>
Date: Monday, March 9, 2015
Subject: FW: Ben's 2012 Gift Tax Return
To: "jeffrey E=" <jeevacation@gmail.com<=a>>
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 gif= tax return. Michael wanted Alan to confirm for him that he understo=d 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.

</=pan>

Alan will keep us post=d if he hears anything further. We would appreciate it if you would =o the same.

</=pan>

Thanks!<=span>

</=pan>

Ada Clapp=/u>

Chief Legal Officer=/u>

Elysium Management LLC=u>

445 Park Avenue=u>

Suite 1401</=>

New York, New York 100=2

[REDACTED]
avascript:_e(%7B%7D,'cvml [REDACTED]');= target=> =/u>

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</=pan>

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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From: Thomas Turrin [ma=ito[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,<=u>

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 =0018



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 Wech=ler
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=/span>

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New York, New York 100=2



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From: Thomas Turrin [ma=lto: [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,<=u>

Attached is copy of co=plete response – the original is being mailed today via<=u>
certified mail. =C2

The password to the pd= is my office zip code. ..below.

Tom</=>

THOMAS TURRIN, CPA

Partner

Raich Ende Malter & Co. LLP

1375 Broadway

New York, New York =0018



Email: [REDACTED]>

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

From: Ada Clapp [mailto:[REDACTED]]
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 100-2

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From: Thomas Turrin [mailto: [REDACTED]]
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,<=u>

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

Rich is sending POA to=ay...just got his email.

I will forward comple= copy to you for your file.

Tom</=>

THOMAS TURRIN, CPA

Partner

Raich Ende Malter & Co. LLP

1375 Broadway

New York, New York 10018

 span> <javascript:_e(%7B%7D,'cvml', [REDACTED]);#39;);>

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 "cc" 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

Chief Legal Officer

Elysium Management LLC=/span>

445 Park Avenue=u>

Suite 1401</=>

New York, New York 100=2



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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 B=n's 2012 Gift Tax Return. Attached is a proposed response to=Michael Shenker's most recent request for information. As yo= 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 prop=sed reply is as brief as possible while still being responsive to Mr. Shenker's requests. Given the comple= series of steps involved in the issuance of the \$5.12 million note, Alan =nd 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 =his 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 spe=k with Alan.

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

Thanks!

Ada Clapp

Chief Legal Officer

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Suite 1401

New York, New York 10022

[REDACTED]
[REDACTED] javascript:_e(%7B%7D,'cv=l',[REDACTED]);>

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=C2

=C2

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