
From: Barry J. Cohen [REDACTED]
Sent: Wednesday, December 27, 2017 3:13 PM
To: jeffrey E.
Subject: Short answers to some questions--PRIVILEGED AND CONFIDENTIAL

Boat. BJA (foreign co.) sells boat at = loss in 2018. BJA is then liquidated resulting in a loss to its domestic owner.

Plane. Even if we get around the domestic flights issue, we don't have nearly enough passive income to use the 100% depreciation expense.

Foreign entities. Agree with you that this will be an IRS focus, but think it will be more 2019-2021.</=>

Dealer. Doing research on income tax implications of trade ins.

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