
From: Barry J. Cohen <[REDACTED]>
Sent: Wednesday, September 20, 2017 11:27 AM
To: jeffrey E.
Subject: Re: Phaidon

Our experience too.

Sent from my iPhone

On Sep 20, 2017, at 7:24 AM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@g=ail.com> > wrote:

btw, they are really smart. . however in=no way proactive .

On Wed Sep 20 2017 at 7:13 AM, Barry J. Cohen <[REDACTED]> <[REDACTED]> > wrote:

Happy New Year!

Sent from my iPhone

On Sep 19, 2017, at 11:03 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@=mail.com> > wrote:

Its ok. Happy new year. Talk next week

<[REDACTED]> 17 at 9:11 PM [REDACTED]

all the names before. 5-6 EY people have told us that they have experience with audits. = I thought I gave you

<=r>

I=will get you a list of everyone we talk to at every firm who has audit exp=rience!

Sent from my iPhone

On Sep 19, 2017, at 7:04 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@g=ail.com> > wrote:

do they have names ??????!!!!

<mailto:[REDACTED]> wrote:

On Tue, Sep 19, 2017 at 5:28 PM, Barry J. Cohen <[REDACTED]>

Phaidon may be \$30MM.

have it. Others less so.

You are consumed with audit experience! Some of our tax team (mostly =Y)

Sent from my iPhone

On Sep 19, 2017, at 5:09 PM, jeffrey E. <jeevacation@gmail.com>

<mailto:jeevacation@gmail.com> > wrote:

I actually dont care whether or not he agrees . I would as= that you merely inquire as to how many 1040 fed audits 1040 l=rge case or 10 40 wealth squad audits hes actually managed or participated =n.

transa=tion.? how much loss do you think you can generate this year with a phaidon

<mailto:[REDACTED]> wrote:

On Tue, Sep 19, 2017 at 4:29 PM, Barry J. Cohen <[REDACTED]>

He is agreeing with you on gift tax returns. =an't leave everything blank.

From: jeffrey E. [mailto:jeevacation@gmail.com]

Sent: Tuesday, September 19, 2017 4:25 PM

To: Barry J. Cohen <[REDACTED]>

Subject: Re: 000's

think about it, again, ask j=e how many 1040 audits he has done. . what size. h=w complex. when we file a grat, we cal=late the gift explicity at zero. . it =s the calculation of a gift minus the annuity. It is sim=le math. no more 2 minus (1&=43;1) does not equal NONE

href="mailto:[REDACTED]&et="_blank"> On Tue, Sep 19, 2017 at 4:19 PM, Barry J. Cohen <[REDACTED]>

Fair enough.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:19 PM
To: Barry J. Cohen [REDACTED]
Subject: Re: 000's

dumb!!!!!!!, as i told you, =omputers dont read letters

On Tue, Sep 19, 2017 at 4:15 PM, Barry J. Cohen BCohen@elysllc.com<=a>> wrote:

Sorry I misunderstood on the 000s. Gift tax r=turns have to report a number somewhere, so maybe statute doesn't start.=nbsp; But if you filed an income tax return for an entity with no income or expenses, Joe V assumes the statute would start. I= any event, we don't file returns that way. As I said, we would sa= "None" where appropriate.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:09 PM
To: Barry J. Cohen <[REDACTED]>
Subject: Re: 000's

i did not suggest you use the 000 method. = Im sorry but i dont have the time
. do you =hink if you filed a gift tax return and left everything blank the st=tue would run?

On Tue, Sep 19, 2017 at 4:03 PM, Barry J. Cohen BCohen@elysllc.com<=a>> wrote:

John Cook at EY said they would not sign a return th=t uses the 000s method. They said that there are too many footing pr=blems. Numbers won't tie to K-1s, W-2s, 1099s, etc. Also, if=you only use it on part of the return, the various numbers on the return would not match internally. He also pointed ou= that this method effectively truncates numbers; though I'm not sure wha= rounding rules you use. E.g., 101,499 become 101? What happen= to the other \$499?

<https://maps.google.com/?q=445+Park+Avenue+Suite&#=3;1401____%0D+New+York,+NY+10022+%3Chttps://maps.google.com/?q%3D445%2BPark%2BAvenue%2BSuite%2B1401%250D%2BNew%2BYork,%2BNY%2B100=2%26entry%3Dgmail%26source%3Dg%3E&entry=gmail&source=g>

Joe V likes the idea of putting in 0's instead of =lanks. He says he uses "none".
He did not understand why t=is would affect the statute of limitations.

Barry J. Cohen =|

Elysium Management,=LLC |

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<tel:(917)%20941-0270>

bcohen@elysll=.com <mailto:bcohen=elysllc.com>

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please no=e

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