

---

**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 =span dir="ltr">> [REDACTED]

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]

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

<=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:[barry.j.connef-spani@att.com](#)> On Tue, Sep 13, 2017 at 3:28 PM, Barry J. Connef -spani>

<mailto:[\[REDACTED\]](#)> | Note:

Phaidon may be \$30MM.

You are consumed with audit experience! Some of our tax team (mostly =Y) have it. Others less so.

Sent from my iPhone

On Sep 19, 2017, at 5:09 PM, jeffrey E. <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=rg case or 10 40 wealth squad audits hes actually managed or participated =n.

how much loss do you think you can generate this year with a phaidon transaction.?

On Tue, Sep 19, 2017 at 4:29 PM, Barry J. Cohen =span><mailto:  
<mailto:**wrote:**

On Tue, Sep 19, 2017 at 4:29 PM, Barry J. Cohen =span><

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

On Tue, Sep 19, 2017 at 4:19 PM, Barry I. Cohen <[Barry.I.Cohen@...](mailto:Barry.I.Cohen@...)> wrote:  
<http://www.w3.org/2001/sw/ld/2017/09/19/ld-issues.html>

Fair enough.

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

dumb!!!!!!1, as i told you, =omputers dont read letters

On Tue, Sep 19, 2017 at 4:15 PM, Barry J. Cohen <=a href="mailto:BCohen@elysllc.com" target="\_blank">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](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 <=a href="r[REDACTED]>

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&#31401\\_\\_\\_\\_\\_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](https://maps.google.com/?q=445+Park+Avenue+Suite&#31401_____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 this would affect the statute of limitations.

Barry J. Cohen =|

Elysium Management,=LLC |

445 Park Avenue Suite 1401

<<https://maps.google.com/?q=445+Park=%2343;Avenue+Suite+1401%0D+New+York,+NY+10022&en=ry=gmail&source=g>>

New York, NY 10022

<<https://maps.google.com/?q=445+Park=%2343;Avenue+Suite+1401%0D+New+York,+NY+10022&en=ry=gmail&source=g>>

|

Tel. (646) 589-0322 <tel:(646)%20589-0322> | Cell (917) 941-0270

<tel:(917)%20941-0270>

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

--

please no=e

The information contained in this communication is confidential, may be attorney-client privileged, may

constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com)

<mailto:jeevacation@gmail.com> , and

destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

--

please no=e

attorney-client privileged, may

The information contained in this communication is confidential, may be

constitute inside information, and is intended only for  
the use of the addressee. It is the property of  
JEE

Unauthorized use, disclosure or copying of this  
communication or any part thereof is strictly prohibited  
and may be unlawful. If you have received this  
communication in error, please notify us immediately by  
return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com)

[, and](mailto:jeevacation@gmail.com)

destroy this communication and all copies thereof,  
including all attachments. copyright -all rights reserved

--

please no=

attorney-client privileged, may

The information contained in this communication is confidential, may be

constitute inside information, and is intended only for  
the use of the addressee. It is the property of  
JEE

Unauthorized use, disclosure or copying of this  
communication or any part thereof is strictly prohibited  
and may be unlawful. If you have received this  
communication in error, please notify us immediately by  
return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com)

[, and](mailto:jeevacation@gmail.com)

destroy this communication and all copies thereof,  
including all attachments. copyright -all rights reserved

--

please note

The information contained in this communication is  
confidential, may be attorney-client privileged, may  
constitute inside information, and is intended only for  
the use of the addressee. It is the property of  
JEE

Unauthorized use, disclosure or copying of this  
communication or any part thereof is strictly prohibited  
and may be unlawful. If you have received this  
communication in error, please notify us immediately by

return e-mail or by e-mail to jeevacation@gmail.com  
<mailto:jeevacation@gmail.com> , and  
destroy this communication and all copies thereof,  
including all attachments. copyright -all rights reserved

--

please note

The information contained in this communication is  
confidential, may be attorney-client privileged, may  
constitute inside information, and is intended only for  
the use of the addressee. It is the property of  
JEE

Unauthorized use, disclosure or copying of this  
communication or any part thereof is strictly prohibited  
and may be unlawful. If you have received this  
communication in error, please notify us immediately by  
return e-mail or by e-mail to jeevacation@gmail.com

<mailto:jeevacation@gmail.com> , and  
destroy this communication and all copies thereof,  
including all attachments. copyright -all rights reserved

--

please note

The information contained in this communication is  
confidential, may be attorney-client privileged, may  
constitute inside information, and is intended only for  
the use of the addressee. It is the property of  
JEE

Unauthorized use, disclosure or copying of this  
communication or any part thereof is strictly prohibited  
and may be unlawful. If you have received this  
communication in error, please notify us immediately by  
return e-mail or by e-mail to jeevacation@gmail.com <mailto:jeevacation@gmail.com> , and  
destroy this communication and all copies thereof,  
including all attachments. copyright -all rights reserved

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of

JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to [jeevacation@gmail.com](mailto:jeevacation@gmail.com) <<mailto:jeevacation@gmail.com>> , and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved