
From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, September 20, 2017 11:24 AM
To: Barry J. Cohen
Subject: Re: Phaidon

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

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

On Tue, Sep 19, 2017 at 9:11 PM Barry J. Cohen <[REDACTED]> <mailto:[REDACTED]> > wrote:

5-6 EY people have told us that they have experience with audits. =A0 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 ??????!!!!

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

Phaidon may be \$30MM.

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

Sent from my iPhone

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

I actually don't care whether or not he agrees. I would ask that you merely inquire as to how many 1040 fed audits 1040 large case or 1040 wealth squad audits he's actually managed or participated in.

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 <BCohen@elysllc.com>
<mailto:[REDACTED]> > wrote:

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

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:25 PM
To: Barry J. Cohen <[REDACTED]> <mailto:BCohen@elysllc.com> >
Subject: Re: 000's

think about it, again, ask me how many 1040 audits he has done. what size. how complex. when we file a gift, we calculate the gift explicitly at zero. it's the calculation of a gift minus the annuity. It is simple math. no more 2 minus (1+) does not equal NONE

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

Fair enough.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:19 PM
To: Barry J. Cohen <[REDACTED]> <mailto:BCohen@elysllc.com> >
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 [REDACTED]<a>> wrote:

Sorry I misunderstood on the 000s. Gift tax r=turns have to report a number somewhere, so maybe statute doesn't =tart. 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 wo=ld say "None" where appropriate.

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

i did not suggest you use the 000 method. =A0 Im sorry but i dont have the time . do yo= think if you filed a gift tax return and left everything blank the =tatue would run?

On Tue, Sep 19, 2017 at 4:03 PM, Barry J. Cohen [REDACTED]<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. Al=o, 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 su=e what rounding rules you use. E.g., 101,499 become 101? What =appens to the other \$499?

<https://maps.google.com/?q=445+Park+Avenue+Suite+1401____%0D+N=w+York,+NY+10022+%3Chttps://maps.google.com/?q%3D445%2BPark%2BAvenue%2BSui=e%2B1401%250D%2BNew%2BYork,%2B10022%26entry%3Dgmail%26source%3Dg%3E&a=p;entry=gmail&source=g>

Joe V likes the idea of putting in 0's inste=d of blanks. He says he uses "none". He did no= understand why this would affect the statute of limitations.

Barry J. Cohen =A0|

Elysium Management,=LLC |

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

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