
From: jeffrey E. <jeevacation@gmail.com>
Sent: Wednesday, September 20, 2017 3:03 AM
To: Barry J. Cohen
Subject: Re: Phaidon

Its ok. Happy new year. Talk next week </=iv>

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

5-6 EY people have told us that they have experience with audits. =A0 I thought I gave you all the names before.

I will get you a list =f everyone we talk to at every firm who has audit experience!

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 =span> [REDACTED]
<mailto:[REDACTED]> wrote:

Phaidon may be \$30MM.

=br>

=ou 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
<mailto:jeevacation@g=ail.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.

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

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

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+=) does not equal NONE

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

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 <=a href="mailto:[REDACTED]> 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]>
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 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+New+York,+NY+10022+%3Chttps://maps.google.com/?q%3D445%2BPark%2BAvenue%2BSuite%2B1401%250D%2BNew%2BYork,+2BNY%2B10022%26entry%3Dgmail%26source%3Dg%3E&entry=gmail&source=3Dg>

Joe V likes the idea of putting in 0's i=stead of blanks. He says he uses "none". He di= not understand why this would affect the statute of limitations.

Barry J. Cohen =A0|

Elysium Management,=LLC |

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[REDACTED]

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please no=e

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