

---

**From:** J <jeevacation@gmail.com>  
**Sent:** Sunday, October 7, 2018 7:03 PM  
**To:** Alan Dlugash  
**Subject:** Re: leon

I sent the nys return

On 10/7/18, Alan Dlugash <[REDACTED]> wrote:  
> 2017 tax return additional discussion points (not including the issues  
> for which we have already received a response, even though they don't  
> fully address our issues):  
>  
> 1) investment interest - should some be allocated to business  
> activities to avoid limitations - e.g., Regan Arts has no interest  
> expense  
> 2) because of both inv int and AMT inv int limitations, have we  
> analyzed whether it is likely that they will be utilizeable in the  
> future, and if not, allocate some against long term cap  
> gains/qualified div 3)Regan Arts cgs is greater than sales. Should  
> some cgs items (like asset  
> sales) be better used as operating exp, improving cgs ratio  
> 4) Not really relevant for this return since not in AMT and 2%  
> deductions being utilized, but for 2018 and beyond should look to  
> capitalize some against assets  
> 5) Any appreciated stock to use to make charitable contributions?  
> 6) potentially dangerous juxtaposition - total for passive loss column  
> on statement 50 says \$294,107,122. It is really \$4,107,122, with the "29"  
> attached from the column to the left.  
> 7)stmt 382 - why would cost not be "qualifying basis" for purposes of  
> reportable transactions  
>  
>  
> Not sure that there would be any issues, but I don't believe we've  
> seen a draft of the NY return.  
>  
> On Fri, Oct 5, 2018 at 6:33 PM J <jeevacation@gmail.com> wrote:  
>  
>> please put all your suggestions in a memo. and questions thx  
>>  
>> --  
>> 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,

>> and destroy this communication and all copies thereof, including all  
>> attachments. copyright -all rights reserved  
>>  
>  
>  
> --  
> Alan J. Dlugash  
> Alan J. Dlugash LLC  
> 767 Third Avenue - 36th Floor  
> New York, NY 10017  
> [REDACTED]  
> [REDACTED]  
> [REDACTED]  
>

--

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, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved <?xml version="1.0" encoding="UTF-8"?> <!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">

<plist version="1.0">

<dict>

<key>conversation-id</key>

<integer>326169</integer>

<key>date-last-viewed</key>

<integer>0</integer>

<key>date-received</key>

<integer>1538938954</integer>

<key>flags</key>

<integer>8590195713</integer>

<key>remote-id</key>

<string>859955</string>

</dict>

</plist>