
From: jeffrey E. <jeevacation@gmail.com>
Sent: Tuesday, September 19, 2017 9:09 PM
To: Barry J. Cohen
Subject: Re: 000's

I actually dont care whether or not he agrees . =C2 I would ask that you merely inquire as to how many 1040 fed audits=C2 1040 large case or 10 40 wealth squad audits hes actually mana=ed or participated in.

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

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

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]> <mailto:[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]" 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:[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 <mailto:[REDACTED]> wrote:

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

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

i did not suggest you use the 000 method. I'm sorry but i don't have the time. do you think if you filed a gift tax return and left everything blank the statute would run?

On Tue, Sep 19, 2017 at 4:03 PM, Barry J. Cohen <mailto:[REDACTED]> wrote:

John Cook at EY said they would not sign a return that uses the 000s method. They said that there are too many footing problems. 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 out that this method effectively truncates numbers; though I'm not sure what rounding rules you use. E.g., 101,499 become 101? What happens to the other \$499?

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

Barry J. Cohen

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Tel. [REDACTED]

[REDACTED] >

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please no=e

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