
From: Barry J. Cohen <[REDACTED]>
Sent: Sunday, August 6, 2017 12:40 PM
To: jeffrey E.
Subject: Re: [External] Re: Plane

May not be possible as documents have to be signed tomorrow (our drop dead =ate). We are not going to buy the plane in Elysium. We will assign its right to buy the plane before we close.

Sent from my iPhone

On Aug 6, 2017, at 8:25 AM, jeffrey E. <jeevacation@gmail.com<mailto:jeevac=tion@gmail.com>> wrote:

new entity

On Sun, Aug 6, 2017 at 8:19 AM, Barry J. Cohen <[REDACTED]> wrote:
We are having Elysium buy it. As long as it is freely assignable, does it have to be a new entity?

Sent from my iPhone

On Aug 6, 2017, at 6:35 AM, jeffrey E.
<jeevacation@gmail.com<mailto:jeevac=tion@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>> wrote:

yes , I would ask that you go through and see exactly which years you took= what and it produce a real szable benefit.
. form a new entity for=the contract signing. have that entity have the right to assign.

On Sat, Aug 5, 2017 at 9:51 PM, Barry J. Cohen

[REDACTED] > wrote:

We never took accelerated depreciation due to lack of passive income. Unuse= depreciation has been carried forward.
Basis is therefore a little high.

Sent from my iPhone

On Aug 5, 2017, at 7:23 PM, jeffrey E.
<jeevacation@gmail.com<mailto:jeevac=tion@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>>> wrote:

not necessarily . talk monday.

On Sat, Aug 5, 2017 at 6:59 PM, Barry J. Cohen

[REDACTED]

[REDACTED] >>> wrote:

Plane sale is minor loss.

Sent from my iPhone

On Aug 5, 2017, at 6:35 PM, jeffrey E.

<jeevacation@gmail.com<mailto:jeevac=ation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>=<mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=ion@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.com=mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacat=on@gmail.com>><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>=<mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>>> wrote:

same idea to make sure boat sale , plane sale art sale . all produce the =est after tax result.

On Sat, Aug 5, 2017 at 5:28 PM, Barry J. Cohen

These are all things we are trying to think about. Our new internal guy is=great, but he doesn't bring solutions with him because, like you say, no o=e is quite like Leon. Since he just joined us, we're starting certain plan=ing work later than we would like.

EY is good but they are better at answering questions than providing proact=ve planning advice. And I am finding them a little slow.

Your derivatives financing idea is a good one. Who would be a good person t= talk to about it? Justin at JPM?

Sent from my iPhone

On Aug 5, 2017, at 10:49 AM, jeffrey E.

<jeevacation@gmail.com<mailto:jeeva=ation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>=<mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=ation@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.co=<mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<m=mailto:jeevac=ion@gmail.com>><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>=mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeeva=ation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com=mailto:jeevacation@gmail.com>><mailto:jeevacation@gmail.com<mailto:jeevac=ion@gmail.com><mailto:jeevacation@gmail.com>><mailto:jeevacation@gmail.co=mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>>> wrote:

barry, perfect example of what i have been trying to explain. without c=ntext the question makes little sense. ex if all is income is ordinar=. selling things at a loss does nothing . however if he is gettin= more capital gains next year. you miiight generate losses and carry them =orward or back. if we think the tax rates will change we might create f=ctiioous gains. and use the loss but have a higher basis for next year. = if the loss in on the trust side , it is a benefit to the future tax of=the children. sorry to be so long winded but at least i am consistant=:)

On Sat, Aug 5, 2017 at 10:39 AM, Barry J. Cohen

One problem is that we want Leon to tell us what art he is interested in se=ling. I don't think he can do that. We should tell him whether we want him=to sell either his gains or his losses and why.

Sent from my iPhone

On Aug 5, 2017, at 10:30 AM, jeffrey E.

<jeevacation@gmail.com<mailto:jeeva=ation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.c
om=><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=tion@gmail.com<mailto:jeevacat
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to:jeevacati=n@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>>>> wrote:

there has been little if any proper planning for tax this year and next. = this needs to be done after the program and materials are put in form

On Sat, Aug 5, 2017 at 9:13 AM, Barry J. Cohen

>>>>> wrote:

I hear you. There is no blue print. I think our numbers are finally thorou=h and accurate. We haven't discussed it much, but technology and security=have been a huge focus for me since I joined Elysium. Making slow but stea=y progress.

Sent from my iPhone

On Aug 5, 2017, at 8:02 AM, jeffrey E.

<jeevacation@gmail.com<mailto:jeevac=tion@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.c
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<mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>><ma=lto:jeevacation@gmail.com<mailto:jeevacation
@gmail.com><mailto:jeevacation=gmail.com<mailto:jeevacation@gmail.com>>>>>>>> wrote:

After fridays discussion

<https://www.aopa.org/training-and-safety/pic-archive/aircraft-ownership/bus=ness-justification-aircraft-expenses>

I suggest you focus on large issues first. . the discussions re personal=use of plane . parties travel. may be relevant at the tippy tip of the =argins but these answers should flow from the structure. On what for= will you use the deduction. ? which business. , its structure. differ=nt buisnesses etc.

Barry , what you will find is that there is very few answers to be found=on point as people in leons position rarely make cases to tax court. ex=emption being estate issues. . planes owned by farmers salesman, bank=rs. are usually small planes. meaningless to leons issue. large bi= gets are usually owned by corporations. . the facts. there are app=ox 400,000 planes in the states. out of that large number only about 13,=000 total private jets. out of that class only

2000 large jets and=most owned by corporations. how many people have business of leons size= . not including his art work.

111

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and all copies thereof, including all attachments. copyright -all rights reserved This email and any files transmitted with it
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and/or privileged material. Any review, retransmission, dissem=nation or other use of, or taking of any action in reliance
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communication and all copies thereof, including all attachments. copyright -all rights reserved This email and any files
transmitted with it are confidential and intended =olely for the person or entity to whom they are addressed and may
contain =onfidential and/or privileged material. Any review, retransmission, dissem=nation or other use of, or taking of
any action in reliance upon this info=mation by persons or entities other than the intended recipient is prohibi=ed. If you
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  <key>date-last-viewed</key>
  <integer>0</integer>
  <key>date-received</key>
  <integer>1502023220</integer>
  <key>flags</key>
  <integer>8590195717</integer>
  <key>gmail-label-ids</key>
  <array>
    <integer>6</integer>
    <integer>2</integer>
  </array>
</dict>
```

```
</array>
<key>remote-id</key>
<string>736657</string>
</dict>
</plist>
```