
From: jeffrey E. <jeevacation@gmail.com>
Sent: Sunday, August 6, 2017 12:58 PM
To: Barry J. Cohen
Subject: Re: [External] Re: Plane

I would suggest a delaware llc , where leon is sole member. I dont belive in drop dead dates. and rushi=g usually is not wise (slow and thoughtful .) =C2 wire the deposit that should be enough. airplanes=C2 are finicky.

On Sun, Aug 6, 2017 at 8:40 AM, =arry J. Cohen <[REDACTED]> > wrote:

May not be possible as documents have to be signed tomo=row (our drop dead date). 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:jeevacation@gm=il.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@=mail.com> >> wrote:

new entity

On Sun, Aug 6, 2017 at 8:19 AM, Barry J. Cohen <[REDACTED]>
<mailto:[REDACTED]> >> wrote:

We are having Elysium buy it. As long as it is freely assignable, does it h=ve to be a new entity?

Sent from my iPhone

On Aug 6, 2017, at 6:35 AM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@=mail.com> >> <mailto:jeevacation@gmail.com
<mailto:j=evacation@gmail.com> <mailto:jeevacation@gmail.com>>> wro=e:

yes , I would ask that you go through and see exactly which years you=tookk what and it produce a real szable benefit. . =A0 form a new entity for the contract signing. have tha= entity have the right to assign.

On Sat, Aug 5, 2017 at 9:51 PM, Barry J. Cohen <[REDACTED]>
<[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.<=r>

Sent from my iPhone

On Aug 5, 2017, at 7:23 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@=mail.com> >> <mailto:jeevacation@gmail.com
<mailto:j=evacation@gmail.com> <mailto:jeevacation@gmail.com>>> <mailto=jeevacation@gmail.com
<mailto:jeevacation@gmail.com> &=t;mailto:jeevacation@gmail.c=m <mailto:jeevacation@gmail.com>
><mailto:jeevacat=on@gmail.com <mailto:jeevacation@gmail.com> <mailto:je <mailto:jeevacation@gmail.com> >>>>
>>>> wrote:

not necessarily . talk monday.

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

Plane sale is minor loss.

Sent from my iPhone

On Aug 5, 2017, at 6:35 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@=mail.com> ><mailto:jeevacation@gmail.com
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><mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> <mailto:jeevacation@gmail.com
<mailto:jeevacation@gmail.co=> >>>>> wrote:

same idea to make sure boat sale , plane sale art sale . all pr=duce the best after tax result.

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

These are all things we are trying to think about. Our new internal g=y is great, but he doesn't bring solutions with him because, like you =ay, no one is quite like Leon. Since he just joined us, we're starting=certain planning 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:jeevacation@g=ail.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation=gmail.com> ><mailto:jeevacation@gmail.com
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 <mailto:jeevacation@gmail.com> <mailto:jeevacation@gmail.com>>>>&t; wrote:

barry, perfect example of what i have been trying to explain. =C2 without context the question makes little sense. =x if all is income is ordinary. selling things at a loss does nothing . however if he is getting more capital gains next year. you might generate losses and carry them forward or back. if we think the tax rates will change we might create fictitious gains. and use the loss but have a higher basis for next year. if the loss is on the trust side, =C2 it is a benefit to the future tax of the children. =A0sorry to be so long winded but at least i am consistent :)

On Sat, Aug 5, 2017 at 10:39 AM, Barry J. Cohen <[REDACTED]>

>>>>>> wrote:

One problem is that we want Leon to tell us what art he is interested in selling. 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.

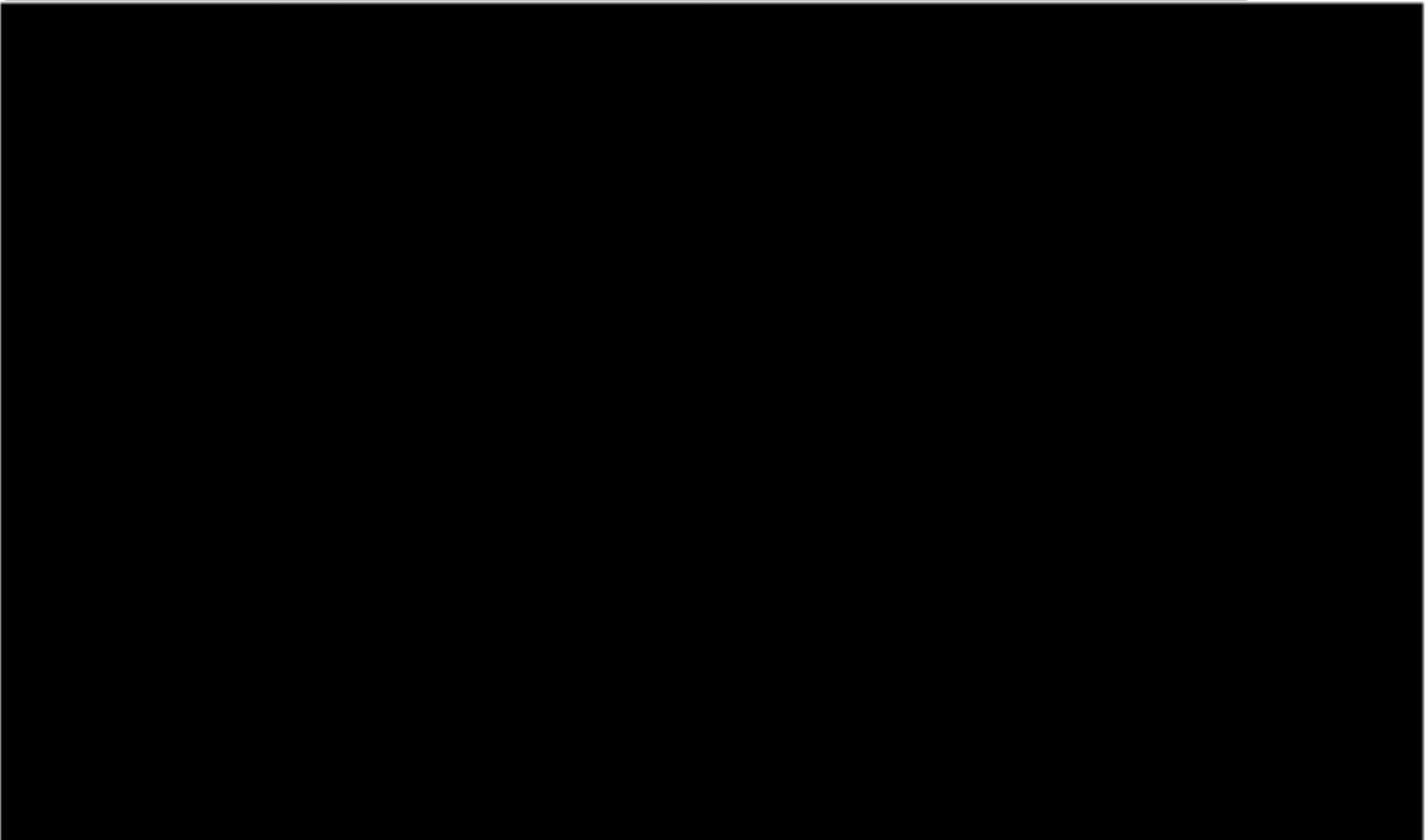
Sent from my iPhone

On Aug 5, 2017, at 10:30 AM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com>
 <mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ><mailto:jeevacation@gmail.com

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><mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> <mailto:cation@gmail.com
<mailto:jeevacation@gmail.com> >>>>>> wrote:

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

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



I hear you. There is no blue print. I think our numbers are finally thorough 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 steady progress.

Sent from my iPhone

On Aug 5, 2017, at 8:02 AM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ><mailto:jeevacation@gmail.com
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<mailto:jeev=cation@gmail.com> <mailto:jeevacation@gmail.com>>>>=>>> wrote:

After fridays discussion

<https://www.aopa.org/training-and-safety/pic-archive/=ircraft-ownership/business-justification-aircraft-expenses> <<https://www.aopa.org/training-and-safety/pic-archive/aircraft-ow=ership/business-justification-aircraft-expenses>>

I suggest you focus on large issues first. . the discussi=ns re personal use of plane . parties travel. may be relevant =t the tippy tip of the margins but these answers should=C2 flow from the structure. On what form will you use the =duction. ? which business. , its structure. diffe=ent businesses 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. exception being estate issues. . =lanes owned by farmers salesman, bankers. are usually small planes. meaningless to leons issue. =A0 large biz gets are usually owned by corporations. . =C2 the facts. there are approx 400,000 planes in the =tates. out of that large number only about 13, 000 total private jets. out of that class only 2000 large jets =A0 and most owned by corporations. how many people have =business of leons size . not including his art work.

You asked, me what do we do now. as I told Brad years ago. First and foremost is accurate numbers presented in an organized fashion. that is 80 percent of the grunt work. Once all the numbers are in shape = ie materials for the building of the financial architecture. =C2 . Leons goals must be addressed and programatic . =C2 this takes hours of discussion. . next . plans are drawn up, . modifications are made, issues of sec=regulation, tax, control, succession. mechanics. all need to be planned and adjusted to meet the goals.

You need to recognize that there are few, very few examples of the house that in leons case needs to be rebuilt. =A0 most people with leons wealth have a serious family office=C2 with a huge stock portfolio, not art. and of those, =ew hold dormant assets ie apollo. . Its been ten years=C2 since apollo went public. and the house needs total renovation. upgrades in tech, security, and the family has c=anged all very similar to architecting a house after the children have grown and left.

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please note

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