
From: Barry J. Cohen <[REDACTED]>
Sent: Sunday, August 6, 2017 6:23 PM
To: jeffrey E.
Subject: Re: [External] Re: Plane

We got RR down to \$1MM and then \$200-300K per year for a while. I thought =hat includes the APU, but will check.

Sent from my iPhone

On Aug 6, 2017, at 2:18 PM, jeffrey E. <jeevacation@gmail.com<mailto:jeevac=tion@gmail.com>> wrote:

im told the rolls royce buy in was 1.2 m not 2 m and the apu 50k is tha= not right/

On Sun, Aug 6, 2017 at 9:46 AM, Barry J. Cohen <[REDACTED]<mailto:[REDACTED]> wrote:
They have our deposit. I don't like going past the drop dead date because i= another buyer has reached out to them at a higher price it gives the sell=r an excuse to walk. We can definitely have the Delaware LLC buy the plane=though.

Sent from my iPhone

On Aug 6, 2017, at 8:57 AM, jeffrey E.
<jeevacation@gmail.com<mailto:jeevac=tion@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.c
om>=> wrote:

I would suggest a delaware llc , where leon is sole member. I dont beli=e in drop dead dates. and rushing usually is not wise (slow and tho=hful .) wire the deposit that should be enough. airplanes are fin=cky.

On Sun, Aug 6, 2017 at 8:40 AM, Barry J. Cohen

[REDACTED]
> wrote:

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 rig=t 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><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.c
om>=<mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=ion@gmail.com<mailto:jeevaca
tion@gmail.com>>>> wrote:

new entity

On Sun, Aug 6, 2017 at 8:19 AM, Barry J. Cohen

[REDACTED]
.com>>>> 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:jeevac=tion@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>>>>> 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><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:jeevac=tion@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><mailto:jeevacat=on@gmail.com<mailto:jeevacation@gmail.com>><mailto:jeevacation@gmail.com>>><mailto:jeevacat=on@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]

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

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o:jeevacatio=@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

>>>>> wrote:

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.c
om=><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=tion@gmail.com<mailto:jeevacat

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ion@gmail.com><mailto:jeevacatio=@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 miight generate losses and carry them =orward or back. if we think the tax rates will change we might create
f=ctitious 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





wrote:

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
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[illegible]

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

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.

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

8

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other use of, or taking of any action in reliance upon this info=ation by persons or entities other than the intended
recipient is prohibi=ed. If you have received this email in error please contact the sender and=delete the material from
any computer. Apollo Global Management, LLC

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