
From: Barry J. Cohen <[REDACTED]>
Sent: Sunday, August 6, 2017 1:48 AM
To: jeffrey E.
Cc: Leon Black
Subject: Re: [External] Re: hopefully helpful

I will get you the info. We have not figured out the structure of the plane=ownership. We have started those conversations. The purchase agreement (e=pected to sign Monday) will allow the contract to be assigned to any affil=ate of Leon.

Sent from my iPhone

On Aug 5, 2017, at 8:12 PM, jeffrey E. <jeevacation@gmail.com<mailto:jeevac=ation@gmail.com>> wrote:

get a tax basis for the plane and document the depreciation taken and its =enefits if any also debra and leon I belive own this plane , who doe= he want to own the new one.

On Sat, Aug 5, 2017 at 6:59 PM, Barry J. Cohen <[REDACTED]<mailto:[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.c
om>=> 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
<[REDACTED]<mailto:[REDACTED]><mailto:[REDACTED]<mailto:[REDACTED]>=> 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=ation@gmail.com<mailto:jeevacat
ion@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 might 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

<[REDACTED]> <[REDACTED]> <mailto:[REDACTED]> <mailto:[REDACTED]> =>
<mailto:[REDACTED]> <mailto:[REDACTED]> <mailto:[REDACTED]> <mailto:[REDACTED]>
.com>>>> 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:jeeva=ation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.c
om>=><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevac=ation@gmail.com<mailto:jeevacat
ion@gmail.com>>><mailto:jeevacation@gmail.co=<mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<m
ailto:jeevaca=ion@gmail.com>>><mailto:jeevacation@gmail.com<mailto:jeevacation@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

<mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]>=
<mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]
.com>>><mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]
[REDACTED]>>=<mailto:[REDACTED]><mailto:[REDACTED]><mailto:[REDACTED]>
[REDACTED]>>>> wrote:

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: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
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>@gmail.com<mailto:jeevacation@gmail.com>>>><mailto:jeevac=tion@gmail.com<mailto:jeevacation@gmail.com><mai
lto:jeevacation@gmail.com<=ailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.com<mailto:jeevacat=on@gm
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vacation@gmail.com><mailto:jeevacat=on@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.co
m<m=ilto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacatio=@gmail.com>>>>>> wrote:

After fridays discussion

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

om>><mailto:j=evacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.com<mailto:je=vacation@gmail.com><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com>>><mailto:jeevacation@gmail.com<mailto:jeevacation@gmail.com><mailto:jeevacation@gmail.com>>>>, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved This email and any files transmitted with it are confidential and intended solely for the person or entity to whom they are addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. 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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  <key>date-received</key>
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  </array>
  <key>remote-id</key>
  <string>736596</string>
</dict>
</plist>
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