
From: jeffrey E. <jeevacation@gmail.com>
Sent: Tuesday, April 18, 2017 2:09 PM
To: Brad Wechsler
Subject: Fwd: Re:

----- Forwarded message -----

From: Richard Joslin <[REDACTED]> <mailto:[REDACTED]> >
Date: Mon, Apr 17, 2017 at 7:01 PM
Subject: RE: Re:<[REDACTED]>To: "jeffrey E." <jeevacation@gmail.com> <mailto:jeevacation@gmail.com> >

This was a sale and should be claimed in the year of sale as reduction of sales proceeds (cost of sale).

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Monday, April 17, 2017 6:29 PM
To: Richard Joslin <[REDACTED]> <mailto:[REDACTED]> >
Subject: Re: Re:

and the fees for structuring the phaidon transaction ? as part of his income tax planning.? I think so. =A0 dont you?

On Mon, Apr 17, 2017 at 6:25 PM, Richard Joslin <[REDACTED]> <mailto:[REDACTED]> > wrote:

I will get you the backup for estate planning nondeductibility

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Monday, April 17, 2017 6:18 PM
To: Richard Joslin <[REDACTED]> <mailto:[REDACTED]> >
Subject: Re:

order to be deductible, the IRS <<http://www.investopedia.com/terms=i/irs.asp>> requires that estate planning fees <<https://www.irs.gov/pub/irs-pdf/p550.pdf>> must be paid: (1) for the production or collection of income; (2) for the management, conservation or maintenance of property held for the production of income; or (3) in connection with the determination, collection or refund <<http://www.investopedia.com/terms/r/refund.asp>> of any tax.

So how might this apply to estate planning fees? If, for example, the estate plan <http://www.investopedia.com/advisor-network/articles/051716/why-it-is-so-important-to-update-your-estate-plan/> involves advice on the construction of income generating instruments, such as an income trust <http://www.investopedia.com/terms/i/incometrust.asp> , or provides guidance on the use of property transfer methods to avoid Federal or State Estate or Inheritance tax <http://www.investopedia.com/terms/e/estatetax.asp> , these would meet the IRS restrictions for the ability to deduct such expenses. Other examples might include investment advice <http://www.investopedia.com/terms/i/investment-advice.asp> for trusts held by the estate, trust tax preparation fees and account custodial fees while held by the estate

Read more: Are estate planning fees tax deductible? | Investopedia
<http://www.investopedia.com/ask/answers/113015/are-estate-planning-fees-tax-deductible.asp#ixzz4eY1kslWb>
<http://www.investopedia.com/ask/answers/113015/are-estate-planning-fees-tax-deductible.asp#ixzz4eY1kslWb> <http://www.investopedia.com/ask/answers/113015/are-estate-planning-fees-tax-deductible.asp#ixzz4eY1kslWb>

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On Mon, Apr 17, 2017 at 6:13 PM, Richard Joslin <[\[REDACTED\]](mailto:[REDACTED])> wrote:

Income tax planning and fees for services to calculate the income tax are deductible

From: jeffrey E. [<mailto:jeevacation@gmail.com>]
Sent: Monday, April 17, 2017 6:09 PM
To: Richard Joslin <[\[REDACTED\]](mailto:[REDACTED])>
Subject:

are fees for tax planning deductible?

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