
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:<=r>To: "jeffrey E." <=eevacation@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 =lanning nondeductibity

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 determina=ion, 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-so-important-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#ixzz4eY1ksIWb>> <[](http://www.investopedia.com/ask/answers/113015/are-estate-planning-fees-tax-deductible.asp#ixzz4eY1ksIWb) <<http://www.investopedia.com/ask/answers/113015/are-estate-planning-fees-tax-deductible.asp#ixzz4eY1ksIWb>>

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

are fees for tax planning deductible?

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please no=

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