

From: Richard Kahn [REDACTED]
Subject: Fwd: FBAR/FATCA
Sent: Wednesday, June 10, 2015 5:27:54 PM
To: "jeffrey E." <jeevacation@gmail.com>
[image001.gif](#)

would you like to speak with alan?
if so please advise on timing?
thank you

has Joslin given you good figures for Leon June 15th estimates?

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
[REDACTED]

Begin forwarded message:

From: "Dlugash, Alan" [REDACTED]
To: jeffrey E. <jeevacation@gmail.com>
Cc: Richard Kahn [REDACTED]
Subject: RE: FBAR/FATCA
Date: June 9, 2015 at 6:39:28 PM EDT

I'm reasonably familiar with FBAR and FATCA issues, but I also do have access to experts.

Trustees of trusts organized under US law are required to file FBAR reports. More than 50% beneficiaries of US trusts are obligated to file FBAR's, but this requirement is waived if a US trustee of the trust files on behalf of the trust.

FATCA reporting is basically only for individuals. Individuals who are beneficiaries of trusts do not have to include in their FATCA filing foreign financial assets that are in the trust solely because they are beneficiaries of the trust.

ALAN DLUGASH CPA

Marks Paneth LLP
685 Third Avenue, New York, NY, 10017
[REDACTED]



From: jeffrey E. [<mailto:jeevacation@gmail.com>]
Sent: Tuesday, June 09, 2015 6:40 AM
To: Dlugash, Alan; Richard Kahn
Subject:

I need an expert on FBAR filing for leon. do the trustees of the trusts have an obligation. beneficiaries. ? 8938 ? as well

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

Any tax advice in this e-mail should be considered in the context of the tax services we are providing to you. Preliminary tax advice should not be relied upon and may be insufficient for penalty protection.

CONFIDENTIALITY NOTE:

This transmission may contain confidential and/or privileged information. This information is intended for use by the individual or entity named above. If you are not the intended recipient, be aware that any disclosures, copying, distribution or use of the contents of this information is prohibited. If you have received this transmission in error, please notify this office immediately.