

From: "jeffrey E." <jeevacation@gmail.com>
To: "Barry J. Cohen" <[REDACTED]>
Subject: Re: 000's
Date: Tue, 19 Sep 2017 20:24:37 +0000

think about it, again, ask joe how many 1040 audits he has done. . what size. how complex. when we file a grat, we calculate the gift explicitly at zero. . it is the calculation of a gift minus the annuity. It is simple math. no more $2 \text{ minus } (1+1)$ does not equal NONE

On Tue, Sep 19, 2017 at 4:19 PM, Barry J. Cohen <[REDACTED]> wrote:

Fair enough.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:19 PM
To: Barry J. Cohen <[REDACTED]>
Subject: Re: 000's

dumb!!!!!!!, as i told you, computers dont read letters

On Tue, Sep 19, 2017 at 4:15 PM, Barry J. Cohen <[REDACTED]> wrote:

Sorry I misunderstood on the 000s. Gift tax returns have to report a number somewhere, so maybe statute doesn't start. But if you filed an income tax return for an entity with no income or expenses, Joe V assumes the statute would start. In any event, we don't file returns that way. As I said, we would say "None" where appropriate.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, September 19, 2017 4:09 PM
To: Barry J. Cohen <[REDACTED]>
Subject: Re: 000's

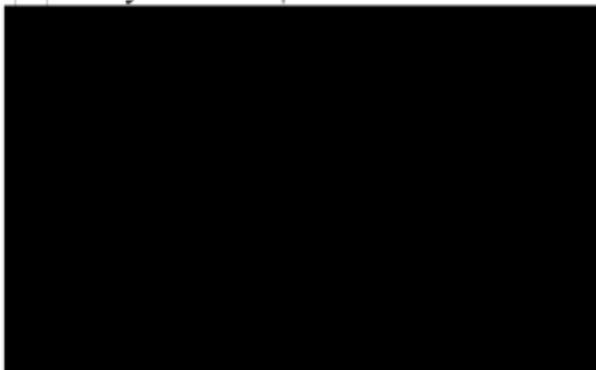
i did not suggest you use the 000 method. Im sorry but i dont have the time . do you think if you filed a gift tax return and left everything blank the statue would run?

On Tue, Sep 19, 2017 at 4:03 PM, Barry J. Cohen <[REDACTED]> wrote:

John Cook at EY said they would not sign a return that uses the 000s method. They said that there are too many footing problems. Numbers won't tie to K-1s, W-2s, 1099s, etc. Also, if you only use it on part of the return, the various numbers on the return would not match internally. He also pointed out that this method effectively truncates numbers; though I'm not sure what rounding rules you use. E.g., 101,499 become 101? What happens to the other \$499?

Joe V likes the idea of putting in 0's instead of blanks. He says he uses "none". He did not understand why this would affect the statute of limitations.

Barry J. Cohen |



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