

From: J <jeevacation@gmail.com>
To: Joseph Vinciguerra <[REDACTED]>, Melanie Spinella <[REDACTED]>
Subject: Re: 2017 1040 Draft P&C
Date: Fri, 05 Oct 2018 14:01:58 +0000

will revisti when i land

On Fri, Oct 5, 2018 at 9:55 AM Joseph Vinciguerra <[REDACTED]> wrote:

I'm not sure what issues being known for months you are referring to.

- All of the 8621 numbers are Apollo flow through figures, as reported to us on the BRH K-1 and are properly reported, as income from QEF elected PFICS.
- What cost of goods sold numbers are you referring to? All reported costs of goods sold are in the proper places on either schedule C, the 8865 or the 8858s.
- We discussed your fees regarding the Phaidon loss and opted not to include them in the Phaidon transaction. Note, the amounts paid in 2017 are being deducted as investment related expenses.
- There is no net foreign income, based on the allocation of expenses and the BRH related foreign expenses. As such, we are taking the foreign taxes paid as a deduction this year (based on the carryforward). Leon is aware of this and made the decision to deduct.
- Debra does not need her own income to contribute to an IRA under the current rules, as Leon has enough wages to cover both contributions.
- 965 cfc rules have already been vetted by EY and are no applicable as we have no CFC E&P.
- The interest paid is bifurcated between schedules A and E as appropriate, and run through the 4952.

Joseph M. Vinciguerra |

Tax Director & Tax Counsel |
Elysium Management LLC |
445 Park Avenue Suite 1401, New York, NY 10022 |

From: J <jeevacation@gmail.com>
Sent: Friday, October 5, 2018 9:25 AM
To: Melanie Spinella <[REDACTED]>; Joseph Vinciguerra <[REDACTED]>; Barry J. Cohen <[REDACTED]>
Subject: Fwd: 2017 1040 Draft

? all of these issues were known for months? review income numbers flowing through 8621,? cost of good s 10 places show zero. . my fees increase phaidon loss. if leon wants. foreign taxes paid but shows no income? debra is showing an IRA deduction? did she get salary ? . need to check 965 cfc rules this year. . interest cost on appropriate schedule?

more later. . landing soon.

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

From: **Joseph Vinciguerra** <[REDACTED]>
Date: Fri, Oct 5, 2018 at 9:03 AM
Subject: RE: 2017 1040 Draft
To: J <jeevacation@gmail.com>
Cc: Barry J. Cohen <[REDACTED]>, Brad Wechsler <[REDACTED]>

Hi Jeffrey,

Based on travel schedules, Mrs. Black will be signing the returns on Tuesday and Leon on Wednesday. As such, if you have any comments that could change the return, please let me know, so I can incorporate them, as applicable.

Thank you.

Joe

Joseph M. Vinciguerra |
Tax Director & Tax Counsel |
Elysium Management LLC |
445 Park Avenue Suite 1401, New York, NY 10022 |
[REDACTED]

From: Joseph Vinciguerra
Sent: Tuesday, October 2, 2018 8:03 PM
To: 'J' <jeevacation@gmail.com>
Cc: Barry J. Cohen <[REDACTED]>; Brad Wechsler <[REDACTED]>
Subject: RE: 2017 1040 Draft

“JEE2017”

Joseph M. Vinciguerra |
Tax Director & Tax Counsel |
Elysium Management LLC |

445 Park Avenue Suite 1401, New York, NY 10022 |

From: Joseph Vinciguerra
Sent: Tuesday, October 2, 2018 8:02 PM
To: 'J' <jeevacation@gmail.com>
Cc: Barry J. Cohen <[REDACTED]>; Brad Wechsler <[REDACTED]>
Subject: RE: 2017 1040 Draft

Please see attached. Note, I am still working through some immaterial issues with the preparer. Let me know if you have any questions.

Password to follow.

Joe

Joseph M. Vinciguerra |
Tax Director & Tax Counsel |
Elysium Management LLC |
445 Park Avenue Suite 1401, New York, NY 10022 |

From: J <jeevacation@gmail.com>
Sent: Tuesday, October 2, 2018 5:51 PM
To: Joseph Vinciguerra <[REDACTED]>
Subject: Re: 2017 1040 Draft

email

On Tue, Oct 2, 2018 at 5:49 PM Joseph Vinciguerra <[REDACTED]> wrote:

Hi Jeffrey,

I hope all is well. I am in the process of finalizing Leon's 2017 1040. Leon would appreciate if you did a high-level review of the draft. Please let me know your delivery preference, as it is over 1,700 pages.

Thank you.

Joe

Joseph M. Vinciguerra |

**Tax Director & Tax Counsel |
Elysium Management LLC |
445 Park Avenue Suite 1401, New York, NY 10022 |**

[REDACTED]
[REDACTED]

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