

From: Richard Joslin [REDACTED]

To: jeffrey E. [REDACTED] lawrence delson [REDACTED]

Subject: FW: BJAV - Personal use

Date: Thu, 14 Aug 2014 16:09:48 +0000

Attachments: hh_mink_29_tcm_177_(1970).pdf;
WK_Actions_on_Decisions_In_re_H_H_MINK_amp_SON_BAG_CO_INC_ET_AL_File_No_AODAOD_Number_not_available_Nov_16_1970_AOD_NUMBER_Nov_16_1970.pdf

Inline-Images: image001.png; image002.jpg; image003.png

From: Richard Joslin

Sent: Thursday, August 14, 2014 11:15 AM

To: 'Thomas Turrin'

Subject: RE: BJAV - Personal use

Tom

I attach commentary on the Tax Court memo decision. Please read that first. I also attach the AOD
Let's discuss after you review

From: Thomas Turrin [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Wednesday, August 13, 2014 12:32 PM

To: Richard Joslin

Subject: BJAV - Personal use

Attached is a case involving partner's personal use of vehicle where income was imputed for personal use. With aircraft, income also imputed for personal use (employees and partners).

Another approach would be to pro-rate the expenses to third party usage.

No matter what approach we use, the bigger issue is the vessel will probably never show a profit.

I'm available to discuss.

THOMAS TURRIN, CPA

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