

SIFL VALUATION

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,284 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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MANIFEST (continued):  
Passenger Name Company

\*Contract  
Employee? For which  
leg(s)?

Business Purpose (attach):  
Project or topic / Meeting with: LOEWAL COMPANY?

E. Silberg

1  
2

SV NSIN - Cam DAD

John Conrath

2

SV NSIN - Cam DAD

B. Wang

1  
2

SVL - JBD

Blak

1  
2

SVL - JBD

- To be used for non-commercial flight valuation computations. See Code Sec. 134(d) and Trans. Reg. Sec. 1.61-21(f).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One aircraft takeoff - 1,1308 statute miles.
- A passenger who performs legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Keep track of relative time spent on each pursuit. Probably at least 25% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.1322(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, also so indicate.

Completed by: [Signature]  
Date: 8.1.23

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Brian Wing Son  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1,2,3	July 18, 1997	Conroe		Aspen		891.0	1.56
4,5,6	July 20, 1997	Aspen		Conroe		891.0	1.56
						<u>1,782.0</u>	<u>3.12</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met\*\* No
- 3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 1,782

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1282 x .1323) =	157.69
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 244.44

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

- \* (Control employee @ 400.0%) 977.74
- \* (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.72 per flight/leg) 53.44

8. Total SIFL amount imputed to 1997 income \$1,041.18

SIFL VALUATION

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,762 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

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AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Christina Wing Daughter  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
2	Dec 19, 1997	Boston		Conroe		1,571.0	3.52
						<u>1,571.0</u>	<u>3.52</u>

1. Valued at a control or non-control employee rate\* NC
  2. 50% capacity test met\*\* No
  3. Is flight primarily business or personal\*\*\* Personal
  4. Formulated Statute Mileage (See page 2) 1,571
- |  |                  |             |
|--|------------------|-------------|
| 0 - 500 miles @ 0.1735   | ( 500 x .1735) = | 86.75       |
| 501-1500 miles @ 0.1323  | (1071 x .1323) = | 131.73      |
| Over 1500 miles @ 0.1272   | ( 0 x .1272) =   | <u>0.00</u> |
| 5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. |                  | 218.48      |
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
    - \* (Control employee @ 400.0%) 873.93
    - \* (Non-control employee @ 31.3%) \_\_\_\_\_
  7. Add: Terminal charge (31.72 per flight/leg) 31.72
  8. Total SIFL amount imputed to 1997 income \$905.65

SIFL VALUATION

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,571 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

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MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?  
For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

E. Wigg

2

SI 11-TRD

1. To be used for non-commercial flight valuation computations. See Code Sec. 119(d) and Treas. Reg. Sec. 1.61-21(g).
2. Maximum number of seats on aircraft for landing seats removed within past 24 months. Exclude seats not highly usable during takeoff. Exclude flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One seat/air mile = 1,508 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 12-21-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Christina Wing Daughter  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	Dec 21, 1997	Conroe		Aspen		891.0	1.56
						<u>891.0</u>	<u>1.56</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 891 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(391 x .1323) =	48.09
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>134.84</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. 134.84
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - (Control employee @ 400.0%) 539.37
  - (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 31.72
8. Total SIFL amount imputed to 1997 income \$571.09





MANIFEST (continued):  
Passenger Name \_\_\_\_\_ Company \_\_\_\_\_

"Control  
Employee"? \_\_\_\_\_ For which  
leg(s)? \_\_\_\_\_

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company? \_\_\_\_\_

B. W. H. G.

1. To be used for non-commercial flight valuation computations. See Code Sec. 214(d) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats reserved within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.  
One medical seat = 1,500 statute miles.
3. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent at each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: \_\_\_\_\_

Signature: [Signature]

Date: 12-21-57

Reviewed by: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

JOHN DAVIS

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Nov 16-21	Pat Davis	3434.87
Nov 22	Pat Davis	2096.68
TOTAL		5531.55

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Davis  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Pat Davis Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
1,2	Nov 22, 1997	Guam		Kona		3,926.0	7.88

3,926.0      7.88

1. Valued at a control or non-control employee rate\*      NC
2. 50% capacity test met\*\*\*      No
3. Is flight primarily business or personal\*\*\*      Personal
4. Formulated Statute Mileage (See page 2)      3,926 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 1926 x .1272) =	<u>244.99</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997      516.24
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%)      2,064.95
  - \* (Non-control employee @ 31.3%)      \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg)      31.73
8. Total SIFL amount imputed to 1997 income      \$2,096.68

SIFL VALUATION

Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

-- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependant child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependant child), retiree, or surviving spouse is valued at the non-control rate.

-- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

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-- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

3,926 Formulated Statute Mileage

----- OR -----

-- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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MANIFEST (continued):  
Passenger Name Company

R1 Davis

"Control  
Employee" ?  
leg(s) ?

1  
2 7

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Guam to Kona - Staturo milk's 3926

1. To be used for non-commercial flight valuation computations. See Code Sec. 114(d) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats reserved within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,130.8 statute miles.
4. A passenger who consumes legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-21(c)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 11-23-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

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- AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Davis  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Pat Davis Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2	Nov 16, 1997	Bangkok		Macau		1,166.0	2.21
3	Nov 18, 1997	Macau		Singapore		1,638.0	3.23
4	Nov 19, 1997	Singapore		Jakarta		575.0	1.25
5,6	Nov 21, 1997	Jakarta		Guam		2,990.0	6.54
						<u>6,369.0</u>	<u>13.23</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 6,369 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	198.45
Over 1500 miles @ 0.1272	( 4369 x .1272) *	<u>555.74</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997 826.99
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 3,307.95
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg) 126.92
8. Total SIFL amount imputed to 1997 income \$3,434.87

SIFL VALUATION

Page 2

- In general a control employee is: a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

6,369 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

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Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Calcutta	Bangkok	Six Days		1007	11-12-97	2:01 ✓
Leg 2	Bangkok	Hong Kong			1116	11-16-97	2:21 ✓
Leg 3	Hong Kong	Singapore			1638	11-18-97	3:23 ✓
Leg 4	Singapore	Singapore			575	11-19-97	1:25 ✓
Leg 5	Jakarta	Movilla	Jakarta-Guam		1728	11-21-97	3:28 ✓
Leg 6	Movilla	Guam	(899b)		1597	11-21-97	3:06 ✓
Summary							15:49 ✓

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg):	
				Project or topic / Meeting with: / Of what company?	
Wing			1	Self Admin	
			2		
			3	Corp	
			4	Self Admin	
			5		
			6		
J Davis			2		

MANIFEST (continued):  
Passenger Name      Company

"Control  
Employee"?      For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Pat Davis

2 ✓

SELF - JD

3 ✓  
4 ✓  
5 ✓  
6 ✓

Eric Silsby

3

Stewart Kline

3

Yvonne Kay

3

SELF - SK

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats reserved within part 24 records. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,150 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent at each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Date: 11-23-77

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

STEVE DOLEZAL

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Jun 14-15	Cherry Dolezal	162.36
Jun.22-27	Cherry Dolezal	466.67
TOTAL		629.03

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Steve Dolezal  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Cherry Dolezal Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1,2	June 22, 1997	Conroe		Edinbrough		4,599.0	
3,4,5,6	June 25, 1997	Edinbrough		Aspen		3,707.0	
7	June 27, 1997	Aspen		Conroe		892.0	
						<u>9,198.0</u>	<u>0</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met No
- 3. Is flight primarily business or personal Personal

4. Formulated Statute Mileage (See page 2) 9,198

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 7198 x .1272) =	<u>915.59</u>

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 1,186.84

6. Certified aircraft take-off weight as a percentage of computed mileage charges:
- (Control employee @ 400.0%)
  - (Non-control employee @ 31.3%) 371.48

7. Add: Terminal charge (31.73 per flight/leg) 95.19

8. Total SIFL amount imputed to 1997 income \$466.67

SIFL VALUATION

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- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

9,198 Formulated Statute Mileage

— OR —

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- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origin	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Col. Ford	GARDNER HND	7239.7	7244.4		6-22-97	4.7
Leg 2	GARDNER	DISBURGH	7244.4	7248.6		6-23-97	4.2
Leg 3	DISBURGH	GARDNER	7248.6	7253.5		6-25-97	4.9
Leg 4	GARDNER	MISSOURI HOLDING CORP	7253.5	7257		6-25-97	2.2
Leg 5	MISSOURI	KANSAS CITY Bldg	7257.7	7268.3		6-26-97	2.6
Leg 6	KANSAS CITY	ASPCA	7268.3	7259.8		6-27-97	1.5
Leg 7 Summary	ASPCA	GARDNER	7259.8	7264.7		6-27-97	1.9
MANIFEST:							

22

Passenger Name	Company	"Control Employee"?	For which Leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
JR Wing			1	CIN DIV - Cirr Conf
			2	
			1	Mtg's CRA, M Hughes
			1	Stud, Howard, Callman, Strick
			3	MONT
			6	
			1	STUD. SLIC
			2	Concert - Edinburgh
			3	Edinburgh - Aspen 3707
			4	Aspen - Concor 898
			7	

MANIFEST (continued):  
Passenger Name Company

"Control  
Employee" ? For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: (Of what company?)

Greg Deal

1

SD-S.I.F. Conroe - Kdinberg - 4899

2

Kdinberg - ASPA - 3707

3

ASPA - Conroe 892

4

5

6

7

WING VIATION

REDACTED

- To be used for non-commercial flight violation computation. See Code Sec. 27(d) and Treas. Reg. Sec. 1.61-21(a).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during subpart. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One aircraft mile = 1,508 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Keep log of relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-3(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 6-15-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

K:\docstov\violation\spshk.g2

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: Steve Dolezal  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Cherry Dolezal Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	June 14, 1997	Conroe	Mont Airport	Washington	Hawthorne	1,176.0	2.15
2	June 15, 1997	Washington	Hawthorne	Conroe	Mont Airport	1,176.0	2.4
						<u>2,352.0</u>	<u>4.55</u>

1. Valued at a control or non-control employee rate\* NC

2. 50% capacity test met\*\* No

3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 2,352 \*\*\*

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 352 x .1272) =	<u>44.77</u>

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 316.02

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

\* (Control employee @ 400.0%)                     

\* (Non-control employee @ 31.3%) 98.92

7. Add: Terminal charge (31.72 per flight/leg) 63.44

8. Total SIFL amount imputed to 1997 income \$162.36

**SIFL VALUATION**

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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**- IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

2,352 Formulated Statute Mileage

— OR —

---

**- IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---

Aircraft Make & Model - Gulfstream 2  
Registration No. - N720JW

AIRCRAFT TRIP SHEET  
WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origin/Altitude	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Conroe	Dulles, DC	7234.2	7237.0	117.6	6-14-97	2.2
Leg 2	Washington DC	Conroe	7237.0	7239.7	117.6	6-15-97	2.1
Leg 3							
Leg 4							
Leg 5							
Leg 6							
Summary							
MANIFEST:							
Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?			
56 Dirs			1 2	BIP Mfg - OVRMND			
C. Polenz			1 2	SD- STLF			

4.90

8.115  
8.11



STUART KIRK

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Mar 5-7	Fidela Kirk	196.15
Nov 18	Fidela Kirk	102.69
TOTAL		298.84

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: Stuart Kirk  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Fidela Kirk Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
3	Nov 18, 1997	Macau		Singapore		1,638.0	3.23
						<u>1,638.0</u>	<u>3.23</u>

1. Valued at a control or non-control employee rate\* NC

2. 50% capacity test met\*\* No

3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 1,638

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1138 x .1323) =	139.97
Over 1500 miles @ 0.1272	( 0 x .1272) =	

5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. 226.72

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

\* (Control employee @ 400.0%)                     

\* (Non-control employee @ 31.3%) 70.96

7. Add: Terminal charge (31.73 per flight/leg) 31.73

8. Total SIFL amount imputed to 1997 income \$102.69

**SIFL VALUATION**  
Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,638 Formulated Statute Mileage

---

— OR —

---

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---

Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7203W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Calcutta	Bangor	SLIP	NOE	1007	11-12-97	2:01 ✓
Leg 2	Bangor	Hong Kong			1166	11-16-97	2:21 ✓
Leg 3	Hong Kong	Singapore			1638	11-18-97	3:23 ✓
Leg 4	Singapore	Suvarata			575	11-19-97	1:25 ✓
Leg 5	Suvarata	Manilla			1728	11-21-97	3:14 ✓
Leg 6	Manilla	Com			1597	11-21-97	3:06 ✓
Summary							<del>15:01</del> ✓

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
Travis			1	SLIP ASIN
			2	
			3	GOT
			4	SLIP ASIN
			5	
			6	
J Davis			2	
			3	
			4	
			5	
			6	

MANIFEST (continued):  
Passenger Name Company

"Control  
Employee" ?  
Leg(s) ?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Pat Davis

2

CONF-SP

3  
4  
1

Eric Silagy

3

Stewart Kaye

3

Field - Kaye

3

STEF-SK

1. To be used for non-commercial flight valuation computation. See Code Sec. 274(f) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,150 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent at each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(7). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Signature: [Signature]  
Date: 11-23-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Stuart Kirk  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Fidela Kirk Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	March 5, 1997	Singapore		Jakarta		580.0	1.25
2	March 5, 1997	Jakarta		Singapore		580.0	1.17
3	March 7, 1997	Singapore		Kuala Lumpur		217.0	0.36
4	March 7, 1997	Kuala Lumpur		Singapore		217.0	0.39
						<u>1,594.0</u>	<u>3.17</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 1,594 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1094 x .1323) =	134.56
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>221.31</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 221.31
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%)
  - \* (Non-control employee @ 31.3%) 69.27
7. Add: Terminal charge (31.72 per flight/leg) 126.88
8. Total SIFL amount imputed to 1997 income \$196.15

SIFL VALUATION

Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,594 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---

Aircraft Make & Model - Gulfstream 2  
 Registration No. - N720JW

AIRCRAFT TIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 14

Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours	
			Begin	End			Hours	Minutes
Leg 1	Singapore	Seventon	7109.3	7110.7		3-5-97	1.4	1.00
Leg 2	Trivento	Singapore	7110.7	7112.0		3-5-97	1.3	1.17
Leg 3	Singapore	Kuala Lumpur	7112.0	7112.6		3-7-97	.6	.30
Leg 4	Kuala Lumpur	Singapore	7112.6	7113.3		1-7-97	.7	.59
Leg 5	Singapore Colaba	Singapore Changi	7113.3	7113.6		3-9-97	.3	1.16
Leg 6								4.30
Summary								

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
<u>Wing</u>			1	SV RBIN
			2	Ston Carroll
			3	MT Relations
			4	
<u>J Davis</u>			1	
			2	
			3	
			4	



ROBERT HARMON

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Jan 25-26	Diana Harmon	162.38
TOTAL		162.38

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: Robert Harmon  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Diana Harmon Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
1	Jan 25, 1997	Conroe	Mont. Airport	Washington	Hawthorne	1,176.0	2.15
2	Jan 26, 1997	Washington	Hawthorne	Conroe	Mont Airport	1,176.0	2.54
						<u>2,352.0</u>	<u>4.69</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 2,352
- |                          |                  |              |
|--------------------------|------------------|--------------|
| 0 - 500 miles @ 0.1735   | ( 500 x .1735) = | 86.75        |
| 501-1500 miles @ 0.1323  | (1500 x .1323) = | 184.50       |
| Over 1500 miles @ 0.1272 | ( 352 x .1272) = | <u>44.77</u> |

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 316.02

6. Certified aircraft take-off weight as a percentage of computed mileage charges:
- (Control employee @ 400.0%) \_\_\_\_\_
  - (Non-control employee @ 31.3%) 98.92

7. Add: Terminal charge (31.73 per flight/leg) 63.46

8. Total SIFL amount imputed to 1997 income \$162.38

SIFL VALUATION

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employee's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

2,352 Formulated Statute Mileage

OR

---

IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---



MANIFEST (continued):

Passenger Name Company

"Control Employee"?

For which leg(s)?

Business Purpose (each leg):

Project or topic / Meeting with: / Of what company?

Emily Horner

\_\_\_\_\_

1

Bob Horner - SELF

2

SELF does not apply  
Child under 3 yrs old

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g). Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One nautical mile = 1,908 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: Emily Horner

Date: 1-27-97

Reviewed by:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

k:\docslavation\tripsh1.g2

ERIC SILAGY

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE

PASSENGER

AMOUNT

May 2

Laura Silagy

162.38

TOTAL

162.38

SIFL VALUATION  
Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

593 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---





JOHN HAYES

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Mar 31	Gene Hayes	666.28
Apr 17	Gene Hayes	768.88
Jul 01	Gene Hayes	429.9
Jul 10	Gene Hayes	429.41
Sep 8-11	Gene Hayes	5272.79
Sep 14-18	Gene Hayes	1535.66
Nov 6-7	Gene Hayes	727.31
Dec 10-14	Gene Hayes	4768.06
TOTAL		14598.29

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2	Mar 31, 1997	Topeka		Indianapolis		510.0	1.08
3	Mar 31, 1997	Indianapolis		Topeka		510.0	1.14
						<u>1,020.0</u>	<u>2.22</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 1,020 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(520 x .1323) =	63.96
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>150.71</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 150.71
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - (Control employee @ 400.0%) 602.84
  - (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 63.44
8. Total SIFL amount imputed to 1997 income \$666.28

SIFL VALUATION  
Page 2

In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,020 Formulated Statute Mileage

— OR —

---

IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---

Aircraft Make & Model - Outstream 2  
 Registration No. - N7201W

**AIRCRAFT TRIP SHEET**  
**WING AVIATION - THE WING GROUP**

Aircraft Seating Capacity - 2

Itinerary	Origin/Location	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	CORCOR TOLUCA	TOLUCA	7144.9	7146.2		3-31-77	1.3 1.09
Leg 2	Toluca Toluca	Toluca	7146.2	7147.3	BID	3-31-77	1.1 1.08
Leg 3	Toluca	Toluca	7147.3	7148.5	BID	3-31-77	1.2 1.14
Leg 4	Toluca	CORCOR	7148.5	7149.9		3-31-77	1.4 1.81
Leg 5							
Leg 6							
Summary							
<b>MANIFEST:</b>							
Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or Topic / Meeting with: / Of what company?			
<u>IS King</u>			<u>1</u> <u>2</u> <u>3</u> <u>4</u>				
<u>PLS</u>			<u>1</u> <u>2</u> <u>3</u> <u>4</u>				

MANIFEST (continued):  
Passenger Name Company

"Control  
Employer?" For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Todd Hayes  
Gene Hayes

\_\_\_\_\_

\_\_\_\_\_

2  
3

\_\_\_\_\_

David W. Hyatt  
with wife

\_\_\_\_\_

\_\_\_\_\_

2  
3

\_\_\_\_\_

Steve Kitchin  
Gene Kitchin

\_\_\_\_\_

\_\_\_\_\_

2  
1

\_\_\_\_\_

- To be used for non-commercial flight submission comparisons. See Code Sec. 314(f) and Trans. Reg. Sec. 1.61-211(g).
- Maximum number of seats on aircraft including crew members of vehicle post 14 months. Excludes seats not legally available for sale.
- One aircraft only - 1,368 statute miles.
- A passenger who contributes legs for both business and personal reasons must describe whether the flight is "primarily" business or personal. Report total mileage then spent on each purpose. Probably at least 31% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.142-2(b)(3). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 4-27-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

Attachment: Attachment 1

- AIR TRANSPORTATION VALUATION FORM LA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2	April 17, 1997	Topeka	Mid America	Boston	Bedford	1,293.0	2.36
						<u>1,293.0</u>	<u>2.36</u>

1. Valued at a control or non-control employee rate\* NC
  2. 50% capacity test met\*\* No
  3. Is flight primarily business or personal\*\*\* Personal
  4. Formulated Statute Mileage (See page 2) 1,293
- |   |                  |             |
|---|------------------|-------------|
| 0 - 500 miles @ 0.1735  | ( 500 x .1735) = | 86.75       |
| 501-1500 miles @ 0.1323   | ( 793 x .1323) = | 97.54       |
| Over 1500 miles @ 0.1272  | ( 0 x .1272) =   | <u>0.00</u> |
| 5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997. |                  | 184.29      |
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
    - \* (Control employee @ 400.0%) 737.16
    - \* (Non-control employee @ 31.3%) \_\_\_\_\_
  7. Add: Terminal charge (31.72 per flight/leg) 31.72
  8. Total SIFL amount imputed to 1997 income \$758.88

SIFL VALUATION  
Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,293 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---



MANIFEST (continued):  
Passenger Name \_\_\_\_\_ Company \_\_\_\_\_

"Control  
Employer" ? \_\_\_\_\_ For which  
Leg(s) ? \_\_\_\_\_

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company? \_\_\_\_\_

*John Hayes*

2

Still - John Hayes

1. To be used for non-commercial flight violation complaints. See Code Sec. 271(d) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats reserved within past 24 months. Exclude seats not legally usable on leg where flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One medical mile = 1,508 statute miles.
4. A passenger who embarks legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(3). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by: \_\_\_\_\_  
Signature: *[Signature]*  
Date: 4-24-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

E:\doc\aviation\m\pshtlg2

AIR TRANSPORTATION VALUATION FORMULA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
2	July 1, 1997	Topeka	Mid America	Eagle		604.0	1.29
						<u>604.0</u>	<u>1.29</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 604 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(104 x .1323) =	12.79
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>99.54</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. 99.54
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 398.17
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg) 31.73
8. Total SIFL amount imputed to 1997 income \$429.90

SIFL VALUATION  
Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

604 Formulated Statute Mileage

- OR -

---

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---



MANIFEST (continued):  
Passenger Name Company

"Control  
Employee?" leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

C Hayes

2

Self - J. Hayes

S Davis

1  
2  
3  
4  
5

B Kelly

1  
2  
3  
4  
5  
6  
7  
8

Pardner

8

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(f).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during when include flight crew seats occupied by anyone sitting in a capacity other than as a flight crew member.
- One seat/leg mile = 1,108 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Keep track of relative time spent on each purpose. Probably at least 31% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by: Signature: [Signature]  
Date: 7-2-97

Reviewed by: Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
4	July 10, 1997	Topeka	Mid America	Eagle		603.0	1.23
						<u>603.0</u>	<u>1.23</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 603 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(103 x .1323) =	12.67
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>99.42</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. 99.42
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 397.68
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg) 31.73
8. Total SIFL amount imputed to 1997 income \$429.41

**SIFL VALUATION**

Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

**- IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

603 Formulated Statute Mileage

— OR —

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**- IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---

Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origin	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Cond Rod	TORRICK	7277.4	7278.8	593	7-10-92	1.4
Leg 2	TORRICK	New York City	7278.8	7281.2	1148	7-10-92	2.4
Leg 3	New York City	TORRICK	7281.2	7283.7	1148	7-10-92	2.5
Leg 4	TORRICK	Beagle	7283.7	7285.1	603	7-10-92	1.4
Leg 5	Beagle	CONDROD	7285.1	7287.1	912	7-11-92	2.0
Leg 6							<u>9.70</u>
Summary							

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
J Hayes			2	Western Research Corp
			3	
			4	
G Hayes			4	



AIR TRANSPORTATION VALUATION FORM JLA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2,3,4	Sep 8, 1997	Boston		Istanbul		4,839.0	
5,6,7	Sep 11, 1997	Istanbul		Phuket		5,267.0	
						<u>10,106.0</u>	<u>0</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 10,106 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 8106 x .1272) =	<u>1,031.08</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997 1,302.33
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 5,209.33
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg) 63.46
8. Total SIFL amount imputed to 1997 income \$5,272.79

SIFL VALUATION

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

10,106 Formulated Statute Mileage

— OR —

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- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

WING AVIATION

Leg	Origin	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Cosmo	Boston	7337.6	7337.1	Dutchess Dutchess Turkey	9.5.97	25 3.30
Leg 2	Cosmo	SHANNON	7337.1	7339.0	Dutchess Turkey	9.7.97	19 1.50
Leg 3	Cosmo	SHANNON	7339.0	7342.8	Dutchess Turkey	9.8.97	28 3.47
Leg 4	Shannon	ISMAIDU	7342.8	7346.4	Turkey	9.9.97	26 3.37
Leg 5	ISMAIDU	DUSAI	7346.4	7350.6	Turkey	9.11.97	42 4.18
Leg 6	DUSAI	Bombay	7350.6	7353.4	Dutchess SIBH	9.12.97	28 2.44
Leg 7	Bombay	Phuket	7353.4	7357.9	Dutchess ASIA	9.12.97	44 4.07
Summary							

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or job? Meeting with: LOF what company?
John Wing			1	Dutchess - the organ - facetime
			2	Dutchess Turkey
			1	Dutchess Turkey
			4	8002 Turkey
			5	8002 Turkey
			1	Dutchess St. ASIA
			7	Dutchess St. ASIA
John Hayes			2	
			3	
			4	
			5	
			6	
			7	

23.9

REDACTED

MANIFEST (continued):  
Passenger Name Company

"Control Employee?"  
For which leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Paula Sallie

2

Spain

3

Gene Hayes

3

Still - John Hayes  
Stanley Milns Boston - Istanbul 4/839  
Istanbul - Phuket 5/8167

John Davis

4

Susan Conroy

4

- To be used for non-commercial flight violation computations. See Code Sec. 274(d) and Trans. Reg. Sec. 1.61-211(a).
- Maximum number of days on aircraft (including seats removed while still in use). Exclude seats not legally available for use.
- One seated and one 1,198 (same rules) crew member.
- A passenger who travels for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs. limit the amount of time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Date: 9-22-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
8	Sep 14, 1997	Phuket		Macau		1,617.0	
11	Sep 18, 1997	Macau		Bangkok		1,144.0	
						<u>2,761.0</u>	<u>0</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 2,761

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 761 x .1272) =	<u>96.80</u>

5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997 368.05

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

• (Control employee @ 400.0%) 1,472.20

• (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.73 per flight/leg) 63.46

8. Total SIFL amount imputed to 1997 income \$1,535.66

SIFL VALUATION

Page 2

In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

2,761 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

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MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?  
For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Perella

8

9

12

13

Geor Hayes

8

11

STLT - J. Hayes Statow Mills 11/17  
Statow Mills 11/14

J Davis

9

12

13

J Courington  
S Courington

11

11

STLT - J. Courington Statow Mills 11/14

1. To be used for non-commercial flight valuation computations. See Code Sec. 174(d) and Treas. Reg. Sec. 1.61-21(g).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,508 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature:

Date:

Reviewed by:

Signature:

Date:

k.Wocslaviation@rjpsht.g2

AIR TRANSPORTATION VALUATION FORMULA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2	Nov 6, 1997	Topeka	Mid America	Atlanta		721.0	1.36
6	Nov 7, 1997	Atlanta		St Petersburg	Exec Air	423.0	1.03
						<u>1,144.0</u>	<u>2.39</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met\*\* No
- 3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 1,144

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(644 x .1323) =	79.21
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00

5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 1997. 165.96

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

- (Control employee @ 400.0%) 663.85
- (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.73 per flight/leg) 63.46

8. Total SIFL amount imputed to 1997 income \$727.31

SIFL VALUATION

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,144 Formulated Statute Mileage

— OR —

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- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---





MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Gene Hayes

3

STLF - John Hayes

Plasalle

2  
3

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,150 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: \_\_\_\_\_  
Signature: [Signature]  
Date: 11-23-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

Guest Flight Imputed to: John Hayes  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Gene Hayes Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
3,4	Dec 10, 1997	Topkea		Paris		4,587.0	
5,6,1,2	Dec 14, 1997	Paris		Palm Beach		4,517.0	
						<u>9,114.0</u>	<u>0</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met\*\* No
- 3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 9,114

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 7114 x .1272) =	904.90

5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997 1,176.15

6. Certified aircraft take-off weight as a percentage of computed mileage charges:
- (Control employee @ 400.0%) 4,704.60
  - (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.73 per flight/leg) 63.46

8. Total SIFL amount imputed to 1997 income \$4,768.06

SIFL VALUATION

Page 2

In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

9,114 Formulated Statute Mileage

OR

---

IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---

Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	CORPORA	ASPER	7519.2	7521.4	891	12-4-57	2:10
Leg 2	ASPER	TOLBEN	7521.4	7522.8	600	12-5-57	1:22
Leg 3	TOLBEN	CORPORA	7522.8	7526.7	2125	12-10-57	3:52
Leg 4	CORPORA	PARIS	7526.7	7531.5	2648	12-11-97	4:46
Leg 5	PARIS	SPARNO	7531.5	7532.9	599	12-14-57	1:22
Leg 6	SPARNO	CORPORA	7532.9	7537.1	2000	12-14-57	4:13

Summary \_\_\_\_\_

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
1 <u>Is Wing</u>			2	General Development
			3	Taxi Pilots
			4	Taxi Spills
			5	
			6	
			7	
			8	
			9	
			10	
			11	
			12	

John Hayes

SPARNO

Aircraft Make & Model - Gulfstream 2  
 Registration No. - N720JW

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	EMARA	Washington DC	7537.1	7540.3	1323	12-14-92	3.13
Leg 2	Washington DC	W. Pol. Beak	7540.3	7542.9	861	12-14-92	2.36
Leg 3	W. Pol. Beak	Dungen Beak	7542.9	7543.5	184	12-14-92	1.34
Leg 4	Dungen Beak	Leases	7543.5	7546.0	814	12-16-92	2.27
Leg 5							
Leg 6							
Summary							
MANIFEST:							
Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?			
T. B. King			1 2 3 4	Gen Development - Total - Tax Sales			
T. B. King			1 2	SAME			

MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?  
For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Car Hayes

3

7  
Stanley Statu Mills Toronto - Paris 4597

Resille

2  
3  
4  
6

SAMU

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(f).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1.1508 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Date: 12-16-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

MANIFEST (continued):  
Passenger Name Company

"Control  
Employee" ? For which  
leg(s) ?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Joe Hoyer

1  
2

STL 17 Staten Mills  
Paris - Palm Beach 4317

PLSalle

1  
2  
3

John Davis

4

Don Cassley

4

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1.1508 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 12-16-57

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

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**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Eric Silagy  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Laura Silagy Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
1	May 2, 1997	Conroe	Mont. Airport	Washington	Hawthorne	1,176.0	2.23
2	May 2, 1997	Washington	Hawthorne	Conroe	Mont Airport	1,176.0	2.55
						<u>2,352.0</u>	<u>4.78</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met\*\* No
- 3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 2,352

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 352 x .1272) =	<u>44.77</u>

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 316.02

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

- (Control employee @ 400.0%)
- (Non-control employee @ 31.3%) 98.92

7. Add: Terminal charge 31.73 63.46

8. Total SIFL amount imputed to 1997 income \$162.38

SIFL VALUATION  
Page 2

In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

---

- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

2,352 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---



WING AVIATION  
REDACTED

MANIFEST (continued):  
Passenger Name Company

Lake Silagy

\*Control  
Employee? For which  
leg(s)?

1  
2

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

STL-ES

04/21/1997 16:33

Completed by:

Signature: *[Handwritten Signature]*  
Date: 5-5-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

Wing Aviation/iph:2

To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(b).  
Maximum number of seats on aircraft including seats removed within past 34 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.  
One nautical mile = 1,150 statute miles.  
A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Keep track of relative time spent on each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for it to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, there is no deduction.

SIFL AMOUNT IMPUTED TO 1997 INCOME

CLIFF KERR

DATE	PASSENGER	AMOUNT
Mar 5-7	Kate Kerr	196.15
TOTAL		196.15

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Cliff Kerr  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Kate Kerr Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual		Total	
		City	FBO	City	FBO	Statute Miles	Flight Hrs	Statute Miles	Flight Hrs
1	March 5, 1997	Singapore		Jakarta		580.0	1.25	580.0	1.25
2	March 5, 1997	Jakarta		Singapore		580.0	1.17	580.0	1.17
3	March 7, 1997	Singapore		Kuala Lumpur		217.0	0.36	217.0	0.36
4	March 7, 1997	Kuala Lumpur		Singapore		217.0	0.39	217.0	0.39
						<b>1,594.0</b>	<b>3.17</b>		

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
  
4. Formulated Statute Mileage (See page 2) 1,594

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1094 x .1323) =	134.56
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		221.31
  
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 221.31
  
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) \_\_\_\_\_
  - \* (Non-control employee @ 31.3%) 69.27
  
7. Add: Terminal charge (31.72 per flight/leg) 126.88
  
8. Total SIFL amount imputed to 1997 income \$196.15

**SIFL VALUATION**  
**Page 2**

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 6% owner of employer's equity, capital or profits' interests.

Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

---

**- IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,594 Formulated Statute Mileage

----- OR -----

**- IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---



MANIFEST (continued):  
 Passenger Name Company

"Control  
 Employee"?

For which  
 leg(s)?

Business Purpose (each leg):  
 Project or topic / Meeting with: / Of what company?

T. Kelly

1  
2  
3  
4

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

C. Kern

1  
2

58D Staturo Milk  
 58D ✓

J. Kern

3  
4

817 ✓

E. Kirk

1  
2  
3  
4

817 ✓

Caterpillar

1  
2

\_\_\_\_\_

Todd Carpenter

1  
2  
3  
4

\_\_\_\_\_

Taff Howard

Caterpillar

1  
2  
3  
4

\_\_\_\_\_

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One nautical mile = 1.1508 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each purpose. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: \_\_\_\_\_  
 Signature: [Signature]  
 Date: 3-17-97

Reviewed by: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
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STEVE KITCHEN

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Mar 31	Brenda Kitchen	666.28
TOTAL		666.28

- AIR TRANSPORTATION VALUATION FORMULA

Guest Flight Imputed to: Steve Kitchen  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Brenda Kitchen Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
2	Mar 31, 1997	Topeka		Indianapolis		510.0	1.08
3	Mar 31, 1997	Indianapolis		Topeka		510.0	1.14
						<u>1,020.0</u>	<u>2.22</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 1,020 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(520 x .1323) =	63.96
Over 1500 miles @ 0.1272	( 0 x .1272) =	<u>0.00</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 150.71
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 602.84
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 63.44
8. Total SIFL amount imputed to 1997 income \$666.28

**SIFL VALUATION**

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

---

**— IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,020 Formulated Statute Mileage

— OR —

---

**— IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---



MANIFEST (continued):  
Passenger Name Company

"Control  
Employee?"  
For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with / Of what company?

John Hayes \_\_\_\_\_ 2 \_\_\_\_\_  
Gene Hayes \_\_\_\_\_ 3 \_\_\_\_\_

David W. King \_\_\_\_\_ 2 \_\_\_\_\_  
Mr. King \_\_\_\_\_ 3 \_\_\_\_\_

Steve Kiteles \_\_\_\_\_ 2 \_\_\_\_\_  
Beard Kiteles \_\_\_\_\_ 1 \_\_\_\_\_

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-211(f).
2. Maximum number of seats on aircraft including seats removed within part 24 aircraft. Exclude seats not legally available for sale.
3. One aircraft only - 1,500 usable miles.
4. A passenger who considers leg to be business and personal reasons must describe whether the flight is "primarily" business or personal. Leg to be considered business if at least 51% of time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.61-211(f). If the purpose for any leg is primarily entertainment or to advance a political campaign, there is no business.

Completed by: \_\_\_\_\_  
Signature: [Signature]  
Date: 7-27-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
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DAVID WITTIG

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Mar 31	Beth Wittig	666.28
TOTAL		666.28

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: David Wittig  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Beth Wittig Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual		Total	
		City	FBO	City	FBO	Statute Miles	Flight Hrs	Statute Miles	Flight Hrs
2	Mar 31, 1997	Topeka		Indianapolis		510.0	1.08		
3	Mar 31, 1997	Indianapolis		Topeka		510.0	1.14		
						<u>1,020.0</u>	<u>2.22</u>		

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 1,020 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(520 x .1323) =	63.96
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>150.71</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 150.71
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 602.84
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 63.44
8. Total SIFL amount imputed to 1997 income \$666.28

**SIFL VALUATION**

Page 2

In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

---

**IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,020 Formulated Statute Mileage

---

— OR —

---

**IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---



MANIFEST (continued):  
Passenger Name Company

Control Employer? For which leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Tolu Hayes  
Gene Hayes

2  
3

David W. Hry  
Mr W. Hry

2  
3

Steve Kikuan  
Beard Kikuan

2  
3

1. To be used for non-commercial flight submission comparisons. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(f).
2. Passenger number of seat on aircraft including seats reserved within pool 24 months. Exclude seats not legally made available. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One awarded rule - 1, 1988 (three rules).
4. A passenger who contributes legs for both business and personal needs must determine whether the flight is "primarily" business or personal. Leg is "primarily" business if at least 25% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, there is no deduction.

Completed by: \_\_\_\_\_  
Signature: [Signature]  
Date: 4-27-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
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JERRY COURINGTON

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Jun 12	Susie Courington	424.48
Sep 18	Susie Courington	695.58
Oct 01	Susie Courington	424.48
TOTAL		1544.54

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Jerry Courington  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Susie Courington Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	June 12, 1997	Conroe	Mont. Airport	Topeka	Mid-Amer	593.0	1.4
						<u>593.0</u>	<u>1.4</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 593 \*\*\*
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	( 93 x .1323) =	11.44
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997.		<u>98.19</u>
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - (Control employee @ 400.0%) 392.76
  - (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 31.72
8. Total SIFL amount imputed to 1997 income \$424.48

**IFL VALUATION**  
**age 2**

general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 75% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

If flights are deemed business/personal based upon each individual's purpose for travelling.

Note: Statute miles are 15% greater than nautical miles.)

---

**F PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

593 Formulated Statute Mileage

— OR —

---

**IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---



REDACTED

MANIFEST (continued):

Passenger Name

Company

\*Control Employee?\*

For which leg(s)?

Business Purpose (each leg):

Project or topic / Meeting with: / Of what company?

J Davis

1

S. Conroy

1

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
- Minimum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One awarded mile = 1,508 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Report back at relative time spent on each purpose. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: *[Handwritten Signature]*

Date: 6-13-97

Reviewed by:

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Jerry Courington  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Susie Courington Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
11	Sep 18, 1997	Macau		Bangkok		1,144.0	
						<u>1,144.0</u>	<u>0</u>

- |   |                        |
|---|------------------------|
| 1. Valued at a control or non-control employee rate*  | <u>NC</u>              |
| 2. 50% capacity test met**  | <u>No</u>              |
| 3. Is flight primarily business or personal***  | <u>Personal</u>        |
| 4. Formulated Statute Mileage (See page 2)  | <u>1,144</u> ***       |
| 0 - 500 miles @ 0.1735  | ( 500 x .1735) = 86.75 |
| 501-1500 miles @ 0.1323   | (644 x .1323) = 79.21  |
| Over 1500 miles @ 0.1272  | ( 0 x .1272) = 0.00    |
| 5. Computed statute mileage charges as applied by the SIFL rate for the period July - December 31, 1997 | <u>165.96</u>          |
| 6. Certified aircraft take-off weight as a percentage of computed mileage charges:                      |                        |
| * (Control employee @ 400.0%)   | <u>663.85</u>          |
| * (Non-control employee @ 31.3%)  | <u>          </u>      |
| 7. Add: Terminal charge (31.73 per flight/leg)  | <u>31.73</u>           |
| 8. Total SIFL amount imputed to 1997 income   | <u>\$695.58</u>        |

**IFL VALUATION**  
page 2

general control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.

All flights are deemed business/personal based upon each individual's purpose for travelling.

Note: Statute miles are 16% greater than nautical miles.)

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**IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,144 Formulated Statute Mileage

— OR —

---

**IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

---



MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?

For which  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

Pearlille

8  
9  
12  
13

Lois Hayes

8  
11

STL - J. Hayes

J Davis

9  
12  
13

J Courington  
J Courington

11  
11

STL - J. Courington  
STATO MILKS 11/11

1. To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,1508 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Reqs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Date: 9-22-97

Reviewed by: \_\_\_\_\_ Signature: \_\_\_\_\_  
Date: \_\_\_\_\_ k:\doc\aviation\trip\pt1.g2

**AIR TRANSPORTATION VALUATION FORMULA**

Guest Flight Imputed to: Jerry Courington  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Susie Courington Spouse  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
2	Oct 1, 1997	Topeka	Mid-America	Conroe	Mont. Airport	593.0	1.19
						<u>593.0</u>	<u>1.19</u>

1. Valued at a control or non-control employee rate\* NC
  2. 50% capacity test met\*\* No
  3. Is flight primarily business or personal\*\*\* Personal
  4. Formulated Statute Mileage (See page 2) 593
- |  |                  |             |
|--|------------------|-------------|
| 0 - 500 miles @ 0.1735   | ( 500 x .1735) = | 86.75       |
| 501-1500 miles @ 0.1323  | ( 93 x .1323) =  | 11.44       |
| Over 1500 miles @ 0.1272   | ( 0 x .1272) =   | <u>0.00</u> |
| 5. Computed statute mileage charges as applied by the SIFL rate for the period July-December 1997. |                  | 98.19       |
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
    - (Control employee @ 400.0%) 392.76
    - (Non-control employee @ 31.3%) \_\_\_\_\_
  7. Add: Terminal charge (31.72 per flight/leg) 31.72
  8. Total SIFL amount imputed to 1997 income \$424.48

JOHN WING

SIFL AMOUNT IMPUTED TO 1997 INCOME

DATE	PASSENGER	AMOUNT
Jan 15-16	Phil Gamer	1041.18
Jan 15-16	Carol Gamer	1041.18
Jan 15	Karen Wing	571.09
Jan 22-27	Brian Wing	4842.53
Jan 28-30	Brian Wing	1796.32
May 5	Brian Wing	796.17
May 5	Robert	796.17
Jul 18-20	Brian Wing	1041.18
Dec 19	Christina	905.65
Dec 21	Christina	571.09
TOTAL		13402.56

**AIR TRANSPORTATION VALUATION FORMULA**

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Phil Garner Guest  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	Jan 15, 1997	Conroe		Aspen		891.0	2.05
2	Jan 16, 1997	Aspen		Conroe		891.0	1.5
						<u>1,782.0</u>	<u>3.55</u>

- 1. Valued at a control or non-control employee rate\* NC
- 2. 50% capacity test met No
- 3. Is flight primarily business or personal Personal

4. Formulated Statute Mileage (See page 2) 1,782

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1282 x .1323) =	157.69
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 244.44

- 6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - (Control employee @ 400.0%) 977.74
  - (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.72 per flight/leg) 63.44

8. Total SIFL amount imputed to 1997 income \$1,041.18

SIFL VALUATION

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,782 Formulated Statute Mileage

----- OR -----

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origination	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	CORCOR	ASPER	7046.5	7046.6	891	1-15-97	2.1
Leg 2	ASPER	CORCOR	7048.6	7050.4	891	1-16-97	1.8
Leg 3							
Leg 4							
Leg 5							
Leg 6							
Summary							
MANIFEST:							
Passenger Name	Company	"Contract Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?			
R. Wing			1	AIRCRAFT to pho SBW SBW ST/ST			
K. Wing			1	SBW			

3.90

MANIFEST (continued):  
Passenger Name Company

"Control  
Employee"?  
leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with: / Of what company?

P. Starnes

1  
2

3  
SRD STJF

C. Gardner

1  
2

3  
SRD STJF

J. W. J. J.

2

Miles - Budget, Finance, Personnel - OH

1. To be used for non-commercial flight valuation computations. See Code Sec. 774(d) and Treas. Reg. Sec. 1.61-21(k).
2. Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
3. One nautical mile = 1,150 statute miles.
4. A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is primarily entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature]  
Date: 1-17-97

Reviewed by: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Carol Garner Guest  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	Jan 15, 1997	Conroe		Aspen		891.0	2.05
2	Jan 16, 1997	Aspen		Conroe		891.0	1.5
						<u>1,782.0</u>	<u>3.55</u>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 1,782 ---
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1282 x .1323) =	157.69
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>244.44</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 244.44
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - \* (Control employee @ 400.0%) 577.74
  - \*\* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 63.44
8. Total SIFL amount imputed to 1997 income \$1,041.18

SIFL VALUATION

Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,762 Formulated Statute Mileage

— OR —

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- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

---

MANIFEST (continued):

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
<u>P. Gardner</u>			<u>1</u> <u>2</u>	<u>3 BUD 3 BUD</u>
<u>C. Gardner</u>			<u>1</u> <u>2</u>	<u>3 BUD 3 BUD</u>
<u>J. Davis</u>			<u>2</u>	<u>Misc - Budget, Finance, Personnel - OH</u>

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(f).
- Attachment number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One nautical mile = 1,508 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.62-2(b)(3). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: [Signature] Date: 1-17-97

Reviewed by: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

k:\locslav\aviation\trips\ll g2



— AIR TRANSPORTATION VALUATION FORM JLA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Karen Wing Guest  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
1	Jan 15, 1997	Conroe		Aspen		891.0	2.05
							0.55
							3.13
						<b>891.0</b>	<b>5.73</b>

1. Valued at a control or non-control employee rate\* NC
2. 50% capacity test met\*\* No
3. Is flight primarily business or personal\*\*\* Personal
4. Formulated Statute Mileage (See page 2) 891 ---
 

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(391 x .1323) =	48.09
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00
		<u>134.84</u>
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 134.84
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
  - (Control employee @ 400.0%) 539.37
  - (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.72 per flight/leg) 31.72
8. Total SIFL amount imputed to 1997 income \$571.09

SIFL VALUATION  
Page 2

In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 60) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.

- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 16% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

891 Formulated Statute Mileage

— OR —

---

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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MANIFEST (continued):

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
L. Gardner			1 2	3RD SEUF
C. Gardner			1 2	3RD SEUF
J. A. W. J.			2	Miss - Budget, Finance, Personnel - OH

- To be used for non-commercial flight valuation computation. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(g).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- One medical mile = 1,350 statute miles.
- A passenger who combines legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Regs look at relative time spent as each pursuit. Probably at least 51% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.61-21(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by: \_\_\_\_\_ Signature: *[Signature]* Reviewed by: \_\_\_\_\_ Signature: \_\_\_\_\_  
 Date: 1-17-97 Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Brian Wing Son  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1,2	June 22, 1997	Conroe		Edinbrough		4,598.0	
3,4,5,6	June 25, 1997	Edinbrough		Aspen		3,707.0	
7	June 27, 1997	Aspen		Conroe		892.0	
						<u>8,198.0</u>	<u>0</u>

1. Valued at a control or non-control employee rate\* NC
  2. 50% capacity test met\*\* No
  3. Is flight primarily business or personal\*\*\* Personal
  4. Formulated Statute Mileage (See page 2) 8,198
- |                          |                   |               |
|--------------------------|-------------------|---------------|
| 0 - 500 miles @ 0.1735   | ( 500 x .1735) =  | 86.75         |
| 501-1500 miles @ 0.1323  | (1500 x .1323) =  | 184.50        |
| Over 1500 miles @ 0.1272 | ( 7198 x .1272) = | <u>915.59</u> |
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 30, 1997 1,186.84
6. Certified aircraft take-off weight as a percentage of computed mileage charges:
- \* (Control employee @ 400.0%) 4,747.34
  - \* (Non-control employee @ 31.3%) \_\_\_\_\_
7. Add: Terminal charge (31.73 per flight/leg) 95.19
8. Total SIFL amount imputed to 1997 income \$4,842.53

SIFL VALUATION

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

9.198 Formulated Statute Mileage

— OR —

- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

9.199 Formulated Statute Mileage

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Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origin	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	CONROE	GARDNER HUB	7239.7	7244.4		6-22-97	4.7
Leg 2	GARDNER	DISBURGH	7244.4	7248.1		6-23-97	4.2
Leg 3	DISBURGH	GARDNER	7248.1	7253.5		6-25-97	4.9
Leg 4	GARDNER	MASSACHUSETTS KANSAS CITY GARDNER	7253.5	7258.7		6-25-97	2.2
Leg 5	MASSACHUSETTS	KANSAS CITY GARDNER	7258.7	7268.3		6-26-97	2.6
Leg 6	KANSAS CITY	ASPERA	7268.3	7259.8		6-27-97	1.5
Leg 7	ASPERA	CONROE	7259.8	7261.7		6-27-97	1.9
Summary	ASPERA	CONROE					1.51
MANIFEST:							

22

REDACTED

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
SR King			1	CIN DIV - CIRA CONF
			2	
			1	Mtg 3 CARA, M HUGHES
			4	SHU, AMONG, CALDWELL STRAS
			5	MOBI, KAP?
			6	MOBI
			1	SRU-311C SHAWO MILING
			2	CONROE - EDINBURGH - 4399
			3	EDINBURGH - ASPEN 3707
			4	ASPEN - CONROE 898
			7	

MANIPESI (continued):  
Passenger Name Company

\*Control  
Employee? For which  
leg(s)?

Business Purpose (attach leg):  
Project or topic / Meeting with: LOI what company?

Clery Dezel

1  
2  
3  
4  
6  
7

SD-STIFF  
Carnegie - Kdnburgn - 4899  
Kdnburgn - ASPAN - 3707  
ASPTA - Conced 892

- To be used for non-commercial flight valuation computation. See Code Sec. 37(d) and Treas. Reg. Sec. 1.61-21(f).
- Maximum number of seats on aircraft including seats removed within past 24 months. Exclude seats not legally usable during takeoff. Include flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- Date aircraft made - 1,500 statute miles.
- A passenger who occupies legs for both business and personal reasons must determine whether the flight is "primarily" business or personal. Attach book of relative time spent on each purpose. Probably at least 33% of the time spent for the entire trip (all legs) should be for business for trip to be "primarily" business. See Reg. Sec. 1.61-21(b)(3). If the purpose for any leg is principally entertainment or to advance a political campaign, then so indicate.

Completed by:

Signature: [Signature]  
Date: 6-30-97

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Brian Wing Son  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual		Total	
		City	FBO	City	FBO	Statute Miles	Flight Hrs	Statute Miles	Flight Hrs
1	Jan 28, 1997	Conroe		Boston		1,571.0	2.53		
2	Jan 30, 1997	Boston		Syracuse		259.0	0.55		
3	Jan 30, 1997	Syracuse		Conroe		1,381.0	3.13		
						<u>3,211.0</u>	<u>6.21</u>		

1. Valued at a control or non-control employee rate\* NC

2. 50% capacity test met\*\* No

3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 3,211 \*\*\*

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	(1500 x .1323) =	184.50
Over 1500 miles @ 0.1272	( 1211 x .1272) =	<u>154.04</u>

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 425.29

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

• (Control employee @ 400.0%) 1,701.16

• (Non-control employee @ 31.3%) \_\_\_\_\_

7. Add: Terminal charge (31.72 per flight/leg) 95.16

8. Total SIFL amount imputed to 1997 income \$1,796.32

**SIFL VALUATION**

Page 2

- In general a control employee is a director; an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travelers occupy 50% or more of aircraft regular seating capacity. Also, when business travelers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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**- IF PRIMARILY PERSONAL:**

Statute miles are formulated as if there had been no business flights, but only personal flights:

3,211 Formulated Statute Mileage

— OR —

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**- IF PRIMARILY BUSINESS:**

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

0 = Formulated Statute Mileage

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Aircraft Make & Model - Gulfstream 2  
 Registration No. - N7201W

AIRCRAFT TRIP SHEET  
 WING AVIATION - THE WING GROUP

Aircraft Seating Capacity - 12

Itinerary	Origin	Destination	Hobbs Meter		Distance Statute Mile	Date	Flight Hours
			Begin	End			
Leg 1	Concord	Boston	70685.5	70688.8	1571	1-28-97	2:53
Leg 2	Boston	Spencerville	70688.8	70693.3	259	1-30-97	1:55
Leg 3	Spencerville	Concord	70693.3	70703.5	1381	1-30-97	3:13
Leg 4							6:09
Leg 5							
Leg 6							
Summary							

MANIFEST:

Passenger Name	Company	"Control Employee"?	For which leg(s)?	Business Purpose (each leg): Project or topic / Meeting with: / Of what company?
J.D. King			1	Mtgs - Strategy - Personnel
			2	Kennedy Smith
			3	Mini Mtgs
B. King			1	SPB - SBE
			2	
			3	



AIR TRANSPORTATION VALUATION FORMULA

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Brian Wing Son  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual	Total
		City	FBO	City	FBO	Statute Miles	Flight Hrs
1	May 5, 1997	Conroe		Nashville		642.0	1.21
2	May 5, 1997	Nashville		Conroe		642.0	1.33
						<u>1,284.0</u>	<u>2.54</u>

1. Valued at a control or non-control employee rate\* NC

2. 50% capacity test met\*\* No

3. Is flight primarily business or personal\*\*\* Personal

4. Formulated Statute Mileage (See page 2) 1,284

0 - 500 miles @ 0.1735	( 500 x .1735) =	86.75
501-1500 miles @ 0.1323	( 784 x .1323) =	96.43
Over 1500 miles @ 0.1272	( 0 x .1272) =	0.00

5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 183.18

6. Certified aircraft take-off weight as a percentage of computed mileage charges:

• (Control employee @ 400.0%) 732.73

• (Non-control employee @ 31.3%)                     

7. Add: Terminal charge (31.72 per flight/leg) 63.44

8. Total SIFL amount imputed to 1997 income \$796.17

SIFL VALUATION

Page 2

- In general a control employee is a director, an officer (if there are no more than 10 officers and they do not represent more than 1% of all employees); among the top 1% (up to a maximum of 50) of all highly paid employees; or at least a 5% owner of employer's equity, capital or profits' interests.
- Refers to the maximum number of seats commonly available ignoring seats required by flight crew. The value of an employee's, spouse's, or dependent child's personal flight is deemed to be zero, when business travellers occupy 50% or more of aircraft regular seating capacity. Also, when business travellers occupy 50% or more of seating capacity, an independent contractor, director or family member (other than a spouse or dependent child), retiree, or surviving spouse is valued at the non-control rate.
- All flights are deemed business/personal based upon each individual's purpose for travelling.

(Note: Statute miles are 15% greater than nautical miles.)

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- IF PRIMARILY PERSONAL:

Statute miles are formulated as if there had been no business flights, but only personal flights:

1,284 Formulated Statute Mileage

— OR —

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- IF PRIMARILY BUSINESS:

Statute miles are formulated using the excess of (1) the value of all flights taken over (2) the value of the flights if only business flights were taken or the value of the flight if only one leg is flown:

Q = Formulated Statute Mileage

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MANIFEST (continued):  
Passenger Name Company

"Control Employee"?  
For which leg(s)?

Business Purpose (each leg):  
Project or topic / Meeting with / Of what company?

E. Selinger

1  
2

SW NSIN - Can Div

John Greenleaf

2

SW NSIN - Can Div

R. Day

1  
2

SWT - JIBD

Rick

1  
2

SWT - JIBD

- To be used for non-commercial flight valuation computations. See Code Sec. 274(d) and Treas. Reg. Sec. 1.61-21(a).
- Minimum number of seats on stretch including seats removed within past 24 months. Exclude seats not legally usable during subject in-hold flight crew seats occupied by anyone acting in a capacity other than as a flight crew member.
- Use actual mile - 1,100 statute miles.
- A passenger who spends less than 20% of the time spent on the entire trip (all legs) should be treated as "primarily" business. See Reg. Sec. 1.162-2(b)(2). If the purpose for any leg is principally entertainment or to advance a political campaign, also so indicate.

Completed by:

Signature: [Signature]  
Date: 11/13

Reviewed by:

Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

**AIR TRANSPORTATION VALUATION FORMULA**

**REDACTED**

Guest Flight Imputed to: John Wing  
 (Employee/Host Name) (Social Security Number)

Guest Flight Received by: Robert Guest  
 (Passenger/Guest Name) (Relationship to Host) (Age)

Leg/Flight	Flight Date	Departure		Arrival		Actual Statute Miles	Total Flight Hrs
		City	FBO	City	FBO		
1	May 5, 1997	Conroe		Nashville		642.0	1.21
2	May 5, 1997	Nashville		Conroe		642.0	1.33
						<u>1,284.0</u>	<u>2.54</u>

1. Valued at a control or non-control employee rate\* NC
  2. 50% capacity test met\*\* No
  3. Is flight primarily business or personal\*\*\* Personal
  4. Formulated Statute Mileage (See page 2) 1,284
- |                          |                  |       |
|--------------------------|------------------|-------|
| 0 - 500 miles @ 0.1735   | ( 500 x .1735) = | 86.75 |
| 501-1500 miles @ 0.1323  | (784 x .1323) =  | 96.43 |
| Over 1500 miles @ 0.1272 | ( 0 x .1272) =   | 0.00  |
5. Computed statute mileage charges as applied by the SIFL rate for the period January - June 1997. 183.18
  6. Certified aircraft take-off weight as a percentage of computed mileage charges:
    - \* (Control employee @ 400.0%) 732.73
    - \* (Non-control employee @ 31.3%) \_\_\_\_\_
  7. Add: Terminal charge (31.72 per flight/leg) 63.44
  8. Total SIFL amount imputed to 1997 income \$796.17