

**To:** jeffrey E.[jeevacation@gmail.com]  
**From:** Richard Joslin  
**Sent:** Thur 5/22/2014 8:22:48 PM  
**Subject:** RE: Re:

Foreign source income understated in 2011 and foreign tax credit disallowed incorrectly. The credit was carried over to 2012 incorrectly. Some or all should have been claimed in 2011.

**From:** jeffrey E. [mailto:jeevacation@gmail.com]  
**Sent:** Thursday, May 22, 2014 4:16 PM  
**To:** Richard Joslin  
**Subject:** Re:

why isnt the full foreign tax credit a carryover

On Thu, May 22, 2014 at 4:02 PM, Richard Joslin <[REDACTED]> wrote:

I will send tom's draft in a few minutes. I am adding amended to the respective forms and ordering the explanations to be contiguous. Larry made a good observation that the font on page 1 is irregular and that may mean manual override which deserve double checking calculations that might not be done by the tax software. In looking at the foreign tax credit, the credit amount for 2011 is calculated incorrectly (General category gross foreign income \$119K; general category foreign tax paid \$837K – gross income cannot be less than tax paid). The point is that the 2012 return should not be claiming (entirely) the carryover foreign tax credit from 2011. I also need to review the tax year 2009 B filing for Black Family 2006 Trust as there is a \$32MM investment interest deduction (BRH pass through interest is only \$16MM for 2009). A big chunk of this interest was allocated to foreign source loss in 2009 that created a carryover.

**From:** jeffrey E. [mailto:jeevacation@gmail.com]  
**Sent:** Thursday, May 22, 2014 3:12 PM  
**To:** Richard Joslin; lawrence delson  
**Subject:**

12 amendment

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