Internal Revenue Service
PO Box 630
Holtsville, NY 11742-0630
Stop 632-1

Department of the Treasury

Date: APR 2 5 2017

Taxpayer Identification Number:
056-38-1069
Tax Form:
1040
Tax Period(s):
2012

Person to Contact:
M. Mclaurin

Employee Identification Number:
0178207440
Contact Telephone Number:
631-447-4831 Fax 1-(855) 241-0441
Refer to:
Interest Computation Schedule

Leon D & Debra Black
C/O Elysium
445 Park Ave Apt 1401
New York, NY 10022-0000

Dear Leon D & Debra Black:

As required by Internal Revenue Code Section 6631, we are providing a copy of the schedule we used to calculate interest on the tax adjustment for the return identified above. This computation is for your information. The enclosed Interest Computation Schedule is not a bill for tax due. We will either send you a bill within the next few weeks or send you a statement of any refund.

If you have any questions, please contact the person named above within 45 days from the date of this letter.

Sincerely yours,

Mariellen Fiedler

Mariellen Fiedler
Exam Field Support Operation Manager

Enclosure:
Interest Computation Schedule

Letter 3535 (3-2002)
Catalog Number: 33709U

490 Activity Summary - LEON D & DEBRA BLACK

FED - ***-**-1069 LEON D & DEBRA BLACK 1040 Tax Period: 2012/12

Run Method:	IRS Default	Module Status:	Open/(Open)
Interest To:	05/05/2017		
GATT Method:	N/A	GATT Date:	Gatt is OFF
LCU Method:	N/A	LCU Interest Date:	LCU Interest is OFF
Underpay Net Start:	All Dates Included	Overpay Net Start:	All Dates Included

Date Transcript	Date Start	Date Adj / End	Description	Susp/Equal	Principal	Balance
12/02/2013		04/15/2013	150 Return Filed & Assessed Tax Liability		71,021,194.00	71,021,194.00
04/15/2013			806 Credit for Withheld Taxes and Excess FICA		(36,822.00)	70,984,372.00
Various		04/15/2013	660 Estimated Tax		(24,000,000.00)	46,984,372.00
04/15/2013			670 Subsequent Payment		(46,000,000.00)	984,372.00
04/15/2012		04/15/2013	710 Overpayment Credit Applied from Prior Tax P(		(10,156,317.85)	(9,171,945.85)
04/15/2013			826 Overpayment Transferred		12,858.38	(9,159,087.47)
04/15/2013			830 Overpayment Credit Elect to Next Periods Tax		9,159,087.47	0.00
05/05/2017		04/15/2013	300 Additional Tax Assessment By Examination D		315,590.00	315,590.00

Date		Description	Amount	Factor	Interest	Balance
04/15/2013		150 Return Filed & Assessed Tax Liability	71,021,194.00			
		300 Additional Tax Assessment By Examination	315,590.00			
		660 Estimated Tax	(24,000,000.00)			
		670 Subsequent Payment	(46,000,000.00)			
		710 Overpayment Credit Applied from Prior Tax	(10,156,317.85)			
		806 Credit for Withheld Taxes and Excess FICA	(36,822.00)			
		826 Overpayment Transferred	12,858.38			
		830 Overpayment Credit Elect to Next Periods T:	9,159,087.47			315,590.00
04/16/2013	05/05/2017	Underpay	315,590.00	0.141765915	44,739.91	360,329.91

Account Summary:	As Computed	Per Transcript	Adjustment
Deficiency Interest	44,739.91		44,739.91
Overpayment Interest			
Principal Balance			315,590.00
	44,739.91		360,329.91

510 Support of Revised Comps - LEON D & DEBRA BLACK

FED - ***-**-1069 LEON D & DEBRA BLACK 1040 Tax Period: 2012/12

Run Method:	IRS Default	Module Status:	Open/(Open)
Interest to:	05/05/2017		
GATT Method:	N/A	GATT Date:	Gatt is OFF
LCU Method:	N/A	LCU Interest Date:	LCU Interest is OFF
Underpay Net Start:	All Dates Included	Overpay Net Start:	All Dates Included

New Activity for 04/15/2013		Note	New Event	Equalize	Susp Over	Susp Under
150	Return Filed & Assessed Tax Liability		71,021,194.00			
300	Additional Tax Assessment By Examination Division		315,590.00			
660	Estimated Tax		(6,000,000.00)			
660	Estimated Tax		(4,000,000.00)			
660	Estimated Tax		(14,000,000.00)			
670	Subsequent Payment		(46,000,000.00)			
710	Overpayment Credit Applied from Prior Tax Period		(10,156,317.85)			
806	Credit for Withheld Taxes and Excess FICA		(36,822.00)			
826	Overpayment Transferred		12,858.38			
830	Overpayment Credit Elect to Next Periods Tax		9,159,087.47			
	Date Total / Susp. Balance		315,590.00			

Interest Computations 04/16/2013 - 05/05/2017	New Balance	Susp Applied 4/15/2013	Interest Balance	Rate	New Interest	Closing Balance
Principal Underpay	315,590.00		315,590.00	Under	44,739.91	315,590.00
Interest Underpay						44,739.91
Subtotal Post New Interest	315,590.00		315,590.00		44,739.91	360,329.91

Department of the Treasury
Internal Revenue Service

Leon D & Debra Black
C/O Elysuim
445 Park Ave Apt 1401
New York NY 10022-0000

Internal Revenue Service

Post Office Box 630
Stop 632-1
Holtsville, NY 11742-0630

Leon D & Debra Black
C/O Elysium
445 Park Ave Apt 1401
New York, NY 10022-0000

Department of the Treasury

Date: APR 2 5 2017

Taxpayer Identification Number:
056-38-1069
Name of Partnership:
Please see Form 4549A for this information
Partnership ID Number:
Please see Form 4549A for this information
Tax Year Ending:
December 31, 2012
Person to Contact:
M. Mclaurin
Employee Identification Number:
0178207440
Contact Hours:
8:00am-2:30pm EST Mon-Fri
Telephone Numbers:
(631)-447-4831 Fax 1-(855) 241-0441
(Not a toll-free number)

Notice of Computational Adjustment

Dear Leon D & Debra Black:

We have completed our examination of the partnership return for the year(s) shown above.

The enclosed Form 4549-A, Income Tax Discrepancy Adjustments, explains changes made to your income tax liability, including applicable penalties, as a result of our examination of the partnership. Form 4549-A does not require any signatures, should not be returned to us, and should be kept for your records.

The adjustments are being made as a result of:

- an agreement you signed,
- an agreement signed by representatives of an entity you are directly or indirectly invested in,
- a court decision,
- an Administrative Adjustment Request,
- allowing a Notice of Final Partnership Administrative Adjustment that was sent to you, the Tax Matters Partner of the partnership or an entity through which you hold your partnership interest, to lapse without bringing a timely challenge in Tax Court, or
- failure to file consistently with the partnership return.

This notice of computational adjustment includes a Form 4549-A which reflects the amount you owe based upon adjustments to a partnership(s) in which are directly or indirectly invested. This does not include any adjustments that may be proposed as a result of any other partnership examinations not referenced above. You may choose to pay the amount shown on the Form 4549-A, as interest will continue to accrue on any unpaid balance. You will receive a separate billing that will reflect any credits/payments and updated interest calculations. If you are due a refund, it will be issued to you if you owe no other taxes, have no other legal obligations that we are required to collect, and are not a party to any other partnership examinations. If you are due a refund, it should be sent to you within six to eight weeks.

To dispute the computational adjustment made to your return or to assert partner-level defenses to any penalty imposed in this notice, you must pay the tax as adjusted in full, and then file a claim for refund at the address provided above within six months from the date of this letter. If you send your claim to an address other than the above address, processing will be delayed and your claim may be disallowed if received at the address specified in this letter after the end of the six-month period. You may file a refund suit as provided by law if your timely-filed refund claim is disallowed or not acted upon within six months after the date it is filed.

If you believe that the calculation of the computational adjustment is wrong because of a mathematical error, please contact us. You do not have to pay the tax in order to discuss issues related to the calculation of the liability. You may call the person whose telephone number and contact hours are shown above or write that person at the IRS address at the top of this letter. Additionally, if you have any other questions about this notice, contact the person listed on this form as they will be most familiar with your case. If you do not contact us concerning any mathematical errors related to this liability within six months from the date of this letter, your failure to contact us may preclude you from raising these issues during any later collection due process proceedings.

If you have any affected items subject to deficiency procedures, a separate notice of deficiency will be sent to you.

If you write, please include your telephone number, the hours you can be reached and a copy of this letter.

Thank you for your cooperation.

Sincerely,

Mariellen Fiedler

Mariellen Fiedler
Exam Field Support Operation Manager

Enclosures:
Form 4549-A
Copy of this letter

Internal Revenue Service

Department of the Treasury

Post Office Box 630
Stop 632-1
Holtsville, NY 11742-0630

Date: APR 2 5 2017

Taxpayer Identification Number:
056-38-1069

Name of Partnership:
Please see Form 4549A for this information

Partnership ID Number:
Please see Form 4549A for this information

Tax Year Ending:
December 31, 2012

Person to Contact:
M. Mclaurin

Employee Identification Number:
0178207440

Contact Hours:
8:00am-2:30pm EST Mon-Fri

Telephone Numbers:
(631)-447-4831 Fax 1-(855) 241-0441
(Not a toll-free number)

Leon D & Debra Black
C/O Elysium
445 Park Ave Apt 1401
New York, NY 10022-0000

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If you have any affected items subject to deficiency procedures, a separate notice of deficiency will be sent to you.

If you write, please include your telephone number, the hours you can be reached and a copy of this letter.

Thank you for your cooperation.

Sincerely,

Mariellen Fiedler

Mariellen Fiedler
Exam Field Support Operation Manager

Enclosures:
Form 4549-A
Copy of this letter

Form **4549-A** (Rev. March 2013)	Department of the Treasury-Internal Revenue Service **Income Tax Examination Changes** **(Unagreed and Excepted Agreed)**	Page 1 of 2

Name and Address of Taxpayer	Taxpayer Identification Number	Return Form No.:
Leon D & Debra Black C/O Elysuim 445 Park Ave Apt 1401 New York NY 10022-0000	056-38-1069	1040
	Person with whom examination changes were discussed.	**Name and Title:** Leon D & Debra Black

1. **Adjustments to Income**	**Period End** 12/31/2012	**Period End**	**Period End**
a. Ordinary Income 98-0541994	884,006.00		
b. Itemized Deductions	17,680.00		
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
o.			
p.			
2. **Total Adjustments**	901,686.00		
3. Taxable Income Per Return or as Previously Adjusted	378,805,695.00		
4. **Corrected Taxable Income**	379,707,381.00		
Tax Method	SCHEDULE D		
Filing Status	Joint		
5. **Tax**	73,510,289.00		
6. **Additional Taxes / Alternative Minimum**			
7. Corrected Tax Liability	73,510,289.00		
8. **Less Credits** a. Foreign Tax Credit	2,099,898.00		
b. General Business Credit	57,310.00		
c. Prior Year Minimum Tax Credit	25,255.00		
d.			
9. **Balance** *(Line 7 less total of Lines 8a thru 8d)*	71,327,826.00		
10. Plus Other Taxes a. Self Employment Tax	8,958.00		
b.			
c.			
d.			
11. Total Corrected Tax Liability *(Line 9 plus Lines 10a thru 10d)*	71,336,784.00		
12. Total Tax Shown on Return or as Previously Adjusted	71,021,194.00		
13. Adjustments to: a.			
b.			
c.			
14. Deficiency-Increase in Tax or *(Overassessment - Decrease in Tax)* *(Line 11 less Line 12 adjusted by Lines 13a through 13c)*	315,590.00		
15. Adjustments to Prepayment Credits-Increase *(Decrease)*			
16. **Balance Due or (Overpayment)** - *(Line 14 adjusted by Line 15)* *(Excluding interest and penalties)*	315,590.00		

Form **4549-A** (Rev. March 2013)	Department of the Treasury-Internal Revenue Service **Income Tax Examination Changes (Unagreed and Excepted Agreed)**	Page 2 of 2

Name of Taxpayer	Taxpayer Identification Number	Return Form No.:
Leon D & Debra Black C/O Elysuim	056-38-1069	1040

17. Penalties/ Code Sections	**Period End** 12/31/2012	**Period End**	**Period End**
a.			
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
18. **Total Penalties**			
Underpayment attributable to negligence: *(1981-1987)* *A tax addition of 50 percent of the interest due on the underpayment will accrue until it is paid or assessed.*			
Underpayment attributable to fraud: *(1981-1987)* A tax addition of 50 percent of the interest due on the underpayment will accrue until it is paid or assessed.			
Underpayment attributable to Tax Motivated Transactions *(TMT)*. Interest will accrue and be assessed at 120% of underpayment rate in accordance with IRC 6621(c).	0.00		
19. **Summary of Taxes, Penalties and Interest:**			
a. Balance due or *(Overpayment)* Taxes - *(Line 16, Page 1)*	315,590.00		
b. Penalties *(Line 18)* - computed to 05/01/2017			
c. Interest *(IRC § 6601)* - computed to 05/31/2017	0.00		
d. TMT Interest - computed to 05/31/2017 *(on TMT underpayment)*	0.00		
e. Amount due or refund - *(sum of Lines a, b, c and d)*	315,590.00		

Other Information:

We have adjusted your return in accordance with the examination results for the identified BRH Holdings LP 98-0541994 partnership. The examination results are based on the Notice of Final Partnership Administrative Adjustment and the Schedule of Adjusted Items, which were not petitioned during the statutory period.

If you have any questions, please contact your Tax Matter Partner.

Examiner's Signature: Name	Employee ID:	Office:	Date:
M. Mclaurin	0178207440	BSC 631-447-4831	05/01/2017

The Internal Revenue Service has agreements with state tax agencies under which information about federal tax, including increases or decreases, is exchanged with the states. If this change affects the amount of your state income tax, you should amend your state return by filing the necessary forms.

You may be subject to backup withholding if you underreport your interest, dividend, or patronage dividend income you earned and do not pay the required tax. The IRS may order backup withholding *(withholding of a percentage of your dividend and/or interest payments)* if the tax remains unpaid after it has been assessed and four notices have been issued to you over a 120-day period.

2012 - Form 3800 - General Business Credit

Part I - Current Year Credit for Credits Not Allowed Against Tentative Minimum Tax (TMT)

1. General business credit from a non-passive activity	1,075.00
2. General business credit allowed from a passive activity	0.00
3. General business credit carryforwards	56,235.00
4. General business credit carrybacks	0.00
5. Tentative general business credit (sum of lines 1 through 4)	57,310.00

Part II - Allowable Credit

6. Regular tax before credits	73,510,289.00
7. Alternative minimum tax	0.00
8. Total of lines 6 and 7	73,510,289.00
9. Foreign tax credit	2,099,898.00
10. Allowable separately stated credits	0.00
11. Total of lines 9 through 10	2,099,898.00
12. Net income tax (line 8 less line11)	71,410,391.00
13. Net regular tax (line 6 less line 11)	71,410,391.00
14. If line 13 is more than $25,000, enter 25% of the excess	17,846,347.75
15. Tentative minimum tax	69,138,526.00
16. Greater of line 14 or line 15	69,138,526.00
17. Line 12 less line 16 (if zero or less, enter -0-)	2,271,865.00
18. Bonus depreciation amount	0.00
19. Add lines 17 and 18	2,271,865.00
20. Smaller of Part I, line 5 above or Part II, line 19	57,310.00
21. Smaller of Part I, line 5 above or Part II, line 17	57,310.00
22. Subtract line 21 from line 20 Skip lines 23 through 27 and enter -0- on line 28 if there is no tentative empowerment zone and renewal community employment credit	0.00
23. Multiply line 15 by 75%	0.00
24. Greater of line 14 or line 23	0.00
25. Subtract line 24 from line 12 (if zero or less, enter -0-)	0.00
26. Subtract line 21 from line 25 (if zero or less, enter -0-)	0.00
27. Tentative empowerment zone and renewal community employment credit	0.00
28. Empowerment zone and renewal community employment credit allowed (smaller of line 26 or line 27)	0.00
29. Subtract line 14 from line 12 (if zero or less, enter -0-)	53,564,043.25
30. Add lines 21 and 28	57,310.00
31. Subtract line 30 from line 29 (if zero or less, enter -0-)	53,506,733.25
32. Business credit from a non-passive activity	0.00
33. Eligible small business credit from a non-passive activity	0.00
34. Business & eligible small business credit allowed from a passive activity	0.00
35. Business & eligible small business credit carryforwards	0.00
36. Business & eligible small business credit carrybacks	0.00
37. Tentative business and eligible small business credit (sum of lines 32 through 36)	0.00
38. Smaller of line 31 or line 37	0.00
39. Current year credit allowed (add lines 30 and 38)	57,310.00

Name of Taxpayer:	Leon D & Debra Black		05/01/2017
Identification Number:	056-38-1069	Total	18.00.00

2012 - Form 6251 - Alternative Minimum Tax Computation

1. If filing Schedule A, enter taxable income before exemptions; otherwise, enter adjusted gross income	379,722,581.00
2. Total adjustment and preferences (excluding any NOL deduction)	11,432,719.00
3. Net operating loss deduction	0.00
4. Alternative tax net operating loss deduction	0.00
5. Alternative minimum taxable income (combine lines 1 thru 4)	391,155,300.00
6. Exemption amount	0.00
7. Subtract line 6 from line 5 (if zero or less, enter zero)	391,155,300.00
8. If capital gains are reported, see line 19 from continuation page (If FEIT worksheet for AMT is used, enter amount from line 6 of that worksheet instead) All others: If line 7 is $175,000 or less ($87,500 if MFS) multiply line 7 by 26%. Otherwise, multiply line 7 by 28% and subtract $3,500 ($1,750 if MFS) from the result	70,966,420.00
9. Alternative minimum tax foreign tax credit	1,827,894.00
10. Tentative minimum tax (line 8 less line 9)	69,138,526.00
11. Regular tax before credits (if Schedule J was used to figure tax, use the refigured amounts for lines 44 and 47 of Form 1040 without using Schedule J)	71,410,391.00
12. Alternative minimum tax	0.00

Exemption Worksheet (line 6 above)

A. Exemption amount based on filing status	78,750.00
B. Alternative minimum taxable income	391,155,300.00
C. Enter $112,500 ($150,000 if married filing jointly or qualifying widow(er), $75,000 if married filing separately)	150,000.00
D. Subtract line C from line B	391,005,300.00
E. Multiply line D by 25%	97,751,325.00
F. Subtract line E from line A (if zero or less, enter zero)	0.00

2012 - Form 6251 - Continuation, Tax Computation Using Maximum Capital Gain Rates

1. Amount from Form 6251 report, line 7 (If FEIT worksheet for AMT was used, enter amount from line 3 of that worksheet instead)	391,155,300.00
2. Amount from line 6 Qualified Dividends and Capital Gain Tax Worksheet or line 13 Schedule D Tax Worksheet (refigured for AMT)	296,380,486.00
3. Amount from Schedule D line 19 (refigured for AMT)	803,368.00
4. Amount from line 2 if no Schedule D worksheet; otherwise, the smaller of the sum of line 2 and line 3 or Schedule D worksheet line 10 (refigured for AMT)	297,183,854.00
5. Smaller of line 1 or line 4	297,183,854.00
6. Subtract line 5 from line 1	93,971,446.00
7. If line 6 is $175,000 or less ($87,500 if MFS) multiply line 6 by 26%; otherwise, multiply line 6 by 28% and subtract $3,500 ($1,750 if MFS) from the result	26,308,505.00
8. Enter: $70,700 if married filing jointly or qualifying widow(er); $35,350 if single or married filing separately; $47,350 if head of household	70,700.00
9. Amount from line 7 Qualified Dividends and Capital Gain Tax Worksheet or line 14 Schedule D Tax Worksheet	83,326,895.00
10. Subtract line 9 from line 8 (if zero or less, enter zero)	0.00
11. Smaller of line 1 or line 2	296,380,486.00
12. Smaller of line 10 or line 11	0.00
13. Subtract line 12 from line 11	296,380,486.00
14. Multiply line 13 by 15%	44,457,073.00
15. Subtract line 11 from line 5	803,368.00
16. Multiply line 15 by 25%	200,842.00
17. Total of lines 7, 14 and 16	70,966,420.00
18. If line 1 is $175,000 or less ($87,500 if MFS) multiply line 1 by 26%; otherwise, multiply line 1 by 28% and subtract $3,500 ($1,750 if MFS) from the result	109,519,984.00
19. Smaller of line 17 or line 18. Enter here and on line 8 of Form 6251 report	70,966,420.00

2012 - Form 8801 - Credit for Prior Year Minimum Tax

Part I - Net Minimum Tax on Exclusion Items

1. Taxable income (loss) from prior year Form 6251	93,723,040.00
2. Adjustments and preferences treated as exclusion items	29,011,633.00
3. Minimum tax credit net operating loss deduction	0.00
4. Combine lines 1 through 3 (if more than $223,900 and married filing separate for prior year - see instructions)	122,734,673.00
5. Exemption amount from prior year Form 6251	74,450.00
6. Phase-out exemption from prior year Form 6251	150,000.00
7. Subtract line 6 from line 4 (if zero or less, enter -0-)	122,584,673.00
8. Multiply line 7 by 25%	30,646,168.00
9. Subtract line 8 from line 5 (if zero or less, enter -0-)	0.00
10. Subtract line 9 from line 4 (if zero or less, enter -0-)	122,734,673.00
11. Line 11 computation (if filing Form 2555/2555-EZ for prior year, enter amount from page 3) or, (if capital gains for prior year, enter amount from Part III, line 47); otherwise, multiply line 10 by 28% and subtract $ 3,500 from the result)	22,445,889.00
12. Minimum tax foreign tax credit on exclusion items	122,464.00
13. Tentative minimum tax on exclusion items (line 11 less line 12)	22,323,425.00
14. Regular tax before credits minus foreign tax credit (line 34 of prior year Form 6251)	14,310,267.00
15. Net minimum tax on exclusion items (line 13 less line 14)	8,013,158.00

Part II - Current Year Nonrefundable and Refundable Credits and Carryover

16. Line 35 of prior year Form 6251	8,008,225.00
17. Amount from line 15 above	8,013,158.00
18. Adjusted net minimum tax (line 16 less line 17)	(4,933.00)
19. Carryforward of minimum tax credit from prior year	30,188.00
20. Prior year unallowed qualified electric vehicle credit	0.00
21. Combine lines 18 through 20	25,255.00
22. Current year regular income tax less allowable credits	71,353,081.00
23. Current year tentative minimum tax (line 33 of Form 6251)	69,138,526.00
24. Subtract line 23 from line 22 (if zero or less, enter -0-)	2,214,555.00
25. Current year nonrefundable credit (smaller of line 21 or line 24)	25,255.00
26. Tentative refundable credit (amount from Part IV, line 53 or 57) ***(if applicable)***	12,628.00
27. Current year refundable credit (line 26 less line 25)	0.00
28. Credit carryforward (subtract larger of line 25 or line 26 from line 21)	0.00

Part III - Tax Computation Using Maximum Capital Gains Rates

29. Amount from line 10 (If FEIT worksheet for F8801 was used, enter amount from line 3 of that worksheet instead)	122,734,673.00
30. Amount from prior year line 6 of Qualified Dividends Worksheet or line 13 of Schedule D Tax Worksheet	91,640,796.00
31. Amount from prior year Schedule D, line 19	100,524.00
32. Smaller of lines 30 and 31	91,741,320.00
or prior year line 10 of Schedule D Tax Worksheet	91,741,320.00
33. Smaller of line 29 or line 32	30,993,353.00
34. Subtract line 33 from line 29	8,674,639.00
35. Multiply line 34 by 28% and subtract $ 3,500 from the result	69,000.00
36. Enter: $69,000 if married filing jointly or qualifying widow(er) for 2011, $34,500 if single or married filing separately for 2011, $46,250 if head of household for 2011	
37. Amount from prior year line 7 of Qualified Dividends Worksheet or line 14 of Schedule D Tax Worksheet	2,067,444.00
38. Subtract line 37 from line 36. If zero or less, enter -0-	0.00
39. Smaller of line 29 or line 30	91,640,796.00
40. Smaller of line 38 or line 39	0.00
41. Subtract line 40 from line 39	91,640,796.00
42. Multiply line 41 by 15%	13,746,119.00
43. Subtract line 39 from line 33	100,524.00
44. Multiply line 43 by 25%	25,131.00
45. Add lines 35, 42, and 44	22,445,889.00
46. Multiply line 29 by 28% and subtract $ 3,500 from the result	34,362,208.00
47. Smaller of line 45 or line 46 (enter here and on line 11 above) (If FEIT worksheet for F8801 was used, enter amount on line 4 of that worksheet instead)	22,445,889.00

Part IV - Tentative Refundable Credit

48. Enter amount from line 21	25,255.00
49. Minimum tax credit amount from 2010 Form 8801, lines 18 and 20 (if zero or less, enter -0-)	0.00
50. Minimum tax credit amount from 2011 Form 8801, lines 18 and 20 (if zero or less, enter -0-)	0.00
51.Total of lines 18 and 20 above (if zero or less, enter -0-)	0.00
52. Add lines 49 thru 51	0.00
53. Long-term unused minimum tax credit (subtract line 52 from line 48) (if zero or less, stop and enter -0- here and on line 26 and do not complete the rest of Part IV),	25,255.00
54. Multiply line 53 by 50%	12,628.00
55. Prior year AMT refundable credit amount	0.00
56. Larger of line 54 or line 55	12,628.00
57. Smaller of line 53 or line 56. Enter result here and on line 26	12,628.00

Name of Taxpayer:	Leon D & Debra Black		05/01/2017
Identification Number:	056-38-1069	Total	18.00.00

2012 - FOREIGN EARNED INCOME TAX WORKSHEET for PRIOR YEAR MINIMUM TAX

1. Enter amount from Form 8801, line 10	0.00
2. Enter amount from 2011 Form 2555, line 45 and 50, or Form 2555-EZ, line 18	0.00
3. Add lines 1 and 2	0.00
4. Tax on amount on line 3 If capital gains are reported for prior year, enter amount from line 3 on Form 8801, line 29. Complete Form 8801, Part III and enter amount from line 47 here All others: If line 3 is $175,000 or less ($87,500 or less if married filing separately for prior year), multiply line 3 by 26%; otherwise, multiply line 3 by 28% and subtract $3,500 ($1,750 if married filing separately for prior year) from the result	0.00
5. Tax on amount on line 2 If line 2 is $175,000 or less ($87,500 or less if married filing separately for prior year), multiply line 2 by 26%; otherwise, multiply line 2 by 28% and subtract $3,500 ($1,750 if married filing separately for prior year) from the result	0.00
6. Subtract line 5 from line 4. If zero or less, enter -0- (enter amount here and on line 11 of page 1)	0.00

NOTE: Computations include capital gain excess determination and any necessary modifications to Form 8801, Part III

Name of Taxpayer: Leon D & Debra Black			05/01/2017
Identification Number: 056-38-1069		Total	18.00.00

2012 - SCHEDULE A - ITEMIZED DEDUCTIONS

	PER RETURN	PER EXAM	ADJUSTMENT
1. Medical, dental and insurance premiums	0.00	0.00	0.00
2. 7.5% of adjusted gross income	30,778,498.00	30,844,797.98	
3. Net medical and dental expenses	0.00	0.00	0.00
4. Taxes	6,485,310.00	6,485,310.00	0.00
5. Home interest expense	19,832.00	19,832.00	0.00
6. Qualified mortgage insurance premiums	0.00	0.00	0.00
7. Investment interest	8,029,812.00	8,029,812.00	0.00
8. Other interest expense	0.00	0.00	0.00
9. Total interest expense	8,049,644.00	8,049,644.00	0.00
10. Contributions	12,783,116.00	12,783,116.00	0.00
11. Casualty and theft losses	0.00	0.00	0.00
12. Miscellaneous deductions	12,448,601.00	12,448,601.00	0.00
13. 2% of adjusted gross income	8,207,599.00	8,225,279.00	
14. Excess miscellaneous deductions	4,241,002.00	4,223,322.00	17,680.00
15. Other miscellaneous deductions	0.00	0.00	0.00
16. Total itemized deductions (Sum of lines 3, 4, 9, 10, 11, 14, and 15)	31,559,072.00	31,541,392.00	17,680.00

2012 - SCHEDULE D - CAPITAL GAINS AND LOSSES

Part I	Short-Term Capital Gains and Losses—Assets Held One Year or Less		
1	Short-term capital gain or loss		3,796,929.00
2	Short-term capital loss carryover		0.00
3	Net Short-term Gain or Loss (Add line 1 and 2)		3,796,929.00
Part II	Long-Term Capital Gains and Losses—Assets Held More Than One Year		
4	Long-term capital gain or loss		272,640,171.00
5	Long-term capital gain or loss carryover		0.00
6	Net long-term Gain or Loss (Add line 4 and 5)		272,640,171.00
Part III	Summary		
7	Sum of lines 3 and 6 - Net Capital Gain or Loss		276,437,100.00
8	Capital loss limitation		0.00
9	Capital Gain or Loss - As Corrected		276,437,100.00
10	Capital Gain or Loss - Per Return		276,437,100.00
11	Line 9 less line 10 - Adjustment to Income		0.00
CORRECTED CARRYOVER			
12	Short-term Carryover to Subsequent Year		0.00
13	Long-term Carryover to Subsequent Year		0.00
	28% RATE GAIN COMPUTATION		
1	Tentative 28% rate gain (total of lines 1 thru 4 from worksheet)		0.00
2	Long-term capital loss carryover		0.00
3	Net short-term capital loss		0.00
4	Allowable 28% rate gain (sum of lines 1 thru 3) (if -0- or less, enter -0-)		0.00
	SECTION 1250 GAIN COMPUTATION		
1	Tentative Section 1250 gain (line 13 from worksheet)		803,368.00
2	Tentative 28% rate gain	0.00	
3	Net short-term capital loss	0.00	
4	Long-term capital loss carryover	0.00	
5	Sum of lines 2 thru 4 (if less than -0-, enter as positive amount) (if -0- or greater, enter -0-)		0.00
6	Allowable Section 1250 gain (line 1 less line 5) (if -0- or less, enter -0-)		803,368.00

2012 - Schedule D Tax Worksheet

1. Enter the taxable income from Form 1040, line 43, or the amount from Foreign Earned Income Tax Worksheet, line 3, if filing Form 2555 or 2555-EZ	379,707,381.00
2. Enter the qualified dividends from Form 1040, line 9b	24,543,683.00
3. Enter the amount from Form 4952, line 4g	0.00
4. Enter the amount from Form 4952, line 4e If applicable, enter the smaller of line 4e or the amount on the dotted line next to line 4e of Form 4952	261,989,805.00
5. Subtract line 4 from line 3. If zero or less, enter -0-	0.00
6. Subtract line 5 from line 2. If zero or less, enter -0-	24,543,683.00
7. Enter the smaller of line 15 or line 16 of Schedule D	272,640,171.00
8. Enter the smaller of line 3 or line 4	0.00
9. Subtract line 8 from line 7. If zero or less, enter -0-	272,640,171.00
10. Add lines 6 and 9	297,183,854.00
11. Add lines 18 and 19 of Schedule D	803,368.00
12. Enter the smaller of line 9 or line 11	803,368.00
13. Subtract line 12 from line 10	296,380,486.00
14. Subtract line 13 from line 1. If zero or less, enter -0-	83,326,895.00
15. Enter: $35,350 if single or married filing separately; $70,700 if married filing jointly or qualifying widow(er); or $47,350 if head of household	70,700.00
16. Enter the smaller of line 1 or line 15	70,700.00
17. Enter the smaller of line 14 or line 16	70,700.00
18. Subtract line 10 from line 1. If zero or less, enter -0-	82,523,527.00
19. Enter the larger of line 17 or line 18	82,523,527.00
20. Subtract line 17 from line 16. This amount is taxed at 0% If lines 1 and 16 are the same, skip lines 21 through 33 and go to line 34. Otherwise, go to line 21.	0.00
21. Enter the smaller of line 1 or line 13	296,380,486.00
22. Enter the amount from line 20 (if line 20 is blank, enter -0-)	0.00
23. Subtract line 22 from line 21. If zero or less, enter -0-	296,380,486.00
24. Multiply line 23 by 15% (.15) If Schedule D, line 19, is zero or blank, skip lines 25 through 30 and go to line 31. Otherwise, go to line 25.	44,457,073.00
25. Enter the smaller of line 9 above or Schedule D, line 19	803,368.00
26. Add lines 10 and 19	379,707,381.00
27. Enter the amount from line 1 above	379,707,381.00
28. Subtract line 27 from line 26. If zero or less, enter -0-	0.00
29. Subtract line 28 from line 25. If zero or less, enter -0-	803,368.00
30. Multiply line 29 by 25% (.25) If Schedule D, line 18, is zero or blank, skip lines 31 through 33 and go to line 34. Otherwise, go to line 31.	200,842.00
31. Add lines 19, 20, 23, and 29	
32. Subtract line 31 from line 1	
33. Multiply line 32 by 28% (.28)	
34. Figure the tax on the amount on line 19. If the amount on line 19 is less than $100,000, use the Tax Table to figure the tax. If the amount on line 19 is $100,000 or more, use the Tax Computation Worksheet	28,852,374.00
35. Add lines 24, 30, 33, and 34	73,510,289.00
36. Figure the tax on the amount on line 1. If the amount on line 1 is less than $100,000, use the Tax Table to figure the tax. If the amount on line 1 is $100,000 or more, use the Tax Computation Worksheet	132,866,723.00
37. Tax on all taxable income (including capital gains and qualified dividends) Enter the smaller of line 35 or line 36. Also include this amount on Form 1040, line 44, or Foreign Earned Income Tax Worksheet, line 4, if applicable	73,510,289.00

Form **886-A** (Rev. January 1994)886-A	**EXPLANATION OF ITEMS**	Schedule number or exhibit
Name of Taxpayer Leon D & Debra Black	Taxpayer Identification Number 056-38-1069	Year/Period Ended 2012

Ordinary Income 98-0541994

Tax Period	Per Return	Per Exam	Adjustment
2012	$53,400,301.00	$54,284,307.00	$884,006.00

We have adjusted your return in accordance with the examination results for the identified BRH Holdings LP 98-0541994 partnership. The examination results are based on the Notice of Final Partnership Administrative Adjustment and the Schedule of Adjusted Items, which were not petitioned during the statutory period.

Statutory-Itemized Deductions

Tax Period	Per Return	Per Exam	Adjustment
2012	$31,559,072.00	$31,541,392.00	$17,680.00

Certain expenses deducted as miscellaneous itemized deductions are only deductible to the extent that they exceed a percentage of your adjusted gross income. Since we have made other changes in this report which affect your adjusted gross income, we have also adjusted these expenses.