

From: Richard Joslin <[REDACTED]>

To: jeffrey E. <jeevacation@gmail.com>

Subject: FW: Follow-up to Pro-Forma 8865 Discussion

Date: Tue, 27 Sep 2016 18:19:37 +0000

Attachments: 1. _Black_Family_Partners,_L.P._Checklist...pdf;
2. _AOG_International_Returns_Instructions_(9-22-16)_Black_Family_Partners.pdf;
2. _Black_Family_Partnership_-_Pro_Forma_International_Filings.pdf;
3. _Founders_Org_Charts.pdf; 4. _BRH_Holdings_LP_2015_1065_For_8865.pdf

Minor revisions pursuant to call on Friday

From: Suzanne Wong [mailto:[REDACTED]]

Sent: Monday, September 26, 2016 8:26 PM

To: John Castrucci <[REDACTED]>; Richard Joslin <[REDACTED]>; Joe Avantario <[REDACTED]>

Cc: Marc Rolan <[REDACTED]>; Sebastian Restrepo <[REDACTED]>; Ramunno, Louis (US - New York) <[REDACTED]>; 'Butera, Thomas (US - New York)' <[REDACTED]>

Subject: Follow-up to Pro-Forma 8865 Discussion

Further to our discussions, attached is the full package provided Friday updated for the following:

- 1) Checklist is revised to include TRA payments related to 2014, made in 2015 – Note this was provided in letter form on 7/15 with original package. Please let me know if you are unable to locate.
- 2) Updated cover letter to include form 8858 filings
- 3) Revised structure charts to exclude “insert name and %”
- 4) LB’s maximum ownership percentage of BRH Holdings L.P. is 48.197%

As a reminder, from discussions Friday, you will also have an additional filing requirement for BRH Holdings, GP, Ltd. We along with Akin are working to obtain the proper legal entity classification for you to determine the proper filing requirement.

Michele will contact you tomorrow to set up time to update you on our next steps including timing.

Let me know if you have any questions.

Best,

Suzanne Wong | Apollo Global Management L.L.C.
[REDACTED]

From: Suzanne Wong

Sent: Friday, September 23, 2016 2:49 PM

To: 'John Castrucci'; 'Richard Joslin'; Joe Avantario

Cc: Marc Rolan; Sebastian Restrepo; Ramunno, Louis (US - New York); 'Butera, Thomas (US - New York)'

Subject: Materials for 3:30pm 8865 Pro-Forma Discussion

Attached are the following to be discussed at our 3:30pm call today:

- 1) 2015 Checklist of K-1 related items
- 2) 2015 Proforma forms 8865 including attachments

- 3) Duplicate Structure Charts (without "Proforma" mark)
- 4) 2015 Form 1065 for BRH Holding LP (data for preparation of the Form 8865)

Thanks,

Suzanne Wong | Apollo Global Management L.L.C.



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