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CC: 'Thomas Turrin' <[REDACTED]>, Richard Joslin <[REDACTED]>
Subject:
Date: Fri, 28 Apr 2017 22:00:37 +0000
Attachments: 2012_BRH.pdf

MEMORANDUM

TO: Leon Black
Jeffrey Epstein

CC: Tom Turrin
Rich Joslin

FROM: Brad Wechsler & Barry Cohen

DATE: April 28, 2017

As discussed, this may all be moot now.

The attached is a prototype of the type of filing we would intend to send to the IRS. As background, immediately following this cover note is the notice we received from the IRS regarding BRH. We are showing you the approach we intend to use for all of the numbers but in this package are just providing you the detail for the \$45MM of interest income.

The first page of the package after the IRS notice to us is a draft of our cover note to the IRS (needs editing) explaining the flow of the following pages. The second page is a tax structure chart that explains the "path" that the BRH numbers take as they get consolidated into the 1040.

The next two pages explain the components of the \$45MM and provide the back-up and tie-in to the schedules on the 1040 where the components of the \$45MM are picked up.

Comments and edits are obviously welcome.

Brad & Barry