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Subject: FW: flowchart

Date: Mon, 17 Apr 2017 16:14:23 +0000

Attachments: 2012_BRH_flowchart.pdf; 4-17-2017_IRS_LDB.PDF

We received the attached letter from the IRS with respect to LDB's 2012 return. The IRS appears to be saying that they cannot reconcile BRH's K-1 and partnership return to LDB's return. We believe this is because BRH's income and K-1s flow through multiple entities on their way to LDB, and the BRH K-1 is not attached to Leon's return. The other attachment charts this flow. Entities in red boxes do not file tax returns.

The BRH income items all seem to be recorded on LDB's return (lumped in with other income). Thus, LDB appears to have paid tax appropriately. Neither Rich J nor any of us were involved in the 2012 returns, but we believe we have much of the support for those returns.

We propose that Tom Turrin make an informal call to the IRS to propose that we offer a simple reconciliation and see if they believe this is sufficient.

It appears that we must respond by May 5.

Let us know if you agree.