

From: "jeffrey E." <jeevacation@gmail.com>

To: Barry Cohen <[REDACTED]>, Leon Black <[REDACTED]>, [REDACTED]

Subject: Re: FW: Alternative IRS Response Letter

Date: Sat, 29 Apr 2017 13:20:53 +0000

Hopefullt this exvercise will illustrate the issues that you two need to address . Systems -accurate numbers , clear concise reporting etc

On Sat, Apr 29, 2017 at 9:00 AM <[REDACTED]> wrote:

Rich is working on 54mm of "business income" and the six or so other categories besides interest (already forwarded) this weekend. Goal is to have a fairly complete package by monday. I expect each category of income to present unique issues in terms of "simple/clear" back-up. As barry notes, we'll have to figure out early next week what our best response to irs is (and you mentioned what type of package, if any, we want to send to irs. I told tom NOT to reach out to IRS monday am without speaking to you for scripting. B
Sent from my Verizon Wireless BlackBerry

From: "jeffrey E." <jeevacation@gmail.com>

Date: Sat, 29 Apr 2017 05:50:04 +0000

To: Barry J. Cohen<[REDACTED]>; Brad Wechsler<[REDACTED]>; Leon Black<[REDACTED]>

Subject: Re: FW: Alternative IRS Response Letter

Needs work , I think we might want to submit part . Explanation details .Joslin should do 54 m of income report . In similar but clearer fashion . Recall. 8865 requires not under audit ??

On Fri, Apr 28, 2017 at 6:03 PM Barry J. Cohen <[REDACTED]> wrote:

If we want to take the position that the second letter from the IRS obviates the need to send the package we just sent you, attached is an alternate letter we could send in response to the first IRS letter.

From: Brad Wechsler

Sent: Friday, April 28, 2017 5:59 PM

To: Barry J. Cohen <[REDACTED]>

Subject: Fw: Alternative IRS Response Letter

Maybe forward to jee to think abt and/or edit?

Sent from my Verizon Wireless BlackBerry

From: "Barry J. Cohen" <[REDACTED]>

Date: Fri, 28 Apr 2017 21:52:14 +0000

To: Brad Wechsler<[REDACTED]>

Cc: Yvonne Berger<[REDACTED]>

Subject: Alternative IRS Response Letter

As I will be out of town Mon.-Wed., please hold on to this in case you need it.

Barry J. Cohen |

Elysium Management, LLC |

445 Park Avenue Suite 1401

New York, NY 10022 |



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please note

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