

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

To: "Barry J. Cohen" <[REDACTED]>, Brad Wechsler <[REDACTED]>

Bcc: Leon Black <[REDACTED]>

Subject: Re: Alternative IRS Response Letter--PRIVILEGED AND CONFIDENTIAL

Date: Sat, 29 Apr 2017 14:15:26 +0000

Difficult to justify a position to IRS if we can't even justify to ourselves !

On Sat, Apr 29, 2017 at 9:42 AM jeffrey E. <jeevacation@gmail.com> wrote:

Let's get to that answer

On Sat, Apr 29, 2017 at 9:29 AM Barry J. Cohen <[REDACTED]> wrote:

But why would lots of other Apollo people be getting something similar if this is just about a Tom Turin mistake?

Sent from my iPhone

On Apr 29, 2017, at 8:46 AM, jeffrey E. <jeevacation@gmail.com> wrote:

Irs says 880 understatement. TOM says 880 loss not gain . Soo. Sloppy it's difficult to decode

On Sat, Apr 29, 2017 at 8:31 AM Barry J. Cohen <[REDACTED]> wrote:

I agree the alternative letter is not great. Note that the IRS's first letter suggests that the BRH numbers are fine, but they can't figure out how we applied them to the return. The IRS's second letter suggests the BRH numbers are wrong and have now been corrected. That leaves the possibility that the IRS is unsure how the new BRH numbers are applied to the return. Even though they appear to have concluded how much we owe.

So if the IRS never returns our call, it is hard to know what to do.

Sent from my iPhone

On Apr 29, 2017, at 1:50 AM, jeffrey E. <jeevacation@gmail.com> wrote:

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 |

[REDACTED]

[REDACTED]

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please note

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