

**From:** "jeffrey E." <jeevacation@gmail.com>  
**To:** "Barry J. Cohen" <[REDACTED]>  
**Subject:** Re: 2012 Reconciliation--PRIVILEGED AND CONFIDENTIAL  
**Date:** Tue, 25 Apr 2017 14:16:58 +0000

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Do not

On Tue, Apr 25, 2017 at 10:13 AM Barry J. Cohen <[REDACTED]> wrote:

We will ask. Do Brad and/or I need POAs? Do we need to disclose our presence on the calls? Not sure.

Barry J. Cohen |

President and Special Counsel |

Elysium Management, LLC |

445 Park Avenue Suite 1401

New York, NY 10022 |

Tel. [REDACTED] | Cell [REDACTED]

[REDACTED]

**From:** jeffrey E. [mailto:[jeevacation@gmail.com](mailto:jeevacation@gmail.com)]

**Sent:** Tuesday, April 25, 2017 9:59 AM

**To:** Barry J. Cohen <[REDACTED]>

**Subject:** Re: 2012 Reconciliation

Will he let you conference ?

On Tue, Apr 25, 2017 at 9:52 AM Barry J. Cohen <[REDACTED]> wrote:

All good points. Though I sometimes find speakerphone calls are more formal than handset calls.

**From:** jeffrey E. [mailto:[jeevacation@gmail.com](mailto:jeevacation@gmail.com)]

**Sent:** Tuesday, April 25, 2017 9:19 AM

To: Barry J. Cohen <[REDACTED]>

Subject: Re: 2012 Reconciliation

yes, have tom ( POA ) , with you listening on speaker phone - explain to the agent that it is picked up as a result of brh being owned by black family partners. he is surprised that it is 2012. he thought that was closed. what would she like , is a proforma enough . does she want each dollar tied to 1040. . why amt amount , he wasnt in amt.

On Tue, Apr 25, 2017 at 9:16 AM, Barry J. Cohen <[REDACTED]> wrote:

In other words before we tick and tie every number, call the IRS to get a feel for what they want?

Sent from my iPhone

On Apr 25, 2017, at 9:06 AM, jeffrey E. <[jeevacation@gmail.com](mailto:jeevacation@gmail.com)> wrote:

dont waste your time before a call with IRS agent find out exactly what she/he wants. toms said its a she , but i dont know why.? you want to give things as a response to her needs. you can ask how much detail , if we merely send the pro forma is it enough or would she like us to tie each number,

On Tue, Apr 25, 2017 at 8:59 AM, Barry J. Cohen <[REDACTED]> wrote:

FYI. A work in progress. . . .

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**From:** Barry J. Cohen

**Sent:** Tuesday, April 25, 2017 8:49 AM

**To:** Brad Wechsler <[REDACTED]>; Richard Joslin <[REDACTED]>; John Castrucci <[REDACTED]>

**Subject:** RE: 2012 Reconciliation

See attached. Brad is right. I am getting close (working off RJ's spreadsheet), but not exact. See summary and back up tabs.

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**From:** Brad Wechsler

**Sent:** Tuesday, April 25, 2017 7:13 AM

**To:** Barry J. Cohen <[REDACTED]>; Richard Joslin <[REDACTED]>; John Castrucci <[REDACTED]>

**Subject:** Re: 2012 Reconciliation

You'll have to show me. I'm not certain my hard copy #'s did foot. Will look at with you later. Meantime, I think RJ is finishing up dividends and then moving to next category.

Sent from my Verizon Wireless BlackBerry

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

**Date:** Tue, 25 Apr 2017 02:31:34 +0000

**To:** Brad Wechsler<[REDACTED]>; Richard Joslin<[REDACTED]>; John Castrucci<[REDACTED]>

**Subject:** RE: 2012 Reconciliation

I see the \$ 4,044,801 in cell I74. It foots perfectly. No? The explanation is complicated, but I think the numbers are clear.

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**From:** Brad Wechsler

**Sent:** Monday, April 24, 2017 6:56 PM

**To:** Barry J. Cohen <[REDACTED]>; Richard Joslin <[REDACTED]>; John Castrucci <[REDACTED]>

**Subject:** Re: 2012 Reconciliation

Re: the "Other k-1" Category: as you noted 10.888 of the 14.9 is easy. The other 4mm will be a little more of a challenge since our sheet is showing "5.8mm". I'm sure RJ will find the deltas efficiently. B

Sent from my Verizon Wireless BlackBerry

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

**Date:** Mon, 24 Apr 2017 22:30:42 +0000

**To:** Brad Wechsler<[REDACTED]>; Richard Joslin<[REDACTED]>; John Castrucci<[REDACTED]>

**Subject:** 2012 Reconciliation

Attached is the way I would format the top level response to the IRS. We would attach further breakdowns for the components of each row. I have also attached Rich's worksheet that I drew this from. The categories are in the same order and phrasing as the IRS letter.

I am tied up until 9:30, but free after then to do further work.

Barry J. Cohen |

Elysium Management, LLC |

445 Park Avenue Suite 1401

New York, NY 10022 |

Tel. [REDACTED] | Cell [REDACTED]

[REDACTED]

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