

---

**From:** Okun, Brad R <bokun@paulweiss.com>  
**Sent:** Monday, January 16, 2017 5:45 PM  
**To:** jeffrey E.  
**Subject:** Re:

Correct

Brad R. Okun | Partner  
Paul, Weiss, Rifkind, Wharton & Garrison =LP  
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(212) 373-3727 (Direct Phone) | (212) 492-0727 (Direct Fax) bokun@paulweiss.com | www.paulweiss.com  
From: jeffrey E.  
Sent: Monday, January 16, 2017 12:44 PM  
To: Okun, Brad R  
Subject: Re:

but that requires a finding of no reasonable cause. !!!

On Mon, Jan 16, 2017 at 1:18 PM, Okun, Brad R <bokun@paulweiss.com <mailto:bokun@paulweiss.com> > wrote:

Any tax on the entire return

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From: jeffrey E.  
Sent: Monday, January 16, 2017 12:13 PM  
To: Okun, Brad R  
Subject: Re: Re:

Assess on what issue

On Mon, Jan 16, 2017 at 1:04 PM Okun, Brad R <bokun@paulweiss.com <mailto:bokun@paulweiss.com> > wrote:

Understand the pragmatic consideration=. Statutorily, assessment period clearly open after the amendment in 2010

Brad R. Okun

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From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ]

Sent: Monday, January 16, 2017 11:53 AM

To: Okun, Brad R <bokun@paulweiss.com>

Subject: Re: Re:

On Mon, Jan 16, 2017 at 11:59 AM, Okun, Brad R <bokun@paulweiss.com> wrote:  
<mailto:bokun@paulweiss.com>

information Not that I can recall, but as you know there is a special provision in 6501(c) for these  
returns. So, is the point that practically it simply does not happen?

Brad R. Okun

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From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ]

Sent: Monday, January 16, 2=17 10:55 AM

To: Okun, Brad R <bokun@paulweiss.com>

Subject: Re:

On Mon, Jan 16, 2017 =t 11:51 AM, Okun, Brad R <bokun@paulweiss.com</=>> wrote:  
<mailto:bokun@paulweiss.com>

Jeffrey, would you have some time toda= or tomorrow to talk about the 6 year  
limitation on tax assessments

you have been discussing with Leon and Brad W? thanks

Brad R. Okun

| Partner (Bio <[https://www.paulweiss.com/professionals/partners-and-counsel/brad-r-okun.aspx?utm\\_source=signature](https://www.paulweiss.com/professionals/partners-and-counsel/brad-r-okun.aspx?utm_source=signature)> )

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From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> ]

Sent: Friday, December 23, 2016 7:49 AM

To: Okun, Brad R <bokun@paulweiss.com>; Karp, Brad S <bkarp@paulweiss.com>

Cc: Leon Black <black@apolloip.com>

Subject:

or we might just say =hat all profits and losses were already filed by apollo , sinc= you have told me that the only issue was dormant 5471 . they would =ot have carried any

p and l

--

&nb=p; please note

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