
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
1285 Avenue of the Americas | New York, NY 10019-6064
(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. =nbsp; !!!

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

Brad R. Okun | Partner
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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

| Partner (Bio <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: Monday, January 16, 2017 11:53 AM

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

Subject:<=b> Re: Re:

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

Not that I can recall, but as you know=there is a special provision in 6501(c) for these information

returns. So, is the point that practically it simply does not happen?=/span>

Brad R. Okun

| Partner (Bio <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: Monday, January 16, 2017 10:55 AM

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

Subject: Re:

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

Jeffrey, would you have some time today 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>)

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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@apollolp.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 I

--

&nb=p; please note

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