
From: Okun, Brad R [REDACTED]
Sent: Tuesday, December 27, 2016 2:25 PM
To: jeffrey E.
Subject: RE:

I don't think we can argue that the 8865s filed by Apollo provided all the p&l for the pships, since as a category 2 filer they were only required to provide info as to their share. If all shares were pro rata, the IRS could extrapolate, but I don't believe anything in the information returns makes that clear. I am confirming with Apollo.

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From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Tuesday, December 27, 2016 9:22 AM
To: Okun, Brad R [REDACTED]
Subject:

further thoughts/?

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please note

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