
From: Thomas Turrin [REDACTED]
Sent: Sunday, February 12, 2017 12:58 PM
To: jeffrey E.
Subject: RE: Re:

yes...will call in about 10 min.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Sunday, February 12, 2017 7:56 AM
To: Thomas Turrin
Subject: Re:

can you call me for a quick quesiton

On Sun, Feb 12, 2017 at 7:40 AM, Thomas Turrin [REDACTED] > wrote:

I will review Jeffrey's comments and respond later today.

Sent from my iPhone

> On Feb 11, 2017, at 5:26 PM, [REDACTED] >
[REDACTED] > wrote:

> I agree barry. Jeffrey-
> 1. With this note im going to forward your sentence for the RC letter
> to the PW people and suggest they reach out to you (or vice versa) with expect to your suggested placement. I assume
you're just suggesting an amplification of the already existing sentence but not 100% certain. (Brian or brad, pls confirm
receipt of this email.) 2. Is it clear where on the cover sheet of the 1040x you wld like your suggested statement. Pls let
me/tom know.
> 3. Again, by copy of this note I am forwarding your comments to tom for incorporation or review (tom, cld u pls
confirm receipt of this note and interact with jeffrey as necessary so we can finalize).

> Thx, brad

> Sent from my Verizon Wireless BlackBerry

>

> -----Original Message-----

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

> Date: Sat, 11 Feb 2017 19:55:51

> To: jeffrey E<jeevacation@gmail.com> <mailto:jeevacation@gmail.com> >;

> Brad Wechsler<BW[REDACTED]> <mailto:bradwechsler@manitowoc.com> >; Leon

> Black<[REDACTED]>

> Subject: Re:

>
> Seems fine but I have no strong view.
>
> Sent from my iPhone
>
> On Feb 11, 2017, at 2:27 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com>
<mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com> >> wrote:
>
> 1. modifications. = I d prefer the letter to state. In order to comply with the the proscribed filing procedures the
taxpayers are certifying that these foreign entities are not now and have never engaged in tax evasion.
>
> 2 .on the front of the 1040 x. the statement to the effect that this return is being filed solely as required to
provide the delinquent information returns. There is no tax owed. please see attached statement of reasonable
cause. 3 many of the 5471. boxes should say " date of incorporation. " somehow the box only says date of ? 4.
we should review the boxes that say date of last filing of the shareholders 1040. .
>
> --
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