
From: jeffrey E. <jeevacation@gmail.com>
Sent: Sunday, September 11, 2016 12:52 AM
To: Pesner, Steven
Cc: Fenn, Patrick; Karp, Brad S
Subject: Re: Reasonable cause statement

can josh harris join the call tomorrow? might be very helpful.

On Sat, Sep 10, 2016 at 8:30 AM, Pesner, Steven=<[REDACTED]> <mailto:[REDACTED]> > wrote:

ok</=>

From: Fenn, Pa=rick
Sent: Saturday, September 10, 2016 8:28 AM
To: Karp, Brad S
Cc: jeeva=ation@gmail.com <mailto:jeevacation@gmail.com> ; Pesner, Steven
Subject: Re: Reasonable cause statement

That works for me. =C2

Patrick B. Fenn=u>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct: [REDACTED] <tel:[REDACTED]>

On Sep 9, 2016, at 11:26 PM, Karp, Brad S <[REDACTED]> <mailto:[REDACTED]> > wrote:

How about Sunday at 10 am=

Brad S. Karp | Partner
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1285 Avenue of the Americas | New York, NY 10019-6064

[REDACTED] <tel:[REDACTED]> (Direct Phone) | [REDACTED]
<tel:[REDACTED]> (Direct Fax) <=r> [REDACTED] = <mailto:[REDACTED]> |
www.paulweiss.com <http://www.paulweiss.com>

From: Fenn, Pa=rick [mailto:[REDACTED] <mailto:[REDACTED]>]
Sent: Friday, September 09, 2016 11:10 PM
To: Karp, Brad S
Cc: jeeva=ation@gmail.com <mailto:jeevacation@gmail.com> <jeevacation@gmail.com
<mailto:jeevacation@gmail.com> >; [REDACTED] <mailto:[REDACTED]>
Subject: Re: Reasonable cause statement

<=p>

That works for me as well.

Patrick B. Fenn=u>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct: [REDACTED] <tel:[REDACTED]>

On Sep 9, 2016, at 10:29 PM, Karp, Brad S <[REDACTED] <mailto:[REDACTED]> >
wrote:

I can speak any time befo=e 1 pm.

Brad S. Karp | Partner
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From: Fenn, Pa=rick [mailto:[REDACTED] <mailto:[REDACTED]>]
Sent: Friday, September 09, 2016 08:15 PM
To: jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gmail.com> >
Cc: Karp, Brad S

Subject: Re: Reasonable cause statement

<=p>

Did we establish a time to speak tomorrow?

Patrick B. Fenn=u>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct: [REDACTED] <tel:[REDACTED]>

On Sep 9, 2016, at 7:10 PM, jeffrey E. <jeevacation@gmail.com
<mailto:jeevacation@gmail.com> > wrote:</=>

i think we might consider attaching affidavit=from Apollo - preparer and accounting firm support=ng the actual events. . this is of course as long =s the numbers also tie. . it is true that technically =A0 each filing requires its own reasonable letter. but I'm uncertain whether=one letter that states with specificity, that it applies=to each one by name and year , would qualify. tha= being said one hundred letters and three h=ndred affidavits plus 100 8865s plus 8 1040xs. is quite a package

On Fri, Sep 9, 2016 at 6:35 PM, Fenn, Patrick <[REDACTED]>
<mailto:[REDACTED]>

<=p>

Will rework over the week=nd for this.

</=>

From: jeffrey E. [mailto:jeevacation@gmail.com <mailto:jeevacation@gmail.com>]
Sent: Friday, September 09, 2016 6:32 PM
To: Fenn, Patrick
Subject: Re: Reasonable cause statement

thx, thoughts for discussion.

i suggest we beef up the background at a miimum , always =iled on time non deliqent n any filing.. blah blah, =A0 resposnilble . biz exec. complex returns alwsays on t=me. no jdugements etc. a character paragraph.. =A0 a tax history of no changes? , hired both accounts and lawfirms in the preparation.? . it i= a joint return , do we need to include debra.? i =ould destres the he didnt know. and add that apollo thou=ht and advised otherwise? do we add al= the patners treated the same , no one filed. only in a compliance review=C2 did it get flagged?

On Fri, Sep 9, 2016 at 6:25 PM, Fenn, Patrick <[REDACTED]>
<mailto:[REDACTED]>
<=p>
As discussed.

Patrick B. Fenn

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| New York, NY 10036-6745 | USA | Direct: [REDACTED] <tel:[REDACTED]> <=> |
Internal: [REDACTED] <tel:[REDACTED]>
Fax: [REDACTED] <tel:[REDACTED]> | [REDACTED]
<mailto:[REDACTED]> | akingump.com <https://urldefense.proofpoint.=om/v2/url?u=http-
3A__www.akingump.com&d=CwMFaQ&c=MVcBZOqZGZl=cau2llMSkQ&r=kYDaj3HQMbdAmy5paefyaL_7ivfBgL1qlIMsd-
G22Iyk&m=YCo=7d-c-1--OrOToUOAGy6arUeZTlbkIHckvKJBY80&s=5GQUPbchdOBcPIGqhvMM3-
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IMsd-G22Iyk&am=;m=YCoY7d-c-1--
OrOToUOAGy6arUeZTlbkIHckvKJBY80&s=N8wEdbYndzfNNeQL0=Rmhk1oDeylsxJULaUldTcbgnA&e=>

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