
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? =ight 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

<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

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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 supporting the actual events. . this is of course as long as the numbers also tie. . it is true that technically 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. that being said one hundred letters and three hundred 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 weekend 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 minimum, always filed on time non delinquent in any filing.. blah blah, =A0 responsible . biz exec. complex returns always on time. no judgments etc. a character paragraph.. =A0 a tax history of no changes? , hired both accountants and lawfirms in the preparation.? . it is a joint return, do we need to include debra.? i could describe the he didn't know. and add that apollo thought and advised otherwise? do we add all the partners 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]>

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As discussed.

Patrick B. Fenn

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Internal: [REDACTED] <tel:[REDACTED]>
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<mailto:[REDACTED]> | akingump.com <https://urldefense.proofpoint.com/v2/url?u=http-
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OrOTuOAGy6arUeZTlbkIHckvKJBY80&s=N8wEdbYndzfNNeQL0=Rmhk1oDeylsxJULaUldTcbgnA&e=>

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