
From: jeffrey E. <jeevacation@gmail.com>
Sent: Friday, August 26, 2016 11:11 AM
To: Brad S Karp; Fenn, Patrick
Subject: privileged

I can do call with both of you anytime before 11.. solution is easy, the only question is how far back . =A0 I have filed 8865 for leon since 13. . however they n=w appear to be inaccurate. but filed. statut=s running. . mark and josh, have open statut=s . -no filing however IRS has a policy not to go back beyond 6 yrs=C2 in general. . IRS program for just this purpose =C2 delinquent international disclosures. is easy. the only=quesiion I have is do josh and mark file 3 years or 6 years. = of course filed along with the explanation from accounting for rea=onableness. . if they file 3 yrs leon will not amend,=C2 if they file 6 leon will amend 10-12. I dont think the =inger pointing for apollo deloitte , PWC is useful. =A0

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=A0 please note

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