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**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Sunday, April 30, 2017 4:21 PM  
**To:** Brad Wechsler  
**Cc:** Tom Turrin; Barry Cohen; Leon Black  
**Subject:** Re:

try to tie down other notices to other execs. either way tom is showing loss of approx 880 , and the irs a gain of the same amount. possible coincidence. my choice is to write the alternate letter with many edits. . detailing the fact that we have available all the records that tie to the return if she wants to review. 3/ I would like an opinion from e and y , if this "adjustment" means we will have to acknowledge in the future an error on audit. ? I will consider the options but i am hesitant to admit a approx 1 million dollar mistake. with the concern of what it means for future years. I m still very unclear of why it has taken so long to tie numbers. I am really only interested in the 54 m vs 53.

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On Sun, Apr 30, 2017 at 11:33 AM, <[REDACTED]> wrote:

Guys-can I just mention an= confirm some things:

1. As an fyi, but as I believe you know, RJ is pulling together the back-up=and presentation on the other items of BRH income highlighted in the original IRS notice this week end. Hopefully we will not have to submit.

2. As we all know I aint no tax guy but I read the assessment letter very c=refully and my "uninformed" view is exactly tom and jeffrey'= first reaction (which may or may not have changed), ie, that the IRS found/acknowledges 378,805,695 of what they believe should be 379,707,3=1 or a delta of 884,006. (They also found a delta of 17,680 in itemized de=uctions.) Definitionally, these numbers have to include BRH numbers and as=jeffrey said to me, they answered the question they posed in the initial n=tice.

3. In that context, my personal view is that tom tries to reach out by phon= monday (after he and jeffrey touch base today or tomorrow morn to coordin=te) to confirm that the 360k assessment is the show stopper.

4. On a parallel basis, I'd have jeffrey and tom edit the "a=tternate response letter" which, again, would set out our belief=that the "assessment" ends this process, at least for 2012. If w= don't hear back from the agent then we should submit in writing our u=derstanding of the notice and assessment.

5. As an aside, if leon's brh assessment is 884,006 it wld be nice to s=if that foots with the overall assessment to the other BRH partners and =ross-check to ownership %'s; although at the end of the day I'm no= certain that's critical.

Thgts? I'm reachable by email or cell phone. Best, b

Sent from my Verizon Wireless BlackBerry

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