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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 and 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 ain't no tax guy but I read the assessment letter very carefully and my "uninformed" view is exactly tom and jeffrey's first reaction (which may or may not have changed), ie, that the IRS found/acknowledges 378,805,695 of what they believe should be 379,707,311 or a delta of 884,006. (They also found a delta of 17,680 in itemized deductions.) Definitionally, these numbers have to include BRH numbers and as jeffrey said to me, they answered the question they posed in the initial notice.
3. In that context, my personal view is that tom tries to reach out by phone Monday (after he and jeffrey touch base today or tomorrow morning to coordinate) to confirm that the 360k assessment is the show stopper.
4. On a parallel basis, I'd have jeffrey and tom edit the "alternate response letter" which, again, would set out our belief that the "assessment" ends this process, at least for 2012. If we don't hear back from the agent then we should submit in writing our understanding of the notice and assessment.
5. As an aside, if Leon's BRH assessment is 884,006 it would be nice to see if that foots with the overall assessment to the other BRH partners and cross-check to ownership %'s; although at the end of the day I'm not 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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