
From: Barry J. Cohen <[REDACTED]>
Sent: Saturday, February 11, 2017 7:56 PM
To: jeffrey E.; Brad Wechsler; Leon Black
Subject: Re:

Seems fine but I have no strong view.

Sent from my iPhone

On Feb 11, 2017, at 2:27 PM, jeffrey E. <jeevacation@gmail.com<mailto:jeevacation@gmail.com>> wrote:

1. modifications. = I d prefer the letter to state. In order to c=mply with the the proscribed filing procedures the taxpayers are certifyin= that these foreign entities are not now and have never engaged in tax ev=sion.
- 2 .on the front of the 1040 x. the statement to the effect that =his return is being filed soley as required to provide the delinquent info=ation returns. There is no tax owed. please see attached stateme=t of reasonable cause. 3 many of the 5471. boxes should say " date of=incorporation. " somehow the box only says date of ? 4. we shoul= review the boxes that say date of last filing of the shareholders 1040.= .

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please note

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```
<?xml version=.0" encoding=TF-8"?>
<!DOCTYPE plist PUBLIC "-//Apple//DTD PLIST 1.0//EN" "http://www.apple.com/DTDs/PropertyList-1.0.dtd">
<plist version=.0">
<dict>
    <key>conversation-id</key>
    <integer>53522</integer>
    <key>date-last-viewed</key>
    <integer>0</integer>
    <key>date-received</key>
    <integer>1486842963</integer>
    <key>flags</key>
    <integer>8590195713</integer>
    <key>gmail-label-ids</key>
    <array>
        <integer>6</integer>
        <integer>2</integer>
    </array>
</dict>
```

```
</array>  
<key>remote-id</key>  
<string>687039</string>  
</dict>  
</plist>
```