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**From:** Grieve, Brian S [REDACTED]  
**Sent:** Wednesday, February 8, 2017 3:22 PM  
**To:** Brad Wechsler; Jeffrey Epstein  
**Cc:** Okun, Brad R  
**Subject:** RE: Privileged and Confidential

Of course, Brad. I can discuss today between 130-3 and then again at 5 or after. Let me know the best time. Thanks

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**From:** Brad Wechsler [REDACTED]  
**Sent:** Wednesday, February 8, 2017 10:06:40 AM  
**To:** Jeffrey Epstein; Grieve, Brian S  
**Cc:** Okun, Brad R  
**Subject:** Re: Privileged and Confidential

Brian/jeffrey-it wld be great if you cld pick a mutually convenient time today to speak so we can wrap this up. I'm sure everyone agrees its time to shut down. Let me know and I'll try to join tho its really the two of you who are critical. Thx,  
b Sent from my Verizon Wireless BlackBerry [REDACTED]

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**From:** "jeffrey E." <jeevacation@gmail.com>  
**Date:** Tue, 7 Feb 2017 20:35:15 -0400  
**To:** Grieve, Brian [REDACTED]  
**Cc:** Brad Wechsler [REDACTED]  
**Subject:** Re: Privileged and Confidential

the numbers included on the delinquent filings were directly derived using the previously filed apollo numbers and only modified for the change in ownership percentage. ( i.e. something to that effect, )

On Tue, Feb 7, 2017 at 8:07 PM, Grieve, Brian S [REDACTED]  
[REDACTED] wrote:

Brad as previously mentioned, we don't feel that statement is technically accurate. The numbers on the forms filed by Apollo entities would be different than the numbers on the forms filed by Leon because they own different percentages of the various underlying foreign entities. Also we know Apollo did not themselves file all required forms, e.g. 5471s, for certain years so there would need to be a carveback for that. I think the sentence I proposed earlier today is probably the best we can do on this particular point given the facts that exist. Or perhaps we can say "substantially similar to" rather than "essentially the same" if Apollo is comfortable with that statement.

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From: Brad Wechsler [REDACTED]  
Sent: Tuesday, February 7, 2017 6:31:35 PM  
To: Grieve, Brian S; Jeffrey Epstein  
Cc: Okun, Brad R  
Subject: Privileged and Confidential

Brian/jeffrey-cld both of you =ive with the following language at the end of the second paragraph of the  
=ackground Section:

"Finally, the information in the International Information Returns pre=iously filed by the Apollo entities is  
essentially the same as the informa=ion included in the applicable International Information Returns being fil=d today by  
the Taxpayers."

If the two of you sign-off I will run by Apollo legal and tax for final con=irmation.  
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