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**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Wednesday, February 8, 2017 12:35 AM  
**To:** Grieve, Brian S  
**Cc:** Brad Wechsler; Okun, Brad R  
**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. ( o= something to that effect, )

On Tue, Feb 7, 2017 at 8:07 PM, Grieve, Brian = [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 "substantial= similar to" rather than "essentially the same" if Apollo is comfortable with that statement.

Brian S. Grieve | Associate  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas | New York, NY 10019-6064  
[REDACTED]

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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 give with the following language at the end of the second paragraph of the background Section:

"Finally, the information in the International Information Returns previously filed by the Apollo entities is essentially the same as the information included in the applicable International Information Returns being filed today by the Taxpayers."

If the two of you sign-off I will run by Apollo legal and tax for final confirmation.  
Sent from my Verizon Wireless BlackBerry

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Re: please note

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