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**From:** jeffrey E. <jeevacation@gmail.com>  
**Sent:** Tuesday, December 27, 2016 2:43 PM  
**To:** Okun, Brad R  
**Subject:** Re:

what are your comfortable writing. ?

On Tue, Dec 27, 2016 at 9:25 AM, Okun, Brad R [REDACTED] =rote:

I don't think we can argue that the 8865s filed by Apollo provided all the p&l for the pships, since as a category 2 filer they were only required to provide info as to their share. If all shares were pro rata, the IRS could extrapolate, but I don't believe anything in the information returns makes that clear. I am confirming with Apollo.

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From: jeffrey E. [mailto:jeevacation@gmail.com]  
Sent: Tuesday, December 27, 2016 9:22 AM  
To: Okun, Brad R [REDACTED]  
Subject:

further thoughts/?

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please no=

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