
From: jeffrey E. <jeevacation@gmail.com>
Sent: Sunday, December 11, 2016 9:34 PM
To: Karp, Brad S
Subject: Re: Fw: Draft Reasonable Cause Statement ACP/AWP

Did you speak to him over the weekend? He's not returned text. ?=C2◆ Unusual

On Fri, =ec 9, 2016 at 7:08 PM Karp, Brad S <[REDACTED]> > wrote:

Leon.

Brad S. Karp | Partner

<=r>Paul, Weiss, Rifkind, Wharton & Garrison LLP

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=br>

=br>
From: Ok=n, Brad R

Se=t: Friday, December 09, 2016 03:20 PM

<= class="gmail_msg">To: [REDACTED]

Cc:=Karp, Brad S; Brad Wechsler <[REDACTED]>

Subject: Draft Reasonabl= Cause Statement ACP/AWP

Leon, as discussed:

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Attached are two draft reaso=able cause statements related to the Forms 8865, 8858 and 5471 that we hav= been discussing. The first statement is intended to be used for the 2007-=012 tax years and would be replicated for each year so a

separate =statement is filed with each Form 1040X that is filed. The second statement=is intended to be used for the 2013-2014 tax years. This statement is base= on the first but contains some differences in the background paragraph, w=ich reflect the fact

that (i) the K-1 provided for those years exp=icitly stated that no foreign filings were required and (ii) notwithstanding the footnote, a Form 8865 was in fact filed for BRH for 2013 and 2014. T=e attached pdf redline highlights the changes between the two

stat=ments.

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Let me know if you would like to discuss.

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