
From: Karp, Brad S [REDACTED]
Sent: Sunday, December 11, 2016 9:40 PM
To: 'jeevacation@gmail.com'
Subject: Re: Fw: Draft Reasonable Cause Statement ACP/AWP

I haven't heard a peep.

Brad S. Karp | Partner
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From: Jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Sunday, December 11, 2016 04:34 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. ? Unusual

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

Leon.

Brad S. Karp | Partner

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From: Okun, Brad R

Sent: Friday, December 09, 2016 03:20 PM

To: black@apollolp.com <<mailto:black@apollolp.com>>

Cc: Karp, Brad S; Brad Wechsler

Subject: Draft Reasonable Cause Statement ACP/AWP

Leon, as discussed:

Attached are two draft reasonable cause statements related to the Forms 8865, 8858 and 5471 that we have been discussing. The first statement is intended to be used for the 2007-2012 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 based on the first but contains some differences in the background paragraph, which reflect the fact

that (i) the K-1 provided for those years explicitly 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. The attached pdf redline highlights the changes between the two

statements.

Let me know if you would like to discuss.

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