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**From:** Halperin, Alan S <[REDACTED]>  
**Sent:** Tuesday, May 10, 2016 4:11 PM  
**To:** Thomas Turrin; jeffrey E.  
**Subject:** RE: GIFT TAX AUDIT

Thanks. I am working on a proposed response to the IRS letter. Could you tell me how the gift amount relating to the split dollar insurance arrangement was determined and send me the supporting document? Alan

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From: Thomas Turrin <[REDACTED]>  
Sent: Tuesday, May 10, 2016 10:48 AM  
To: jeffrey E. <[jeevacation@gmail.com](mailto:jeevacation@gmail.com)>; Halperin, Alan S <[REDACTED]>  
Subject: GIFT TAX AUDIT

Alan and Jeffrey,

The agent finally called me this morning. He was apologetic that he didn't call sooner. He said he's been in and out of the office the last couple of weeks.<[REDACTED]>

He was very nice on the phone....saying we can have more time to get him the information requested.

However, he said to contact him by the end of May if we still need more time. He said he would grant more time, if necessary.

I would hope we can get the response done as soon as possible so we don't have to ask for more time.

The bad news is that they will also examine 2014.&nb=p; He told me a letter will go out soon.

Mr. Falk readily volunteered that it is the GRATS (s=ecifically the valuations) that are kicking off the audits.

He did say that he would try to "move the audi=s along" .... He also said he sees (and audits) valuations from Empire all the time.

I'm reachable all day, if you would like to ca=l.

Tom

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