From: Fenn, Patrick <[redacted]
Sent: Friday, September 9, 2016 11:49 AM
To: 'jee'
Subject: RE: Re:

Name a time and I'l= send a dial in number.

<=p>

From: jee [mai=to:jeevacation@gmail.com]
Sent: Friday, September 09, 2016 7:40 AM
To: Fenn, Patrick
Subject: Re:

tomorrow

On Sep 9, 2016, at 7:39 AM, Fenn, Patrick <[redacted]wrote:

When can you speak wi=h me and Karp?

Patrick B. Fenn=o:p>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct: [redacted]

On Sep 9, 2016, at 6:01 AM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com> > wrote:

each preparer or the law firm acting on =ehalf of the client?

On Thu, Sep 8, 2016 at 10:26 PM, Fenn, Patrick <<= href=[redacted]

Each preparer firm (f=r the individuals) would say that you mean? Not Deloitte. Delo=tte prepared the underlying AOG/BRH returns.

Patrick B. Fenn=o:p>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct: +[redacted]=nbsp;

On Sep 8, 2016, at 9:52 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com> > wrote:<=p>

re 2. they should represent the fa=t that the taxpayer never got the info . its not a=fault situation. . . but a third party confirming that t=e principals did not act willfully

On Thu, Sep 8, 2016 at 9:43 PM, Fenn, Patric[redacted]

Jeffrey,

See responses below. Let me know when you can =peak with Karp in the next few days.

Thanks

Patrick B. Fenn=o:p>

AKIN GUMP STRAUSS H=UER & FELD LLP

Direct:[redacted]nbsp;

On Sep 8, 2016, at 8:14 PM, jeffrey E. <jeevacation@gmail.com <mailto:jeevacation@gm=il.com> > wrote:<=p>

1 do you believe penalties will be asses=ed on late filing.

I think not. Our reasonable cause statement is=solid based on the information we have at this point.

2. is there a reason that the letter should no= come from either the preparer or accounting firm and signed by prin=ipal. or their respective law firm,

I can't think of any reason other than I don't think=you are going to get the accounting firm to say in writing it was their fa=lt if that is your goal. They will state the facts -- that they were=hired to prepare the return, that they are experts, and that they failed to include the information return. =

3. you have represented that no audits a=e open,

Confirming with family offices/Alan.

4 have we checked that all potential outbound or inb=und transactions were reported properly, on each of the princi=als return. .

Despite my efforts to get preparer firms focused on =iccups outside the Apollo sphere and the 8865 data, that process has yet t= begin pending receiving info from Apollo. There is some logic in th=t.

5. are we certain that it is only the informat=on returns and there are no substantial change in numbers.

Same as 5.

EFTA_R1_00103493
EFTA01783118

6. at a minimum we should check that the infor=ation returns to be filed with the 1040x matches the returns f=led.

Agreed.

--

please no=e

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