From: Richard Joslin <[redacted]
Sent: Thursday, May 1, 2014 12:20 PM
To: Thomas Turrin; Abel Goce
Cc: Jeffrey Epstein; tax
Subject: Re: GSCO IMY accounts

Please dont forget to take out $250K of interest income (GSCO) in the =012 amended return

On Mar 28, 2014, at 4:04 PM, "Richard Joslin" <[redacted]> wrote:

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See screenshot belo= that shows BRH ownership of AP Professionals which owns Apollo Operating =roup. BRH Holdings LP has a 98- prefix (a foreign partnership). = Foreign partnerships are assigned EIN's with a 98 prefix http://www.irs.gov/irm/part21/irm_21-007-013r.html <http://www.irs.gov/irm/part21/irm_21-007-013r=html> . AP Pro=essional Holdings, L.P., an exempted limited partnership formed under the =aws of the Cayman Islands, http://www.sec.gov/Archives/edgar/data/1411494/000119312513204748/d532543de=101.htm <http://www.sec.gov/Archives/edgar/data/1411494/00011931251320474=/d532543dex101.htm> The foreign partnerships are non-withholding partn=rship for purposes of Sec 1441 (they have not elected with the IRS to be t=eated as a withholding foreign partnership for US tax purposes.

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AP Professionals ha= an account at GSCO. Since AP professionals is a non-withholding foreign p=rtnership and since the owner of AP Professioanls (BRH) is also a non-with=olding partnership, GSCO is reporting income directly to the US owners of BRH. This is accomplished by AP =rofessional issuing a W-8 IMY to GSCO and giving GSCO the W-8-IMY of BRH w=ich reflects the US owners of BRH. GSCO issues 1099's directly=to US owner. We know that BRH is owned by BFP LP (not LDB). The BRH K-1 was picked up by BFP but this 1099 was reported =irectly on LDB's 1040 (should have been BFP pro forma K1 (if not rep=rted by BRH)). The AP Professional LP income was picked up by BRH Ho=dings. I confirmed with Apollo.

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Summary: GSCO=1099s issued under LEON BLACK IMY-AP PROFESSIONAL HOLDINGS LP were r=ported twice in 2012 – once on LDB 1040 and once on K-1 for BFP LP.

Taxable income over=tated by ~ $250K.

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Accounts:

[redacted]=/o:p>

[redacted]<=:p>

The pages upload to=portal of the 1099 for [redacted] have been left out – I can'= see for certain but likely also IMY-AP PROFESSIONAL HOLDINGS LP

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Oddly I don't=see these GSCO accounts for AP Professional are reported on 1040 for 2011 =ut they are reported in 2010 (in addition to other GSCO accounts) and 2009= Very small amounts in those years.

<image001.png>