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From: [REDACTED]

Sent: Tuesday, March 01, 2016 8:40:57 AM

To: [REDACTED]

Cc:

Bcc:

Subject: RE: TEFRA question

Hi ,

I agree about the disallowance of the capital losses and ordinary losses reported by the partnership being computational adjustments that do not require partner level determinations. This includes any carryovers of those amounts.

I also agree that, if the partnership was determined to be a sham, the professional fees are affected items likely requiring an affected item SND. Bedrosian v. Comm'r, 144 T.C. 152, 159-61 (2015); Domulewicz v. Comm'r, T.C. Memo. 2010-77. [REDACTED]
[REDACTED]

Thanks,