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From: [REDACTED]

Sent: Friday, April 01, 2016 11:30:31 AM

To: [REDACTED]

Cc: [REDACTED]

Bcc:

Subject: RE: FPAA for Review - statute 6/30/2014

Hi ,

We cannot determine a partner's outside basis in an FPAA (absent a section 754 election) because it is not a partnership item. But, we can determine the partnership-level components of it (i.e. contributions, distributions, etc.) in the FPAA. [REDACTED]

Thanks,