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February 11, 1977

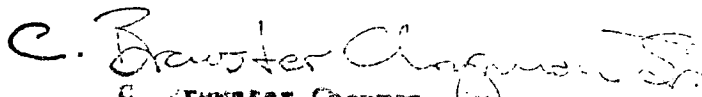
DGL-T.CBC 119011

Mr. David M. Reizes
Chief, International Operations Branch
Internal Revenue Service - Rm. 4226
1111 Constitution Ave., N.W.
Washington, D.C. 20226

Dear Mr. Reizes:

On October 15, 1976, following a phone conversation I had with you, I wrote you a letter concerning the tax status of Messrs. Leo Falcan and Edward Pangelinan. A copy of that letter is attached for your ready convenience. As yet, I have not received an opinion from you as to whether the respective incomes and emoluments of these gentlemen are subject to Federal income tax. Since April 15 is fast approaching, I would appreciate it if I could hear from you at your early convenience.

Sincerely yours,



C. Brewster Chapman, Jr.
Assistant Solicitor, Territories
Division of General Law

Docket
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CBChapman, Jr.:bb:2/11/77

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