

EXHIBIT T

The Fishers & Dashers Tax Court Cases

Audit & Law Review

THE DISCLOSED ENTITIES AND THE TWO \$8M+ DOLLAR US TAX CASES

This audit leads the Burkes onto the current tax court case involving 2 entities which are disclosed in the judges' financial report.

The first is *Dasher's Bay at Effingham, LLC*, which is listed in the United States Tax Court Docket No. [4078-18](#);

Pursuant to Tax Court Rule 50(f), orders shall not be treated as precedent, except as otherwise provided. **ALS**

UNITED STATES TAX COURT
WASHINGTON, DC 20217

DASHER'S BAY AT EFFINGHAM, LLC,)	
DASHER'S BAY MANAGEMENT GROUP,)	
LLC, TAX MATTERS PARTNER,)	
)	
Petitioner,)	
)	
v.)	Docket No. 4078-18.
)	
COMMISSIONER OF INTERNAL REVENUE,)	
)	
Respondent)	

A search reveals related cases for *Dasher's Bay Management Group, LLC* as shown below. It is unknown if the judge has any shareholding in this entity.

Max. Results per Page: 25				
Docket No.	Date Filed	Petitioner Name	Spouse Name	State
004078-18	02/26/2018	Dasher's Bay at Effingham, LLC		GA
004078-18	02/26/2018	Dasher's Bay Management Group, LLC		GA
004011-18	02/26/2018	Dasher's Bay Management Group, LLC		GA
002771-18	02/07/2018	Dasher's Bay Management Group, LLC		GA
001111-18	01/22/2018	Dasher's Bay Management Group, LLC		GA

The second is *River's Edge Landing, LLC* which is listed in the United States Tax Court Docket; [Docket No. 1111-18](#)

Pursuant to Tax Court Rule 50(f), orders shall not be treated as precedent, except as otherwise provided. **ALS**

**UNITED STATES TAX COURT
WASHINGTON, DC 20217**

RIVER'S EDGE LANDING, LLC, DASHER'S)	
BAY MANAGEMENT GROUP, LLC, TAX)	
MATTERS PARTNER,)	
)	
Petitioner,)	
)	
v.)	Docket No. 1111-18.
)	
COMMISSIONER OF INTERNAL REVENUE,)	
)	
Respondent)	

In the financial report, you will note below there are 3 LLC's (lines 66-68), namely; (i) River's Edge Landing, LLC ("Rivers") (ii) Ledbetter Lake Investors, LLC (iii) Dasher's Bay at Effington, LLC. ("Dashers") It would appear (i) and (iii)

are involved with the Tax Court, the Burkes could not locate any case against entity (ii).

64. Excelerate Discovery, LLC		None			Merged (with line 65)				
65. TrustPoint International, LLC	D \$5-15K	None	K	U	\$15K-50K				
66. River's Edge Landing, LLC		None	J	U	LESS THAN \$15K				
67. Ledbetter Lake Investors, LLC		None	J	U	LESS THAN \$15K				
68. Dasher's Bay at Effingham, LLC		None	J	U	LESS THAN \$15K				

1. Income Gain Codes: (See Columns B1 and D4)	A - \$1,000 or less F - \$50,001 - \$100,000 J - \$13,000 or less (See Columns C1 and D3)	B - \$1,001 - \$2,500 G - \$100,001 - \$1,000,000 K - \$13,001 - \$50,000 O - \$500,001 - \$1,000,000	C - \$2,501 - \$5,000 H - \$1,000,001 - \$5,000,000 L - \$50,001 - \$100,000 P1 - \$1,000,001 - \$5,000,000 P4 - More than \$50,000,000	D - \$5,001 - \$15,000 I1 - \$1,000,001 - \$5,000,000 M - \$100,001 - \$250,000 P2 - \$5,000,001 - \$25,000,000	E - \$15,001 - \$50,000 I2 - More than \$5,000,000
2. Value Codes: (See Columns C1 and D3)	N - \$250,001 - \$500,000 P3 - \$25,000,001 - \$50,000,000	R - Cost (Real Estate Only) V - Other	S - Assessment W - Estimated	T - Cash Market	
3. Value Method Codes (See Column C2)	Q - Appraisal U - Book Value				

It should be disclosed, the registered owners of these entities, unlike the residential properties and commercial apartment building as listed separately in the 2017 financial report, do not name *Jill A. Pryor* or her husband, Edward B. Krugman. Nor do the entities involved provide any multi-member shareholding information in any annual filings. However, these entities are listed on the 2017 report and as such, it would indicate that these are multi-member LLCs' where *Jill A. Pryor* retains a shareholding in the entities. Furthermore, the case at the tax court indicates there is a "Partnership" in place based on the filings to the IRS and that the valuations of the shareholding/partnership have been materially understated, in fact, the entities never even put a 'numerical' valuation on the required IRS form field.

This is a “conservation easement” tax case involving a 2010 donation of an easement to the [National Wild Turkey Federation, Inc.](#) At question is taken from the tax court judges’ own summation;

Rivers filed Form 1065, U.S. Return of Partnership Income, for 2010 reporting the conservation easement as a deductible *partner-level* charitable contribution of \$8,309,000. It reported **no** partnership-level income or deductions.

Along with this return, *Rivers* filed Form 8283, Noncash Charitable Contributions, describing the contribution. Item 5(f) on Form 8283 requests the donor's cost or adjusted basis in the contributed property. *Rivers* did not provide a numerical answer in box 5(f) on Form 8283.

The same tax court discussion was applied to the *Dashers* entity Order, the sum being the only difference, which is \$8,619,000.

On the 10th of December, 2019, the judge in the case(s) ordered the case proceed to trial. The IRS assessed an \$8.3 million dollar adjustment to income based on 2010 filings by the *Rivers* entity and \$8.6 million for the *Dashers* entity, wherein the IRS determined they did not qualify for a claimed charitable contribution deduction.