

September 12, 2019

## **RE: No Action Required - IRS Notice 2019-46 and Notification**

On June 22, 2019 the IRS issued Notice 2019-46 (“Notice”), which announced that the Department of Treasury and the IRS intend to issue regulations that will permit a domestic partnership to apply the rules in Prop. Treas. Reg. § 1.951A-5 for taxable years ending before June 22, 2019. The Notice allows a partnership to file its partnership return (for taxable years ending before June 22, 2019) consistent with Prop. Treas. Reg. § 1.951A-5 if partners are notified of certain information. As required by the Notice, The Blackstone Group L.P. (E.I.N. 20-8875684) is providing notification of the following:

- (1) The 2018 Schedule K-1 issued The Blackstone Group L.P. is consistent with Prop. Treas. Reg. § 1.951A-5.
- (2) The Blackstone Group L.P. is filing its 2018 Form 1065, U.S. Return of Partnership Income, consistent with Prop. Treas. Reg. § 1.951A-5.

If you have any questions, please contact:

Blackstone Investor Relations  
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