
From: Richard Joslin [REDACTED]
Sent: Monday, January 26, 2015 12:43 PM
To: jeffrey E.; Brad Wechsler; Eileen Alexanderson; Melanie Spinella
Subject: RE:

The entity that owns direct interest in Phaidon Press Ltd is JMWT Ltd, a corporation for US tax purposes. The holding companies above JMWT Ltd (Midco, Topco) are disregarded entities for income tax purposes. Any lending activity between these holding companies should be disregarded for income tax purposes. Further no trade or business of lending would be ascribed to the holding companies single loan activity. I will look at the historical activity of these entities to see if any costs were capitalized and thus might be available for claiming when liquidation occurs.

From: jeffrey E. [mailto:jeevacation@gmail.com]
Sent: Monday, January 26, 2015 6:56 AM
To: Brad Wechsler; Richard Joslin; Eileen Alexanderson; Melanie Spinella
Subject:

someone should take a hard look at the topco midco bidco liquidation and decide if there is a passive, though albeit deferred tax loss.

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com <mailto:jeevacation@gmail.com>, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved