
From: jeffrey E. <jeevacation@gmail.com>
Sent: Monday, January 26, 2015 1:22 PM
To: Richard Joslin
Subject: Re:

foreign loss?

On Mon, Jan 26, 2015 at 8:42 AM, Richard Joslin <<mailto: [REDACTED]>> wrote:

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

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

someone should take a hard look at the topco midco b=dco liquidation and decide if there is a passive,though albeit deferred ta= loss.

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please no=e

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JEE

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