
From: Dlugash, Alan <[REDACTED]>
Sent: Friday, June 13, 2014 3:11 PM
To: Richard Kahn; Jeffrey Epstein
Cc: David Hasson
Subject: RE: JEE Form 8621

= I am writing regarding the tax issue=of what triggers the termination of the extension of time to pay the PFIC =ax. We have deferred the tax otherwise due from 1999 through 2006, but we have been paying the tax on all earnings reported since then.

Th= termination of the extension is basically triggered by either or both of = occurrences:

- 1) the distribution fr=m the PFIC to the shareholder of the income whose tax is being deferred. I= our case, this would be a distribution from the PFIC to the investment pa=tnership in which Haze is the investor. Typically there would not be distributions as long as the PFIC investment =continues being held by the investment partnership. If there are any distri=utions, they would be deemed to come out of the most RECENT earnings - per=ect in our case, since these would be the earnings on which we have already paid tax.
- 2) the disposition of =he shares to which the deferral is attributable. It appears that each PFIC=share would carry with it its share of the deferral from each year. Our on=y wrinkle is that it is not the investment partnership selling its PFIC shares, but rather Haze is selling a share of=its investment in the investment partnership.

Let's di=cuss.

Alan

=b>ALAN DLUGASH CPA

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From: Richard Kahn [mailto: [REDACTED]]
Sent: Thursday, June 12, 2014 4:06 PM
To: Dlugash, Alan
Subject: Re: JEE 8621

please call me as we need to know t=x rules, then review with jee before monday withdrawal deadline

thanks

Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue 4th Floor
New York, NY 10022
tel [REDACTED]
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On Jun 11, 2014, at 7:11 PM, Dlugash, Alan <[REDACTED] <mailto:[REDACTED]>>>
wrote:

The (obvious) answer was that the info was per the Form 8621 (PFIC information return) that was attached to Jeff's 1040, as it has been every year.

 Alan

ALAN DLUGASH CPA

-----Original Message-----
From: Sayar, Edward

Sent: Wednesday, June 11, 2014 5:38 PM
To: Dlugash, Alan
Subject: FW: JEE 8621

It was included as an attachment to his 2012 1040=

EDWARD A. SAYAR, EA, Manager

Tax

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