

From: Richard Joslin <[REDACTED]>

To: jeffrey E. <jeevacation@gmail.com>

Subject: FW: Phaidon

Date: Wed, 08 Oct 2014 15:31:23 +0000

Inline-Images: image001.png; image002.jpg; image003.png



From: Richard Joslin

Sent: Wednesday, October 08, 2014 11:30 AM

To: 'Thomas Turrin'; Abel Goce; Brett Larsen

Cc: lawrence delson

Subject: RE: Phaidon

Agreed re Kabushiki Kaisha

Based on name of entity: PH Art AG, the AG stands for Aktiengesellschaft and that also is a per se corporation Reg 301.7701-2

From: Thomas Turrin [[mailto:\[REDACTED\]](mailto:[REDACTED])]

Sent: Wednesday, October 08, 2014 11:15 AM

To: Richard Joslin; Abel Goce; Brett Larsen

Cc: lawrence delson

Subject: RE: Phaidon

We are making changes....

re: Swiss entity – I have no record of any ck the box election re: Swiss entity.
The Swiss entity was not part of the original structure. Maybe they made an
ck the box election in 2013 ..but I don't have it. ..I have no info as to dates

Japan entity – there is no ck the box election filed since it is a “per se” corporation...
owned by the parent company – I think we should do a 5471.

THOMAS TURRIN, CPA

Partner

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Email: [REDACTED]

Website: www.rem-co.com

From: Richard Joslin [mailto:]

Sent: Wednesday, October 08, 2014 9:56 AM

To: Thomas Turrin; Abel Goce; Brett Larsen

Cc: lawrence delson

Subject: Phaidon

BJAV 8865

Principal bus code/activity should match 1065 filed

BJAV K-1 attachment not the K-1 filed with IRS

8858

General comment: why is tax expense in "other income"

~~Phaidon Press SARL – country and date duplicated – pls remove~~

~~Phaidon Press PTY – Australia (not Austria)~~

~~Phaidon Press PTY – try to add info so there is no truncation of address~~

Phaidon Press Lrd SARL – inconsistent grouping of P&L items vs reporting on other 8858

Phaidon Verlag – there is a weird character in the address

Phaidon Verlag – inconsistent grouping of P&L items vs reporting on other 8858

Phaidon Press Ltd – add EIN of JMWT Ltd to page 1

Phaidon Press Ltd – why is Sch G - Quest 3 answered "No"?

JMWT Acquisition LLP – it is a LLP not an LP (pls check Form 8832)

JMWT Acquisition LLP – country/ date disregarded/ principal activity / direct owner/ income statement should be filled in

JMWT Acquisition LLP – Sch G – why are questions related to dual consolidated losses completed? CFC does not own the disregarded entity so not clear why boxes answered

Where is 8858 fo Swiss entity?

Where is foreign disclosure for Phaidon Press KK (Japanese per se entity)? Does not look like there was a filing for this entity in 2012.

JMWT Topco – address incorrect

JMWT Topco – delete duplication of activity – should change to "holding company"

JMWT Topco – why leave P&L section blank? (Balance sheet changed year over year.)

JMWT Midco – address incorrect

JMWT Midco – why leave P&L section blank? (Balance sheet changed year over year.)

5471 – JMWT Ltd

Why not category 2 filer as well?

Incomplete percentage ownership –pls revise

Misspelled "holding" in Business activity

Why was address not changed like all other filings?

Sch H blank?

Statement 67 – incorrect SSN for Leon Black

Statement 67 – Debra SSN for Debra Black

Statement 68 – address not changed – given that all the trusts are grantor – please change to make clear that the trusts are grantor to LDB.

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