

Comparison of Charitable Vehicles

	Donor controls the investment of assets	Donor controls the charitable destination of funds	“Guaranteed” Donor/family seat on Board of Dirs./Trustees	Requires Donor time and professional guidance	Minimum payout required	Excise Tax on investment income	Limitation on Deduction for gifts of cash (lesser of amount of gift or % of AGI*)	Limitation on Deduction for gifts of long term appreciated securities or real property (lesser of amount of gift or % of AGI)**	Donor or family member can control Board of Dirs/Trustees
Public Charities	No	Yes	No	No	No	No	50%	30% Amount=FMV	No
Community Foundations	Restricted	Restricted	No	No	No	No	50%	30% Amount=FMV	No
Supporting Organizations	Restricted	Restricted	Yes	Yes	No	No	50%	30% Amount=FMV	No
Operating Foundations	Yes	Yes	Yes	Yes	Yes	Yes	50%	30% Amount=FMV	Yes
Private Foundations	Yes	Yes	Yes	Yes	Yes	Yes	30%		Yes

Capital Gain Property (other than qualified appreciated stock):
 20%, Amount = lesser of FMV or adjusted cost basis

Qualified appreciated stock:
 20%, Amount = FMV unless gift equals more than 10% of total outstanding shares

* “AGI” is adjusted gross income without regard to any NOL carry back into the year of the gift.

**The income tax deduction for a gift of appreciated property must generally be reduced by the amount of ordinary income that the donor would have had if the donor sold the asset on the contribution date, but if a sale would have produced a long term capital gain, the donor may deduct the full appreciated value.

(Certain exceptions may not be listed on this chart. Please always consult your attorney and tax planner for legal and tax advice.)

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