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Subject: DAF

Date: Tue, 08 Jul 2014 00:10:58 +0000

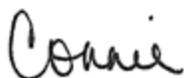
Attachments: Rev._Rul._81-282,_1981-2_CB_78_--_IRC_Sec(s)._170.pdf

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Jeffrey,

The call this morning was helpful as it resulted in a better understanding of the level of involvement potential donors may wish to have over the ongoing management and disposition of donated stock. It is widely accepted that DAFs essentially follow the wishes of donors when it comes to the recipients of the charitable donations. We had talked about a structure that allows donors to select/continue to use their own investment advisors, but I do not think we had a full appreciation that the donors may wish to provide a comparable level of ongoing advice to those investment advisors regarding the donated stock as is typically done with regard to the charitable donations.

As you have identified, a greater level of engagement would obviously trigger a number of additional potential securities/investment/tax issues. (See for example, the attached revenue ruling that provides that "a donor who retains the right to vote stock, in fact, cannot claim a charitable contribution deduction.) I appreciate we are working on a new model of giving that may not have precedent, but think it would be useful to have conversations with any DAFs of which you are aware that are more liberal in taking advice as it relates to the management and disposition of donated stock or that have, as I believe you said, entered into customized arrangements of this nature.



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