

Code. The trust foundation agreement will have to be different and usually more extensive in its language than the language of the articles of incorporation which created your corporate foundation. The reason for the more extensive language necessary in the trust foundation agreement is that the trust foundation is not governed by a state corporate law and therefore must repeat all of the powers and qualifications necessary for the proper operation of a tax-exempt foundation without reference to any state law.

Your corporate foundation, on the other hand, referred directly to your state law and incorporated by reference all of the language of that statute. Most state laws set out all the powers and duties of foundations and this language need not be repeated in articles of incorporation.

Once the trust foundation is created, however, it must operate within the same guidelines and principles that affect the corporate foundation. All of the definitions and procedures that were discussed in the first sessions of this seminar apply equally well to the trust foundation. There are a few detailed changes and these will be explained.

Before we discuss the detailed operations of the trust foundation as they may differ from those of the corporate