

Trust Foundation Investments - Under an unusual quirk of the Internal Revenue Code, trust foundations are seemingly prohibited from investing in foreign countries. This does not bar the trust foundation from accomplishing charitable activities or research and development in foreign countries. It merely prohibits investment in foreign countries. Consequently, trust foundation investment should be limited to United States and its territories. If you are interested in foreign investments, your corporate foundation and the original equity trust are more than capable of accomplishing these investments without loss of benefit.

General Recommendations on Trust Foundation Operation-

Because your trust foundation is generally used as a receptacle for "surplus" earnings developed in other entities under your control, such as the parent trust or corporate foundation, the trust foundation would generally have a large amount of capital available for philanthropic activity. Philanthropic activity must, under the law, be accomplished in one or more of the seven fields outlined in Section 501(c)(3) of the Internal Revenue Code, but the method of accomplishing philanthropic activity in the trust foundation should differ significantly from the method of