

TABLE OF CONTENTS

	Page
Introduction.....	1
Summary of report.....	5
Part I. Appraisal of private foundations.....	11
A. Philanthropic values and private foundations.....	12
B. Evaluation of general criticisms of foundations.....	13
Part II. Major problems.....	15
A. Self-dealing.....	15
1. The existing situation.....	15
2. Consequences of existing situation.....	15
3. Prior attempt to solve problem—1950 legislation.....	17
4. Evaluation of existing law.....	17
5. Possible solution.....	21
B. Delay in benefit to charity.....	23
1. Introduction.....	23
2. 1950 legislation—Existing law.....	24
3. Evaluation of existing law.....	25
4. Possible solution.....	26
a. Distribution of realized income.....	26
b. Income equivalent.....	28
C. Foundation involvement in business.....	30
1. The existing situation.....	30
2. Evaluation.....	31
3. Possible solution.....	36
D. Family use of foundations to control corporate and other property.....	37
1. Two widely practiced tax devices.....	37
2. Evaluation.....	39
3. Possible solution.....	41
4. Possible restriction of this solution.....	43
E. Financial transactions unrelated to charitable functions.....	45
1. Foundation borrowing.....	45
2. Foundation lending.....	50
3. Trading and speculation by foundations.....	52
F. Broadening of foundation management.....	54
1. Abuse potentialities of donor influence.....	54
2. Perpetual existence of foundations.....	55
3. Possibilities for narrowness of foundation management.....	56
4. Possible solution.....	56
Part III. Additional problems.....	58
A. Contributions of unproductive property.....	58
B. Contributions of section 306 stock and other ordinary income assets.....	60
1. Section 306 stock.....	60
2. Other ordinary income assets.....	62
C. Correction of computation of estate tax marital deduction.....	63
D. Sanctions for failure to file information returns.....	64
Appendixes.....	65
A. Statistical appendix.....	65
1. Historical pattern of total contributions.....	65
2. Contributions by type of recipient.....	69
3. The size and growth of foundations.....	72
4. 1964 survey of foundations.....	76
5. The income of foundations.....	78
6. The wealth of foundations.....	82
7. Certain ratios with respect to foundations.....	84
8. Frequency of certain transactions.....	88
9. Foundation payout ratios to assets.....	92
10. Foundation involvement in business.....	96
11. Foundations and type of charity.....	100
B. Internal Revenue Service administrative activity.....	109