

38 TREASURY DEPARTMENT REPORT ON PRIVATE FOUNDATIONS

c. *Frequency of certain transactions*

Table 13 summarizes the answers to a number of questions asked on the Form 990-A concerning the occurrence of various transactions between the foundation and a substantial donor, and various persons related to the donor.

Under present law, the transactions involved in question 2 might be considered prohibited transactions, a cause for denial of the charitable exemption, only if the price involved in the transaction was not an arm's-length price. The question is designed to call the attention of a revenue agent to a particular transaction that might need to be investigated further. A foundation answering "yes" to any part of this question does not indict itself as having forfeited its exemption, but it is possible that some of these transactions go unreported in order to avoid having questions raised by revenue agents. Because of this possibility the answers to question 2 on table 13 may understate the frequency of these transactions.

The answers to question 3 on table 13 are in response to a question on the supplemental questionnaire, relating to the occurrence of transactions between the foundation and its officials (and parties related to such officials). Present law does not contain a specific prohibition on these types of transactions. Occurrence of one of the listed transactions between a foundation and an official, or a party related to an official of the foundation would be indicated by a "yes" answer to that part of question 3.

Question 4 dealing with holdings of 10 percent or more of any class of stock was also taken from the supplemental questionnaire.

TABLE 13.—*Responses to questions concerning certain transactions, etc.*

1. Did you hold any real property for rental purposes with respect to which there is an indebtedness incurred in acquiring the property or in making improvements thereto or which was acquired subject to a mortgage or similar lien?

[In percent]

	Yes	No	No answer
total.....	1.2	97.1	0.7
very large.....	3.7	92.1	4.3
large.....	3.5	95.5	1.0
medium.....	2.6	96.4	1.0
small.....	.2	99.4	.4
minor influence 50 percent or over.....	1.1	94.6	4.3
minor influence under 50 percent, over 20 percent.....	.4	98.3	1.2
minor influence not over 20 percent.....	2.1	96.0	1.9
unclassified.....	2.3	97.7	0