

IRS Issues Notice on Charitable Contributions to Domestic Disregarded Entities

Nonprofit Organizations Alert

August 2012

The IRS has issued a [ruling](#) to provide guidance on the deductibility of contributions to domestic single-member limited liability companies that are wholly owned and controlled by organizations described in § 170(c)(2) of the Internal Revenue Code (U.S. charities) and for federal tax purposes are disregarded as entities separate from their owners under § 301.7701-2(c)(2)(i) of the Procedure and Administration Regulations (SMLLCs).

If you have questions about this Alert, please contact [Richard S. Caputo](#) or any member of Fox Rothschild's [Nonprofit Organizations Practice](#).