

Flax Nikole C

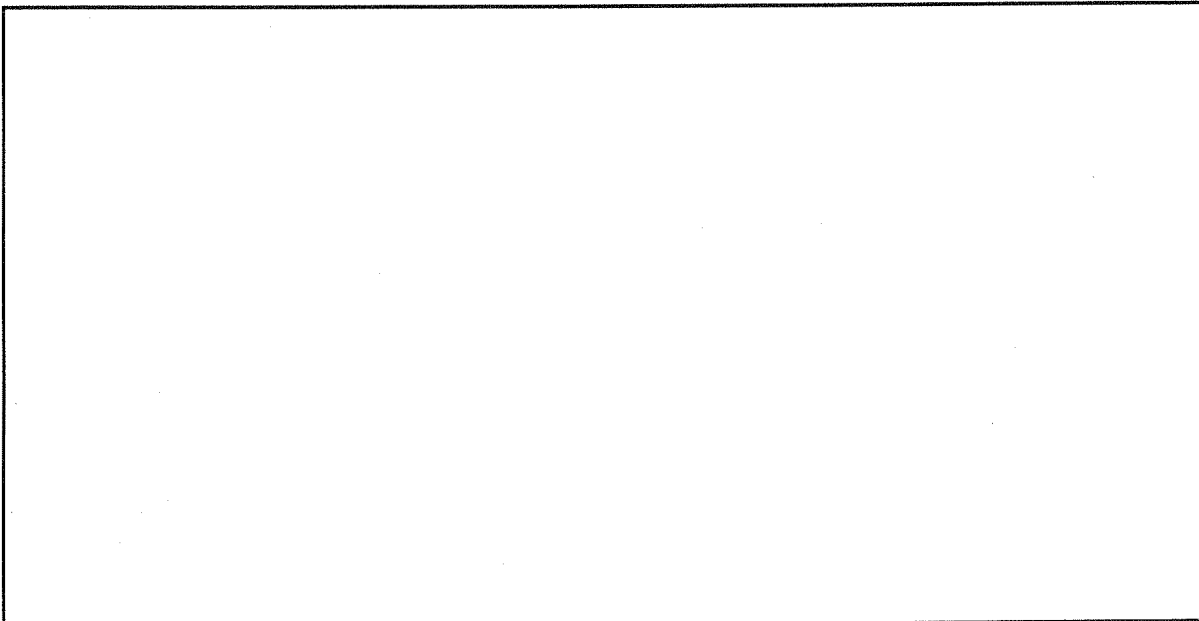
From: Lerner Lois G
Sent: Friday, May 13, 2011 4:26 PM
To: Williams Floyd L; Miller Steven T; Potter Clarissa C
Cc: Fink Faris R; Grant Joseph H; Flax Nikole C; Perez Ruth
Subject: RE: Gift Tax implications of Section 501(c)(4) Organizations

I believe Joseph sent you one from TEGE yesterday regarding our side of the legal piece. As to the below-- to be clearer, the courts have said specifically that contributions to **527 political organizations** are not subject to the gift tax--nothing that I am aware of about contributions to organizations that are not political organizations .

Lois G. Lerner
Director, Exempt Organizations

From: Williams Floyd L
Sent: Friday, May 13, 2011 9:59 AM
To: Miller Steven T; Potter Clarissa C
Cc: Fink Faris R; Grant Joseph H; Flax Nikole C; Perez Ruth; Lerner Lois G
Subject: RE: Gift Tax implications of Section 501(c)(4) Organizations

For what it's worth, here's a very brief synopsis from Estate and Gift/SBSE:



(b)(3)/26 USC 6103

From: Miller Steven T

11/17/2011

IRS-JW-220-005635

Sent: Friday, May 13, 2011 9:51 AM
To: Williams Floyd L; Potter Clarissa C
Cc: Fink Faris R; Grant Joseph H; Flax Nikole C; Perez Ruth; Lerner Lois G
Subject: RE: Gift Tax implications of Section 501(c)(4) Organizations

So first thing we need is a one pager creating a concise statement of legal issue relating to gift tax...Do we have that? If not, can we get one quick.

From: Williams Floyd L
Sent: Friday, May 13, 2011 9:44 AM
To: Miller Steven T; Lerner Lois G; Perez Ruth; Flax Nikole C
Cc: Keith Frank; Davis Jonathan M (Wash DC); Campbell Carol A; Castro Jorge E; Fink Faris R; Grant Joseph H
Subject: Gift Tax implications of Section 501(c)(4) Organizations

Not surprisingly, interest on the hill is picking up on this issue. [REDACTED] with Majority Leader Reid's Office, has suggested the possibility of a briefing for the Senate Finance Committee staff on general issues related to section 501(c)(4) organizations. I think we should do it as interest is likely to grow as we get closer to elections.

(b)(6)