Taxation of Exempts: Jamison Shipman on Private Foundations and Co-Investments

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In a recent *Taxation of Exempts* article, Douglas Mancino and Ofer Lion conclude that a private foundation's investment in, or disposition of, a pooled investment vehicle (taxed as a partnership) is a "sale or exchange" for purposes of Section 4941 that, absent an exception, would be an act of self-dealing. Read more …