

GIANT, IMPORTANT DISCLAIMER: WE AREN'T GIVING LEGAL, TAX OR FINANCIAL ADVICE. PLEASE SEEK YOUR OWN COUNSEL FOR ANY DONATIONS. MANY OF THESE QUESTIONS ARE OPEN TO SOME INTERPRETATION, ARE GENERAL IN NATURE OR ARE UNIQUE TO A PARTICULAR JURISDICTION. ASSUME ALL ANSWERS ARE WRONG UNTIL YOU/YOUR DONOR CONFIRMS WITH HER/HIS ADVISOR.

Q & A from “High-Impact Advanced CGAs: Unlocking the Full Value of Your Donor’s Noncash Assets (with bonus Featured Guest Case Studies)”
<Sep, 2025>

Where are the Trumbell pictures displayed at Yale? My grandsons lives in Guilford, CT, and it would be a nice field trip to show them to them when we go up and visit them.	They're at the Yale University Art Gallery.
Is this Private Equity or Equity in privately held companies?	Semantics. Both are names for privately held stock, which are not publicly traded.
How do retirement accounts figure into the Tiger One chart?	Retirement Accounts are in the 21% Public Equities and 8% Fixed Income segments of the pie.
Hi Johnne... A statement more than a question... Based on your data, if we don't talk about Illiquid Assets with our HNW Donors, we are effectively ignoring 89% of their balance sheet. ALL assets should be considered in a conversation with Donors/Clients about their desire to be generous. Good to see you, Johnne.	Thanks for your pertinent comment.
Can you share the Private Letter Ruling for the Charitable "Put" technique?	I misstated that fact. The “PUT” technique complies with Revenue Ruling 78-197, which of course is stronger and broader than a PLR. This Ruling came out after the Palmer case settled the Pre-Arranged Sale question.
If you adjust the value of the contract (based upon amount actually realized), does that have any effect on the donor's deduction?	No.

<p>Do most charities require a buyer to be identified before accepting a donation of a home within a CGA?</p>	<p>We can't speak for "most" charities. But at NGAF we appreciate knowledge of any potential buyers, but more often we simply put the property on the market as any other seller would.</p>
<p>If CGAs are regulated by state, how does that affect federal income tax deductions?</p>	<p>State compliance regulations are more geared to protect the donor regarding contract language, charity reserves, etc. They have no effect on the federal deduction.</p>
<p>What do you share with donors who only want to do the lesser amount to fund an IRA CGA, even when they know they can do the larger \$54K amount?</p>	<p>"Why would you want to waste a one-time "gift" from the Federal government by only transferring your RMD amount into a Legacy IRA Rollover to a CGA rather than the maximum allowed? The unused amount up to the \$54K current limit is wasted when it could have helped to reduce your IRA balance now and thereby reduce all future RMD's."</p>
<p>Do DAFs offer CGAs? If not, is there a regulation against it?</p>	<p>If a DAF sponsor issues CGAs funded by direct donor contributions (not from DAF accounts), there is no statutory prohibition. Many large DAF sponsors (e.g., Fidelity Charitable, Schwab Charitable, National Christian Foundation) do not issue CGAs, but that's a policy choice, not a legal bar. They often refer the donor to NGAF where we then write the CGA, naming the DAF host as the charitable remainder beneficiary.</p>
<p>Johnne, could you talk through the Impact CGA again? I missed a detail!</p>	<p>The donor sets up a traditional CGA, then redirects the annuity payments back to the charity for a 3–5-year period to satisfy their multi-year pledge to the Capital Campaign. Donor gets a large charitable deduction up front plus annual deductions for the charity's receipt of the cash from their redirected annuity payment. After the pledge is satisfied, the donor continues to receive all future CGA payments to support their lifestyle until they pass away.</p>