

## C. OVERVIEW OF INCOME/PRIVATE BENEFIT ISSUES IN IRC 501(c)(3)

### I. Preface

An unorthodox domestic relations case has a judge inquiring of the elderly plaintiff about who, after some fifty years of marriage, she was now seeking a divorce. "Well, your husband," she replied, "enough is enough!"

In the charitable area, much private benefit may be avoidable. The trick is to know when enough is enough.

### II. Introduction

IRC 501(c)(3) provides exemptions from federal income tax for organizations that are "organized and operated exclusively" for religious, educational, or charitable purposes. The exemption is further conditioned on the organization being not "in part or the net income of which inures to the benefit of any private shareholder or individual."<sup>1</sup> This article examines the prescriptions against inurement and the requirements that an organization must be organized and operated exclusively for exempt purposes by serving public rather than private interests.

### A. The Prohibition Against Inurement of Net Earnings

#### A. What Is Inurement?

The statutory prohibition against inurement of net earnings first appeared in 1894. The provision has been carried forward without significant Congressional comment or debate through successive revenue acts and codifications. See "The Concept of Charity" in the *Fundraising Organizations Annual*, Technical Section Institute for 1989 beginning at page 7. While the provision speaks of "net earnings," it is not interpreted as a strict accounting term; in essence the reasonable after expenses are subtracted from gross earnings. Any unjust enrichment, whether out of gross or net earnings, may constitute inurement. See *People of God v. Community of Christ*, 75 F.3d 122 (9th Cir. 1997).

Regs. 1.501(c)(3)-4(c)(2) explains the prohibition against private inurement as follows:

# Overview Of Inurement Private Benefit Issues

**J Dewey**



## **Overview Of Inurement Private Benefit Issues:**

## **Overview Of Inurement Private Benefit Issues** Book Review: Unveiling the Power of Words

In some sort of driven by information and connectivity, the ability of words has be evident than ever. They have the ability to inspire, provoke, and ignite change. Such may be the essence of the book **Overview Of Inurement Private Benefit Issues**, a literary masterpiece that delves deep to the significance of words and their affect our lives. Written by a renowned author, this captivating work takes readers on a transformative journey, unraveling the secrets and potential behind every word. In this review, we will explore the book is key themes, examine its writing style, and analyze its overall affect readers.

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