



September 25, 2018

To whom it may concern:

The National Association of Charitable Gift Planners (CGP), a tax exempt 501(c)3 corporation, is currently soliciting donations to fund the filing fees and related administrative costs for a Private Letter Ruling to address IRA charitable beneficiary distribution processes established and enforced by IRA custodians. This is a limited fundraising campaign with all funds restricted for the use of the above stated activities.

Contributions can be made with a credit card or by ACH deposit by calling the CGP offices at (317) 269-6274.

Contributions by check should be mailed to:

National Association of Charitable Gift Planners  
200 South Meridian St. Suite 510  
Indianapolis, IN 46225

Make checks payable to CGP  
Be sure to write on the check "IRA – PLR contribution"

All contributors will be recognized publicly as campaign supporters through CGP communications and media press releases unless informed by the contributor otherwise.

Any unused funds contributed by organizations will be returned on a pro rata basis within 90 days of the issuance of the Private Letter Ruling.

For additional information and assistance please contact Michael Kenyon at the CGP offices at (317) 269-6274 or via email at [mkenyon@charitablegiftplanners.org](mailto:mkenyon@charitablegiftplanners.org).



Thank you for your generous support of this important initiative to improve IRA beneficiary distributions to charitable organizations throughout the country.

With gratitude,



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September 12, 2018

BY EMAIL

RE: GETTING YOUR ORGANIZATION'S IRA BENEEICIARY DISTRIBUTION

Dear Colleague,

As you may know or have heard, IRA custodians such as Fidelity, Schwab, and Vanguard require a charity to establish an "inherited IRA" in order for the charity to receive its IRA beneficiary distribution.

This requirement violates both the custodian's fiduciary duties and federal tax law. The violations are not debatable. They are clear.

Yet the custodians persist in their violations.

I and others want to bring these violations to an end.

My personal game plan is two pronged: [1] to obtain a private letter ruling (PLR) on the matter, and [2] to place the matter before a Federal District Court in what is called a Declaratory Judgment action.

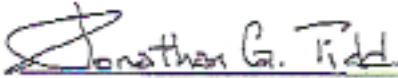
I will act *pro bono*.

What is needed to move forward is [1] a charity willing to seek the PLR, and [2] a charity willing to seek the Declaratory Judgment.

The best custodian as to which to seek the PLR appears to me to be Vanguard. Any custodian requiring a charity to set up an inherited IRA could be named defendant in a Declaratory Judgment suit.

There is a growing coalition of charities that will back these efforts. One advantage of the coalition is financial. The IRS will charge \$28,500 to get the PLR. The court costs for the Declaratory Judgment will be far less. The coalition will help defray these costs.

If you want more information about these efforts, please call or send me an email. I'll be happy to provide details.

  
Jonathan G. Tidd

P.S. Please forward this to anyone who may want to see it.