

2 Corporate Tax**Lecture 2.05****●Deductions (Continued)**

- **Charitable Contributions** 慈善寄付金

Adjusted Taxable Income (ATI: 調整課税所得) の **10%** を上限として控除できる。

Adjusted Taxable Income とは、下記調整後の課税所得。

- 慈善寄付金 (charitable contribution) 控除前、
- 受取配当金控除 (DRD) 前、
- 欠損金 (NOL) の繰戻し前 (carryback)、
- キャピタルロス (capital loss) の繰戻し前 (carryback)

* 課税所得からの算出する場合

課税所得から **Adjusted Taxable Income** を算出する場合には、「慈善寄付金」、「受取配当金控除」、「欠損金の繰戻し」、「キャピタルロスの繰戻し」を足し戻すと、**Adjusted Taxable Income** が算出されることになる。控除できなかった分は **5年間繰越控除**ができる。

→ **[CLASS QUESTIONS 3, 4]**

→ **[IPQ 1, 2]**

REG-TAX IPQ

1. For year 2, Quest Corp., an accrual-basis calendar-year C corporation, had an \$8,000 unexpired charitable contribution carryover from year 1. Quest's year 2 taxable income before the deduction for charitable contributions was \$200,000. On December 12, year 2, Quest's board of directors authorized a \$15,000 cash contribution to a qualified charity, which was made on January 6, year 3. What is the maximum allowable deduction that Quest may take as a charitable contribution on its year 2 income tax return?

- (a) \$23,000
- (b) \$20,000
- (c) \$15,000
- (d) \$8,000

(b) The charitable contribution deduction for a corporation is limited to 10% of taxable income before taking into account the contribution deduction and the dividends received deduction. Accrued contributions are deductible if they are paid within 2 ½ months after year-end. The \$15,000 cash contribution was paid within 2 ½ months after December 31, year 2, so the amount is deductible. Quest has a total of \$23,000 of contributions that are potentially deductible (\$8,000 + \$15,000). However, Quest's contribution deduction is limited to 10% of its taxable income, or \$20,000 ($\$200,000 \times 10\%$).

2. Robin, a C corporation, had revenues of \$200,000 and operating expenses of \$75,000. Robin also received a \$20,000 dividend from a domestic corporation and is entitled to a \$14,000 dividend-received deduction. Robin donated \$15,000 to a qualified charitable organization in the current year. What is Robin's contribution deduction?

- (a) \$15,000
- (b) \$14,500
- (c) \$13,900
- (d) \$13,100

(b) The charitable contribution deduction for a corporation is limited to 10% of taxable income before taking into account the contribution deduction and the dividends received deduction. Robin has \$145,000 of income before taking into consideration the contribution deduction and the dividends received deduction ($\$200,000 + \$20,000 - \$75,000$). The contribution deduction is limited to \$14,500 ($\$145,000 \times 10\%$).