



April 5, 2024

Submitted electronically at [www.regulations.gov](http://www.regulations.gov)  
and by email to: [publichearings@irs.gov](mailto:publichearings@irs.gov)

CC:PA:01:PR (REG-142338-07)  
Room 5205  
Internal Revenue Service  
P.O. Box 7604  
Ben Franklin Station  
Washington, DC 20044

Re: IRS and REG-142338-07  
Request to TESTIFY in person at Public Hearing in Connection with Taxes on Taxable Distributions  
from Donor Advised Funds under Section 4966

The Community Foundation of Sarasota County, Inc. (the "Community Foundation") requests an opportunity to testify in person at the public hearing on the Proposed Regulations on Taxes on Taxable Distributions from Donor Advised Funds under Section 4966 (REG-142338-07). During the hearing, the Community Foundation will be represented by **Roxanne G. Jerde, President and CEO** of the Community Foundation.

Below is an outline of our testimony at the scheduled public hearing:

1. Introduction to the Community Foundation of Sarasota County (3 minutes)
2. Expansion of "donor advisor" definition to include investment advisors (4 minutes)
  - a. Relationship with Investment Advisors and other Professional Advisors
  - b. Outside invested funds are larger and able to transform grantmaking
    - i. \$25 million + funds for dyslexia
    - ii. Alternative is a private foundation or commercial fund that does not have our local knowledge and expertise in grantmaking
  - c. Misperception of Abuse
3. Disruption to the advisor relationship would negatively impact our ability to continue to strengthen our community with philanthropic dollars led by local experts (2 minutes)

If you have any questions or would like more information, please contact me at [roxie@cfsarasota.org](mailto:roxie@cfsarasota.org) or Betsy Pennewill, General Counsel, at [betsy@cfsarasota.org](mailto:betsy@cfsarasota.org).

Sincerely,

A handwritten signature in blue ink that reads "Roxanne G. Jerde". The signature is fluid and cursive, with the first name being the most prominent.

Roxanne G. Jerde  
President & CEO  
Community Foundation of Sarasota County, Inc.  
Direct: 941-556-7112