Absent IRS Action, High-Income Investors in South Carolina Will See Significantly Higher Returns if They Donate Their Stock to Fund Private School Vouchers, Instead of Selling that Stock on the Open Market

	Sell Stock	Donate Stock and Receive 100% State Tax Credit		
	Sell Stock	No Regulation	Regulation Denying Charity Deduction but Not Taxing Gain	Regulation Denying Charity Deduction and Taxing Gain
Price originally paid for stock	\$50,000	\$50,000	\$50,000	\$50,000
Market value of stock today (assuming approx. 7% annual return over 14 years)	\$125,000	\$125,000	\$125,000	\$125,000
Investment earnings from increase in value (capital gain)	\$75,000	\$75,000	\$75,000	\$75,000
Example: High-income taxpayer (37% federal tax bracket) paying more than \$10,000 in deductible SALT				
Payment received in return for stock	\$125,000	\$125,000	\$125,000	\$125,000
Form of payment	Cash	Tax Credit	Tax Credit	Tax Credit
Federal (23.8%) and state (7%) tax payment on \$75k gain	\$(23,100)	N/A	N/A	\$(23,100)
Federal tax savings from charity deduction	N/A	\$46,250	N/A	N/A
Net payment (after taxes) received in return for stock with market value of \$125k	\$101,900	\$171,250	\$125,000	\$101,900
Pre-tax earnings on stock originally purchased for \$50,000	\$75,000	\$75,000	\$75,000	\$75,000
After-tax earnings on stock originally purchased for \$50,000	\$51,900	\$121,250	\$75,000	\$51,900
Financial reward from choosing to donate to fund private school vouchers, relative to selling stock on the open market	N/A	\$69,350	\$23,100	\$0