QSSO Contribution Illustrations (Reflecting federal tax laws for 2018 under the 2017 tax reform act (1), signed into law on December 22, 2017.)

Illustrations of Tax Consequences for Individuals and Married Couples who Itemize Deductions (2)

Overall: The credit provides taxpayers whose SALT deduction is not limited with the opportunity to contribute to a QSSO with little net cash outlay. Taxpayers whose SALT deduction is limited both before and after the contribution will receive a cash benefit equal to the amount of the contribution muliplied by their marginal tax rate. These taxpayers will trade a non-deductible state tax payment for a fully deductible contribution.

ı	INDIVIDUALS WHO ITEMIZE								
l		NO SALT DEDUCTI	ON LIMITATION		SALT	SALT DEDUCTION LIMITED BEFORE AND AFTER CONTRIBUTION			
<u>Federal</u>	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	
Adjusted Gross Income (3)	100,000	100,000	100,000	100,000	250,000	250,000	250,000	250,000	
Itemized Deductions									
State/Local Income & Property Taxes Paid (SALT)	(8,000)	(8,000)	(8,000)	(8,000)	(16,000)	(16,000)	(16,000)	(16,000)	
Reduction in Taxes Paid (4)	-	1,000	-	2,500	-	1,000	-	2,500	
Excess over Limit on SALT Deduction (5)	-	-	-	-	6,000	5,000	6,000	3,500	
Mortgage Interest	(12,000)		(12,000)	(12,000)	(22,000)	(22,000)	(22,000)	(22,000)	
Maximum QSSO Contribution	-	(1,000)		(2,500)		(1,000)		(2,500)	
Taxable Income	80,000	80,000	80,000	80,000	218,000	217,000	218,000	215,500	
Federal Regular Tax	13,540	13,540	9,479	9,479	51,990	51,640	40,899	40,299	
0.9% Additional Medicare Tax	-	-		-	450	450		-	
Total Federal Tax	13,540	13,540	9,479	9,479	52,440	52,090	40,899	40,299	
<u>Georgia</u>									
Federal AGI	100,000	100,000	100,000	100,000	250,000	250,000	250,000	250,000	
Addback of QSSO Contribution	-	1,000	-	2,500	-	1,000	-	2,500	
Georgia Itemized Deductions	(20,000)	(20,000)	(20,000)	(20,000)	(32,000)	(33,000)	(32,000)	(34,500)	
Georgia Personal Exemptions	(2,700)	(2,700)	(7,400)	(7,400)	(2,700)	(2,700)	(7,400)	(7,400)	
Georgia Taxable Income	77,300	78,300	72,600	75,100	215,300	215,300	210,600	210,600	
Georgia Tax Before Credit	4,451	4,511	4,099	4,249	12,728	12,728	12,376	12,376	
Georgia Scholarship Credit	-	(1,000)		(2,500)		(1,000)		(2,500)	
Net Georgia Tax	4,451	3,511	4,099	1,749	12,728	11,728	12,376	9,876	
Net Federal and Georgia Tax	17,991	17,051	13,578	11,228	65,168	63,818	53,275	50,175	
Contribution Paid	-	1,000	-	2,500	-	1,000	-	2,500	
Net Cash Outlay	17,991	18,051	13,578	13,728	65,168	64,818	53,275	52,675	
Net Cash Benefit/(Cost) to Taxpayer		(60)		(150)		350		600	

Comments on Illustrations:

Tax Benefit as % of Contribution

(1) "An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018"; (P.L. 115-97); known as the "Tax Cuts and Jobs Act".

94%

- (2) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates, but not the potential 20% deduction under new IRC Section 199A.
- (3) AGI is assumed to include wages, Schedule C and/or Schedule E ordinary income only.
- (4) This amount reflects a reduction of state income taxes paid due to the offsetting credit received for a charitable contribution to a QSSO.
- (5) Beginning for the 2018 tax year, the deduction for state and local income and property taxes ("SALT" deduction) is limited to \$10,000 for all individual taxpayers.

Individuals whose SALT deduction is not limited before or after the contribution will have no federal consequence in making a QSSO contribution. They will receive a Georgia tax benefit equal to 94% of their contribution, which represents a 100% Georgia tax credit for the contribution offset by 6% of the charitable deduction added back.

Individuals whose SALT deduction is limited both before and after the contribution will receive a federal tax benefit equal to the amount of the contribution multiplied by their marginal tax rate. They will receive a GA tax benefit equal to 100% of their contribution which represents a 100% GA tax credit. The addback of the charitable donation returns the taxpayer to their original GA taxable income prior to their contribution.

94%

135%

124%

Single Tax Rates			
Not over \$9,525	10% of taxable income	10.0%	-
Over \$9,525 but not over \$38,700	\$952.50 plus 12% of the excess over \$9,525	12.0%	952.50
Over \$38,700 but not over \$82,500	\$4,453.50 plus 22% of the excess over \$38,700	22.0%	4,453.50
Over \$82,500 but not over \$157,500	\$14,089.50 plus 24% of the excess over \$82,500	24.0%	14,089.50
Over \$157,500 but not over \$200,000	\$32,089.50 plus 32% of the excess over \$157,500	32.0%	32,089.50
Over \$200,000 but not over \$500,000	\$45,689.50 plus 35% of the excess over \$200,000	35.0%	45,689.50
Over \$500,000	\$150,689.50 plus 37% of the excess over \$500,000	37.0%	150,689.50
Married Filing Jointly			
Not over \$19,050	10% of taxable income	10.0%	-
Over \$19,050 but not over \$77,400	\$1,905 plus 12% of the excess over \$19,050	12.0%	1,905.00
Over \$77,400 but not over \$165,000	\$8,907 plus 22% of the excess over \$77,400	22.0%	8,907.00
Over \$165,000 but not over \$315,000	\$28,179 plus 24% of the excess over \$165,000	24.0%	28,179.00
Over \$315,000 but not over \$400,000	\$64,179 plus 32% of the excess over \$315,000	32.0%	64,179.00

\$91,379 plus 35% of the excess over \$400,000

\$161,379 plus 37% of the excess over \$600,000

35.0%

37.0%

91,379.00

161,379.00

Over \$400,000 but not over \$600,000

Over \$600,000

QSSO Contribution Illustrations (Reflecting federal tax laws for 2018 under the 2017 tax reform act (1), signed into law on December 22, 2017.)

Illustrations of Tax Consequences for Individuals and Married Couples who Do Not Itemize Deductions (2)

Overall: The credit provides taxpayers claiming the standard deduction with the opportunity to contribute to a QSSO while recouping 100% of their total contribution.

INDIVIDUALS TAKING STANDARD DEDUCTION

<u>Federal</u>	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY
Adjusted Gross Income (3)	100,000	100,000	100,000	100,000	250,000	250,000	250,000	250,000
Standard Deduction	(12,000)	(12,000)	(24,000)	(24,000)	(12,000)	(12,000)	(24,000)	(24,000)
Taxable Income	88,000	88,000	76,000	76,000	238,000	238,000	226,000	226,000
Federal Regular Tax	15,410	15,410	8,739	8,739	58,990	58,990	42,819	42,819
0.9% Additional Medicare Tax Total Federal Tax	15,410	- 15,410	- 8,739	- 8,739	450 59,440	450 59,440	42,819	- 42,819
Georgia Federal AGI Georgia Standard Deductions Georgia Personal Exemptions	100,000 (2,300) (2,700)	100,000 (2,300) (2,700)	100,000 (3,000) (7,400)	100,000 (3,000) (7,400)	250,000 (2,300) (2,700)	250,000 (2,300) (2,700)	250,000 (3,000) (7,400)	250,000 (3,000) (7,400)
Georgia Taxable Income	95,000	95,000	89,600	89,600	245,000	245,000	239,600	239,600
Georgia Tax Before Credit Georgia Scholarship Credit Net Georgia Tax	5,513 - 5,513	5,513 (1,000) 4,513	5,119 - 5,119	5,119 (2,500) 2,619	14,510 - 14,510	14,510 (1,000) 13,510	14,116 - 14,116	14,116 (2,500) 11,616
Net Federal and Georgia Tax Contribution Paid Net Cash Outlay	20,923	19,923 1,000 20,923	13,858	11,358 2,500 13,858	73,950 73,950	72,950 1,000 73,950	56,935 56,935	54,435 2,500 56,935
Net Cash Benefit/(Cost) to Taxpayer Tax Benefit as % of Contribution		- 100%		- 100%		- 100%		- 100%

Comments on Illustrations:

- (1) "An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018" (P.L. 115-97); known as the "Tax Cuts and Jobs Act".
- (2) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates, but not the potential 20% deduction under new IRC Section 199A.
- (3) AGI is assumed to include wages, Schedule C and/or Schedule E ordinary income only.

Federal: Individuals that take the standard deduction and do not deduct state income taxes or charitable contributions will have no federal consequence in making a QSSO contribution.

Georgia: Individuals receive a Georgia tax benefit equal to 100% of the QSSO contribution.

Single Tax Rates			
Not over \$9,525	10% of taxable income	10.0%	-
Over \$9,525 but not over \$38,700	\$952.50 plus 12% of the excess over \$9,525	12.0%	952.50
Over \$38,700 but not over \$82,500	\$4,453.50 plus 22% of the excess over \$38,700	22.0%	4,453.50
Over \$82,500 but not over \$157,500	\$14,089.50 plus 24% of the excess over \$82,500	24.0%	14,089.50
Over \$157,500 but not over \$200,000	\$32,089.50 plus 32% of the excess over \$157,500	32.0%	32,089.50
Over \$200,000 but not over \$500,000	\$45,689.50 plus 35% of the excess over \$200,000	35.0%	45,689.50
Over \$500,000	\$150,689.50 plus 37% of the excess over \$500,000	37.0%	150,689.50
Married Filing Jointly			
Not over \$19,050	10% of taxable income	10.0%	-
Over \$19,050 but not over \$77,400	\$1,905 plus 12% of the excess over \$19,050	12.0%	1,905.00
Over \$77,400 but not over \$165,000	\$8,907 plus 22% of the excess over \$77,400	22.0%	8,907.00
Over \$165,000 but not over \$315,000	\$28,179 plus 24% of the excess over \$165,000	24.0%	28,179.00
Over \$315,000 but not over \$400,000	\$64,179 plus 32% of the excess over \$315,000	32.0%	64,179.00
Over \$400,000 but not over \$600,000	\$91,379 plus 35% of the excess over \$400,000	35.0%	91,379.00
Over \$600,000	\$161,379 plus 37% of the excess over \$600,000	37.0%	161,379.00

QSSO Contribution Illustrations (Reflecting federal tax laws for 2018 under the 2017 tax reform act (1), signed into law on December 22, 2017.)

Illustrations of Tax Consequences for Individuals and Married Couples who Itemize Deductions (2)

Overall: Taxpayers whose SALT deduction is limited will receive a cash benefit by contributing to a QSSO. Taxpayers whose SALT deduction is limited both before and after the contribution will receive a cash benefit equal to the amount of the contribution multiplied by their marginal tax rate. These taxpayers will trade a non-deductible state tax payment for a fully deductible contribution.

INDIVIDUALS WITH SUFFICIENT BUSINESS INCOME FROM FLOW THROUGH ENTITIES

SALT DEDUCTION LIMITED BEFORE CONTRIBUTION
SALT DEDUCTION LIMITED BEFORE AND AFTER CONTRIBUTION

<u>Federal</u>	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY
Adjusted Gross Income (3)	250,000	250,000	250,000	250,000	500,000	500,000	500,000	500,000
Itemized Deductions	(4.0.000)	(4.5.000)	(4.5.000)	(4.5.000)	(25.000)	(25,000)	(25.000)	(25,000)
State/Local Income & Property Taxes Paid (SALT)	(16,000)		(16,000)	(16,000)	(35,000)	(35,000) 10,000	(35,000)	(35,000) 10,000
Reduction in Taxes Paid (4) Excess over Limit on SALT Deduction (5)	6,000	10,000	6,000	10,000	25,000	15,000	25,000	15,000
Mortgage Interest	(22,000)		(22,000)	(22,000)	(22,000)	(22,000)	(22,000)	(22,000)
Maximum QSSO Contribution	(22,000)	(10,000)	(22,000)	(10,000)	(22,000)	(10,000)	(22,000)	(10,000)
Taxable Income	218,000	212,000	218,000	212,000	468,000	458,000	468,000	458,000
	210,000	212,000	218,000	212,000	400,000	438,000	400,000	438,000
Federal Regular Tax	51,990	49,890	40,899	39,459	139,490	135,990	115,179	111,679
0.9% Additional Medicare Tax	450	450	-	-	2,700	2,700	2,250	2,250
Total Federal Tax	52,440	50,340	40,899	39,459	142,190	138,690	117,429	113,929
Georgia								
Federal AGI	250,000	250,000	250,000	250,000	500,000	500,000	500,000	500,000
Addback of QSSO Contribution	-	10,000	-	10,000	-	10,000	-	10,000
Georgia Itemized Deductions	(32,000)	(38,000)	(32,000)	(38,000)	(32,000)	(42,000)	(32,000)	(42,000)
Georgia Personal Exemptions	(2,700)		(7,400)	(7,400)	(2,700)	(2,700)	(7,400)	(7,400)
Georgia Taxable Income	215,300	219,300	210,600	214,600	465,300	465,300	460,600	460,600
Georgia Tax Before Credit	12,728	12,968	12,376	12,616	27,728	27,728	27,376	27,376
Georgia Scholarship Credit	-	(10,000)	-	(10,000)		(10,000)		(10,000)
Net Georgia Tax	12,728	2,968	12,376	2,616	27,728	17,728	27,376	17,376
		== ===		40.000	450.040	456.440		404.005
Net Federal and Georgia Tax	65,168	53,308	53,275	42,075	169,918	156,418	144,805	131,305
Contribution Paid	-	10,000		10,000	100.010	10,000	144.005	10,000
Net Cash Outlay	65,168	63,308	53,275	52,075	169,918	166,418	144,805	141,305
Net Cash Benefit/(Loss) to Taxpayer		1,860		1,200		3,500		3,500
Tax Benefit as % of Contribution		1,860		1,200		3,500 135%		3,500 135%
Tax beliefit as /0 of Contribution		119%		11270		155%		155%

Comments on Illustrations:

- (1) "An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018"; (P.L. 115-97); known as the "Tax Cuts and Jobs Act".
- (2) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates.
- (3) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates, but not the potential 20% deduction under new IRC Section 199A.
- (4) This amount reflects a reduction of state income taxes paid due to the offsetting credit received for a charitable contribution to a QSSO.
- (5) Beginning for the 2018 tax year, the deduction for state and local income and property taxes ("SALT" deduction) is limited to \$10,000 for all individual taxpayers.

Individuals whose SALT deduction is limited will receive a cash benefit by making a QSSO contribution. Individuals whose SALT deduction is limited both before and after the contribution will receive a federal tax benefit equal to the amount of the contribution multiplied by their marginal tax rate. They will receive a GA tax benefit equal to 100% of their contribution which represents a 100% Georgia tax credit. The addback of the charitable donation returns the taxpayer to their original GA taxable income prior to their contribution.

Single Tax Rates			
Not over \$9,525	10% of taxable income	10.0%	-
Over \$9,525 but not over \$38,700	\$952.50 plus 12% of the excess over \$9,525	12.0%	952.50
Over \$38,700 but not over \$82,500	\$4,453.50 plus 22% of the excess over \$38,700	22.0%	4,453.50
Over \$82,500 but not over \$157,500	\$14,089.50 plus 24% of the excess over \$82,500	24.0%	14,089.50
Over \$157,500 but not over \$200,000	\$32,089.50 plus 32% of the excess over \$157,500	32.0%	32,089.50
Over \$200,000 but not over \$500,000	\$45,689.50 plus 35% of the excess over \$200,000	35.0%	45,689.50
Over \$500,000	\$150,689.50 plus 37% of the excess over \$500,000	37.0%	150,689.50
Married Filing Jointly			
Not over \$19,050	10% of taxable income	10.0%	-
Over \$19,050 but not over \$77,400	\$1,905 plus 12% of the excess over \$19,050	12.0%	1,905.00
Over \$77,400 but not over \$165,000	\$8,907 plus 22% of the excess over \$77,400	22.0%	8,907.00
Over \$165,000 but not over \$315,000	\$28,179 plus 24% of the excess over \$165,000	24.0%	28,179.00
Over \$315,000 but not over \$400,000	\$64,179 plus 32% of the excess over \$315,000	32.0%	64,179.00
Over \$400,000 but not over \$600,000	\$91,379 plus 35% of the excess over \$400,000	35.0%	91,379.00
Over \$600,000	\$161,379 plus 37% of the excess over \$600,000	37.0%	161,379.00

QSSO Contribution Illustrations (Reflecting federal tax laws for 2018 under the 2017 tax reform act (1), signed into law on December 22, 2017.)

Illustrations of Tax Consequences for Individuals and Married Couples who Itemize Deductions (2)

Overall: Taxpayers whose SALT deduction is limited both before and after contributing to a QSSO will receive a cash benefit will equal the amount of the contribution muliplied by their marginal tax rate. These taxpayers will trade a non-deductible state tax payment for a fully deductible charitable contribution.

]				SALT Deduction Limited	ed Before and After Contribution				
ſ		\$1,000/\$2,500 Cont	ribution Limitation			\$10,000 Business Incom	e Contribution Limitation		
<u>Federal</u>	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	NO CHARITABLE CONTRIBUTION SINGLE	MAXIMUM GA GOAL CONTRIBUTION SINGLE	NO CHARITABLE CONTRIBUTION MARRIED FILING JOINTLY	MAXIMUM GA GOAL CONTRIBUTION MARRIED FILING JOINTLY	
Adjusted Gross Income (3)	550,000	550,000	650,000	650,000	600,000	600,000	700,000	700,000	
Itemized Deductions State/Local Income & Property Taxes Paid (SALT] Reduction in Taxes Paid (4) Excess over Limit on SALT Deduction (5) Mortgage Interest	(38,000) - 28,000 (22,000)	1,000 27,000	(44,000) - 34,000 (22,000)	(44,000) 2,500 31,500 (22,000)	(41,000) - 31,000 (22,000)	(41,000) 10,000 21,000 (22,000)	(47,000) - 37,000 (22,000)	(47,000) 10,000 27,000 (22,000)	
Maximum QSSO Contribution	-	(1,000)		(2,500)		(10,000)		(10,000)	
Taxable Income	518,000	517,000	618,000	615,500	568,000	558,000	668,000	658,000	
Federal Regular Tax 0.9% Additional Medicare Tax Total Federal Tax	157,350 3,150 160,500	156,980 3,150 160,130	168,039 3,600 171,639	167,114 3,600 170,714	175,850 3,600 179,450	172,150 3,600 175,750	186,539 4,050 190,589	182,839 4,050 186,889	
<u>Georgia</u>									
Federal AGI Addback of QSSO Contribution Georgia Itemized Deductions Georgia Personal Exemptions Georgia Taxable Income	550,000 - (32,000) (2,700) 515,300		650,000 - (32,000) (7,400) 610,600	650,000 2,500 (34,500) (7,400) 610,600	600,000 - (32,000) (2,700) 565,300	600,000 10,000 (42,000) (2,700) 565,300	700,000 - (32,000) (7,400) 	700,000 10,000 (42,000) (7,400) 660,600	
Georgia Tax Before Credit Georgia Scholarship Credit Net Georgia Tax	30,728 - 30,728	30,728 (1,000) 29,728	36,376 - 36,376	36,376 (2,500) 33,876	33,728 - 33,728	33,728 (10,000) 23,728	39,376 - 39,376	39,376 (10,000) 29,376	
Net Federal and Georgia Tax Contribution Paid Net Cash Outlay	191,228 - 191,228	189,858 1,000 190,858	208,015 - 208,015	204,590 2,500 207,090	213,178 - 213,178	199,478 10,000 209,478	229,965 - 229,965	216,265 10,000 226,265	
Net Cash Benefit/(Cost) to Taxpayer		370		925		3,700		3,700	

Comments on Illustrations:

Tax Benefit as % of Contribution

(1) "An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018"; (P.L. 115-97); known as the "Tax Cuts and Jobs Act".

137%

- (2) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates.
- (3) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates, but not the potential 20% deduction under new IRC Section 199A.
- (4) This amount reflects a reduction of state income taxes paid due to the offsetting credit received for a charitable contribution to a qualified rural hospital organization.
- (5) Beginning for the 2018 tax year, the deduction for state and local income and property taxes ("SALT" deduction) is limited to \$10,000 for all individual taxpayers.

Individuals whose SALT deduction is limited both before and after the QSSO contribution will receive a federal tax benefit equal to the amount of the contribution multiplied by their marginal tax rate, as they are substituting a non-deductible state tax payment with a fully deductible charitable contribution. They will receive a GA tax benefit equal to 100% of their contribution which represents a 100% GA tax credit. The addback of the charitable donation returns the taxpayer to their original GA taxable income prior to the contribution.

137%

137%

137%

Single Tax Rates			
Not over \$9,525	10% of taxable income	10.0%	-
Over \$9,525 but not over \$38,700	\$952.50 plus 12% of the excess over \$9,525	12.0%	952.50
Over \$38,700 but not over \$82,500	\$4,453.50 plus 22% of the excess over \$38,700	22.0%	4,453.50
Over \$82,500 but not over \$157,500	\$14,089.50 plus 24% of the excess over \$82,500	24.0%	14,089.50
Over \$157,500 but not over \$200,000	\$32,089.50 plus 32% of the excess over \$157,500	32.0%	32,089.50
Over \$200,000 but not over \$500,000	\$45,689.50 plus 35% of the excess over \$200,000	35.0%	45,689.50
Over \$500,000	\$150,689.50 plus 37% of the excess over \$500,000	37.0%	150,689.50
Married Filing Jointly			
Not over \$19,050	10% of taxable income	10.0%	-
Over \$19,050 but not over \$77,400	\$1,905 plus 12% of the excess over \$19,050	12.0%	1,905.00
Over \$77,400 but not over \$165,000	\$8,907 plus 22% of the excess over \$77,400	22.0%	8,907.00
Over \$165,000 but not over \$315,000	\$28,179 plus 24% of the excess over \$165,000	24.0%	28,179.00
Over \$315,000 but not over \$400,000	\$64,179 plus 32% of the excess over \$315,000	32.0%	64,179.00
Over \$400,000 but not over \$600,000	\$91,379 plus 35% of the excess over \$400,000	35.0%	91,379.00
Over \$600,000	\$161,379 plus 37% of the excess over \$600,000	37.0%	161,379.00

		C-Corporations								
	100	% GA	20% GA Ap	portionment	100	% GA	20% GA Ap	portionment		
<u>Federal</u>	NO CHARITABLE CONTRIBUTION	MAXIMUM GA GOAL CONTRIBUTION	NO CHARITABLE CONTRIBUTION	MAXIMUM GA GOAL CONTRIBUTION	NO CHARITABLE CONTRIBUTION	MAXIMUM GA GOAL CONTRIBUTION	NO CHARITABLE CONTRIBUTION	MAXIMUM GA GOAL CONTRIBUTION		
Federal Taxable Income Before State Tax Deduction Scholarship Contribution (up to 75% of Georgia tax) Accrued Other States Taxes (assumes 6% rate) Accrued Georgia State Tax	100,000	100,000 (4,433) (1,478)	100,000 (4,800) (1,186	(897) (4,757)	1,000,000 (56,604)	1,000,000 (44,335) (14,778)	1,000,000 (48,000) (11,858)			
Adjusted Federal Taxable Income	94,340	94,089	94,014		943,396	940,887	940,142	940,467		
Federal Tax	19,811	19,759	19,743	19,750	198,113	197,586	197,430	197,498		
Georgia										
Federal Taxable Income Addback Other State Taxes	94,340	94,089	94,014 4,800	4,757	943,396	940,887	940,142 48,000	940,467 47,569		
Georgia Contribution Addback Georgia Taxable Income	94,340	4,433 98,522	19,763	897 19,940	943,396	44,335 985,222	197,628	8,973 199,402		
Georgia Taxable medite	5,660	5,911	1,186		56,604	59,113	11,858	11,964		
Georgia Scholarship Credit (75% max) (3)	-	(4,433)	-	(897)	-	(44,335)	-	(8,973)		
Georgia Tax	5,660	1,478	1,186	299	56,604	14,778	11,858	2,991		
Other States			04.014	04.047			040 442	040.467		
Federal Taxable Income Addback Other State Taxes			94,014 4,800				940,142 48,000	940,467 47,569		
Accrued Georgia State Tax			1,186				11,858	2,991		
Other States Taxable Income			100,000	99,103			1,000,000	991,027		
80% Apportionment			80,000	79,282			800,000	792,822		
Accrued Other States Taxes (assumes 6% rate)			4,800	4,757			48,000	47,569		
Net Federal and Georgia Tax	25,472	21,236	20,929		254,717	212,365	209,288	200,489		
Other State Taxes (assume 6% of remaining 80% of income)	-	-	4,800				48,000	47,569		
Contribution paid Net Cash Outlay	25,472	4,433 25,670	25,729	897 25,703	- 254,717	44,335 256,699	257,288	8,973 257,031		
=		(400)		22		(4.003)		256		
Net Cash Benefit/(Cost) to Taxpayer Tax Benefit as % of Contribution		(198) 96%		26 103%		(1,982) 96%		256 103%		

Comments on Illustrations:

- (1) "An Act to provide for reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018" (P.L. 115-97); known as the "Tax Cuts and Jobs Act".
- (2) Illustrations assume 2018 federal tax rates and 2017 Georgia tax rates, but not the potential 20% deduction under the new IRC Section 199A.
- (3) Corporations are allowed a Georgia income tax credit for qualified student scholarship organization expense in an amount equal to 75% of the corporation's income tax liability.

Georgia: C Corporations receive a Georgia tax benefit equal to approximately 96 - 103% of the contribution. In effect, Georgia is substantial portion of the contribution. This is the result of three factors: 1. 100% of the Georgia tax credit for amount of contribution up to 75% of Georgia tax liability. 2. Offset by 6% additional Georgia taxes on higher Georgia income. The higher Georgia income is because the law does not allow a deduction for the scholarship contribution when taking the Georgia tax credit. 3. Lower other state taxes because nondeductible state tax expense is converted to a deductible charitable contribution for other states.