Partial Interests in Property

- Generally, a donor cannot deduct a contribution of less than their entire interest in the property.
  - Example: Donor owns an office building – donates the use of a suite to a charitable organization.
    - Not deductible, not countable.
  - Example: Donor owns a vacation home, donated the right to use home for 1 week at a fundraising auction. Winning bidder paid the FMV of 1 weeks rental.
    - Not a gift by property owner
    - payment by bidder not a gift because benefit received equal to FMV.
  - Example: Vehicle leases are not a 100% interest in the property.