

FREEZE PARTNERSHIP ACTION STEPS	
1.	Determine whether to amend existing Black Family Partners LP Agreement or create new LLC/LP, and create amended LLC/LP Agreement or create new LLC/LP, as the case may be
2.	Address governance issues to ensure no estate tax inclusion under Section 2036
3.	Value the artwork to be contributed by Leon (or by the LLC owning the artwork)
4.	Value the financial assets to be contributed by the Trust and the preferred coupon rate retained by Leon
5.	Draft and execute contribution and assignment agreements whereby Leon contributes art to LLC/LP and the Trust contributes the Apollo interests (including any indirect interest currently held via Black Family Partners LP and LBF Holdings LP)
6.	Coordinate updating insurance coverage for artwork to reflect change in title to LLC/LP (if artwork is contributed directly to the partnership)
7.	Coordinate updating all books and records to reflect change in title of Apollo interests
8.	Draft and execute either (i) use agreement between Trust and Deborah regarding use of artwork held through the LLC/LP, or (ii) lease agreement between Trust and Leon (to include the fair market rental rate for his use)