

SUMMARY

COMPARISON OF CLAT VS. NO CLAT VS. FOUNDATION

Assumptions:

Gross value of LDB/DRB assets at time of death is assumed to be \$4.3B consistent with 3/31/16 balance sheet. Net worth after paydown of \$600mm art loan and \$1.5B of notes to children's trusts is \$2.2B. From this amount, the estate will pay bequests to charity and family, administration expenses and estate taxes on the non-charitable gifts. The Residuary Estate is shown at \$2.0B with preponderance of remaining assets in BFP valued as if all residuary assets are BFP interests.

LDB Residuary Estate:	\$ 2,000,000,000
Scenario 1:	
Income:	4.0%
Growth:	5.0%
Scenario 2:	
Income:	3.0%
Growth:	2.0%
Lack of marketability discount applied to underlying BFP assets:	13.7%

CLAT					vs.	NO CLAT - 100% TO CHILDREN'S TRUST		vs.	NO CLAT - 100% TO FOUNDATION		
Scenario	Value of CLAT at end of 15 years (to children)	Value of Foundation at end of 15 years	Aggregate Amount Paid to Charity during 15 year period	TOTAL		Value of Trust at end of 15 years (to children)			Value of Foundation at end of 15 years	Aggregate Amount Paid to Charity during 15 year period	TOTAL
1	\$ 3,399,563,827	\$ 2,649,769,809	\$ 830,979,388	\$ 6,880,313,024		\$ 3,289,228,038			\$ 3,601,887,010	\$ 2,002,358,764	\$ 5,604,245,774
2	\$ 1,302,312,820	\$ 1,984,986,300	\$ 694,745,205	\$ 3,982,044,325		\$ 1,978,860,276			\$ 2,000,000,000	\$ 1,500,000,000	\$ 3,500,000,000

CHARITABLE LEAD ANNUITY TRUST
FIFTEEN (15) YEAR CLAT (ZEROED-OUT)

Assumptions:

LDB "taxable" residuary estate consists entirely of
 BFP interests.

LDB "taxable" residuary estate - undiscounted:	\$	2,000,000,000
Less lack of marketability discount:		<u>13.70%</u>
Adjusted Value:	\$	<u>1,726,000,000</u>
AGM starting value - per share	\$	17.00

CLAT

Term (years): 15

Required Annuity (as a % of Adjusted Value): 7.667%

Annuity Amount (in USD): \$ 132,332,420

Income (Cash Flow): 4.0%

Growth (Appreciation): 5.0%

Combined (as a % of undiscounted value) 9.0%

Foundation:

Income (Cash Flow): 4.0%

Growth (Appreciation): 5.0%

Combined (as a % of Foundation assets) 9.0%

Required Annual Distribution (as a % of Foundation assets on 1/1): 5.0%

Income Tax Rate:

Combined Federal and State (on Ordinary Income): 42.62%

Capital gains taxes not illustrated

CHARITABLE LEAD ANNUITY TRUST

FIFTEEN (15) YEAR CLAT (ZEROED-OUT)

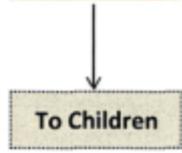
4% INCOME; 5% GROWTH

Assumptions:

CLAT Principal - Undiscounted

\$ 2,000,000,000

Year	Beginning Principal	Income (Cash Flow)	Growth (Appreciation) (Unrealized)	Annuity payment to Foundation	Income Taxes (Cash Flow)	Ending Principal	Estimated Stock Price for AGM - per share
1	\$ 2,000,000,000	\$ 80,000,000	\$ 100,000,000	\$ (132,332,420)	\$ -	\$ 2,047,667,580	\$ 17.85
2	\$ 2,047,667,580	\$ 81,906,703	\$ 102,383,379	\$ (132,332,420)	\$ -	\$ 2,099,625,242	\$ 18.74
3	\$ 2,099,625,242	\$ 83,985,010	\$ 104,981,262	\$ (132,332,420)	\$ -	\$ 2,156,259,094	\$ 19.68
4	\$ 2,156,259,094	\$ 86,250,364	\$ 107,812,955	\$ (132,332,420)	\$ -	\$ 2,217,989,993	\$ 20.66
5	\$ 2,217,989,993	\$ 88,719,600	\$ 110,899,500	\$ (132,332,420)	\$ -	\$ 2,285,276,673	\$ 21.69
6	\$ 2,285,276,673	\$ 91,411,067	\$ 114,263,834	\$ (132,332,420)	\$ -	\$ 2,358,619,154	\$ 22.77
7	\$ 2,358,619,154	\$ 94,344,766	\$ 117,930,958	\$ (132,332,420)	\$ -	\$ 2,438,562,458	\$ 23.91
8	\$ 2,438,562,458	\$ 97,542,498	\$ 121,928,123	\$ (132,332,420)	\$ -	\$ 2,525,700,659	\$ 25.11
9	\$ 2,525,700,659	\$ 101,028,026	\$ 126,285,033	\$ (132,332,420)	\$ -	\$ 2,620,681,298	\$ 26.37
10	\$ 2,620,681,298	\$ 104,827,252	\$ 131,034,065	\$ (132,332,420)	\$ -	\$ 2,724,210,195	\$ 27.69
11	\$ 2,724,210,195	\$ 108,968,408	\$ 136,210,510	\$ (132,332,420)	\$ -	\$ 2,837,056,693	\$ 29.07
12	\$ 2,837,056,693	\$ 113,482,268	\$ 141,852,835	\$ (132,332,420)	\$ -	\$ 2,960,059,376	\$ 30.52
13	\$ 2,960,059,376	\$ 118,402,375	\$ 148,002,969	\$ (132,332,420)	\$ -	\$ 3,094,132,300	\$ 32.05
14	\$ 3,094,132,300	\$ 123,765,292	\$ 154,706,615	\$ (132,332,420)	\$ -	\$ 3,240,271,787	\$ 33.65
15	\$ 3,240,271,787	\$ 129,610,871	\$ 162,013,589	\$ (132,332,420)	\$ -	\$ 3,399,563,827	\$ 35.33



**CHARITABLE LEAD ANNUITY TRUST
FOUNDATION**

4% INCOME; 5% GROWTH

Year	Beginning Principal	Income (Cash Flow)	Growth (Appreciation)	Distribution from CLAT	5% payment to Charity	Ending Principal	Estimated Stock Price for AGM - per share
1	\$ -	\$ -	\$ -	\$ 132,332,420	\$ -	\$ 132,332,420	\$ 17.85
2	\$ 132,332,420	\$ 5,293,297	\$ 6,616,621	\$ 132,332,420	\$ (6,616,621)	\$ 269,958,137	\$ 18.74
3	\$ 269,958,137	\$ 10,798,325	\$ 13,497,907	\$ 132,332,420	\$ (13,497,907)	\$ 413,088,882	\$ 19.68
4	\$ 413,088,882	\$ 16,523,555	\$ 20,654,444	\$ 132,332,420	\$ (20,654,444)	\$ 561,944,857	\$ 20.66
5	\$ 561,944,857	\$ 22,477,794	\$ 28,097,243	\$ 132,332,420	\$ (28,097,243)	\$ 716,755,071	\$ 21.69
6	\$ 716,755,071	\$ 28,670,203	\$ 35,837,754	\$ 132,332,420	\$ (35,837,754)	\$ 877,757,694	\$ 22.77
7	\$ 877,757,694	\$ 35,110,308	\$ 43,887,885	\$ 132,332,420	\$ (43,887,885)	\$ 1,045,200,422	\$ 23.91
8	\$ 1,045,200,422	\$ 41,808,017	\$ 52,260,021	\$ 132,332,420	\$ (52,260,021)	\$ 1,219,340,859	\$ 25.11
9	\$ 1,219,340,859	\$ 48,773,634	\$ 60,967,043	\$ 132,332,420	\$ (60,967,043)	\$ 1,400,446,913	\$ 26.37
10	\$ 1,400,446,913	\$ 56,017,877	\$ 70,022,346	\$ 132,332,420	\$ (70,022,346)	\$ 1,588,797,210	\$ 27.69
11	\$ 1,588,797,210	\$ 63,551,888	\$ 79,439,861	\$ 132,332,420	\$ (79,439,861)	\$ 1,784,681,518	\$ 29.07
12	\$ 1,784,681,518	\$ 71,387,261	\$ 89,234,076	\$ 132,332,420	\$ (89,234,076)	\$ 1,988,401,199	\$ 30.52
13	\$ 1,988,401,199	\$ 79,536,048	\$ 99,420,060	\$ 132,332,420	\$ (99,420,060)	\$ 2,200,269,667	\$ 32.05
14	\$ 2,200,269,667	\$ 88,010,787	\$ 110,013,483	\$ 132,332,420	\$ (110,013,483)	\$ 2,420,612,874	\$ 33.65
15	\$ 2,420,612,874	\$ 96,824,515	\$ 121,030,644	\$ 132,332,420	\$ (121,030,644)	\$ 2,649,769,809	\$ 35.33
					\$ (830,979,388)		

NO CLAT - RESIDUARY ESTATE TO CHILDREN'S TRUST

Assumptions:

LDB "taxable" residuary estate consists entirely of BFP interests.

LDB "taxable" residuary estate - undiscounted:	\$ 2,000,000,000
<i>Less lack of marketability discount:</i>	<u>13.7%</u>
Adjusted Value:	<u>\$ 1,726,000,000</u>
<i>AGM starting value - per share</i>	\$ 17.00

Trust for Children:

LDB "taxable" residuary estate - undiscounted:	\$ 2,000,000,000
Less: Estate Taxes <i>49.6% of Adjusted Value</i>	<u>(856,096,000)</u>
Net Trust Principal	<u>\$ 1,143,904,000</u>

Term (years):	15
Income (Cash Flow):	4.0%
Growth (Appreciation):	<u>5.0%</u>
<i>Combined (as a % of Trust assets)</i>	9.0%

Income Tax Rates:

Combined Federal and State (on Ordinary Income)	42.62%
<i>Capital gains taxes not illustrated</i>	

NO CLAT - RESIDUARY ESTATE TO CHILDREN'S TRUST

**CHILDREN'S TRUST
FIFTEEN (15) YEAR PERIOD**

4% INCOME; 5% GROWTH

Assumptions:

Children's Trust Principal - Undiscounted \$ 1,143,904,000

<u>Year</u>	<u>Beginning Principal</u>	<u>Income (Cash Flow)</u>	<u>Growth (Appreciation) (Unrealized)</u>	Federal Tax on Income	<u>Ending Principal</u>	<u>Estimated Stock Price for AGM - per share</u>
1	\$ 1,143,904,000	\$ 45,756,160	\$ 57,195,200	\$ (19,501,275)	\$ 1,227,354,085	\$ 17.85
2	\$ 1,227,354,085	\$ 49,094,163	\$ 61,367,704	\$ (20,923,932)	\$ 1,316,892,020	\$ 18.74
3	\$ 1,316,892,020	\$ 52,675,681	\$ 65,844,601	\$ (22,450,375)	\$ 1,412,961,927	\$ 19.68
4	\$ 1,412,961,927	\$ 56,518,477	\$ 70,648,096	\$ (24,088,175)	\$ 1,516,040,325	\$ 20.66
5	\$ 1,516,040,325	\$ 60,641,613	\$ 75,802,016	\$ (25,845,455)	\$ 1,626,638,499	\$ 21.69
6	\$ 1,626,638,499	\$ 65,065,540	\$ 81,331,925	\$ (27,730,933)	\$ 1,745,305,031	\$ 22.77
7	\$ 1,745,305,031	\$ 69,812,201	\$ 87,265,252	\$ (29,753,960)	\$ 1,872,628,524	\$ 23.91
8	\$ 1,872,628,524	\$ 74,905,141	\$ 93,631,426	\$ (31,924,571)	\$ 2,009,240,520	\$ 25.11
9	\$ 2,009,240,520	\$ 80,369,621	\$ 100,462,026	\$ (34,253,532)	\$ 2,155,818,635	\$ 26.37
10	\$ 2,155,818,635	\$ 86,232,745	\$ 107,790,932	\$ (36,752,396)	\$ 2,313,089,916	\$ 27.69
11	\$ 2,313,089,916	\$ 92,523,597	\$ 115,654,496	\$ (39,433,557)	\$ 2,481,834,452	\$ 29.07
12	\$ 2,481,834,452	\$ 99,273,378	\$ 124,091,723	\$ (42,310,314)	\$ 2,662,889,239	\$ 30.52
13	\$ 2,662,889,239	\$ 106,515,570	\$ 133,144,462	\$ (45,396,936)	\$ 2,857,152,335	\$ 32.05
14	\$ 2,857,152,335	\$ 114,286,093	\$ 142,857,617	\$ (48,708,733)	\$ 3,065,587,312	\$ 33.65
15	\$ 3,065,587,312	\$ 122,623,492	\$ 153,279,366	\$ (52,262,132)	\$ 3,289,228,038	\$ 35.33



NO CLAT - RESIDUARY ESTATE TO FOUNDATION

Assumptions:

LDB "taxable" residuary estate consists entirely of
BFP interests.

LDB "taxable" residuary estate - undiscounted:	\$	2,000,000,000
<i>Less lack of marketability discount:</i>		<u>13.70%</u>
Adjusted Value:	\$	<u>1,726,000,000</u>
<i>AGM starting value - per share</i>	\$	17.00

Foundation

Income (Cash Flow):	4.0%
Growth (Appreciation):	<u>5.0%</u>
<i>Combined (as a % of undiscounted value)</i>	9.0%
Required Annual Distribution (as a % of Foundation assets on 1/1):	5.0%

FOUNDATION ONLY

4% INCOME; 5% GROWTH

Year	Beginning Principal	Income (Cash Flow)	Growth (Appreciation)	5% payment to Charity	Ending Principal	Estimated Stock Price for AGM - per share
1	\$ 2,000,000,000	\$ 80,000,000	\$ 100,000,000	\$ (100,000,000)	\$ 2,080,000,000	\$ 17.85
2	\$ 2,080,000,000	\$ 83,200,000	\$ 104,000,000	\$ (104,000,000)	\$ 2,163,200,000	\$ 18.74
3	\$ 2,163,200,000	\$ 86,528,000	\$ 108,160,000	\$ (108,160,000)	\$ 2,249,728,000	\$ 19.68
4	\$ 2,249,728,000	\$ 89,989,120	\$ 112,486,400	\$ (112,486,400)	\$ 2,339,717,120	\$ 20.66
5	\$ 2,339,717,120	\$ 93,588,685	\$ 116,985,856	\$ (116,985,856)	\$ 2,433,305,805	\$ 21.69
6	\$ 2,433,305,805	\$ 97,332,232	\$ 121,665,290	\$ (121,665,290)	\$ 2,530,638,037	\$ 22.77
7	\$ 2,530,638,037	\$ 101,225,521	\$ 126,531,902	\$ (126,531,902)	\$ 2,631,863,558	\$ 23.91
8	\$ 2,631,863,558	\$ 105,274,542	\$ 131,593,178	\$ (131,593,178)	\$ 2,737,138,100	\$ 25.11
9	\$ 2,737,138,100	\$ 109,485,524	\$ 136,856,905	\$ (136,856,905)	\$ 2,846,623,624	\$ 26.37
10	\$ 2,846,623,624	\$ 113,864,945	\$ 142,331,181	\$ (142,331,181)	\$ 2,960,488,569	\$ 27.69
11	\$ 2,960,488,569	\$ 118,419,543	\$ 148,024,428	\$ (148,024,428)	\$ 3,078,908,112	\$ 29.07
12	\$ 3,078,908,112	\$ 123,156,324	\$ 153,945,406	\$ (153,945,406)	\$ 3,202,064,436	\$ 30.52
13	\$ 3,202,064,436	\$ 128,082,577	\$ 160,103,222	\$ (160,103,222)	\$ 3,330,147,013	\$ 32.05
14	\$ 3,330,147,013	\$ 133,205,881	\$ 166,507,351	\$ (166,507,351)	\$ 3,463,352,894	\$ 33.65
15	\$ 3,463,352,894	\$ 138,534,116	\$ 173,167,645	\$ (173,167,645)	\$ 3,601,887,010	\$ 35.33
				\$ (2,002,358,764)		