

## Proposed 2013 Will and Revocable Trust

### Dispositive Provisions Upon Leon's death<sup>1</sup>

<u>Will</u>	
<u>Debra Survives</u>	<u>Debra Predeceases</u>
<ul style="list-style-type: none"> <li>▶ <u>Outright to Debra</u> <ul style="list-style-type: none"> <li>○ Personal property (excluding Art Entities and Collectibles<sup>2</sup>).</li> <li>○ Residences.</li> </ul> </li> <li>▶ <u>Charitable Pledges Paid.</u></li> <li>▶ <u>To Revocable Trust.</u> <ul style="list-style-type: none"> <li>○ Art Entities.</li> <li>○ Collectibles.</li> <li>○ Balance of estate.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ <u>Outright to Children</u> <ul style="list-style-type: none"> <li>○ Personal property (excluding Art Entities and Collectibles) in equal shares to surviving children.</li> </ul> </li> <li>▶ <u>Charitable Pledges Paid.</u></li> <li>▶ <u>To Revocable Trust.</u> <ul style="list-style-type: none"> <li>○ Proceeds from sale of residences.</li> <li>○ Art Entities.</li> <li>○ Collectibles.</li> <li>○ Balance of estate.</li> </ul> </li> </ul>
<u>Revocable Trust</u>	
<u>Debra Survives</u>	<u>Debra Predeceases</u>
<ul style="list-style-type: none"> <li>▶ <u>Cash Bequests</u> <ul style="list-style-type: none"> <li>○ \$3 million to Melanie Spinella.</li> <li>○ Unused estate tax exemption amount to Black Family 1997 Trust.</li> </ul> </li> <li>▶ <u>To Marital Trust</u> <ul style="list-style-type: none"> <li>○ Art Entities.</li> <li>○ Collectibles.</li> <li>○ Balance of Trust Fund (less debts, expenses and taxes owing).</li> </ul> <p><b><u>Marital Trust:</u></b> All income to Debra during her lifetime. Upon her death, remaining principal (less estate tax owing) is disposed of as follows:</p> <ul style="list-style-type: none"> <li>▪ Each child selects \$X of art held in Art Entities and Collectibles for his or her Legacy Trust (see next column).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▶ <u>Cash Bequests</u> <ul style="list-style-type: none"> <li>○ \$3 million to Melanie Spinella.</li> <li>○ 10 million to John Ressler.</li> <li>○ \$25 million in trust for Judy Black.                             <ul style="list-style-type: none"> <li>⇒ On Judy's death, \$1 million to her husband and balance to Heritage Trust.</li> </ul> </li> <li>○ Unused GST tax exemption amount to Black Family 1997 GST exempt Trust.</li> </ul> </li> <li>▶ <u>Art and Collectibles not selected for a Legacy Trust to be sold.</u></li> <li>▶ <u>To Heritage Trust</u> <ul style="list-style-type: none"> <li>○ Sale proceeds for art and Collectibles not selected for a Legacy Trust.</li> <li>○ Interests in Art Entities (if any after sale of art).</li> <li>○ Balance of Trust Fund (less debts, expenses and taxes owing).</li> </ul> </li> </ul>

<sup>1</sup> Assumes the Revocable Trust is not funded during Leon's lifetime.

<sup>2</sup> Collectibles are defined as art valued at \$10,000 or more, the cane collection and first edition books.

**Revocable Trust (continued)**

Debra Survives	Debra Predeceases
<ul style="list-style-type: none"> <li>▪ Balance of Collectibles and art held in Art Entities to be sold.</li> <li>▪ \$10 million to John Ressler.</li> <li>▪ \$25 million in trust for Judy Black.</li> <li>⇒ On Judy's death, \$1 million to her husband and balance to Heritage Trust.</li> <li>▪ Debra's GST exemption amount to Black Family 1997 Trust.</li> <li>▪ Balance of Marital Trust (including sale proceeds of art and Collectibles) to the Heritage Trust (see next column).</li> </ul>	<p><b>Heritage Trust:</b> Trustees may pay income and principal to descendants for any purpose and must pay:</p> <ul style="list-style-type: none"> <li>▪ \$10 million to a child's Legacy Trust when child attains age 30.</li> <li>▪ \$50 million to a child's Legacy Trust when child attains age 35.</li> <li>▪ \$100 million to a child's Legacy Trust when child attains age 40.</li> </ul> <p>▶ <u>To a Child's Legacy Trust.</u></p> <ul style="list-style-type: none"> <li>○ \$X of art and Collectibles selected by the child for his or her Legacy Trust.</li> <li>○ \$10 million at age 30.</li> <li>○ \$50 million at age 35.</li> <li>○ \$100 million at age 40.</li> </ul> <p><b>Legacy Trust:</b> Trustees may pay income and principal to the child for any purpose.</p> <ul style="list-style-type: none"> <li>▪ Trustee is requested to give the child \$10 million at age 30 to buy a residence.</li> <li>▪ Legacy Trust terminates upon the child's death and is distributed to Leon's descendants as child appoints or in default to child's descendants <i>per stirpes</i> subject to a Legacy Trust.</li> </ul>