

United States Estate (and Generation-Skipping Transfer) Tax Return

Estate of a citizen or resident of the United States (see separate instructions).
To be filed by decedents dying after December 31, 1998
For Paperwork Reduction Act Notice, see page 1 of the separate instructions.

OMB No. 1545-0015

| | | | | |
|---|--|---|--|--------------------------------------|
| Part 1 Decedent and Executor | 1a Decedent's first name and middle initial (and maiden name, if any) FRED C. | 1b Decedent's last name TRUMP | 2 Decedent's Social Security No. [REDACTED] | |
| | 3a Legal residence (domicile) at time of death (county, state, and ZIP code, or foreign country) QUEENS COUNTY, NY | 3b Year domicile established 1948 | 4 Date of birth 10/11/1905 | 5 Date of death 06/25/1999 |
| | 6a Name of executor (see page 4 of the instructions) ROBERT S. TRUMP | 6b Executor's address (number and street including apartment or suite no. or rural route; city, town, or post office; state; and ZIP code) 167 EAST 61ST STREET, APT. 36-C NEW YORK, NY 10021 | | |
| | 6c Executor's social security number (see page 4 of the instructions) [REDACTED] | | | |
| | 7a Name and location of court where will was probated or estate administered SURROGATE'S COURT - QUEENS COUNTY, NEW YORK | 7b Case number 3949/99 | | |
| 8 If decedent died testate, check here <input checked="" type="checkbox"/> and attach a certified copy of the will. | | 9 If Form 4768 is attached, check here <input checked="" type="checkbox"/> | | |
| 10 If Schedule R-1 is attached, check here <input type="checkbox"/> | | | | |

| | | | |
|---|--|-----------|------------|
| Part 2 Tax Computation | 1 Total gross estate less exclusion (from Part 5, Recapitulation, page 3, item 12) | 1 | 39,427,204 |
| | 2 Total allowable deductions (from Part 5, Recapitulation, page 3, item 23) | 2 | 36,856,065 |
| | 3 Taxable estate (subtract line 2 from line 1) | 3 | 2,571,139 |
| | 4 Adjusted taxable gifts (total taxable gifts (within the meaning of section 2503) made by the decedent after December 31, 1976, other than gifts that are includible in decedent's gross estate (section 2001(b))) | 4 | 18,043,964 |
| | 5 Add lines 3 and 4 | 5 | 20,615,103 |
| | 6 Tentative tax on the amount on line 5 from Table A on page 12 of the instructions | 6 | 10,979,107 |
| | 7a If line 5 exceeds \$10,000,000, enter the lesser of line 5 or \$17,184,000. If line 5 is \$10,000,000 or less, skip lines 7a and 7b and enter -0- on line 7c. | 7a | 17,184,000 |
| | b Subtract \$10,000,000 from line 7a | 7b | 7,184,000 |
| | c Enter 5% (.05) of line 7b | 7c | 359,200 |
| | 8 Total tentative tax (add lines 6 and 7c) | 8 | 11,338,307 |
| | 9 Total gift tax payable with respect to gifts made by the decedent after December 31, 1976. Include gift taxes by the decedent's spouse for such spouse's share of split gifts (section 2513) only if the decedent was the donor of these gifts and they are includible in the decedent's gross estate (see instructions) | 9 | 10,255,718 |
| | 10 Gross estate tax (subtract line 9 from line 8) | 10 | 1,082,589 |
| | 11 Maximum unified credit (applicable credit amount) against estate tax | 11 | 202,050 |
| | 12 Adjustment to unified credit (applicable credit amount). (This adjustment may not exceed \$6,000. See page 4 of the instructions.) | 12 | 0 |
| | 13 Allowable unified credit (subtract line 12 from line 11) | 13 | 202,050 |
| | 14 Subtract line 13 from line 10 (but do not enter less than zero) | 14 | 880,539 |
| | 15 Credit for state death taxes. Do not enter more than line 14. Figure the credit by using the amount on line 3 less \$60,000. See Table B in the instructions and attach credit evidence (see instructions) | 15 | 144,491 |
| | 16 Subtract line 15 from line 14 | 16 | 736,048 |
| | 17 Credit for Federal gift taxes on pre-1977 gifts (sec. 2012)(attach computation) | 17 | |
| | 18 Credit for foreign death taxes (from Schedule(s) P). (Attach Form(s) 706CE) | 18 | |
| | 19 Credit for tax on prior transfers (from Schedule Q) | 19 | |
| | 20 Total (add lines 17, 18, and 19) | 20 | 0 |
| | 21 Net estate tax (subtract line 20 from line 16) | 21 | 736,048 |
| | 22 Generation-skipping transfer taxes (from Schedule R, Part 2, line 10) | 22 | 0 |
| | 23 Total transfer taxes (add lines 21 and 22) | 23 | 736,048 |
| | 24 Prior payments. Explain in an attached statement | 24 | 1,580,000 |
| | 25 United States Treasury bonds redeemed in payment of estate tax | 25 | |
| 26 Total (add lines 24 and 25) | 26 | 1,580,000 | |
| 27 Balance due (or overpayment) (subtract line 26 from line 23) | 27 | -843,952 | |

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than the executor) is based on all information of which preparer has any knowledge.

Signature(s) of executor(s)

STEPHEN J. SCHWARTZ, P.C.
3000 MARCUS AVENUE

3000 MARCUS AVENUE
LAKE SUCCESS NY 11042

Date

Signature of preparer (other than the executor)

Address (and ZIP code)

Date

Estate of: FRED C. TRUMP

Part 3.—Elections by the Executor

| Please check the "Yes" or "No" box for each question. (See instructions beginning on page 5.) | | Yes | No |
|---|--|-----|----|
| 1 | Do you elect alternate valuation? | | X |
| 2 | Do you elect special use valuation? If "Yes," you must complete and attach Schedule A-1. | | X |
| 3 | Do you elect to pay the taxes in installments as described in section 6166? If "Yes," you must attach the additional information described on page 8 of the instructions. | | X |
| 4 | Do you elect to postpone the part of the taxes attributable to a reversionary or remainder interest as described in section 6163? | | X |

Part 4.—General Information (Note: Please attach the necessary supplemental documents. You must attach the death certificate.)
(See instructions beginning on page 9.)

Authorization to receive confidential tax information under Regs. Sec. 601.504(b)(2)(i); to act as the estate's representative before the IRS; and to make written or oral presentations on behalf of the estate if return prepared by an attorney, accountant, or enrolled agent for the executor:

Name of representative (print or type) **STEPHEN J. SCHWARTZ, ESQ.** State **NY** Address (number, street, and room or suite no., city, state, and ZIP code) **3000 MARCUS AVE., LAKE SUCCESS NY 11042**

I declare that I am the attorney/ certified public accountant/ enrolled agent (you must check the applicable box) for the executor and prepared this return for the executor. I am not under suspension or disbarment from practice before the Internal Revenue Service and am qualified to practice in the state shown above.

Signature _____ CAF number _____ Date **09/30/00** Telephone number **516-488-1200**

1 Death certificate number and issuing authority (attach a copy of the death certificate to this return).
CERT. NO. 156-99-031136 NYC DEPARTMENT OF HEALTH

2 Decedent's business or occupation. If retired, check here and state decedent's former business or occupation.
REAL ESTATE DEVELOPER

3 Marital status of the decedent at time of death:
 Married
 Widow or widower—Name, SSN and date of death of deceased spouse ▶ _____
 Single
 Legally separated
 Divorced—Date divorce decree became final ▶ _____

4a Surviving spouse's name **MARY ANNE TRUMP** 4b Social security number _____ 4c Amount received (see page 9 of the instructions) **31,278,751**

5 Individuals (other than the surviving spouse), trusts, or other estates who receive benefits from the estate (do not include charitable beneficiaries shown in Schedule O)(see instructions). For Privacy Act Notice (applicable to individual beneficiaries only), see the instructions for Form 1040.

| Name of individual, trust, or estate receiving \$5,000 or more | Identifying number | Relationship to decedent | Amount (see instructions) |
|---|--------------------|--------------------------|---------------------------|
| DONALD J. TRUMP JR. | [REDACTED] | GRANDCHILD TRUST | 202,000 |
| IVANKA MARIE TRUMP | | GRANDCHILD TRUST | 202,000 |
| ERIC F. TRUMP | | GRANDCHILD TRUST | 202,000 |
| TIFFANY ARIANA TRUMP | | GRANDCHILD TRUST | 202,000 |
| DAVID DESMOND JR. | | GRANDCHILD TRUST | 202,000 |
| AMY LUERSSSEN | | EMPLOYEE-FRIEND | 200,000 |
| MARY L. TRUMP | | GRANDCHILD TRUST | 202,000 |
| FRED C. TRUMP | | GRANDCHILD TRUST | 202,000 |
| All unascertainable beneficiaries and those who receive less than \$5,000 | | | 0 |
| Total | | | 1,614,000 |

Total 1,614,000

| Please check the "Yes" or "No" box for each question. | | Yes | No |
|---|---|-----|----|
| 6 | Does the gross estate contain any section 2044 property (qualified terminable interest property (QTIP) from a prior gift or estate) (see page 9 of the instructions)? | | X |

Part 4.—General Information (continued) FRED C. TRUMP

Please check the "Yes" or "No" box for each question.

| | | Yes | No |
|--|--|-----|----|
| 7a Have Federal gift tax returns ever been filed? If "Yes," please attach copies of the returns, if available, and furnish the following information: | | X | |
| 7b Period(s) covered SEE SCHEDULE | 7c Internal Revenue office(s) where filed ATTACHED | | |
| If you answer "Yes" to any of questions 8-16, you must attach additional information as described in the instructions. | | | |
| 8a Was there any insurance on the decedent's life that is not included on the return as part of the gross estate? | | X | |
| b Did the decedent own any insurance on the life of another that is not included in the gross estate? | | | X |
| 9 Did the decedent at the time of death own any property as a joint tenant with right of survivorship in which (a) one or more of the other joint tenants was someone other than the decedent's spouse, and (b) less than the full value of the property is included on the return as part of the gross estate? If "Yes," you must complete and attach Schedule E | | | X |
| 10 Did the decedent, at the time of death, own any interest in a partnership or unincorporated business or any stock in an inactive or closely held corporation? | | X | |
| 11 Did the decedent make any transfer described in section 2035, 2036, 2037, or 2038 (see the instructions for Schedule G beginning on page 11 of the separate instructions)? If "Yes," you must complete and attach Schedule G | | | X |
| 12 Were there in existence at the time of the decedent's death: a Any trusts created by the decedent during his or her lifetime? | | X | |
| b Any trusts not created by the decedent under which the decedent possessed any power, beneficial interest, or trusteeship? | | | X |
| 13 Did the decedent ever possess, exercise, or release any general power of appointment? If "Yes," you must complete and attach Schedule H | | | X |
| 14 Was the marital deduction computed under the transitional rule of Public Law 97-34, section 403(e)(3) (Economic Recovery Tax Act of 1981)? If "Yes," attach a separate computation of the marital deduction, enter the amount on item 20 of the Recapitulation, and note on item 20 "computation attached." | | | X |
| 15 Was the decedent, immediately before death, receiving an annuity described in the "General" paragraph of the instructions for Schedule I? If "Yes," you must complete and attach Schedule I. | | | X |
| 16 Was the decedent ever the beneficiary of a trust for which a deduction was claimed by the estate of a pre-deceased spouse under section 2056(b)(7) and which is not reported on this return? If "Yes," attach an explanation | | | X |

Part 5.—Recapitulation

| Item number | Gross estate | Alternate value | Value at date of death |
|-------------|--|-----------------|------------------------|
| 1 | Schedule A-Real Estate | | 3,704,126 |
| 2 | Schedule B-Stocks and Bonds | | 0 |
| 3 | Schedule C-Mortgages, Notes, and Cash | | 19,173,337 |
| 4 | Schedule D-Insurance on the Decedent's Life (attach Form(s) 712) | | 0 |
| 5 | Schedule E-Jointly Owned Property (attach Form(s) 712 for life insurance) | | 0 |
| 6 | Schedule F-Other Miscellaneous Property (attach Form(s) 712 for life insurance) | | 16,549,741 |
| 7 | Schedule G-Transfers During Decedent's Life (attach Form(s) 712 for life insurance) | | 0 |
| 8 | Schedule H-Powers of Appointment | | 0 |
| 9 | Schedule I-Annuities | | 0 |
| 10 | Total gross estate (add items 1 through 9) | | 39,427,204 |
| 11 | Schedule U-Qualified Conservation Easement Exclusion | | 0 |
| 12 | Total gross estate less exclusion(subtract item 11 from item 10). Enter here and on line 1 of Part 2—Tax Computation | | 39,427,204 |
| Item number | Deductions | Amount | |
| 13 | Schedule J-Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims | 622,988 | |
| 14 | Schedule K-Debts of the Decedent | 4,279,326 | |
| 15 | Schedule K-Mortgages and Liens | 0 | |
| 16 | Total of items 13 through 15 | 4,902,314 | |
| 17 | Allowable amount of deductions from item 16 (see the instructions for item 17 of the Recapitulation) | 4,902,314 | |
| 18 | Schedule L-Net Losses During Administration | 0 | |
| 19 | Schedule L-Expenses Incurred in Administering Property Not Subject to Claims | 0 | |
| 20 | Schedule M-Bequests, etc., to Surviving Spouse | 31,278,751 | |
| 21 | Schedule O-Charitable, Public, and Similar Gifts and Bequests | 0 | |
| 22 | Schedule T-Qualified Family-Owned Business Interest Deduction | 675,000 | |
| 23 | Total allowable deductions (add items 17 through 22). Enter here and on line 2 of the Tax Computation | 36,856,065 | |

Estate of: FRED C. TRUMP

SCHEDULE A—Real Estate

- For jointly owned property that must be disclosed on Schedule E, see the instructions on the reverse side of Schedule E.
- Real estate that is part of a sole proprietorship should be shown on Schedule F.
- Real estate that is included in the gross estate under section 2035, 2036, 2037, or 2038 should be shown on Schedule G.
- Real estate that is included in the gross estate under section 2041 should be shown on Schedule H.
- If you elect section 2032A valuation, you must complete Schedule A and Schedule A-1.

| Item number | Description | Alternate valuation date | Alternate value | Value at date of death |
|--|--|--------------------------|-----------------|------------------------|
| 1 | HOUSE AND LOT, 85-14 MIDLAND PARKWAY, JAMAICA ESTATES, NY USED AS PRINCIPAL RESIDENCE BLOCK 9940 LOT 106 VALUE BASED ON APPRAISAL COPY OF WHICH IS ATTACHED | | | 830,000 |
| 2 | VACANT LAND LOCATED AT SURF AVENUE AND WEST 17TH AVENUE BROOKLYN, NY BLOCKS 7062 LOT 28 AND BLOCK 7062 LOT 34 PREVIOUSLY A PARKING LOT, CURRENTLY NOT BEING USED VALUE BASED ON APPRAISAL COPY OF WHICH IS ATTACHED | | | 1,800,000 |
| 3 | 50% INTEREST IN LAND - CROPSY AVENUE, BROOKLYN, NY, SUBJECT TO A GROUND LEASE TO SHORE HAVEN APARTMENTS NO. 1, INC. DATED AUGUST 2, 1949, FOR 99 YEARS WITH AN OPTION FOR AN ADDITIONAL 99 YEAR TERM. VALUE BASED ON PRESENT VALUE OF STREAM OF PAYMENTS - SEE CALCULATION ATTACHED | | | 275,754 |
| 4 | 50% INTEREST IN LAND - 20TH AVENUE AND 21ST DRIVE, BROOKLYN, NY, SUBJECT TO A GROUND LEASE TO SHORE HAVEN APARTMENTS NO. 2, INC. DATED AUGUST 2, 1949, FOR 99 YEARS WITH AN OPTION FOR AN ADDITIONAL 99 YEAR TERM. VALUE BASED ON PRESENT VALUE OF STREAM OF PAYMENTS - SEE CALCULATION ATTACHED | | | 295,450 |
| Total from continuation schedules or additional sheets attached to this schedule | | | | 502,922 |
| TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 1.) | | | | 3,704,126 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)

(See the instructions on the reverse side.)

Estate of: FRED C. TRUMP

CONTINUATION SCHEDULE

Continuation of Schedule A

(Enter letter of schedule you are continuing.)

| Item number | Description For securities, give CUSIP number. | Unit value (Sch B, E or G only) | Alternate valuation date | Alternate value | Value at date of death or amount deductible |
|--|--|------------------------------------|--------------------------|-----------------|---|
| 5 | 50% INTEREST IN LAND - SHORE PARKWAY, BROOKLYN, NY, SUBJECT TO A GROUND LEASE TO SHORE HAVEN APARTMENTS NO.3, INC. DATED AUGUST 2, 1949, FOR 99 YEARS WITH AN OPTION FOR AN ADDITIONAL 99 YEAR TERM. VALUE BASED ON PRESENT VALUE OF STREAM OF PAYMENTS - SEE CALCULATION ATTACHED | | | | 413,630 |
| 6 | INTEREST IN LAND - 87TH DRIVE AND MIDLAND PARKWAY, QUEENS, NY, SUBJECT TO A GROUND LEASE TO WEXFORD HALL, INC. DATED JULY 1, 1950 FOR 99 YEARS WITH AN OPTION FOR AN ADDITIONAL 99 YEAR TERM. VALUE BASED ON PRESENT VALUE OF STREAM OF PAYMENTS - SEE CALCULATION ATTACHED | | | | 89,292 |
| TOTAL. (Carry forward to main schedule.) | | | | | 502,922 |

See the instructions on the reverse side.

Estate of: FRED C. TRUMP

SCHEDULE C—Mortgages, Notes, and Cash

(For jointly owned property that must be disclosed on Schedule E, see the instructions for Schedule E.)

| Item number | Description | Alternate valuation date | Alternate value | Value at date of death |
|--|--|--------------------------|-----------------|------------------------|
| 1 | NOTE RECEIVABLE FROM SON DONALD J. TRUMP INCLUSIVE OF ACCRUED INTEREST OF \$631,979. INTEREST RATE 4.64% | | | 10,265,772 |
| 2 | NOTE RECEIVABLE FROM SON ROBERT S. TRUMP INCLUSIVE OF ACCRUED INTEREST OF \$942,022. INTEREST RATE 4.64% | | | 4,692,022 |
| 3 | LOAN RECEIVABLE FROM DAUGHTER MARYANNE T. BARRY INCLUSIVE OF ACCRUED INTEREST OF \$755,250. INTEREST RATE 4.64% | | | 2,310,960 |
| 4 | CASH ON DEPOSIT CHASE BUSINESS CHECKING ACCOUNT NO. 101-1-049382 | | | 112,657 |
| 5 | CASH ON DEPOSIT CHASE CHECKING ACCOUNT NO. 251-022896 | | | 46,257 |
| 6 | CASH ON DEPOSIT CHASE VISTA FUNDS | | | 1,139 |
| 7 | CASH ON DEPOSIT CHASE CERTIFICATE OF DEPOSIT ACCOUNT NO. 230-725147 | | | 1,185,300 |
| 8 | CASH ON DEPOSIT M & T BANK ACCOUNT NO. 15004192977551 CERTIFICATE OF DEPOSIT | | | 487,289 |
| 9 | CASH ON DEPOSIT M & T BANK ACCOUNT NO. 31003804672548 TIME DEPOSIT | | | 26,108 |
| Total from continuation schedules (or additional sheets) attached to this schedule | | | | 45,833 |
| TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 3.) | | | | 19,173,337 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
(See the instructions on the reverse side.)

Estate of: FRED C. TRUMP

CONTINUATION SCHEDULE

Continuation of Schedule C

(Enter letter of schedule you are continuing.)

| Item number | Description For securities, give CUSIP number. | Unit value (Sch B, E or G only) | Alternate valuation date | Alternate value | Value at date of death or amount deductible |
|---|---|------------------------------------|--------------------------|-----------------|---|
| 10 | CASH ON DEPOSIT M & T BANK ACCOUNT NO. 31003804672663 TIME DEPOSIT | | | | 45,833 |
| TOTAL (Carry forward to main schedule.) | | | | | 45,833 |

Estate of: FRED C. TRUMP

SCHEDULE D—Insurance on the Decedent's Life

You must list all policies on the life of the decedent and attach a Form 712 for each policy.

| Item number | Description | Alternate valuation date | Alternate value | Value at date of death |
|--|---|--------------------------|-----------------|------------------------|
| 1 | NEW ENGLAND FINANCIAL POLICY NO. 2289035 AMOUNT OF POLICY PROCEEDS PAID IN ONE SUM \$98,746.00 - POLICY NOT INCLUDED IN GROSS ESTATE SINCE THE OWNER OF THE POLICY WAS THE SPOUSE OF THE DECEDENT MARY A. TRUMP - SEE FORM 712 ATTACHED | | | |
| 2 | NEW ENGLAND FINANCIAL POLICY NO. 2289036 AMOUNT OF POLICY PROCEEDS PAID IN ONE SUM \$98,746 - POLICY NOT INCLUDED IN GROSS ESTATE SINCE THE OWNER OF THE POLICY WAS THE SPOUSE OF THE DECEDENT MARY A. TRUMP - SEE FORM 712 ATTACHED | | | |
| 3 | NEW ENGLAND FINANCIAL POLICY NO. 2289032 AMOUNT OF POLICY PROCEEDS PAID IN ONE SUM \$76,762 - POLICY NOT INCLUDED IN GROSS ESTATE SINCE THE OWNER OF THE POLICY WAS CHASE MANHATTAN BANK, N.A., TRUSTEE U/W/O ELIZABETH TRUMP - SEE FORM 712 ATTACHED | | | |
| 4 | NEW ENGLAND FINANCIAL POLICY NO. 2301774 AMOUNT OF POLICY PROCEEDS PAID IN ONE SUM \$19,190 - POLICY NOT INCLUDED IN GROSS ESTATE SINCE THE OWNER OF THE POLICY WAS CHASE MANHATTAN BANK N.A., TRUSTEE U/W/O ELIZABETH TRUMP - SEE FOR 712 ATTACHED | | | |
| Total from continuation schedules (or additional sheets) attached to this schedule | | | | |
| TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 4.) | | | | 0 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
 (See the instructions on the reverse side.)

Estate of: **FRED C. TRUMP**

SCHEDULE F—Other Miscellaneous Property Not Reportable Under Any Other Schedule

(For jointly owned property that must be disclosed on Schedule E, see the instructions for Schedule E.)
 (If you elect section 2032A valuation, you must complete Schedule F and Schedule A-1.)

| | Yes | No |
|---|-----|----|
| 1 Did the decedent at the time of death own any articles of artistic or collectible value in excess of \$3,000 or any collections whose artistic or collectible value combined at date of death exceeded \$10,000? If "Yes," submit full details on this schedule and attach appraisals. | | X |
| 2 Has the decedent's estate, spouse, or any other person, received (or will receive) any bonus or award as a result of the decedent's employment or death? If "Yes," submit full details on this schedule. | | X |
| 3 Did the decedent at the time of death have, or have access to, a safe deposit box? If "Yes," state location, and if held in joint names of decedent and another, state name and relationship of joint depositor. | | X |

If any of the contents of the safe deposit box are omitted from the schedules in this return, explain fully why omitted.

| Item number | Description For securities, give CUSIP number. | Alternate valuation date | Alternate value | Value at date of death |
|--|--|--------------------------|-----------------|------------------------|
| 1 | 49.8% LLC INTEREST IN CHELSEA HALL, LLC VALUE BASED ON ATTACHED APPRAISAL | | | 2,692,763 |
| 2 | 49.8% LLC INTEREST IN FOUNTAINEBLEAU APARTMENTS, LLC VALUE BASED ON ATTACHED APPRAISAL | | | 1,154,492 |
| 3 | 49.8% LLC INTEREST IN LAWRENCE TOWERS APARTMENTS, LLC VALUE BASED ON ATTACHED APPRAISAL | | | 1,399,193 |
| 4 | 49.8% LLC INTEREST IN WILSHIRE HALL, LLC VALUE BASED ON ATTACHED APPRAISAL | | | 1,241,810 |
| 5 | 49.8% LLC INTEREST IN TYSENS PARK APARTMENTS, LLC VALUE BASED ON ATTACHED APPRAISAL | | | |
| Total from continuation schedules (or additional sheets) attached to this schedule | | | | 10,061,483 |
| TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 6.) | | | | 16,549,741 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
 (See the instructions on the reverse side.)

Estate of: FRED C. TRUMP

CONTINUATION SCHEDULE

Continuation of Schedule F

(Enter letter of schedule you are continuing.)

| Item number | Description For securities, give CUSIP number. | Unit value (Sch B, E or G only) | Alternate valuation date | Alternate value | Value at date of death or amount deductible |
|-------------|---|------------------------------------|-----------------------------|-----------------|---|
| 6 | 99.99% LLC INTEREST IN SEA ISLE APARTMENTS, LLC VALUE BASED ON ATTACHED APPRAISAL | | | | 2,406,109 |
| 7 | 99.99% LLC INTEREST IN OCEAN TERRACE APARTMENTS, LLC VALUE BASED ON ATTACHED APPRAISAL | | | | 2,070,393 |
| 8 | 49.8% LLC INTEREST IN SHORE HAVEN SHOPPING CENTER, LLC VALUE BASED ON ATTACHED APPRAISAL | | | | 304,764 |
| 9 | 49.8% LLC INTEREST IN BEACH HAVEN SHOPPING CENTER, LLC VALUE BASED ON ATTACHED APPRAISAL | | | | 694,725 |
| 10 | OVERPAYMENT OF 1999 U.S. INCOME TAX | | | | 150,603 |
| 11 | OVERPAYMENT OF 1999 NYS INCOME TAX | | | | 265,183 |
| 12 | ADDITIONAL RECEIVABLE DUE FROM THE FRED C. TRUMP RETAINED ANNUITY TRUST NO. 1 - BASED ON IRS GIFT TAX AUDIT | | | | 2,216,399 |
| 13 | 49.8% LLC INTEREST IN SINCLAIR FARMS, LLC VALUE BASED ON APPRAISAL OF GREYSTON & CO. - SEE ATTACHED | | | | 508,273 |
| 14 | 49.8% LLC INTEREST IN OCEAN AIR INVESTORS, LLC VALUE BASED ON APPRAISAL OF GREYSTON & CO. - SEE ATTACHED | | | | 832,736 |
| 15 | 49.8% LLC INTEREST IN OAKDALE INVESTORS, LLC VALUE BASED ON APPRAISAL OF GREYSTON & CO. - SEE ATTACHED | | | | 395,198 |

TOTAL. (Carry forward to main schedule.)

See the instructions on the reverse side.

Continuation Schedule—Page 40

Estate of: FRED C. TRUMP

CONTINUATION SCHEDULE

Continuation of Schedule F

(Enter letter of schedule you are continuing.)

| Item number | Description For securities, give CUSIP number. | Unit value (Sch B, E or G only) | Alternate valuation date | Alternate value | Value at date of death or amount deductible |
|---|--|------------------------------------|--------------------------|-----------------|---|
| 16 | 27% PARTNERSHIP INTEREST IN 220 PROSPECT STREET CO. - A GENERAL PARTNERSHIP | | | | 62,100 |
| 17 | 9.72% PARTNERSHIP INTEREST IN STARRETT CITY ASSOCIATES - A GENERAL PARTNERSHIP | | | | 100,000 |
| 18 | 1984 ROLLS ROYCE AUTOMOBILE SEE APPRAISAL ATTACHED | | | | 35,000 |
| 19 | PERSONAL PROPERTY | | | | 20,000 |
| TOTAL (Carry forward to main schedule.) | | | | | 10,061,483 |

See the instructions on the reverse side.

Estate of: FRED C. TRUMP

SCHEDULE J—Funeral Expenses and Expenses Incurred in Administering Property Subject to Claims

Note: Do not list on this schedule expenses of administering property not subject to claims. For those expenses, see the instructions for Schedule L.

If executors' commissions, attorney fees, etc., are claimed and allowed as a deduction for estate tax purposes, they are not allowable as a deduction in computing the taxable income of the estate for Federal income tax purposes. They are allowable as an income tax deduction on Form 1041 if a waiver is filed to waive the deduction on Form 706 (see the Form 1041 instructions).

| Item number | Description | Expense amount | Total amount |
|---|---|----------------|--------------|
| A. Funeral expenses: | | | |
| | FRANK E. CAMPBELL - THE FUNERAL CHAPEL | 53,595 | |
| | MARBLE COLLEGIATE CHURCH | 9,243 | |
| | Total funeral expenses | | 62,838 |
| B. Administration expenses: | | | |
| 1 | Executors' commissions—amount estimated/ agreed upon/ paid. (Strike out the words that do not apply.) WAIVED | | |
| 2 | Attorney fees—amount estimated/ agreed upon/ paid. (Strike out the words that do not apply.) | | 500,000 |
| 3 | Accountant fees—amount estimated/ agreed upon/ paid. (Strike out the words that do not apply.) | | |
| 4 | Miscellaneous expenses: | Expense amount | |
| | 1 SURROGATE'S COURT FILING FEES AND CERTIFICATES OF LETTERS TESTAMENTARY | 2,150 | |
| | 2 LANDAUER REALTY GROUP, INC. - APPRAISAL | 38,000 | |
| | 3 MANAGEMENT PLANNING, INC. - APPRAISAL | 20,000 | |
| | Total miscellaneous expenses from continuation schedules (or additional sheets) attached to this schedule | | 60,150 |
| | Total miscellaneous expenses | | 622,988 |
| TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 13.) | | | 622,988 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
(See the instructions on the reverse side.)

Estate of: FRED C. TRUMP

SCHEDULE K—Debts of the Decedent, and Mortgages and Liens

| Item number | Debts of the Decedent-Creditor and nature of claim, and allowable death taxes | Amount unpaid to date | Amount in contest | Amount claimed as a deduction |
|-------------|--|-----------------------|-------------------|-------------------------------|
| 1 | INTERNAL REVENUE SERVICE ADDITIONAL 1995 GIFT TAX LIABILITY GIFT TAX \$2,286,445 INTEREST \$ 899,372 TOTAL \$3,185,817 | | | 3,185,817 |
| 2 | NYS DEPT. OF TAX & FINANCE ADDITIONAL 1995 GIFT TAX LIABILITY GIFT TAX \$ 800,256 INTEREST \$ 293,253 TOTAL \$1,093,509 | | | 1,093,509 |

Total from continuation schedules (or additional sheets) attached to this schedule

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 14.)

4,279,326

| Item number | Mortgages and Liens-Description | Amount |
|-------------|---------------------------------|--------|
| | NONE | |

Total from continuation schedules (or additional sheets) attached to this schedule

TOTAL. (Also enter on Part 5, Recapitulation, page 3, at item 15.)

0

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
(The instructions to Schedule K are in the separate instructions.)

Estate of: **FRED C. TRUMP**

SCHEDULE M—Bequests, etc., to Surviving Spouse

Election To Deduct Qualified Terminable Interest Property Under Section 2056(b)(7).—If a trust (or other property) meets the requirements of qualified terminable interest property under section 2056(b)(7), and

- a. the trust or other property is listed on Schedule M, and
 - b. the value of the trust (or other property) is entered in whole or in part as a deduction on Schedule M,
- then unless the executor specifically identifies the trust (all or a fractional portion or percentage) or other property to be excluded from the election, the executor shall be deemed to have made an election to have such trust (or other property) treated as qualified terminable interest property under section 2056(b)(7).

If less than the entire value of the trust (or other property) that the executor has included in the gross estate is entered as a deduction on Schedule M, the executor shall be considered to have made an election only as to a fraction of the trust (or other property). The numerator of this fraction is equal to the amount of the trust (or other property) deducted on Schedule M. The denominator is equal to the total value of the trust (or other property).

Election To Deduct Qualified Domestic Trust Property Under Section 2056A.—If a trust meets the requirements of a qualified domestic trust under section 2056A(a) and this return is filed no later than 1 year after the time prescribed by law (including extensions) for filing the return, and

- a. The entire value of a trust or trust property is listed on Schedule M, and
 - b. The entire value of the trust or trust property is entered as a deduction on Schedule M,
- then unless the executor specifically identifies the trust to be excluded from the election, the executor shall be deemed to have made an election to have the entire trust treated as qualified domestic trust property.

| | | Yes | No |
|----|--|-----|----|
| 1 | Did any property pass to the surviving spouse as a result of a qualified disclaimer? If "Yes," attach a copy of the written disclaimer required by section 2518(b). | X | |
| 2a | In what country was the surviving spouse born? <u>SCOTLAND</u> | | |
| b | What is the surviving spouse's date of birth? _____ | | |
| c | Is the surviving spouse a U.S. citizen? _____ | X | |
| d | If the surviving spouse is a naturalized citizen, when did the surviving spouse acquire citizenship? <u>1936</u> | | |
| e | If the surviving spouse is not a U.S. citizen, of what country is the surviving spouse a citizen? _____ | | |
| 3 | Election out of QTIP Treatment of Annuities. —Do you elect under section 2056(b)(7)(C)(ii) not to treat as qualified terminable interest property any joint and survivor annuities that are included in the gross estate and would otherwise be treated as qualified terminable interest property under section 2056(b)(7)(C)? (see instructions) | | |

| Item number | Description of property interests passing to surviving spouse | Amount |
|--|--|------------|
| 1 | SCHEDULE A - EXECUTOR ELECTS TO QUALIFY AS QTIP | 3,704,126 |
| 2 | SCHEDULE C - EXECUTOR ELECTS TO QUALIFY AS QTIP | 19,173,337 |
| 3 | SCHEDULE F - EXECUTOR ELECTS TO QUALIFY AS QTIP | 16,549,741 |
| 4 | LESS: SCHEDULE J | -622,988 |
| 5 | LESS: SCHEDULE K | -4,279,326 |
| Total from continuation schedules (or additional sheets) attached to this schedule | | -2,289,000 |
| 4 | Total amount of property interests listed on Schedule M | 32,235,890 |
| 5a | Federal estate taxes payable out of property interests listed on Schedule M | 736,048 |
| 5b | Other death taxes payable out of property interests listed on Schedule M | 221,091 |
| 5c | Federal and state GST taxes payable out of property interests listed on Schedule M | |
| 5d | Add items 5a, b, and c | 957,139 |
| 6 | Net amount of property interests listed on Schedule M (subtract 5d from 4). Also enter on Part 5, Recapitulation, page 3, at item 20 | 31,278,751 |

(If more space is needed, attach the continuation schedule from the end of this package or additional sheets of the same size.)
(See the instructions on the reverse side.)

Estate of: FRED C. TRUMP

CONTINUATION SCHEDULE

Continuation of Schedule M

(Enter letter of schedule you are continuing.)

| Item number | Description For securities, give CUSIP number. | Unit value (Sch B, E or G only) | Alternate valuation date | Alternate value | Value at date of death or amount deductible |
|--|---|------------------------------------|--------------------------|-----------------|---|
| 6 | LESS: SPECIFIC NON MARITAL BEQUESTS | | | | -1,614,000 |
| 7 | LESS: AMOUNT FOR WHICH EXECUTOR DOES NOT ELECT TO QUALIFY AS QTIP | | | | -675,000 |
| TOTAL. (Carry forward to main schedule.) | | | | | -2,289,000 |

See the instructions on the reverse side.

FRED C. TRUMP

Schedule R—Generation-Skipping Transfer Tax

Note: To avoid application of the deemed allocation rules, Form 706 and Schedule R should be filed to allocate the GST exemption to trusts that may later have taxable terminations or distributions under section 2612 even if the form is not required to be filed to report estate or GST tax.

The GST tax is imposed on taxable transfers of interests in property located **outside the United States** as well as property located inside the United States.

See instructions beginning on page 19.

Part 1.—GST Exemption Reconciliation (Section 2631) and Section 2652(a)(3) (Special QTIP) Election

You no longer need to check a box to make a section 2652(a)(3) (special QTIP) election. If you list qualifying property in Part 1, line 9, below, you will be considered to have made this election. See page 21 of the separate instructions for details.

| | | | |
|---|---|---|-------------|
| 1 | Maximum allowable GST exemption | 1 | \$1,010,000 |
| 2 | Total GST exemption allocated by the decedent against decedent's lifetime transfers | 2 | |
| 3 | Total GST exemption allocated by the executor, using Form 709, against decedent's lifetime transfers | 3 | |
| 4 | GST exemption allocated on line 6 of Schedule R, Part 2 | 4 | |
| 5 | GST exemption allocated on line 6 of Schedule R, Part 3 | 5 | |
| 6 | Total GST exemption allocated on line 4 of Schedule(s) R-1 | 6 | |
| 7 | Total GST exemption allocated to intervivos transfers and direct skips (add lines 2-6) | 7 | |
| 8 | GST exemption available to allocate to trusts and section 2032A interests (subtract line 7 from line 1) | 8 | 1,010,000 |
| 9 | Allocation of GST exemption to trusts (as defined for GST tax purposes): | | |

| A Name of trust | B Trust's EIN (if any) | C GST exemption allocated on lines 2-6, above (see instructions) | D Additional GST exemption allocated (see instructions) | E Trust's inclusion ratio (optional-see instructions) |
|--------------------------------|---------------------------|---|--|--|
| TRUST FBO DONALD J. TRUMP, JR. | | | 202,000 | |
| TRUST FBO IVANKA MARIE TRUMP | | | 202,000 | |
| TRUST FBO TIFFANY ARIANA TRUMP | | | 202,000 | |
| TRUST FBO DAVID DESMOND, JR. | | | 202,000 | |
| TRUST FBO ERIC F. TRUMP | | | 202,000 | |

| | | | | |
|----|-------------------------------------|----|-----------|--|
| 9D | Total. May not exceed line 8, above | 9D | 1,010,000 | |
|----|-------------------------------------|----|-----------|--|

| | | | | |
|----|--|----|---|--|
| 10 | GST exemption available to allocate to section 2032A interests received by individual beneficiaries (subtract line 9D from line 8). You must attach special use allocation schedule (see instructions) | 10 | 0 | |
|----|--|----|---|--|

(The instructions to Schedule R are in the separate instructions.)

Estate of: FRED C. TRUMP



Part 2.—Direct Skips Where the Property Interests Transferred Bear the GST Tax on the Direct Skips

| Name of skip person | Description of property interest transferred | Estate tax value |
|---------------------|--|------------------|
| | | |

| | | |
|---|----|---|
| 1 Total estate tax values of all property interests listed above | 1 | |
| 2 Estate taxes, state death taxes, and other charges borne by the property interests listed above | 2 | |
| 3 GST taxes borne by the property interests listed above but imposed on direct skips other than those shown on this Part 2 (see instructions) | 3 | |
| 4 Total fixed taxes and other charges (add lines 2 and 3) | 4 | |
| 5 Total tentative maximum direct skips (subtract line 4 from line 1) | 5 | |
| 6 GST exemption allocated | 6 | |
| 7 Subtract line 6 from line 5 | 7 | |
| 8 GST tax due (divide line 7 by 2.818182) | 8 | |
| 9 Enter the amount from line 8 of Schedule R, Part 3 | 9 | |
| 10 Total GST taxes payable by the estate (add lines 8 and 9). Enter here and on line 22 of Part 2—Tax Computation on page 1. | 10 | 0 |

Estate of: FRED C. TRUMP

Part 3.—Direct Skips Where the Property Interests Transferred Do Not Bear the GST Tax on the Direct Skips

| Name of skip person | Description of property interest transferred | Estate tax value |
|---------------------|--|------------------|
| | | |

| | | |
|---|---|---|
| 1 Total estate tax values of all property interests listed above | 1 | |
| 2 Estate taxes, state death taxes, and other charges borne by the property interests listed above | 2 | |
| 3 GST taxes borne by the property interests listed above but imposed on direct skips other than those shown on this Part 3 (see instructions) | 3 | |
| 4 Total fixed taxes and other charges (add lines 2 and 3) | 4 | |
| 5 Total tentative maximum direct skips (subtract line 4 from line 1) | 5 | |
| 6 GST exemption allocated | 6 | |
| 7 Subtract line 6 from line 5 | 7 | |
| 8 GST tax due (multiply line 7 by .55). Enter here and on Schedule R, Part 2, line 9 | 8 | 0 |

Estate of: FRED C. TRUMP

SCHEDULE T.—Qualified Family-Owned Business Interest Deduction

For details on the deduction, including trades and businesses that do not qualify, see page 22 of the separate Instructions for Form 706.

Part 1.—Election

Note: The executor is deemed to have made the election under section 2057 if he or she files Schedule T and deducts any qualifying business interests from the gross estate.

Part 2.—General Qualifications

- 1 Did the decedent and/or a member of the decedent's family own the business interests listed on line 5 of this schedule for at least 5 of the 8 years immediately preceding the date of the decedent's death? Yes No
- 2 Were there any periods during the 8-year period preceding the date of the decedent's death during which the decedent or a member of his or her family:
- | | | |
|---|-----|----|
| | Yes | No |
| a Did not own the business interests listed on this schedule? | | X |
| b Did not materially participate, within the meaning of section 2032A(e)(6), in the operation of the business to which such interests relate? | | X |

If "Yes" to either of the above, you must attach a statement listing the periods. If applicable, describe whether the exceptions of sections 2032A(b)(4) or (5) are met.

Attach affidavits describing the activities constituting material participation and the identity and relationship to the decedent of the material participants.

- 3 Check the applicable box(es). The qualified family-owned business interest(s) is:
- An interest as a proprietor in a trade or business carried on as a proprietorship.
 - An interest in an entity, at least 50% of which is owned (directly or indirectly) by the decedent and members of the decedent's family.
 - An interest in an entity, at least 70% of which is owned (directly or indirectly) by members of 2 families and at least 30% of which is owned (directly or indirectly) by the decedent and members of the decedent's family.
 - An interest in an entity, at least 90% of which is owned (directly or indirectly) by members of 3 families and at least 30% of which is owned (directly or indirectly) by the decedent and members of the decedent's family.
- 4 Persons holding interests. Enter the requested information for each party who received any interest in the family-owned business. If any qualified heir is not a U.S. citizen, see the line 4 instructions beginning on page 23 of the separate instructions.
(Each of the qualified heirs receiving an interest in the business must sign the agreement that begins on the following page 40, and the agreement must be filed with this return.)

| | Name | Address |
|---|---------------|--|
| A | MARITAL TRUST | |
| B | D.J. TRUMP | 721 FIFTH AVE. NEW YORK, NY |
| C | R.S. TRUMP | 167 E. 61ST STREET NEW YORK, NY |
| D | M.A.T. BARRY | 5 ISLAND TRAIL SPARTA, NJ 07871 |
| E | E.T. GRAU | 200 E. 69TH STREET APT. 37A NEW YORK, NY |
| F | | |
| G | | |
| H | | |

| | Identifying number | Relationship to decedent | Value of interest |
|---|--------------------|--------------------------|------------------------|
| A | | TRUST FBO WIFE | 16,736,360 |
| B | ██████████ | SON | 1/4 REMAINDER INTEREST |
| C | ██████████ | SON | 1/4 REMAINDER INTEREST |
| D | ██████████ | DAUGHTER | 1/4 REMAINDER INTEREST |
| E | ██████████ | DAUGHTER | 1/4 REMAINDER INTEREST |
| F | | | |
| G | | | |
| H | | | |

Part 3.—Adjusted Value of Qualified Family-Owned Business Interests

5 Qualified family-owned business interests reported on this return.
Note: All property listed on line 5 must also be entered on Schedules A, B, C, E, F, G, or H, as applicable.

| A Schedule and item number from Form 706 | B Description of business interest and principal place of business | C Reported value |
|--|--|----------------------|
| SEE ATTACHED | | |
| 6 Total reported value | | 6 16,736,360 |
| 7 Amount of claims or mortgages deductible under section 2053(a)(3) or (4)(see separate instructions) | 7 | |
| 8a Enter the amount of any indebtedness on qualified residence of the decedent (see separate instructions) | 8a | |
| b Enter the amount of any indebtedness used for educational or medical expenses (see separate instructions) | 8b | |
| c Enter the amount of any indebtedness other than that listed on line 8a or 8b, but do not enter more than \$10,000 (see separate instructions) | 8c | |
| d Total (add lines 8a through 8c) | 8d | |
| 9 Subtract line 8d from line 7 | | 9 |
| 10 Adjusted value of qualified family-owned business interests (subtract line 9 from line 6) | | 10 16,736,360 |

Part 4.—Qualifying Estate

| | | | |
|--|------------|------------|-----------------------|
| 11 Includible gifts of qualified family-owned business interests (see separate instructions): | | | |
| a Amount of gifts taken into account under section 2001(b)(1)(B) | 11a | 18,043,964 | |
| b Amount of such gifts excluded under section 2503(b) | 11b | | |
| c Add lines 11a and 11b | | | 11c 18,043,964 |
| 12 Add lines 10 and 11c | | | 12 34,780,324 |
| 13 Adjusted gross estate (see separate instructions): | | | |
| a Amount of gross estate | 13a | 39,427,204 | |
| b Enter the amount from line 7 | 13b | | |
| c Subtract line 13b from line 13a | 13c | 39,427,204 | |
| d Enter the amount from line 11c | 13d | 18,043,964 | |
| e Enter the amount of transfers, if any, to the decedent's spouse (see inst.) | 13e | | |
| f Enter the amount of other gifts (see inst.) | 13f | | |
| g Add the amounts on lines 13d, 13e, and 13f | 13g | 18,043,964 | |
| h Enter any amounts from line 13g that are otherwise includible in the gross estate | 13h | | |
| i Subtract line 13h from line 13g | 13i | 18,043,964 | |
| j Adjusted gross estate (add lines 13c and 13i) | | | 13j 57,471,168 |
| 14 Enter one-half of the amount on line 13j Note: If line 12 does not exceed line 14, stop here; the estate does not qualify for the deduction. Otherwise, complete line 15. | | | 14 28,735,584 |
| 15 Net value of qualified family-owned business interests you elect to deduct (line 10 reduced by any marital or other deductions)— DO NOT enter more than \$675,000—(see instructions) (attach schedule)—enter here and on Part 5, Recapitulation, page 3, at item 22 | | | 15 675,000 |

Estate of: FRED C. TRUMP



CONTINUATION SCHEDULE
Continuation of Schedule T

| A Schedule and item number from Form 706 | B Description of business interest and principal place of business | C Reported value |
|--|--|---------------------|
| 1 SCHEDULE A | ITEMS 2-6 | 2,874,126 |
| 2 SCHEDULE F | ITEMS 1-9 AND 13-17 | 13,862,234 |

TOTAL (Carry forward to main schedule.)

16,736,360

Part 5.—Agreement to Family-Owned Business Interest Deduction Under Section 2057

| | | |
|------------------------------------|------------------------------------|--|
| Estate of: FRED C. TRUMP | Date of Death 06/25/1999 | Decedent's Social Security Number [REDACTED] |
|------------------------------------|------------------------------------|--|

There cannot be a valid election unless:

- The agreement is executed by each and every one of the qualified heirs, and
- The agreement is included with the estate tax return when the estate tax return is filed.

We (list all qualified heirs and other persons having an interest in the business required to sign this agreement)

TRUSTEE OF THE TRUST F/B/O MARY ANNE TRUMP, DONALD J. TRUMP,
ROBERT S. TRUMP, MARY ANNE TRUMP BARRY AND ELIZABETH GRAU

being all the qualified heirs and _____

being all other parties having interests in the business(es) which are deducted under section 2057 of the Internal Revenue Code, do hereby approve of the election made by ROBERT S. TRUMP

Executor/Administrator of the estate of FRED C. TRUMP

pursuant to section 2057 to deduct said interests from the gross estate and do hereby enter into this agreement pursuant to section 2057(h).

The undersigned agree and consent to the application of subsection (f) of section 2057 of the Code with respect to all the qualified family-owned business interests deducted on Schedule T of Form 706, attached to this agreement. More specifically, the undersigned heirs expressly agree and consent to personal liability under subsection (c) of 2032A (as made applicable by section 2057(i)(3)(F) of the Code) for the additional estate tax imposed by that subsection with respect to their respective interests in the above-described business interests in the event of certain early dispositions of the interests or the occurrence of any of the disqualifying acts described in section 2057(f)(1) of the Code. It is understood that if a qualified heir disposes of any deducted interest to any member of his or her family, such member may thereafter be treated as the qualified heir with respect to such interest upon filing a new agreement and any other form required by the Internal Revenue Service.

The undersigned interested parties who are not qualified heirs consent to the collection of any additional estate tax imposed under section 2057(f) of the Code from the deducted interests.

If there is a disposition of any interest which passes or has passed to him or her, each of the undersigned heirs agrees to file the appropriate form and pay any additional estate tax due within 6 months of the disposition or other disqualifying act.

It is understood by all interested parties that this agreement is a condition precedent to the election of the qualified family-owned business deduction under section 2057 of the Code and must be executed by every interested party even though that person may not have received the estate tax benefits or be in possession of such property.

Each of the undersigned understands that by making this election, a lien will be created and recorded pursuant to section 6324B of the Code on the interests referred to in this agreement for the applicable percentage of the adjusted tax differences with respect to the estate as defined in section 2057(f)(2)(C).

As the interested parties, the undersigned designate the following individual as their agent for all dealings with the Internal Revenue Service concerning the continued qualification of the deducted property under section 2057 of the Code and on all issues regarding the special lien under section 6324B. The agent is authorized to act for all the parties with respect to all dealings with the Service on matters affecting the qualified interests described earlier. This authority includes the following:

- To receive confidential information on all matters relating to continued qualification under section 2057 of the deducted interests and on all matters relating to the special lien arising under section 6324B.
- To furnish the Service with any requested information concerning the interests.
- To notify the Service of any disposition or other disqualifying events specified in section 2057(f)(1) of the Code.
- To receive, but not to endorse and collect, checks in payment of any refund of Internal Revenue taxes, penalties, or interest.
- To execute waivers (including offers of waivers) of restrictions on assessment or collection of deficiencies in tax and waivers of notice of disallowance of a claim for credit or refund.
- To execute closing agreements under section 7121.

(continued on next page)

Part 5.—Agreement to Family-Owned Business Interest Deduction Under Section 2057 (continued)

| | | |
|------------------------------------|------------------------------------|--|
| Estate of: FRED C. TRUMP | Date of Death 06/25/1999 | Decedent's Social Security Number [REDACTED] |
|------------------------------------|------------------------------------|--|

• Other acts (specify) ▶ _____

By signing this agreement, the agent agrees to provide the Internal Revenue Service with any requested information concerning the qualified business interests and to notify the Internal Revenue Service of any disposition or other disqualifying events with regard to said interests.

| Name of Agent | Signature | Address |
|---------------|-----------|---------|
|---------------|-----------|---------|

The interests to which this agreement relates are listed in Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return, along with their fair market value according to section 2031 (or, if applicable, section 2032A) of the Code. The name, address, social security number, and interest (including the value) of each of the undersigned in this business(es) are as set forth in the attached Schedule T.

IN WITNESS WHEREOF, the undersigned have hereunto set their hands at _____

this _____ day of _____

SIGNATURES OF EACH OF THE QUALIFIED HEIRS:

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

| | |
|-----------------------------|-----------------------------|
| Signature of qualified heir | Signature of qualified heir |
|-----------------------------|-----------------------------|

Signature(s) of other interested parties _____

Signature(s) of other interested parties _____

**ESTATE OF FRED C. TRUMP
U.S. ESTATE (AND GENERATION-SKIPPING TRANSFER)
TAX RETURN**

Schedule of Attachments

1. Schedule of Additional Preliminary Executors;
2. Copy of Will;
3. Form 4768 - Extension Request;
4. Death Certificate;
5. Part 4 - Question 7b Schedule of Federal Gift Tax Returns filed;
6. Copies of Prior Gift Tax Returns filed;
7. Life Insurance Statements - Form 712;
8. Appraisal of Landauer Realty Group, Inc. ;
9. Financial and Economic Analysis and Evaluation of Equity Interests owned by Fred C. Trump on June 25, 1999, prepared by Management Planning, Inc.;
10. Trusts created by Decedent;
11. Schedule A items 3, 4, 5, 6 Calculation of Value of Land subject to Ground Leases, Shore Haven No.'s, 1, 2, & 3 and Wexford Hall;
12. Disclaimers of bequests under Article Fourth of Will - See Schedule M, Question 1;
13. Appraisal of Automobile.

**ESTATE OF FRED C. TRUMP
U.S. ESTATE (AND GENERATION -SKIPPING TRANSFER)
TAX RETURN**

PAGE 1, Question 6a - Additional Preliminary Executors

**Donald J. Trump
721 Fifth Avenue
New York, New York**
[REDACTED]

**Hon. Maryanne T. Barry
5 Island Trail
Sparta, New Jersey 07871**
[REDACTED]

STATE OF NEW YORK
SURROGATE'S COURT
COUNTY OF QUEENS

FILE # 3949 / 1999

-----THE PEOPLE OF THE STATE OF NEW YORK-----
TO ALL TO WHOM THESE PRESENTS SHALL COME OR MAY CONCERN, GREETINGS:

On the date written below letters were granted by the Surrogate's Court of Queens County, New York as follows:

Name of Decedent: FREDERICK CHRIST TRUMP, FRED C. TRUMP

Date of Death:: June 25, 1999

Domicile of Decedent: 87-14 MIDLAND PKWY., JAMAICA ESTATES, NY

Date Letters Issued: 09-24-1999

Name of Each Preliminary Executor: ROBERT S. TRUMP, MAYANNE TRUMP BARRY,
DONALD J. TRUMP

Classifications of Letters Issued:

PRELIMINARY LETTERS TESTAMENTARY

LIMITATIONS ON LETTERS:

The Fiduciary cannot pay or satisfy a legacy or distributive share, or sell or otherwise dispose of property specifically bequeathed or devised except with the written consent of the specific legatee or devisee or by Court Order.
These Letters will expire 180 Days after the date of issuance.

and that it does not appear by said records that said letters have been revoked.

Dated 28-Sep-99
Queens, New York

IN TESTIMONY WHEREOF, the seal of the Queens County Surrogate's Court has been hereunto affixed.

WITNESS HON. ROBERT L. NAHMAN
Queens County Surrogate



ALICEMARIE E. RICE
Chief Clerk of the Surrogate's Court

THIS CERTIFICATE IS NOT VALID WITHOUT A RAISED SEAL OF THE COURT