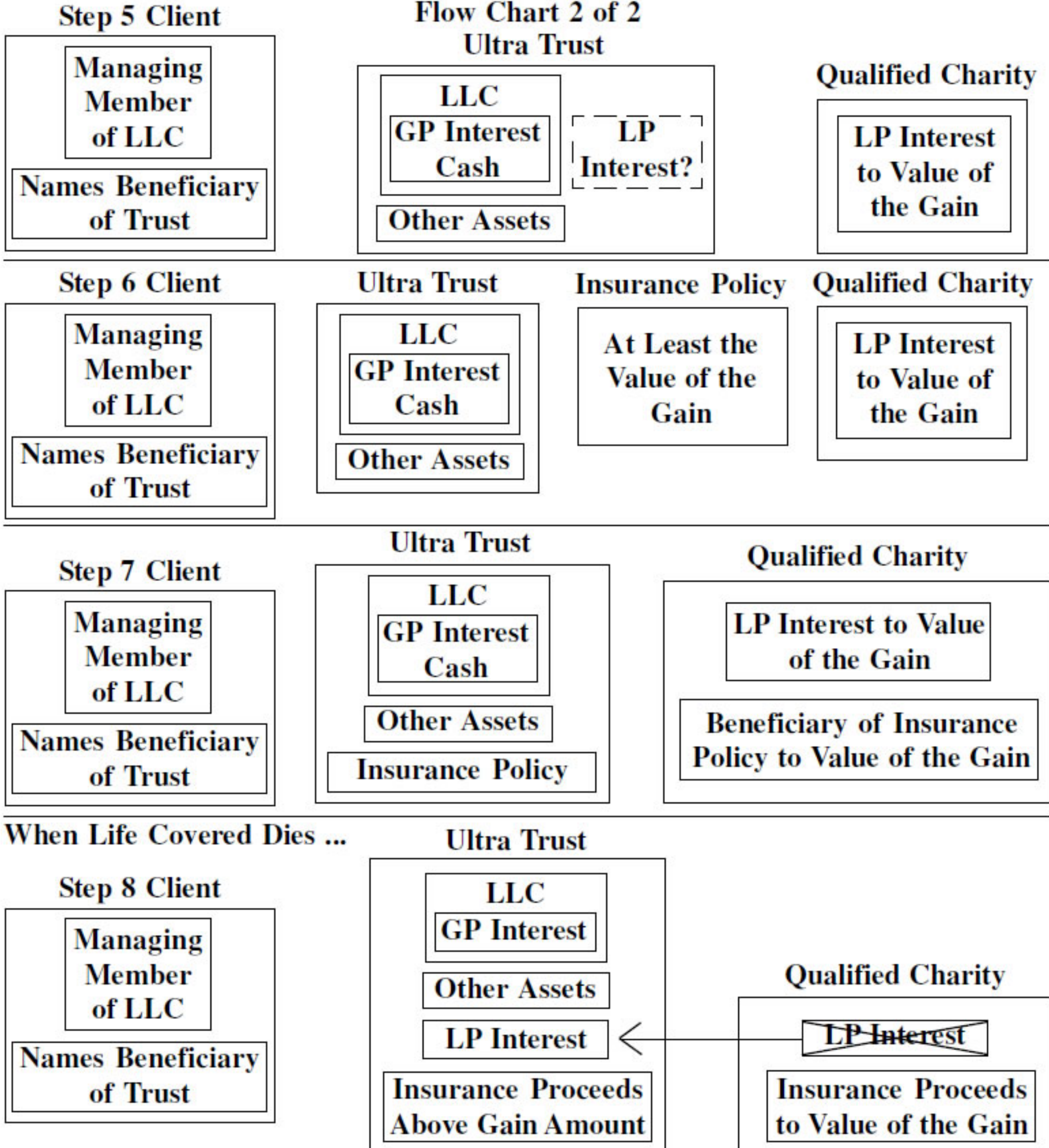


THE ULTIMATE TRANSACTION

Flow Chart 2 of 2

Ultra Trust



The ratio of GP Interest to LP Interest is 1 to 10. However, the GP Interest is the cost basis. The total \$1,000,000 is under the control of the GP yet the K1 for the sale of the appreciated asset and its profit goes 100% to the charity since the GP Interest represents a return of investment.