Frazer Ryan Goldberg & Arnold LLP

3101 N. Central Ave.
Suite 1600
Phoenix, Arizona 85012

602-277-2010

www.frgalaw.com

JONATHON MORRISON'S PRACTICE AREAS

Tax Planning

Estate Planning

Wills and Trusts

Business Formation and M&A Transactions

Probate and Trust Administration

Property Tax Law

State and Local Tax Law

Jonathon M. Morrison

jmorrison@frgalaw.com

Jonathon Morrison is a Senior Partner with the firm. He is a licensed attorney in both Arizona and California and is a Certified Specialist in Estate Planning, Trust and Probate Law in California.

Jonathon's background as a Silicon Valley tax and estate planning attorney sets him apart from the majority of estate planners across the country. In addition to preparing basic wills and trusts and handling probate and trust administration matters, Jonathon is recognized in Arizona and California for designing advanced estate planning solutions for high income and high net worth clients whose objectives include income tax and estate tax minimization, charitable and philanthropic giving, business exit and succession planning, and/or creditor protection.

Jonathon and his California-licensed partners also represent clients and serve as co-counsel to attorneys with respect to California-specific matters, including California "Proposition 13" real property tax, California real property transfers, California probate and trust administration, and California income tax issues.

SOPHISTICATED NEEDS

For nearly a decade before relocating to his hometown of Phoenix in 2015, Jonathon practiced law as an estate and tax planning attorney with the two leading trust and estate firms in Silicon Valley. During this time, Jonathon served as a trusted advisor to hundreds of the wealthiest individuals and families in the world, including world-renowned technology company founders, executives, venture capitalists, and angel investors. Most notably, Jonathon worked with the personal tax planning group associated with the preeminent venture capital law firm, Wilson Sonsini, which led IPOs for virtually every major technology company, including Apple, Google, Amazon, Tesla, Twitter, LinkedIn, Netflix, Pandora, and GoDaddy.

In 2015, Jonathon returned to Phoenix to raise children near his family. Equipped with sophisticated tax and estate planning knowledge that is unique within the Arizona legal community, Jonathon quickly distinguished himself as one of the premier tax and estate planners in the greater Phoenix area. Representative clients include:

- Founders, executives, and owners of private and public companies
- Private equity, venture capitalists, angel investors & entrepreneurs
- Athletes and entertainment professionals
- Philanthropists
- Physicians, attorneys, accountants, executives and other high-earner, high-liability professionals
- Developers, syndicators and real estate investors

For these clients, Jonathon has personally designed and implemented over 250 tax-planning transactions using one or more of the following proven strategies:

- Generation-skipping dynasty trusts (GST trusts)
- Charitable split-interest trusts (CRTs, CLATs)
- Family limited partnerships (FLPs)
- Sales to intentionally defective grantor trusts (IDGTs)
- Grantor retained annuity trusts (GRATs)
- Irrevocable life insurance trusts (ILITs)
- Qualified personal residence trusts (QPRTs)
- Nevada incomplete non-grantor trusts (NING trusts)
- Asset protection trusts (APTs), self-settled and non-self-settled

MEETING NEEDS AT ALL LEVELS

Although Jonathon is recognized for his skill in complex estates and sophisticated tax planning strategies, he takes great pride in assisting any client who has estate-related needs – regardless of a client's net worth or the complexity of their estate.

In addition, Jonathon has extensive experience in probate and trust administration, business formation and succession planning, estate and trust litigation, international estate planning, irrevocable trust modification and decanting, and California-specific services such as Proposition 13 property tax planning and California real property transfers.

PERSONAL

Outside of the office, Jonathon treasures his time with his adorable wife, newborn son and miniature dachshund Lilly. Jonathon is also a performance car enthusiast who enjoys attending Cars & Coffee and participating in autocross and high-performance driving events on the racetrack.

LEGAL SERVICES IN DETAIL

Estate Planning. The cornerstone of any client's estate plan typically consists of a revocable living trust, will, durable power of attorney, and advanced health care directives. By helping clients put these documents in place, Jonathon helps protect assets, avoid probate and undue delay, and minimize hassle and potential litigation after death.

Charitable and Philanthropic Planning. The greatest joy in Jonathon's practice is helping clients who have philanthropic goals and are willing to ask, "How much is enough?" As a frequent speaker on creative charitable giving strategies, Jonathon helps donors maximize available tax benefits (thereby reducing the "cost of giving") by implementing IRS-sanctioned trust strategies such as charitable remainder trusts and charitable lead trusts. For every one dollar of tax savings, the donor and the donor's family have one more dollar to give away to charity or their private family foundation.

California "Prop. 13" Real Property Tax Planning. Jonathon's clients benefit from his expertise with respect to the arcane California "Proposition 13" real property tax deferral rules. By properly structuring lifetime and testamentary gift transfers, owners of valuable California real estate can defer (and sometimes avoid) property tax reassessment that would otherwise occur at death. In addition to directly advising clients on these issues, Jonathon is engaged by both California and non-California licensed attorneys as expert co-counsel to assist clients with valuable California real property holdings.

Modification of Irrevocable Trusts. Jonathon is often engaged to "clean up" situations in which an existing irrevocable trust contains unfavorable terms that are causing (or could cause) tax or non-tax problems. Depending on the situation, Jonathon may offer up to a half-dozen solutions to modify the trust terms and solve these problems.

Business Formation and Succession. In the context of estate planning, Jonathon routinely assists clients in establishing family entities to centralize management of assets, maximize retained control, and assist with inter-generational transfers. In the context of active operating businesses, Jonathon is adept at handling matters involving concentrated positions, partnership and S corporation income tax issues, executive incentive compensation planning, and business succession planning.

International Estate Planning. Clients with large estates oftentimes have international holdings or dual citizenship/residency, particularly in Canada, Asia and Mexico. In these situations, Jonathon works with a client's advisors around the world to achieve a coordinated, tax-efficient, international estate plan.

Estate and Trust Administration. Jonathon helps families prepare for and navigate the emotional and technical post-death estate administration process. His role includes advising executors (or, in Arizona, "personal representatives") and trustees regarding fiduciary duties, notifying beneficiaries of their interests, reviewing estate documents, allocating and dividing assets, and advising on the income and estate tax consequences of death and potential ongoing trust administration. He also helps individuals and families identify and overcome challenges relating to concentrated asset positions (such as real property, farmland and family businesses), disputes with the IRS and state tax agencies, fiduciary conflicts of interest, and other issues common to estate administration.

Estate and Trust Litigation. Jonathon helps families achieve harmony and develop amicable solutions in the event of disagreement. Unfortunately, some estate-related disputes are unavoidable. In this context, Jonathon works closely with Frazer Ryan's trust and estate litigation attorneys to resolve the situation in a timely and cost-efficient manner. He often serves in an advisory role, interpreting technical terms of the estate documents and providing guidance with respect to income and estate tax consequences.

CERTIFICATIONS

Certified Specialist in Estate Planning, Trust & Probate Law: State Bar of California

PROFESSIONAL MEMBERSHIPS

State Bar of Arizona: Probate and Trust Law Section; Tax Law Section

State Bar of California

Maricopa County Bar Association

Central Arizona Estate Planning Council

Valley Estate Planners

Planned Giving Roundtable of Arizona

COURT ADMISSIONS

Arizona, 2015

California, 2007

PRESENTATIONS

"Creative Charitable Trust Strategies," A New Leaf, May 2017

"Creative Charitable Trust Strategies," Planned Giving Roundtable Annual Conference, May 2017

"Zeroed Out Grantor CLAT: The High-Earner's Charitable Super-IRA," October 2016

"How to Use Grantor Charitable Lead Annuity Trusts," Phoenix Rescue Mission, September 2016

"Advising Your Clients About Charitable Remainder Trusts," Edward Jones Financial Advisors, June 2016

"Pre- and Post-Sale Planning for You, Your Company and Your Family," Merrill Lynch Conference for Business Owners: M&A Solutions for Privately Held Companies, April 2016

"Interstate Tax Issues," State Bar of Arizona, Probate & Trust Section, March 2016

"Charitable Giving Strategies," Dignity Health, February 2015

EDUCATION

J.D., University of California Hastings College of Law, 2007

B.S., *cum laude*, University of Arizona Eller College of Management (Finance), 2004

COMMUNITY ACTIVITIES

Phoenix Zoo: Planned Giving Advisory Committee

Phoenix Rescue Mission: Professional Advisory Committee

A New Leaf: Planned Giving Advisory Committee

Valley of the Sun United Way: Legacy Society

BIRTHPLACE

Phoenix, Arizona