Frazer Ryan Goldberg & Arnold LLP

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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

CERTIFIED SPECIALIST IN ESTATE PLANNING, TRUST AND PROBATE LAW

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A senior partner and a *Best Lawyers®* honoree, Jonathon Morrison's practice is focused on tax, business and estate planning for clients with large or complex estates. He is licensed in both Arizona and California and is a Certified Specialist in Estate Planning, Trust and Probate Law in California.

After a decade practicing with preeminent estate planning law firms in Silicon Valley, Jonathon gained a mastery of virtually every estate and tax planning strategy in existence. With his unique background, Jonathon enjoys a reputation for developing 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 asset protection.

A *Forbes* contributor, Jonathon is widely viewed as a thought leader and innovator in estate planning and related tax strategies.

Jonathon is also a frequent speaker and nationally recognized authority with respect to the "charitable lead annuity trust" (CLAT). Jonathon estimates that he has been involved in more than 250 CLAT transactions over the past 10 years, and he is frequently engaged by clients, tax advisors, and estate planning attorneys around the country to implement and provide advice with respect to complex CLAT transactions.

PROFESSIONAL BACKGROUND

Before Jonathon and his wife relocated to his hometown of Phoenix in 2015 to raise their children, he practiced with two of the premier estate planning law firms in Silicon Valley – most notably, the personal tax planning group associated with the preeminent venture capital law firm Wilson Sonsini, which led IPOs for virtually every major Silicon Valley-based company, including Apple, Google, Amazon, Tesla, Twitter, LinkedIn, Netflix, Pandora, and GoDaddy. As one of the top tax-planning technicians in Silicon Valley, Jonathon designed, drafted and implemented estate plans for hundreds of the wealthiest individuals in the world, including founders, C-level executives, "Midas List" venture capitalists, and angel investors associated with the world's most prominent tech companies.

SOPHISTICATED NEEDS

Equipped with sophisticated tax and estate planning knowledge that is unique to the Arizona legal community, Jonathon quickly distinguished himself after his return to the Valley as one of the Phoenix area's premier tax and estate planners.

Jonathon has personally architected and implemented over 500 tax planning transactions using one or more of the following advanced planning strategies:

- Generation-skipping dynasty trusts (GST trusts)
- Charitable remainder trusts (CRTs)
- Charitable lead trusts (CLTs)
- 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

- 678 Trusts, Beneficiary Defective Inheritors Trusts (BDITs), and “MegaTrusts” *(limited to review, analysis and administration; not creation)*
- Spousal life access trusts (SLATs)

Representative clients include:

- Founders, executives, and owners of private and public companies
- Private equity, venture capitalists, angel investors and entrepreneurs
- Developers, syndicators and real estate investors
- Professional athletes
- Physicians, attorneys, accountants, executives, and other professionals
- Philanthropists

PERSONAL

Outside of the office, Jonathon treasures his time with his wife and two young children. They primarily live in Scottsdale, but their favorite time of the year is the summer, when the whole family sets sail to Paris to beat the Arizona heat in their Saint-Germain-des-Pres flat (and Jonathon takes advantage of the nine-hour time zone difference). Jonathon is also a performance car enthusiast and passionate collector of Ferraris, Porsches, and BMWs. On the weekend, you can usually spot him (and one of his kids riding shotgun) at Cars & Coffee or participating in high -performance driving events.

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 knowledge of 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 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

HONORS & AWARDS

The Best Lawyers in America® (Closely Held Companies and Family Businesses Law), 2022-present

Az Business Leaders (Tax Law), AZ Big Media, 2023, 2024

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

PUBLISHED ARTICLES

"This Strategy Helps Rich Millennials Lower Taxes, Give Back, and Build Next-Gen Wealth," *Forbes,* November 16, 2022

"Elevating Your Estate and Legacy: A Lesson from Jackie Kennedy," *Forbes,* August 19, 2022

"The Optimized CLAT: A Compelling Income Tax Deduction Vehicle Hiding In Plain Sight" (co-author), *Estate Planning,* a Thompson Reuters Publication, Vol. 47, No. 9, September 2020

SELECT PRESENTATIONS

"Advanced Charitable Trust Planning Strategies," Arizona Community Foundation, Professional Advisors Series, September 2022

"Planning Strategies in Advance of Potential Tax Reform," East Valley Estate Planning Council, September 2021

"Charitable Planning Using CLATs," CalCPA Phoenix Tax Workshop, July 2021

"Pre- and Post-Sale Planning for You, Your Company and Your Family," Northern Trust Conference for Business Owners, February 2020

"Estate Planning and Charitable Trust Strategies," Desert Botanical Garden Donors Circle, Summer 2019

"Charitable Tax Strategies," JP Morgan Wealth Advisors, Summer 2019

"California Conundrums: What Arizona Attorneys and Advisors Must Know When Planning for Clients with California Ties," Valley Estate Planners, January 2019

"Using Charitable Lead Annuity Trusts to Maximize the Economic Benefits of Charitable Giving," Arizona Society of Certified Public Accountants (ASCPA) Annual Conference, June 2018

"Introduction to Tax-Efficient and Maximum Impact Charitable Giving," Valley of the Sun United Way, February 2018

"California Conundrums: What Arizona Attorneys and Advisors Must Know When Planning for Clients with California Ties," Scottsdale Estate Planners, January 2018

"Creative Charitable Lead Trust Strategies," Valley Estate Planners, November 2017

"7 Uses of Charitable Trusts to Achieve a Donor's Economic Goals," Southwest Autism Research & Resource Center (SARRC), October 2017

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

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

"Creative Charitable Strategies," Maricopa County Bar Association, February 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., Taxation, University of California Hastings College of Law, 2007

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

COMMUNITY ACTIVITIES

Desert Botanical Garden: Planned Giving Committee

Ballet Arizona: Planned Giving Committee

Arizona Community Foundation (ACF): Planned Giving Advisory Committee

Central Arizona Estate Planning Council: Executive Board

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