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CALIFORNIA-LICENSED TRUST, REAL ESTATE AND TAX ATTORNEYS

Jonathon Morrison and David Cohen have years of experience in practicing law in California and can help clients in any state navigate the complexities of California real estate, probate, tax and business law.





Jonathon Morrison (left) is a Certified Specialist in Estate Planning, Trust and Probate Law. His clients benefit from his knowledge of California's Proposition 13 property tax issues and his counsel in avoiding California probate.

David Cohen analyzes complex tax issues and formulates strategies for businesses, tax-exempt organizations, multi-entity clients, and high net worth individuals and has worked with numerous clients to minimize or eliminate the impact of property tax reassessments under Proposition 13.

Business and real property ownership in California poses a wide array of risks and requirements that are unique to that state, and that can hold serious consequences for Arizona and other out-of-state businesses and individuals that are not guided by California-experienced attorneys.

Our California experience is valuable to the clients we serve directly, and to their legal, financial and tax advisors who look to Frazer Ryan as a trusted professional resource.

CALIFORNIA EXPERIENCE

Jonathon Morrison and David Cohen are not just *licensed* to practice in California; both practiced law extensively in California before returning to Arizona, and both have keen knowledge of California's complex Proposition 13 property tax laws, particularly as they relate to helping clients avoid unintended real property reassessments on direct and indirect transfers.

For eight years, **Jonathon Morrison** worked with Silicon Valley's two largest estate planning law firms – most notably, the personal tax planning group associated with the preeminent venture capital law firm, Wilson Sonsini. Jonathon is a Certified Specialist in Estate Planning, Trust and Probate Law (State Bar of California) whose practice also encompasses probate and trust administration in California and Arizona and the preparation of Heggstad petitions, designed to avoid California probate and the onerous statutory fees associated with California probate.

David Cohen practiced law in San Diego for 17 years, as a member of a law firm and as a sole practitioner. David has an LL.M. in Taxation from Georgetown University and offers an invaluable ability to analyze complex tax issues and formulate effective strategies for businesses, tax-exempt organizations, multi-entity clients, and high net worth individuals.

VALUABLE CALIFORNIA-SPECIFIC KNOWLEDGE

Working in close coordination with their Frazer Ryan colleagues, Jonathon Morrison and David Cohen provide valuable California-specific guidance to clients in:

- Estate planning
- Property tax planning and controversy, including issues specific to Prop. 13
- Real estate law, including real property transfers and the tax impact of how real property is titled (business, personal and trust ownership) and used
- Federal and state income tax planning and tax controversy
- Mergers and acquisitions, business transactions and related tax planning
- Business entity formation, expansion and taxation, as well as planning to minimize the impact of the limited liability company (LLC) gross receipts tax and S corporation net taxable income tax

CALIFORNIA PROP. 13 REAL PROPERTY TAX PLANNING

By properly structuring transfers of real property, whether during one's lifetime or as part of their estate plan, owners of highly appreciated California real estate can defer (and sometimes avoid) property tax reassessment that would otherwise occur when a property is transferred.

In addition to directly advising clients on these issues, David and Jonathon are engaged by both California and non-California licensed attorneys as expert co-counsel to assist clients with California-specific real property holdings as well as business, tax and transactional matters.