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APRIL 2020 NEWSLETTER

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Yes – We are working and available to help you!

Our team at Miller Monson has been here for you, your family and your business for more than 60 years, and we are here for you today. While we are not holding in-person meetings unless critical, we are available by email and telephone, and we can host conference and Skype calls. We can also send a notary to your home or office so you can sign your documents. We value you, and will continue to meet your changing needs.

New Staff: We are pleased to welcome Paralegal William Longworth to our staff. William graduated from San Diego State University with a Bachelor of Science in Criminal Justice. He also graduated from the University of San Diego with an ABA-approved Paralegal Certificate. William was born in Germany, but moved to San Diego at an early age. He holds dual-citizenship in both Germany and the United States. With living in San Diego, William enjoys the ability to go the beach when the weather permits, and go hiking on the weekends.

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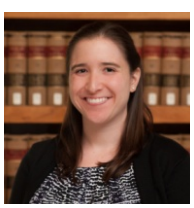

WAYS TO TAKE ADVANTAGE OF CORONAVIRUS

By Katie Lepore, CPA, J.D., LL.M., Taxation

The recent pandemic of COVID-19, or Coronavirus, has thrown the world into a new normal, at least in the short term. While many people are feeling fearful and worried about the state of the economy and the unknown future, the downturn in the economy does create some unique estate and tax planning opportunities. This article attempts to lay out some of these opportunities that you may be able to take advantage of and find a silver lining by possibly saving money in the long run.

Lifetime Gifting

In late 2017 with the passage of the *Tax Cuts and Jobs Act*, the lifetime exemption for estate and gift taxation increased to $11,580,000 per person, or $23,160,000 per married couple (2020 amounts, indexed for inflation). However, these high exemptions are scheduled to sunset at the end of 2025, at which time they will revert to their pre-*Tax Cuts and Jobs Act* amount of $5,000,000 per person, indexed for inflation (which may be somewhere around $6,000,000 per person). In November 2019, the IRS issued final Regulations 20.2010-1, formally announcing that there would not be any "claw back" after the exemptions are reduced. What this means is every person has a unique opportunity right now to make lifetime gifts to reduce his or her taxable estate, knowing that there will not be adverse tax consequences later when the exemption may be lower.

The value of a taxable gift is computed at the time of the gift. As a result, individuals may now own securities or business interests that are at their lowest value in several years. Parents or grandparents have a unique opportunity to gift a large amount of assets from their estate, while using a now smaller portion of their $11,580,000 lifetime exemption. Furthermore, the annual gift exclusion of $15,000 (the amount which a person can gift to another person in a year without reducing their lifetime exemption) can likely encompass a larger amount of assets as well due to the depressed value of stocks and businesses. For those who have taxable estates, or think they may have taxable estates in 2026, now is a great time to make gifts, either annual exclusion gifts up to $15,000, or larger gifts, due to the now lower values.

If gifted now, all future appreciation would be owned by the gift recipient, enabling you to pass a greater value out of your estate, while only using a relatively small amount of your lifetime exemption.

Given the unstable economic and political climate, and the effect that new bailout and stimulus packages will have on the deficit and the economy, we do not know what Congress will do with the lifetime exemption; it is possible the exemption could be reduced to its pre-*Tax Cuts and Jobs Act* amount (or lower) earlier than 2026. Now may be a good time for families with large stock portfolios, real estate interests, family owned businesses, or even limited liability companies (LLCs) or family limited partnerships (FLPs) that own these types of assets to pass them to the next generation and possibly reduce a future estate tax bill.

<u>Property Tax Reassessment</u>

On a related note to the lifetime gifting, if the real estate market becomes severely depressed and a family is planning on passing real estate to a younger generation, it may be to the client's benefit to intentionally trigger a property tax reassessment while the property values are somewhat depressed, with the goal of locking in a lower base value upon which property taxes increase and are assessed in all future years.

Due to Proposition 13 in California, the rate at which property taxes increase year over year can be no more than 2.0%. Real properties which are held in a legal entity such as an LLC or FLP undergo a reassessment upon a "change in control" or "change in ownership." Generally, this is defined as any one owner obtaining more than 50.0% ownership, or if more than one-half of the original co-owners' interests change hands. For families who have a large real estate portfolio in an LLC or an FLP, gifting 51.0% of the entity to a younger generation may trigger a property tax reassessment, with the properties in the entity being revalued as of the date of the transfer. Then, when the other 49.0% of the entity is bequeathed or gifted at a later date, there would be no further property tax implications, and the younger generation could then own 100.0% of the property, while paying property taxes with a base value as of the date of the transfer, increased by a maximum of 2.0% each year.

<u>Intentionally Defective Grantor Trusts</u>

Parents and grandparents looking to maximize their ability to reduce their estates, may want to consider an Intentionally Defective Grantor Trust. A grantor trust is one in which the trustor of the trust pays the income tax owed by the trust, such as a living trust or family trust. Non-grantor trusts are responsible for paying the tax on the trust's income in that year, from trust assets. An Intentionally Defective Grantor Trust combines both of these types of trusts so that the tax must be paid by someone other than the trust or beneficiary. It allows for parents to set up a trust for the benefit of a child (or any other loved one), but continue to pay the income taxes on the trust's income rather than the trust itself paying the taxes. Better yet, the tax paid by the parent is *not* treated as an additional taxable gift. Therefore, parents can make a large gift to a gift trust that it set up to be an Intentionally Defective Grantor Trust, utilize a lower taxable gift value due to the downturn in the economy, allow the child to enjoy all the appreciation on the gifted assets, *and* further reduce their estate by paying the taxes on the trust's income each year.

Family Loans

The low interest rate environment also provides planning opportunities for families to transfer assets or cash to loved ones, including those in younger generations. The Department of the Treasury announced that the April 2020 Applicable Federal Rate, or "AFR," for long-term lending is a mere 1.44%. For short- or mid-term lending, the rate is below 1.0%. The AFR is the minimum rate that must be used for the IRS to uphold the loan as a bona fide loan rather than an inter-family loan with imputed interest. As a result, you could loan to a loved one at a very low interest rate. Individuals can make a loan to loved ones, such as millennials trying to purchase a house but in need of help with the down payment, recent graduates who may need additional assistance paying down student loans, or even helping a loved one who may have been laid off or had his or her job phased out during these unprecedented times due to Coronavirus, all while requiring minimal interest payments in return.

Because the rates on mortgages may decline as well, homeowners who do not have extra cash right now but still wish to loan money to a loved one may be able to do a cash-out refinance of their existing mortgage.

Grantor Retained Annuity Trusts

To take further advantage of the lower interest rates, you may want to consider a Grantor Retained Annuity Trust, or "GRAT." If you like the idea of passing assets to a younger generation, but are not entirely ready to give up control or use of that asset through an outright gift, a GRAT may be a useful medium to accomplish both of these goals. A GRAT is a trust in which the grantor retains a right to an annuity. At the end of the trust term, the trust assets are distributed to the named beneficiary(ies). Therefore, transferring a stock portfolio to a 5-year GRAT would allow the taxable gift to be calculated based on today's depressed values and lower interest rates, but yet the grantor receives all the income or a payment of money during that 5-year period before the assets transfer to the named beneficiary(ies). An alternate term for the trust can be chosen by the grantor.

Irrevocable Trust Analysis

If you have an irrevocable trust that has been around for a while, such as a Bypass Trust created at the death of a spouse from many years ago, or a gift trust created by a parent or grandparent, now may be a good time to review the assets in these trusts for possible income tax savings. Since gifts take a carryover income tax basis, and the assets in a Bypass Trust have an income tax basis established as of the decedent's date of death, these trusts may hold assets with a very low income tax basis. In the event any of these assets should be converted into a different type of asset or a different investment, now may be a good time to sell and liquidate those low-performing assets and purchase a different asset, while reducing capital gains that may need to be paid (or recognizing capital losses).

Convert to Roth IRA

If you have a large traditional IRA, you may want to consider converting it to a Roth IRA while the marketable securities are at reduced levels. While a traditional IRA is funded using pre-tax monies, a Roth IRA is funded using after-tax monies. Therefore, distributions from a Roth IRA are withdrawn tax-free. If a traditional IRA owner desires to convert to a Roth IRA, he or she needs to pay income tax on the value of the account in the year of conversion. Since the value of the account is likely much lower now than it was recently, and perhaps lower than it will be in the future, paying tax on these lower values now saves the owner, or those who inherit the IRA, from paying tax on withdrawals when the securities have increased in value.

Tax Basis
A final consideration is tax basis. Normally, when you make a gift, the recipient receives the assets with the same tax characteristics as the giver, which includes tax basis. An exception applies when the value of the gift is lower than the basis. In that instance, the new owner receives it with a basis that is limited to the current fair market value. That means that assets which have lost value since you bought them are generally not a good asset to give. It may be better to sell such assets and to take the loss.

Conclusion
These are just some of the many ways in which you can take advantage of this unusual and distressing time. Should you have any questions about these strategies or wish to implement them, please reach out to our office.

FINISH YOUR PLANNING NOW *by Mary J. Peshel, J.D.*

Estate planning is one of those chores that is often put off or delayed. Most of us would rather think about almost anything else. The current pandemic reminds us how important this planning is for our loved ones and for our own peace of mind.

Your plans are important to you - and you and your plans are important to us! If you have already started to create your estate plan, or are updating your existing plan, or would like to create a plan or update one, we are here to help. If you are in an "at risk" category, we understand that it is more important than ever that you finish your plans as soon as possible. We are available to ensure this is completed so you can have peace of mind.

Now may be a particularly important time to ensure that your Advance Health Care Directives, HIPAA waivers, and Powers of Appointment are up-to-date and reflect your medical wishes.

We are also happy to answer any questions or concerns you may have about your existing plan. Our office remains available to assist you during this tumultuous time.

We are available to talk on the phone, and will answer your email questions. Technology permits us to send you many kinds of documents by secure email, if that is helpful. If in-person meetings, or a notary, are required, we will work with you to provide these as you need and our personnel permits.

If you have questions or concerns, please do not hesitate to contact us.

LAW CHANGES YOU NEED TO KNOW NOW *by DeEtte L. Loeffler, J.D., LL.M., Taxation*

Congress and the California legislature have passed several important new bills in response to drops in market values, and concerns over the impact the COVID-19 virus is having on business. This is a summary of these bills and how they will affect you, whether you are an employer or an employee.

Relief in the Federal CARES Act. The *Coronavirus Aid, Relief and Economic Security (CARES) Act* was signed into law on Friday, March 27, 2020. Here is what it includes:

1. Cash Relief Payments. Beginning April 6, 2020, the IRS will send electronic deposits in

the amount of $1,200 ($2,400 for joint filers) to those individual taxpayers with incomes below $75,000 ($150,000 for couples). In addition, those with children will receive $500 per child. The rebates begin phasing out at $75,000 (at 5% per dollar) and no payment will be made to an individual earning more than $99,000 ($198,000 for couples). Eligibility will be based on 2019 (if filed) or 2018 tax returns. This is a refundable tax credit, like the one given in 2008, which is an advance on the tax refund you would otherwise receive in April of 2021.

2. Expended Unemployment Benefits. The *CARES Act* expands unemployment relief by increasing payments by $600 per week for up to 4 months above what states currently provide, and includes the self-employed, independent contractors, and those with limited work history. Unemployment Insurance will also be extended by another 13 weeks, up to December 31, 2020, after state benefits end. In California, some workers could receive up to $1,000 per week.

3. Tax Credit for Employers. The *CARES Act* provides a refundable payroll tax credit for 50% of employer wages for companies that are fully or partly prohibited from operating during the crisis. The credit is limited to $10,000, and will only apply if the business has a 50% drop in revenue over the same quarter in 2019.

4. Loans for Employers. Employers with fewer than 500 employees are eligible to take loans of up to $10 million (based on a payroll tax formula) for expenses (including payroll for employees earning up to $100,000) incurred February 15 – June 30, 2020. Loans may be forgiven if the funds are used for payroll, interest on a mortgage, rent, and utilities, but would be reduced if the employer reduces wages by more than 25% or lays off workers.

5. Employer Share of Social Security Tax Delayed. Employers will be able to delay paying their share of the employment tax as follows: 50% in December of 2021 and 50% in December of 2022.

6. Penalties Waived for Early IRA Withdrawals. The *CARES Act* waives the 10% early withdrawal penalty for retirement fund distributions of up to $100,000 made on or after Jan. 1, 2020, and before Dec. 31, 2020. In addition, Required Minimum Distributions have been suspended.

Emergency Paid Sick Leave Act. The *Families First Coronavirus Response Act* contains an Emergency Paid Sick Leave which is in effect from April 2 –December 31, 2020. Private employers with fewer than 500 employees must provide paid sick leave to employees as follows:

- For full time employees – 80 hours
- For part time employees – the number of hours equal to that normally worked in a 2 week period.

Leave with **full pay** (up to $511/day, $5,110 total) applies if the employee:

1. Is subject to a quarantine or isolation order due to the COVID-19 virus; or
2. Has been advised by a medical professional to self-quarantine for COVID-19 reasons; or
3. The employee has symptoms of the COVID-19 virus and is seeking medical diagnosis.

Leave with **2/3 pay** (up to $200/day, $2,000 total) applies if the employee:

4. Is caring for someone else who qualified under #1 or #2 above; or
5. Is caring for a child under age 18 whose school or child care facility is closed due to COVID-19; or
6. The employee otherwise qualifies under HHS guidelines.

Employers with fewer than 50 employees may qualify for a “good cause” exclusion to #5 only if the business will be put in jeopardy.

Child Care Leave. The *Families First Coronavirus Response Act*, which expanded the Family Medical Leave Act, is in effect from April 2 – December 31, 2020. It applies to all businesses with 500 or fewer employees. Employers must provide employees (other than temp or seasonal) with up to 12 weeks job protected leave to care for a child under age 18 whose school is closed due the pandemic. The first 10 days may be unpaid, or employees can use accrued paid leave, and sick leave. Employers must pay 2/3 pay up to $200/day up to $10,000 aggregate. Employers with fewer than 25 employees may be exempt from the job protection requirement if they meet certain requirements including the elimination of the job position due to economic conditions, but employees are still entitled to the 12 weeks of leave.

Employers with fewer than 50 employees may qualify for a "good cause" exemption if these requirements would jeopardize the business. Employers should seek legal advice if in doubt that they might be exempt from these requirements.

Warning: Employers must be careful to post the required notice of these acts as required by law, and to not discriminate against employees who exercise these leave rights. They must also not try to convert employees into independent contractors to avoid these requirements. Employers may still layoff for business reasons related to the pandemic.

Payroll Tax Credit. Employers required to provide 2/3 pay due to the pandemic may be entitled to seek a credit for payroll taxes paid by the employer. The credit applies to Q2 – Q4, and is collectable quarterly.

Self-Employment Tax. Self-employed people are entitled to a tax credit for sick and family leave, limited to the lesser of their daily self-employment tax or $511 per day (if caring for self) and $200 per day (if caring for another). Time limits apply (10 days for sickness and 50 days for caring for family).

The Supporting Older Americans Act of 2020: On March 25, 2020 the President signed the SOA Act to assist seniors. The Act is intended to help roughly 11 million older Americans who rely on social services and community-based programs like Meals on Wheels. It reauthorizes the Older American Act, increases funding by 7% in the first year, then 6% thereafter, seeks to address social isolation by giving local organizations more power to test programing, funds a study to improve spending to improve independence and safety for seniors; improves support for family caregivers, and establishes a National Research, Demonstration, and Evaluation Center for the Aging Network in the Office of the Assistant Secretary of Health and Human Services.

FEDERAL TAX UPDATE

By DeEtte L. Loeffler, J.D., LL.M., Taxation

Income Tax Returns Extended. The IRS has extended the due date for filing several types of income tax returns from April 15, 2020 to July 15, 2020. These include: personal tax returns (Form 1040) and trust and estate tax returns (Form 1041). Corporate returns also qualify. No interest or penalties will apply to tax payments made by the new July 15th deadline. Payment of the tax has also been extended. There is no longer any limit on the amount of the tax payment that can be deferred this way.

If you are due a tax refund, or are able to file by the original April 15, 2020, please do. The IRS will not delay refunds, and filing early will help prevent overwhelming the IRS in July.

The extension only appears to apply to income tax returns due April 15th. Partnership returns that were due March 15th, and charitable returns due May 15th do not qualify. Also, the extension does not apply to other kinds of tax, such as employment and social security tax.

Gift and GST Tax Returns Extended. IRS Notice 2020-18 extended the filing and payment deadline for federal gift and generation skipping transfer tax returns (Form 709) until July 15, 2020.

Relief for Some Landlords. Fannie May and Freddie Mac have agreed to suspend mortgage payments for landlords of apartment buildings who do not evict tenants who have unpaid rent due to the pandemic.

Relief for Homeowners With Mortgages. Five banks have agreed to defer mortgage payments for up to three (3) months, and will not initiate foreclosures or evictions in the next 60 days. These banks include Wells Fargo, US Bank, Citi and JP Morgan Chase. Bank of America has agreed to a 30-day deferral but may extend this period. Deferral is not loan forgiveness, so banks may seek loan modifications for borrowers once the pandemic eases.

Bill to Cut Estate Tax Rate. H.R. 5652, the *Estate Tax Rate Reduction Act*, was introduced on January 17, 2020, by Representative Joey Arrington (R-TX). The Bill would reduce estate, gift, and generation skipping tax rates to 20% instead of their current 40% rate. The Bill is in Committee but is not expected to pass.

Presidential Budget Extends Tax Cuts. President Trump's proposed budget for fiscal year 2021, proposed extending the tax cuts imposed under the 2017 *Tax Cuts and Jobs Act*, though the budget may be changed in light of the unforeseen Coronavirus pandemic. The proposed budget would extend the increased value of the estate and gift tax exemption.

Biden's Proposal for Healthcare and Capital Gains. Vice President Joe Biden as a Democratic nominee published his health care plan on his campaign website. In order to expand the Affordable Care Act implemented by President Obama, and expand health care access for Americans, Vice President Biden would raise the capital gains rate from 20% to the top marginal tax rate on any taxpayers earning more than $1 million, and would simultaneously raise the top tax bracket from 37% to 39.6%.[1] According to *Tax Foundation*, the Vice President would also eliminate the step-up in basis allowed at the death of a decedent for capital gains.[2]

IRS Gives Leeway to Financial Institutions Regarding RMDs. With the passage of the *SECURE Act* in 2019, the laws surrounding Required Minimum Distributions (RMDs) have drastically changed. For Financial Institutions that needed to provide statements to IRA owners regarding RMDs by January 31, 2020, the IRS has granted some leeway in Notice 2020-6 to allow the Financial Institution to correct any incorrect statements by April 15, 2020.

IRS Proposed Regulations on Built-in-Gain Issued. The IRS issued Reg-125710-18 on March 18, 2020, addressing the calculation of built-in-gains and built-in-losses and the inclusion of income and deductions in these calculations under IRC Section 382. The Proposed Regulations would adopt a safe harbor calculation.

STATE TAX NEWS
By DeEtte L. Loeffler, J.D., LL.M., Taxation

California Income Tax Returns Extended. The Franchise Tax Board postponed until July 15th the filing and payment deadlines for all individuals and business entities for 2019 tax returns, 2019 tax return payments, and 2020 1st and 2nd quarter estimated payments.

Other Tax Relief. The FTB has also extended until July 15th 2020 LLC taxes and fees, and 2020 non-wage withholding payments.

Extension to File/Pay and Penalty Relief. The California Department of Tax and Fee Administration (CDTFA) is permitting individuals and businesses affected by COVID-19 to seek an extension through May 15th to file and pay,

[1] https://joebiden.com/healthcare/?mod=article_inline

[2] https://taxfoundation.org/joe-biden-tax-proposals/

for relief from penalties and interest, and to seek refunds for all taxes administered by the CDTFA.

Extension Payroll Tax. Employers affected by COVID-19 may seek a 60-day extension to file payroll reports and deposit payroll tax without penalty or interest.

Relief for Renters. On March 25, 2020, San Diego passed a moratorium on residential and commercial tenant evictions through May 31, 2020. The change was made under Governor Gavin Newsom's authority which requires all back rent to be paid within 6 months of the Governor withdrawing the authority of local governments to block evictions. To qualify, tenants must inform landlords of their inability to pay rent. Tenants must also pay any unpaid rent upon vacating.

60-Day Layoff Notice Requirement Suspended. In a bid to help prevent bankrupting businesses affected by the Governor's stay at home order and the COVID-19 virus, Executive Order N-31-20 suspended the requirement for employers to give employees 60 days' notice before doing layoffs. Any business doing layoffs must provide written notice to the employees and the state. Large employers should also review other provisions of the Cal-WARN and Federal WARN Act for potential additional obligations.

Layoff notices must now include the following language: **"If you have lost your job or been laid off temporarily, you may be eligible for Unemployment Insurance (UI). More information on UI and other resources available for workers is available at labor.ca.gov/coronavirus2019."**

AB 5 and *Dynamex* Proposed Changes. There have been at least 19 proposed bills in the State Assembly and State Senate to alter 2019's AB 5 and *Dynamex* case regulations regarding the definition of employee versus independent contractor. Most of the proposed bills would expand the categories of exempt workers in certain industries. More detail on AB 5 can be found in our October 2019 newsletter at: https://www.mmpph.com/wp-content/uploads/2019/10/October-2019-Newsletter.pdf

U.S. Supreme Court Denies Motion about CA LLC Fee. The U.S. Supreme Court has denied a Motion for Leave to File Bill of Complaint brought by Arizona against California regarding California's $800 minimum LLC fee. As reported in our September 2019 newsletter, Arizona claimed that California's fee, which is levied on businesses based on a broad interpretation of "doing business" in California even if residents of other states, violates the U.S. Constitution's Due Process and Commerce Clauses.

Health Insurance Penalty Calculation. The California Franchise Tax Board issued Notice 2020-01, outlining the calculations for the penalty that will be levied on California residents who do not have health insurance coverage as of January 1, 2020. The penalty, which varies based upon several factors including age and gross income, will be payable on the taxpayer's 2020 tax return filed in 2021.

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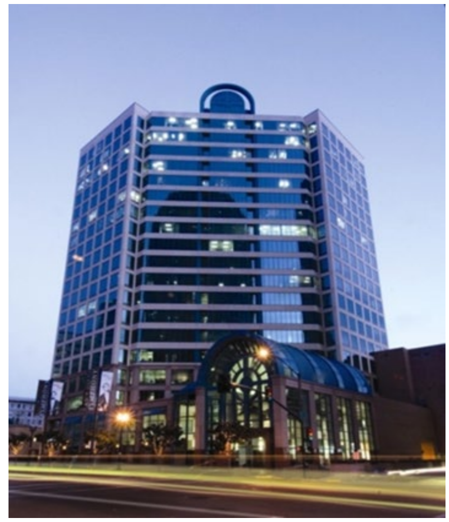

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