



APPRECIATION Padlock

Investors want their assets to have a high tax basis --and a *very* low tax rate-- when a liquidation occurs.

This means a *capital gains* tax liability is often preferred over an income, estate, or gift tax liability.

Unfortunately, however, many assets held by individuals, real estate companies, business owners, or entrepreneurs can lose their step-up in basis due to tax-free exchanges, business depreciation, or by being held over an extended period of time. Selling highly appreciated stocks, rental properties, land holdings, or other large assets can trigger exorbitant capital gains tax liabilities for many investors.

Appreciation Padlock utilizes FFR's proprietary **5D Process** to radically reduce (or in some cases, completely eliminate), capital gains taxes on highly appreciated assets. Additional strategies can help radically lower estate and gift taxes by locking in values today, and passing appreciation on to the heirs.

We help *eliminate* capital gains taxes --and can legally *freeze* all future appreciation on most assets.

The following is a short list of analysis, audit, and design solutions that FFR currently provides:

Techniques for Appreciated Assets

- Selling Assets (Full Economic Modeling)
- Intentionally Defective Trust Planning
- Family Partnership • Limited and General
- Estate Freeze Audit for Future Appreciation
- Qualified Terminable Interest Property (QTIP)
- Grantor Retained Annuity Trust (GRAT)
- Allocate Separate Property for Step-up Basis
- Generation Skipping Transfer Trust Review
- Corporate Reorganization w/ Stock Gifts
- Stock Distributions for Non-Participating Heirs
- Employer Stock Ownership Plans (ESOPs)
- Re-qualify (Rollback) of IRA to a Pension Plan
- Interpolated Terminal Reserve Rollout to FLP
- Charitable Lead Trust • CLUT • CLAT
- Charitable Remainder Uni-Trust (CRUT)

Questions that Concern Asset Owners

Most assets are sold quickly during a genuine business opportunity --or a forced liquidation. When such events occur, are you willing to sell your assets while under pressure? Or would you consider it a wise decision to have thoroughly researched your options in advance of a crisis event or a golden opportunity?

With long-term tax planning solutions and economic modeling available, who do you rely on for solid tax advice when selling your asset? Who takes responsibility for tax losses when assets are liquidated?

After selling a highly appreciated asset, can anything be done to reduce your ultimate capital gains tax, or should financial and legal advisors be consulted *prior* to locating a potential buyer for your property?