

**Date:** [Insert Date]

[Client Name]  
[Client Address]  
[City, State, Zip Code]

**Re: Reasonable Basis Tax Opinion - [Insert Specific Tax Position/Transaction]**

Dear [Client Name],

This letter provides our formal opinion regarding the tax treatment of [describe transaction or position] for the tax year ending [Date].

**Scope of Analysis**

We have reviewed the relevant facts provided by you, including [list documents, e.g., contracts, financial statements]. We have also analyzed the Internal Revenue Code, Treasury Regulations, judicial decisions, and administrative rulings applicable to this matter.

**Factual Summary**

[Insert a concise summary of the relevant facts and circumstances].

**Legal Analysis**

Based on our review, the primary authorities supporting this position include [Cite specific Code Sections, Cases, or Revenue Rulings]. While there may be contrary interpretations, the supporting authorities provide a credible basis for the reported treatment.

**Opinion**

It is our opinion that there is a "reasonable basis" (as defined under Treasury Regulation §1.6662-3) for the tax position taken. This standard is significantly higher than "not frivolous" and is satisfied if the return position is reasonably based on one or more authorities. Consequently, this position should not be subject to accuracy-related penalties under Section 6662, provided the position is adequately disclosed on Form 8275, if required.

**Disclosures and Limitations**

This opinion is based on the facts as presented to us. Any change in facts or subsequent changes in tax law may invalidate this conclusion. This letter is intended solely for the use of [Client Name] and may not be relied upon by any other party.

Sincerely,

[Signature]  
[Name of Tax Professional/Firm]  
[Title]