[Company Letterhead / Logo]

[Date]

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

RE: Final Tax Opinion - Cost Segregation Study for [Property Name/Address]

Dear [Client Name],

At the request of [Client Entity Name], we have performed a formal cost segregation study for the property located at [Property Address]. The primary objective of this study was to identify and segregate the costs of the subject property into appropriate asset classifications and recovery periods for federal income tax purposes in accordance with the Internal Revenue Code (IRC) and applicable Treasury Regulations.

Scope of Work

Our analysis included a physical site inspection, a review of construction drawings, contractor payment applications, and various closing documents. We utilized the "Engineering Approach" as recognized by the IRS Cost Segregation Audit Techniques Guide to allocate costs into the following categories:

- 5-Year Personal Property (Section 1245)
- 7-Year Personal Property (Section 1245)
- 15-Year Land Improvements (Section 1250)
- 27.5 or 39-Year Real Property (Section 1250)

Tax Opinion and Summary of Findings

Based on our engineering analysis and review of IRC Section 167, Section 168, and relevant judicial precedents (e.g., Hospital Corp. of America v. Commissioner), it is our professional opinion that the reclassifications identified in the attached report are supported by substantial authority. We have concluded that the following amounts are eligible for accelerated depreciation:

Total Basis Evaluated: $[Amount]
5-Year Property: $[Amount]
15-Year Property: $[Amount]
Remaining Real Property: $[Amount]

Bonus Depreciation

For assets placed in service during the current tax year, we have evaluated eligibility for Bonus Depreciation under IRC Section 168(k). It is our opinion that the qualified property identified in our report meets the requirements for [Percentage]% first-year bonus depreciation.

Conclusion and Limitations

This opinion is intended for the internal use of [Client Name] and its tax advisors for the preparation of federal and state income tax returns. This letter does not constitute a guarantee that the Internal Revenue Service will not challenge the classifications provided; however, we believe the findings represent a conservative and legally defensible position.

Please refer to the full Cost Segregation Report for detailed asset schedules and methodology.

Sincerely,

[Signature]
[Name of Principal/Engineer]
[Firm Name]