

Subject: M&A Tax Planning Recommendations

Dear [Recipient Name],

As part of our ongoing efforts to optimize the strategic transaction between [Company A] and [Company B], I am pleased to provide you with our tax planning recommendations. These recommendations are aimed at maximizing tax efficiencies and minimizing liabilities during the M&A process.

1. Tax Structure Optimization

Consider evaluating various M&A structures including asset purchases versus stock purchases to identify the most tax-efficient option.

2. Due Diligence on Tax Attributes

Thoroughly review and assess the tax attributes of both entities, including net operating losses, tax credits, and any potential contingencies.

3. Consideration of Transaction Costs

Plan for the tax implications associated with transaction costs and how they may affect the overall financial positioning of the merged entity.

4. Post-Transaction Compliance

Establish a comprehensive plan for post-transaction compliance to ensure adherence to new regulations and reporting requirements.

5. Ongoing Advisory Support

We recommend maintaining a continuous dialogue with our tax advisory team throughout the integration process to address any emerging tax matters promptly.

We believe that implementing these recommendations will greatly enhance the success of the merger and contribute to a seamless integration. Please feel free to reach out should you have any questions or require further clarification on any points mentioned.

Thank you for your attention to this important matter. We look forward to assisting you further.

Sincerely,

[Your Name]

[Your Title]

[Your Company]