

**Tab 28 Attorney's Opinion for Acquisition Tax Credit**

When requesting Acquisition Tax Credits, an attorney experienced in Section 42 of the Internal Revenue Code (IRC) must issue an opinion regarding the building's eligibility for the Acquisition Tax Credits. In a multiple-building development, the opinion letter must separately address each building contained in the development. The letter must be explicit in describing how the acquisition of the property meets the requirements of Section 42(d)(2) of the Code.