

SAMPLE OPINION LETTER

LAWYER OR ACCOUNTANT LETTERHEAD

Date

Olympia Trust Company
2200, 125 – 9 Avenue SE
Calgary, Alberta T2G 0P6

Name of Corporation (“the corporation”):

We provide the following information to confirm that the shares of **(name of corporation)** are a qualified investment (as defined in subsection 146(1) of the Income Tax Act and the applicable Income Tax Regulations) to be held within a Registered Retirement Savings Plan (“RRSP”), a Registered Retirement Income Fund (“RRIF”), a Registered Education Savings Plan (“RESP”), or a Tax Free Savings Account (“TFSA”).

The corporation is a Canadian controlled private corporation. All or substantially all of the fair market value of the assets of the corporation are used principally in an active business carried on primarily in Canada. As such, the corporation is a small business corporation within the meaning assigned by the paragraph 4900 (12)(a) of the Income Tax Act.

Based on this information, the shares of the corporation are a qualified investment for a trust governed by an RRSP, RRIF, RESP, or TFSA (provided the annuitant thereto is not a “connected shareholder” of the Company as defined in the Income Tax Act).

Sincerely,