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COST SEGREGATION WORKPAPER • CPA-VERIFIED

# Engineering-based component reclassification of **\$448,000** in depreciable basis.

EXISTING PURCHASE • SINGLE-FAMILY RESIDENCE • TY 2024

PREPARED FOR

**Demo Holdings LLC**

STUDY DATE

**June 26, 2026**

MODEL FINGERPRINT

**v6 • 9f2e4a7c8b5d...**

PROPERTY

**Gatlinburg, TN**

PLACED IN SERVICE

**August 20, 2024**

STUDY TYPE

**Residual Estimation Approach**

ATG CHAPTER 4

**COSTSEGLOGIC**

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PAGE 1 OF 49

# Table of Contents

Read in order, or jump straight to a section. The five-minute read is §1 (Executive Summary). The CPA / examiner read is front to back. Methodology is §5; allocation detail is §8; year-by-year schedule is §9-D.

|           |                                                                                |         |
|-----------|--------------------------------------------------------------------------------|---------|
| § 1       | Cover Letter                                                                   | PAGE 03 |
| § 2       | CostSegLogic Certification • Methodology, authorities, compensation, retention | PAGE 04 |
| § 3       | Executive Summary • Property overview, reclass, tax impact                     | PAGE 05 |
| § 4       | Scope & Limitations                                                            | PAGE 08 |
| § 5       | Methodology • Three converging approaches; standards referenced                | PAGE 09 |
| § 6       | MACRS Asset Class Summary                                                      | PAGE 11 |
| § 7       | Property Details                                                               | PAGE 12 |
| 7 • A     | General Information                                                            | 12      |
| 7 • B     | Purchase Price Allocation                                                      | 12      |
| § 8       | Detailed Cost Allocation                                                       | PAGE 13 |
| 8 • A     | High-Level Allocation                                                          | 13      |
| 8 • B     | Consolidated Allocation Table                                                  | 14      |
| 8 • C     | Component Allocation Grid by MACRS Class                                       | 17      |
| 8 • C • 2 | Component Allocation Charts                                                    | 18      |
| 8 • D     | Top 10 Components by Allocated Cost                                            | 19      |
| 8 • E     | Building Systems Allocation (TD 9636)                                          | 20      |
| § 9       | Depreciation Schedules                                                         | PAGE 22 |
| 9 • A     | Annual Depreciation by Asset Class                                             | 24      |
| 9 • B     | Combined Annual Depreciation (Stacked View)                                    | 24      |
| 9 • C     | Bonus Depreciation Analysis                                                    | 25      |
| 9 • D     | Full 28-Year Depreciation Schedule                                             | 27      |
| § 10      | Tax Impact Summary                                                             | PAGE 28 |
| § 11      | State Conformity                                                               | PAGE 29 |
| 11 • A    | State-Adjusted Depreciation Schedule                                           | 30      |
| § 12      | Taxpayer-Provided Evidence Registry                                            | PAGE 31 |
| § 13      | Recommended Site Documentation                                                 | PAGE 32 |
| 13 • 1    | Recommended Actions                                                            | 33      |
| § 14      | Assumptions                                                                    | PAGE 34 |
| § 15      | Representations                                                                | PAGE 35 |
| § 16      | Disclaimers                                                                    | PAGE 36 |
| A         | Appendix A — Property Inputs                                                   | PAGE 37 |
| B         | Appendix B — Glossary & FAQ                                                    | PAGE 38 |
| B • 1     | Glossary                                                                       | 38      |
| B • 2     | Frequently Asked Questions                                                     | 39      |

## • § 1 • COVER LETTER

JUNE 26, 2026

**Demo Holdings LLC**

Gatlinburg, TN

Tennessee

**Subject: Cost Segregation Analysis for Gatlinburg, TN**

Dear Demo Holdings LLC,

This report contains a cost segregation study for the property located at **Gatlinburg, TN**, placed in service on **August 20, 2024**. The study applies the *Residual Estimation Approach* recognized in the IRS Cost Segregation Audit Techniques Guide, Chapter 4, to identify building components eligible for shorter MACRS recovery periods than the default 27.5-year residential rental treatment.

Cost segregation is an established tax planning methodology recognized by the Internal Revenue Service. By reclassifying components of a building into the appropriate Modified Accelerated Cost Recovery System (MACRS) asset classes — 5-year personal property, 15-year land improvements, and Section 179 immediately expensed property — the owner optimizes capital recovery through structural reclassification, materially increasing first-year deductions.

For the residential rental properties this platform is designed to serve, the methodology applied here meets the documentation standards of the IRS Audit Techniques Guide and is suitable for the depreciation positions claimed. We recommend reviewing this report with your certified public accountant or tax preparer before filing.

Sincerely,

**CostSegLogic**  
COSTSEGLOGIC.COM

## § 2

## CostSegLogic Certification

METHODOLOGY • AUTHORITIES • COMPENSATION

The CostSegLogic engine certifies the following with respect to the methodology, data, and compensation arrangement underlying this study. Each point is structured to permit the taxpayer's preparer or, in the case of an examination, an Internal Revenue Service examiner, to audit the structural posture of the work product before consuming the dollar conclusions that follow.

**01 Methodology.**

The methodology applied in this study conforms to the IRS Cost Segregation Audit Techniques Guide (Chapter 4), specifically the *Residual Estimation Approach* combined with *Cost Estimation Using Industry Databases* — both methodologies explicitly recognized as acceptable approaches in that guide.

**02 Asset Classification Authorities.**

Asset classification rules applied in this study are sourced from Internal Revenue Code §168, Rev. Proc. 87-56 (1987-2 C.B. 674), and Treas. Reg. §1.167(a)-11. Class lives, recovery periods, and depreciation conventions are taken directly from those authorities; no extrapolation has been performed.

**03 Cost Library Calibration.**

The component cost library that underlies the within-class allocation percentages is calibrated against industry-standard cost-estimation references, including RSMeans methodology and the Marshall Valuation Service approach. The library is reviewed periodically against published cost data; the version in effect at the time of this study is recorded in the model\_version footer of every page.

**04 Compensation.**

Compensation for the production of this study is fixed at the published tier price in effect at the time of intake. It is **not** contingent on the findings of the study, on the dollar amount of any deduction claimed, or on any other action by any party with respect to the study's conclusions.

**05 Data Provenance.**

The property data underlying this study — address, year built, square footage, basis, placed-in-service date, feature presence flags, and similar attributes — was certified by the taxpayer at the time of intake. The engine does not independently verify taxpayer-provided inputs; the integrity of the analysis depends on the accuracy of those inputs. See the Representations section.

**06 Consistency and Lack of Bias.**

The analysis applies the same set of classification rules, the same component library, and the same MACRS schedules to every property of the same archetype. The engine has no incentive to find any particular allocation outcome; the rules are applied identically whether the resulting Y1 deduction is large or small.

**07 Workpaper Retention.**

This study and the supporting workpapers should be retained by the taxpayer to substantiate the depreciation deductions claimed. Per IRC §6001 and Treas. Reg. §1.6001-1, taxpayers must keep records sufficient to establish the amount of any deduction shown on a return, generally for at least three years after the later of the return's due date or filing date and for the entire recovery period of any depreciable asset.

— COSTSEGLOGIC

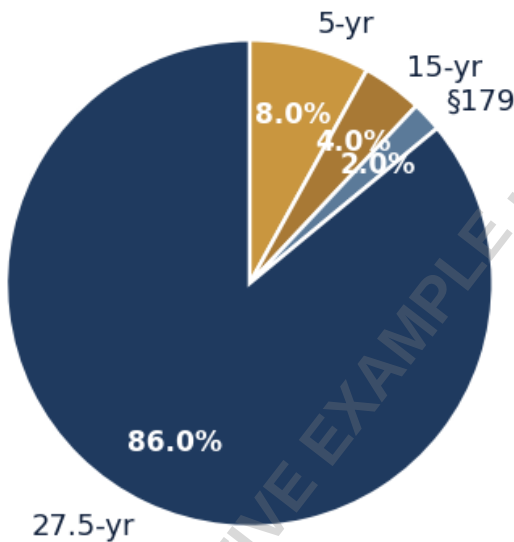
§ 3 Executive Summary

FIVE-MINUTE READ

Property Overview

|                   |                                                  |                            |                            |
|-------------------|--------------------------------------------------|----------------------------|----------------------------|
| PROPERTY ADDRESS  | Gatlinburg, TN<br>Tennessee                      | PROPERTY TYPE              | Single-Family<br>Residence |
| PLACED IN SERVICE | August 20, 2024                                  | DEPRECIABLE BUILDING BASIS | \$448,000                  |
| STUDY TYPE        | Residual Estimation<br>Approach<br>ATG CHAPTER 4 | SCENARIO                   | Existing Purchase          |

Allocation by MACRS Class



Headline split of the customer's depreciable building basis by MACRS class. The per-component breakdown lives in §8-B; the §168(k) bonus + §179 stacking is detailed in §9-C.

Audit-Defensibility Profile

GREEN

**Strong audit-defensibility profile.** Methodology, asset classification, and citations conform to the IRS Cost Segregation Audit Techniques Guide; data inputs are taxpayer-certified; no engineered site inspection in scope.

The pages that follow itemize the reclassification (§3.2), the federal Y1 tax shield (§3.3), and the methodology and authorities supporting both (§5). Customers seeking the per-component allocation table jump to §8-B.

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### 3.2 Reclassification Summary

|                                 |                        |           |       |
|---------------------------------|------------------------|-----------|-------|
| 5-YEAR<br>PERSONAL PROPERTY     | <div><div></div></div> | \$35,840  | 8.0%  |
| 15-YEAR<br>LAND IMPROVEMENTS    | <div><div></div></div> | \$17,920  | 4.0%  |
| §179<br>IMMEDIATE EXPENSE       | <div><div></div></div> | \$8,960   | 2.0%  |
| 27.5-YEAR<br>RESIDENTIAL RENTAL | <div><div></div></div> | \$385,280 | 86.0% |

| ASSET CLASS                             | AMOUNT           | % OF BASIS    |
|-----------------------------------------|------------------|---------------|
| 5-Year Personal Property                | \$35,840         | 8.0%          |
| 15-Year Land Improvements               | \$17,920         | 4.0%          |
| §179 Immediate Expense (Income-Limited) | \$8,960          | 2.0%          |
| 27.5-Year Residential Rental            | \$385,280        | 86.0%         |
| <b>Total Depreciable Basis</b>          | <b>\$448,000</b> | <b>100.0%</b> |

### 3.3 Tax Impact Summary

|                                                                                           |                                                                                    |                                                                               |
|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <p>BONUS RATE • §168(K)</p> <p><b>60.0%</b></p> <p>TCJA §168(K) • PIS AUGUST 20, 2024</p> | <p>Y1 — WITHOUT COST SEG</p> <p><b>\$6,109</b></p> <p>SL • 27.5-YR • MID-MONTH</p> | <p>Y1 — WITH COST SEG</p> <p><b>\$49,695</b></p> <p>+\$43,586 INCREMENTAL</p> |
|-------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|

Incremental Year-1 deduction of **\$43,586** is the difference between the with-cost-seg deduction and the straight-line baseline. It is a timing benefit; the cumulative deduction over the 28-year recovery period is identical to the without-cost-seg path.

### 3.4 Estimated Tax Savings

| METRIC                                    | VALUE           |
|-------------------------------------------|-----------------|
| Federal marginal rate assumed             | 37.0%           |
| State marginal rate assumed (Tennessee)   | 0%              |
| Federal Y1 tax shield                     | \$18,387        |
| State Y1 tax shield                       | \$0             |
| <b>Total estimated Year-1 tax benefit</b> | <b>\$18,387</b> |

#### YEAR-1 FEDERAL TAX SHIELD

# \$18,387

\$49,695 Y1 DEDUCTION × 37.0% FED MARGINAL RATE

#### TENNESSEE CONFORMITY

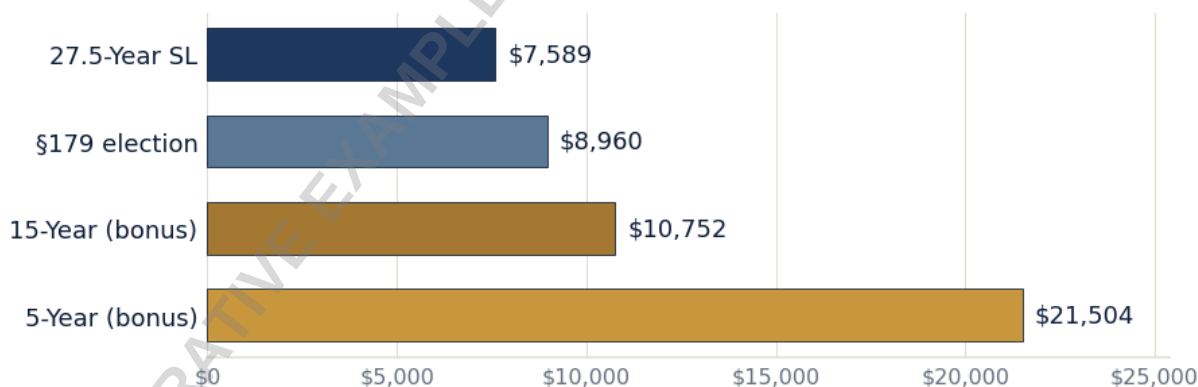
NO INDIVIDUAL INCOME TAX

SEE §11 STATE CONFORMITY

#### Y1 DEDUCTION

**\$49,695**

### 3.5 Year-1 Deduction by Asset Class



#### STATE RATE METHODOLOGY

State marginal rate uses the state's top individual bracket as the default, multiplied by the state's §168(k) recognition factor (full / partial / decoupled). Actual state benefit depends on the taxpayer's effective state bracket and filing posture — see State Conformity section (§11).

## § 4 Scope & Limitations

WHAT THIS STUDY DOES AND DOES NOT COVER

### STUDY TYPE

This is a cost segregation study applying the *Residual Estimation Approach* (ATG Chapter 4). Component cost estimates are derived from a curated industry-standard cost database, calibrated to the property's archetype.

### DATA SOURCES

No taxpayer-provided source documents were referenced in this analysis. Industry-standard defaults were applied per the methodology described above. The full list of supporting documents that may be supplied to strengthen audit-defense posture is described later in *Taxpayer-Provided Evidence Registry*.

### LIMITATIONS

- **Methodology framing.** Component classification and quantification follow ATG-recognized industry-database methods. A licensed engineer or construction professional was not engaged to physically verify components or measure square footage on site.
- **Reliance on taxpayer-certified data.** Property characteristics (square footage, year built, beds/baths, features) are taxpayer-certified inputs ingested by the modeling engine. The taxpayer represents that this data is accurate and complete (see Representations).
- **Standardized allocation where itemization is unavailable.** Where specific construction invoices or component-level cost detail is not provided, the engine applies within-class allocation percentages from a curated industry-standard cost-segregation database, documented in the Methodology section.
- **Tax-law currency.** Bonus depreciation rates and §179 caps in this analysis reflect federal law as of the report date. Future legislative changes may affect the deductions claimed in subsequent tax years.
- **Scope.** This study addresses the federal income tax treatment of the building components and includes state §168(k) conformity treatment. Other tax considerations (passive activity loss, at-risk, basis, real estate professional status) are out of scope and should be evaluated by the taxpayer's tax advisor.

## § 5 Methodology

APPROACH · PROCESS · STANDARDS

## APPROACH USED · THREE CONVERGING METHODOLOGIES

- **Residual Estimation Approach (ATG Chapter 4).** After identifying short-life personal property and 15-year land improvements through standardized cost estimation, the remaining depreciable basis is allocated to the building shell and structural interiors as the 27.5-year residual property. This methodology is explicitly recognized in the IRS Cost Segregation ATG and is the standard approach for cost segregation studies that do not include an on-site engineering inspection.
- **Cost Estimation Using Industry Databases (ATG Chapter 4).** Component-level allocation percentages within each MACRS class are derived from a curated industry-standard cost-segregation database, calibrated to residential-rental property archetypes. The ATG explicitly endorses this approach as one of the recognized cost segregation methodologies.
- **Full IRS Audit Techniques Guide compliance.** Methodology, documentation, asset class assignments, and citations follow the documentation standards recommended by the IRS Cost Segregation Audit Techniques Guide. Each component class life is supported by Rev. Proc. 87-56 asset class codes, with established Tax Court precedent for boundary classifications (IRS-blessed framework since 1997).

## PROCESS OVERVIEW · FOUR STEPS FROM ACQUISITION TO SCHEDULE

1. **Determine total depreciable basis.** Acquisition cost less land value, plus capitalized closing costs and improvements (per the customer's inputs).
2. **Remove land value.** Land is non-depreciable. The land/building split is per the customer's allocation (typically the appraisal or county assessor's ratio).
3. **Identify short-life assets** using actual cost detail where available, modeled allocations from the component library where not. Each component is assigned an asset class (5-year, 15-year, §179, or 27.5-year) per Rev. Proc. 87-56.
4. **Assign MACRS class lives** and compute depreciation under the appropriate convention: Half-Year for 5/15-year property (200%/150% Declining Balance), Mid-Month for 27.5-year residential rental (Straight-Line). §168(k) bonus depreciation is applied to qualifying property at the rate in effect at the placed-in-service date.

## STANDARDS REFERENCED · IRS AUTHORITIES APPLIED THROUGHOUT

- **IRS Cost Segregation Audit Techniques Guide** — Methodology framework and documentation standards.
- **Rev. Proc. 87-56** — Asset class life table; the basis for all MACRS class life assignments in this report.
- **IRS Publication 946** (How to Depreciate Property) — MACRS rate tables (Tables A-1 and A-6) used for year-by-year depreciation calculations.
- **§168(k) of the Internal Revenue Code** — Bonus depreciation treatment. As amended by the One Big Beautiful Bill Act (OBBBA, signed July 4, 2025), property both acquired and placed in service after January 19, 2025 qualifies for permanent 100% first-year bonus depreciation. Property failing the OBBBA acquired+PIS test remains on the TCJA phase-down schedule.

- **§179 of the Internal Revenue Code** — Immediate-expense election thresholds and active-trade-or-business limitation.
- **§263A of the Internal Revenue Code** — Uniform capitalization rules considered in determining basis for cost segregation.

#### DOCTRINAL FOUNDATION · §1245 / §1250 DISTINCTION

The §1245 / §1250 distinction at the core of every cost segregation study is grounded in a well-developed line of Tax Court precedent that has shaped the IRS's acceptance of the discipline. The framework applied in this report reflects four doctrinal pillars that the courts and the IRS have endorsed since 1997:

- **Functional-use principle.** A component whose function is tied to the operation of equipment within the building (rather than to the building's structural shell) may be separately depreciated. Affixation alone does not require §1250 treatment.
- **Six-factor personal-property test.** Distinguishing tangible personal property from structural components turns on movability in fact, design intent to be moved, damage on removal, manner and permanence of affixation, intended duration of placement, and manner of removal in practice.
- **Business-function support.** Decorative and merchandising-related components — signage, millwork, certain lighting, ceiling and wall finishes — can retain their identity as personal property where their function supports the trade or business activity rather than the building structure itself.
- **Special-purpose systems.** Electrical, plumbing, and HVAC systems installed solely to support specific equipment can be classified as tangible personal property even where physically integrated with the building, when their useful life and removal characteristics align with the equipment they serve.

#### AUDIT-DEFENSIBLE SINCE 1997

Cost segregation has been an IRS-blessed methodology since the Tax Court line of decisions in the late 1990s. The IRS's Cost Segregation Audit Techniques Guide formalizes acceptance and prescribes the documentation standards followed throughout this report. Specific case citations are consolidated in the FAQ appendix for taxpayers or examiners who wish to trace the doctrinal lineage directly.

## § 6 MACRS Asset Class Summary

RECOVERY • METHOD • CONVENTION • CLASS CODE

The table below summarizes every MACRS asset class used in this study. Each row shows the class's recovery period, depreciation method, applicable convention, eligibility for §168(k) bonus depreciation, eligibility for §179 immediate expensing, the IRS class code per Rev. Proc. 87-56, and the controlling authority. Per-component allocation appears in §8 Detailed Cost Allocation; per-class year-by-year depreciation schedules appear in §9.

| CLASS                          | RECOVERY | METHOD  | CONVENTION | BONUS | §179 | IRS CLASS |
|--------------------------------|----------|---------|------------|-------|------|-----------|
| ■ 5-Year Personal Property     | 5 yr     | 200% DB | Half-Year  | Yes   | Yes  | 57.0      |
| ■ 15-Year Land Improvements    | 15 yr    | 150% DB | Half-Year  | Yes   | No   | 00.3      |
| ■ §179 Immediate Expense       | Y1       | n/a     | n/a        | No    | —    | N/A       |
| ■ 27.5-Year Residential Rental | 27.5 yr  | SL      | Mid-Month  | No    | No   | 45.0      |

### CONTROLLING AUTHORITIES

**5-Year Personal Property:** §168(e)(3)(B) — property with class life of 4 to less than 10 years per Rev. Proc. 87-56 (asset class 57.0, Distributive Trades & Services, covers residential-lodging tangible personal property and applies to qualifying components of a residential rental property).

**15-Year Land Improvements:** §168(e)(3)(E)(iv) — land improvements (excluding buildings and structural components) per Rev. Proc. 87-56 asset class 00.3.

**§179 Immediate Expense:** §179(a) of the Internal Revenue Code — election to expense up to the §179 cap in the year of placement, subject to the active-trade-or-business income limitation.

**27.5-Year Residential Rental:** §168(c) — applicable recovery period for residential rental property; Pub. 946 Table A-6 mid-month convention.

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§ 7

Property Details

GENERAL INFORMATION & BASIS

7 • A

General Information

|                         |                         |                        |                                       |
|-------------------------|-------------------------|------------------------|---------------------------------------|
| ADDRESS                 | Gatlinburg, TN          | STATE                  | Tennessee                             |
| PROPERTY TYPE           | Single-Family Residence | YEAR BUILT / RENOVATED | 2021                                  |
| BUILDING SQUARE FOOTAGE | 2,000 sqft              | PLACED IN SERVICE      | August 20, 2024                       |
| BEDROOMS / BATHROOMS    | 3 / 3.0                 | CONSTRUCTION TYPE      | Existing-purchase (acquired property) |

7 • B

Purchase Price Allocation

|                                        |                    |
|----------------------------------------|--------------------|
| COMPONENT                              | AMOUNT             |
| Total acquisition basis                | \$640,000          |
| Less: Land allocation                  | \$192,000 (30.00%) |
| Allocable building basis (depreciable) | \$448,000          |

|                                                      |                                       |
|------------------------------------------------------|---------------------------------------|
| ALLOCABLE BUILDING BASIS                             | LAND ALLOCATION                       |
| \$448,000                                            | 30.00%                                |
| DEPRECIABLE BASIS · BUILDING PORTION · LAND EXCLUDED | EXISTING-PURCHASE (ACQUIRED PROPERTY) |
|                                                      | TAX YEAR                              |
|                                                      | 2024                                  |

## § 8 Detailed Cost Allocation

HEADLINE VIEW

## 8 • A High-Level Allocation

Summary view grouping the four MACRS classes into three high-level categories — Personal Property, Land Improvements, and Building. This is the headline allocation customers and CPAs see first.

| <div><div></div> Personal Property — 10.0 %</div> <div><div></div> Land Improvements — 4.0 %</div> <div><div></div> Building (27.5-Yr) — 86.0 %</div> |           |            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|------------|
| CATEGORY                                                                                                                                              | AMOUNT    | % OF BASIS |
| <div></div> Personal Property (5-Year, including §179)                                                                                                | \$44,800  | 10.0%      |
| <div></div> Land Improvements (15-Year)                                                                                                               | \$17,920  | 4.0%       |
| <div></div> Building (27.5-Year Residential)                                                                                                          | \$385,280 | 86.0%      |
| Total Depreciable Basis                                                                                                                               | \$448,000 | 100.0%     |

Per-component breakdown of each category appears in §8-B. The high-level allocation is reconciled to the line-item table at the bottom of §8-B. Section 3.2 and this table use the same single depreciable-basis anchor (\$448,000), with the §179 election broken out as its own line under the Personal Property heading. See §6 for class definitions and Rev. Proc. 87-56 class codes.

## 8 • B Consolidated Allocation Table

System-level breakdown grouped into consolidation buckets by MACRS class. Each row shows a building system or component group, the *source* of the dollar amount, the allocated cost, recovery period, depreciation method, and IRS class code per Rev. Proc. 87-56. **Taxpayer-Provided Actual** rows roll up the exact amounts the taxpayer entered; **Modeled — Archetype Library** rows are residual class basis the taxpayer did not itemize, allocated via the within-class cost-segregation library. Building systems (HVAC, electrical, plumbing) eligible for both §179 election and 27.5-year recovery are split onto separate lines so each carries its own discrete basis for partial-asset disposition under Treas. Reg. §1.168(i)-8.

| SYSTEM / COMPONENT GROUP                                                                                  | SOURCE                         | ALLOCATED<br>\$ | RECV. | BONUS      | METHOD     | CLASS |
|-----------------------------------------------------------------------------------------------------------|--------------------------------|-----------------|-------|------------|------------|-------|
| 5-YEAR                                                                                                    |                                |                 |       |            |            |       |
| Kitchen Cabinetry & Millwork                                                                              | MODELED — ARCHETYPE<br>LIBRARY | \$16,235.52     | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Removable Flooring                                                                                        | MODELED — ARCHETYPE<br>LIBRARY | \$7,096.32      | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Specialty Plumbing Fixtures                                                                               | MODELED — ARCHETYPE<br>LIBRARY | \$2,795.52      | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Living & Dining Furniture                                                                                 | MODELED — ARCHETYPE<br>LIBRARY | \$2,688         | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Major Appliances Package                                                                                  | MODELED — ARCHETYPE<br>LIBRARY | \$2,114.56      | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Appliance Wiring                                                                                          | MODELED — ARCHETYPE<br>LIBRARY | \$2,007.04      | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Window Treatments                                                                                         | MODELED — ARCHETYPE<br>LIBRARY | \$1,218.56      | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Decorative Lighting & Fans                                                                                | MODELED — ARCHETYPE<br>LIBRARY | \$967.68        | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| Audio/Visual & Smart Home                                                                                 | MODELED — ARCHETYPE<br>LIBRARY | \$716.80        | 5 yr  | 100%<br>Y1 | 200%<br>DB | 57.0  |
| 5-Year Subtotal                                                                                           |                                | \$35,840        |       |            |            |       |
| 15-YEAR                                                                                                   |                                |                 |       |            |            |       |
| Landscaping & Irrigation                                                                                  | MODELED — ARCHETYPE<br>LIBRARY | \$6,272         | 15 yr | 100%<br>Y1 | 150%<br>DB | 00.3  |
| Hardscape Paving & Driveways                                                                              | MODELED — ARCHETYPE<br>LIBRARY | \$5,376         | 15 yr | 100%<br>Y1 | 150%<br>DB | 00.3  |
| Outdoor Structures (2 items)                                                                              | MODELED — ARCHETYPE<br>LIBRARY | \$3,584         | 15 yr | 100%<br>Y1 | 150%<br>DB | 00.3  |
| Fencing & Retaining Walls                                                                                 | MODELED — ARCHETYPE<br>LIBRARY | \$2,688         | 15 yr | 100%<br>Y1 | 150%<br>DB | 00.3  |
| CONTINUED OVERLEAF — remaining systems, per-class subtotals, and the table total appear on the next page. |                                |                 |       |            |            |       |

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§ 8-B Consolidated Allocation Table CONTINUED

| SYSTEM / COMPONENT GROUP                                                                                  | SOURCE                         | ALLOCATED<br>\$ | RECV.   | BONUS         | METHOD | CLASS |
|-----------------------------------------------------------------------------------------------------------|--------------------------------|-----------------|---------|---------------|--------|-------|
| 15-Year Subtotal                                                                                          |                                | \$17,920        |         |               |        |       |
| §179                                                                                                      |                                |                 |         |               |        |       |
| HVAC System                                                                                               | MODELED — ARCHETYPE<br>LIBRARY | \$4,480         | Y1      | Y1<br>(\$179) | Y1     | N/A   |
| Roof Replacement                                                                                          | MODELED — ARCHETYPE<br>LIBRARY | \$3,136         | Y1      | Y1<br>(\$179) | Y1     | N/A   |
| Electrical System                                                                                         | MODELED — ARCHETYPE<br>LIBRARY | \$1,344         | Y1      | Y1<br>(\$179) | Y1     | N/A   |
| §179 Subtotal                                                                                             |                                | \$8,960         |         |               |        |       |
| 27.5-YEAR                                                                                                 |                                |                 |         |               |        |       |
| Interior Partitions & Ceilings                                                                            | MODELED — ARCHETYPE<br>LIBRARY | \$127,142.40    | 27.5 yr | —             | SL     | 45.0  |
| Building Shell & Foundation                                                                               | MODELED — ARCHETYPE<br>LIBRARY | \$88,614.40     | 27.5 yr | —             | SL     | 45.0  |
| Roof Replacement (2 items)                                                                                | MODELED — ARCHETYPE<br>LIBRARY | \$48,160        | 27.5 yr | —             | SL     | 45.0  |
| Other Permanent Flooring                                                                                  | MODELED — ARCHETYPE<br>LIBRARY | \$36,601.60     | 27.5 yr | —             | SL     | 45.0  |
| Electrical System                                                                                         | MODELED — ARCHETYPE<br>LIBRARY | \$27,740.16     | 27.5 yr | —             | SL     | 45.0  |
| Plumbing — Bathroom Fixtures                                                                              | MODELED — ARCHETYPE<br>LIBRARY | \$15,411.20     | 27.5 yr | —             | SL     | 45.0  |
| Windows                                                                                                   | MODELED — ARCHETYPE<br>LIBRARY | \$11,558.40     | 27.5 yr | —             | SL     | 45.0  |
| Doors                                                                                                     | MODELED — ARCHETYPE<br>LIBRARY | \$9,632         | 27.5 yr | —             | SL     | 45.0  |
| Plumbing — Water & Waste Utility                                                                          | MODELED — ARCHETYPE<br>LIBRARY | \$5,393.92      | 27.5 yr | —             | SL     | 45.0  |
| CONTINUED OVERLEAF — remaining systems, per-class subtotals, and the table total appear on the next page. |                                |                 |         |               |        |       |

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§ 8-B Consolidated Allocation Table CONTINUED

| SYSTEM / COMPONENT GROUP                    | SOURCE                      | ALLOCATED<br>\$ | RECV.   | BONUS | METHOD | CLASS |
|---------------------------------------------|-----------------------------|-----------------|---------|-------|--------|-------|
| 27.5-YEAR (CONTINUED)                       |                             |                 |         |       |        |       |
| Permanent Lighting                          | MODELED – ARCHETYPE LIBRARY | \$5,393.92      | 27.5 yr | —     | SL     | 45.0  |
| Bathroom Vanities                           | MODELED – ARCHETYPE LIBRARY | \$4,623.36      | 27.5 yr | —     | SL     | 45.0  |
| HVAC System                                 | MODELED – ARCHETYPE LIBRARY | \$4,238.08      | 27.5 yr | —     | SL     | 45.0  |
| Fire Protection                             | MODELED – ARCHETYPE LIBRARY | \$770.56        | 27.5 yr | —     | SL     | 45.0  |
| 27.5-Year Subtotal                          |                             | \$385,280       |         |       |        |       |
| Total Depreciable Basis — All MACRS Classes |                             | \$448,000       |         |       |        |       |

SOURCES. *Taxpayer-Provided Actual* — the bucket rolls up exact amounts the taxpayer entered (1:1 pass-through, no archetype scaling). *Modeled — Archetype Library* — residual class basis not itemized by the taxpayer, allocated via the within-class cost-segregation library (ATG Ch. 4 method).

COLOR BAND on leftmost column: ■ gold-bright = 5-Year, ■ warm gold = 15-Year, ■ light blue = \$179, ■ navy = 27.5-Year.

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8 • C Component Allocation Grid by MACRS Class

Visual decomposition of every line in §8-B grouped by recovery period. Each pane lists components, sorted by allocated cost, with per-class total and share of total basis.

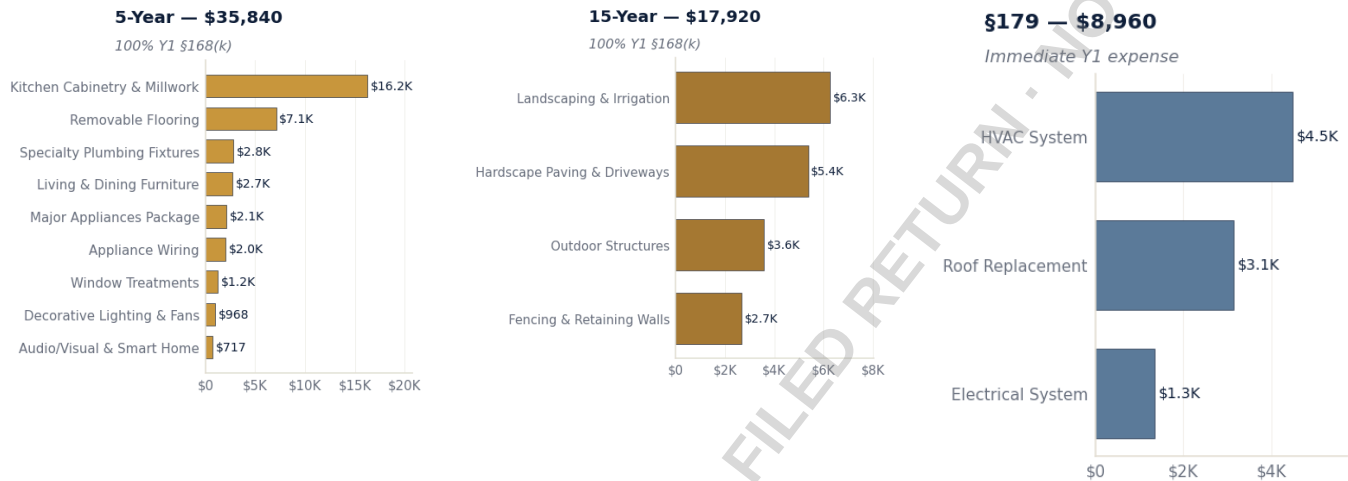
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <div>5-YEAR • 200% DB</div> <div>\$35,840</div> <div>8.0% OF BASIS</div> <div><div>Kitchen Cabinetry &amp; Millwork</div><div>\$16,235.52</div></div> <div><div>Removable Flooring</div><div>\$7,096.32</div></div> <div><div>Specialty Plumbing Fixtures</div><div>\$2,795.52</div></div> <div><div>Living &amp; Dining Furniture</div><div>\$2,688</div></div> <div><div>Major Appliances Package</div><div>\$2,114.56</div></div> <div><div>Appliance Wiring</div><div>\$2,007.04</div></div> <div><div>Window Treatments</div><div>\$1,218.56</div></div> <div><div>Decorative Lighting &amp; Fans</div><div>\$967.68</div></div> <div><div>Audio/Visual &amp; Smart Home</div><div>\$716.80</div></div> | <div>15-YEAR • 150% DB</div> <div>\$17,920</div> <div>4.0% OF BASIS</div> <div><div>Landscaping &amp; Irrigation</div><div>\$6,272</div></div> <div><div>Hardscape Paving &amp; Driveways</div><div>\$5,376</div></div> <div><div>Outdoor Structures</div><div>\$3,584</div></div> <div><div>Fencing &amp; Retaining Walls</div><div>\$2,688</div></div> | <div>\$179 • IMMEDIATE</div> <div>\$8,960</div> <div>2.0% OF BASIS • 1 ELECTION</div> <div><div>HVAC System</div><div>\$4,480</div></div> <div><div>Roof Replacement</div><div>\$3,136</div></div> <div><div>Electrical System</div><div>\$1,344</div></div> <div><div>QUALIFYING PERSONAL PROPERTY EXPENSED IN Y1; SUBJECT TO ACTIVE-T-O-B INCOME LIMIT. STATE CAP Same as federal.</div></div> | <div>27.5-YR • SL • MID-MO.</div> <div>\$385,280</div> <div>86.0% OF BASIS</div> <div><div>Interior Partitions &amp; Ceilings</div><div>\$127,142.40</div></div> <div><div>Building Shell &amp; Foundation</div><div>\$88,614.40</div></div> <div><div>Roof Replacement</div><div>\$48,160</div></div> <div><div>Other Permanent Flooring</div><div>\$36,601.60</div></div> <div><div>Electrical System</div><div>\$27,740.16</div></div> <div><div>Plumbing — Bathroom Fixtures</div><div>\$15,411.20</div></div> <div><div>Windows</div><div>\$11,558.40</div></div> <div><div>Doors</div><div>\$9,632</div></div> <div><div>Plumbing — Water &amp; Waste Utility</div><div>\$5,393.92</div></div> <div><div>Permanent Lighting</div><div>\$5,393.92</div></div> <div><div>Bathroom Vanities</div><div>\$4,623.36</div></div> <div><div>HVAC System</div><div>\$4,238.08</div></div> <div><div>+ 1 more (see §8-B)</div></div> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|              |               |             |                 |
|--------------|---------------|-------------|-----------------|
| 5-YEAR SHARE | 15-YEAR SHARE | \$179 SHARE | 27.5-YEAR SHARE |
| 8.0%         | 4.0%          | 2.0%        | 86.0%           |

● CPA-VERIFIED

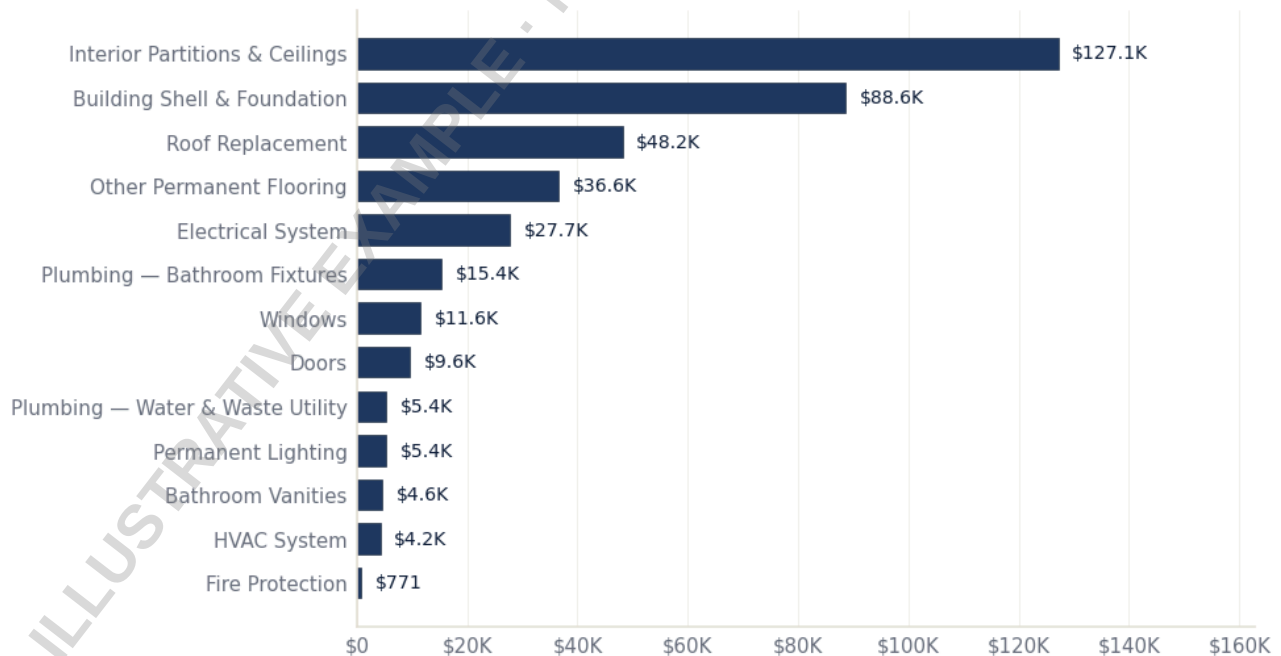
## 8 · C · 2 Component Allocation Charts

Each chart shows the per-component allocation within a single MACRS class for this property. Bar lengths are proportional to allocated cost; labels show the line-item amounts. Class titles carry the class basis and depreciation treatment.



## 27.5-Year Residential Rental — \$385,280

SL · mid-month convention



CPA-VERIFIED

## 8 • D Top 10 Components by Allocated Cost

Sorted descending. Bar length is proportional to allocated cost; bar color denotes MACRS class. The top 10 components account for \$388,192 (86.7%) of total depreciable basis.

|    |                                |  |              |      |
|----|--------------------------------|--|--------------|------|
| 01 | Interior Partitions & Ceilings |  | \$127,142.40 | 27.5 |
| 02 | Building Shell & Foundation    |  | \$88,614.40  | 27.5 |
| 03 | Roof Replacement               |  | \$48,160     | 27.5 |
| 04 | Other Permanent Flooring       |  | \$36,601.60  | 27.5 |
| 05 | Electrical System              |  | \$27,740.16  | 27.5 |
| 06 | Kitchen Cabinetry & Millwork   |  | \$16,235.52  | 5    |
| 07 | Plumbing — Bathroom Fixtures   |  | \$15,411.20  | 27.5 |
| 08 | Windows                        |  | \$11,558.40  | 27.5 |
| 09 | Doors                          |  | \$9,632      | 27.5 |
| 10 | Removable Flooring             |  | \$7,096.32   | 5    |

TOP-10 SHARE OF BASIS

**\$388,192**

86.7% OF \$448,000 TOTAL

TOP-10 SHORT-LIFE SHARE

**\$23,332**

5/15-YR + §179 IN TOP 10

■ 5-Year

■ 15-Year

■ §179

■ 27.5-Year

## 8 • E Building Systems Allocation (TD 9636)

The Tangible Property Final Regulations — promulgated as **Treasury Decision 9636 (Sept. 17, 2013)** — require a building owner to perform unit-of-property analysis at the building-system level when evaluating future capital expenditures against the "repair" standard of Treas. Reg. §1.263(a)-3. The same regulations specify the nine systems used for that analysis at §1.263(a)-3(e)(2)(ii):

- HVAC system
- Escalators
- Security system
- Plumbing system
- Elevators
- Gas distribution system
- Electrical system
- Fire protection & alarm
- Other structural components

Recharacterizing the property's depreciable basis through these systems serves two future tax positions: (i) it supports capital-vs-expense determinations on subsequent maintenance work by establishing the unit of property each replacement is being measured against, and (ii) it creates the documentation needed to claim a partial-asset-disposition deduction under Treas. Reg. §1.168(i)-8 when an individual component is later replaced. Without a per-system allocation, the taxpayer would typically forfeit the loss on the disposed component's remaining basis.

| TD 9636 SYSTEM               | DEPRECIABLE COST | % OF BUILDING COST |
|------------------------------|------------------|--------------------|
| HVAC                         | \$3,226          | 0.7%               |
| Plumbing                     | \$21,146         | 4.7%               |
| Electrical                   | \$35,661         | 8.0%               |
| Fire Protection & Alarm      | \$582            | 0.1%               |
| Security                     | \$0              | —                  |
| Other / Structural           | \$387,386        | 86.5%              |
| <b>Total Allocated Basis</b> | <b>\$448,000</b> | <b>100.0%</b>      |

### NOT APPLICABLE TO RESIDENTIAL RENTAL

Escalators, Elevators, and Gas Distribution systems are not applicable to this property archetype and are intentionally omitted. Commercial property archetypes are not in scope for residential v1. Cost columns reflect depreciable allocation only; a "replacement cost" column is intentionally omitted.

## USE OF THIS ALLOCATION

When the taxpayer later replaces a component within one of these systems — for example, replacing the HVAC condenser, re-roofing, or repaving a parking pad — this allocation is the basis for two filing-time determinations:

## CAPITAL VS EXPENSE

Under *Treas. Reg. §1.263(a)-3*, an expenditure is capitalized if it (i) results in a betterment, (ii) restores the unit of property, or (iii) adapts the property to a new or different use. The unit-of-property test is applied at the system level, not at the whole-building level. A new HVAC condenser replacing the old one is evaluated against the HVAC system; a new roof against the building structure; new exterior lighting against the electrical system. **This allocation makes those tests possible.**

## PARTIAL-ASSET DISPOSITION

Under *Treas. Reg. §1.168(i)-8*, the taxpayer may make an election to claim a deductible loss on the un-depreciated basis of the disposed component (for example, the old roof that was torn off). **Without a documented per-system or per-component basis, the disposition election is generally not available** because the disposed component's adjusted basis cannot be determined.

*The §1.168(i)-8 partial-disposition election routinely converts what would otherwise be sunk capital into a current-year ordinary deduction — but only where the per-component basis exists in the workpapers.*

— TREAS. REG. §1.168(I)-8 • TD 9689 (2014)

## § 9 Depreciation Schedules

10-YEAR SIDE-BY-SIDE

Side-by-side comparison of the first 10 years of depreciation under straight-line 27.5-year residential rental (without cost segregation) versus cost segregation. The incremental benefit accumulates in the early years and narrows in later years as cost segregation front-loads the deductions that would otherwise be spread across 27.5 years.

### A • WITHOUT COST SEGREGATION

| YEAR            | DEPRECIATION |
|-----------------|--------------|
| Year 1          | \$6,109      |
| Year 2          | \$16,291     |
| Year 3          | \$16,291     |
| Year 4          | \$16,291     |
| Year 5          | \$16,291     |
| Year 6          | \$16,291     |
| Year 7          | \$16,291     |
| Year 8          | \$16,291     |
| Year 9          | \$16,291     |
| Year 10         | \$16,291     |
| Total (10-year) | \$152,728    |

### B • WITH COST SEGREGATION

| YEAR            | DEPRECIATION |
|-----------------|--------------|
| Year 1          | \$49,695     |
| Year 2          | \$14,010     |
| Year 3          | \$14,010     |
| Year 4          | \$14,010     |
| Year 5          | \$14,010     |
| Year 6          | \$14,010     |
| Year 7          | \$14,010     |
| Year 8          | \$14,010     |
| Year 9          | \$14,010     |
| Year 10         | \$14,010     |
| Total (10-year) | \$191,737    |

Year 1 with-cost-seg figure of \$49,695 includes \$32,256 of §168(k) bonus depreciation on 5-Year and 15-Year property and the remaining first-year MACRS amounts on each class. Years 2–10 reflect remaining 27.5-Year SL depreciation only — short-life classes have already been fully recovered through bonus.

• CPA-VERIFIED

C • INCREMENTAL BENEFIT

| YEAR                 | ADDITIONAL DEPRECIATION |
|----------------------|-------------------------|
| Year 1               | \$43,586                |
| Year 2               | \$-2,281                |
| Year 3               | \$-2,281                |
| Year 4               | \$-2,281                |
| Year 5               | \$-2,281                |
| Year 6               | \$-2,281                |
| Year 7               | \$-2,281                |
| Year 8               | \$-2,281                |
| Year 9               | \$-2,281                |
| Year 10              | \$-2,281                |
| Cumulative (10-year) | \$39,009                |

CUMULATIVE INCREMENTAL DEDUCTION • 10-YEAR

\$39,009

Y1 ACCEL • NEGATIVE Y2-10 • NET POSITIVE

Y1 ACCELERATION

+\$43,586

Y2-10 REVERSAL • PER YEAR

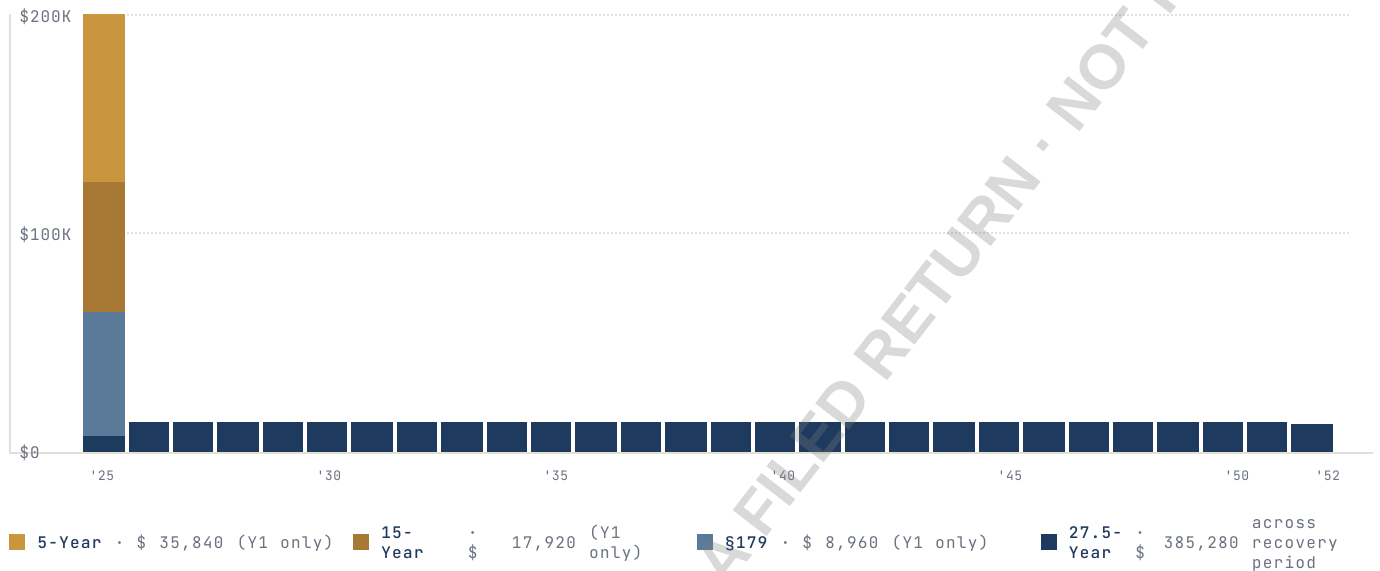
\$-2,281

TIMING BENEFIT, NOT INCREMENTAL DOLLARS

The negative Year 2-10 incremental deductions reflect the fact that bonus depreciation has front-loaded basis recovery into Year 1. Total recovery over the 28-year schedule is identical to without-cost-seg (\$448,000); the cost-seg benefit is the time value of taking deductions sooner. See §9-D for the full 28-year schedule and PV analysis.

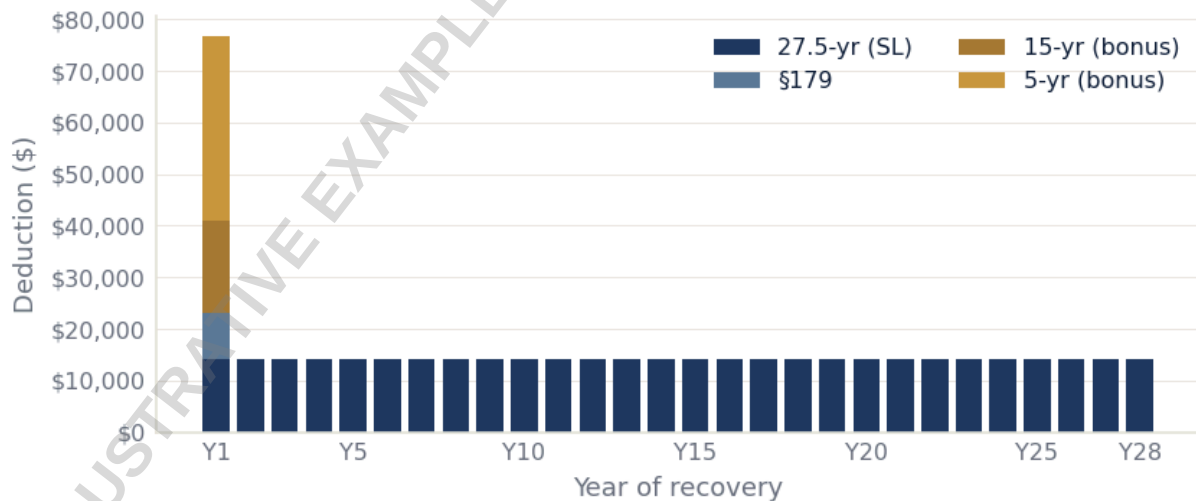
## 9 • A Annual Depreciation by Asset Class

28-year horizon, by MACRS class. The Y1 spike comprises \$168(k) bonus on the 5-Year and 15-Year property plus \$179 immediate expense; subsequent years are residual 27.5-Year SL depreciation.



## 9 • B Combined Annual Depreciation (Stacked View)

Same data, expressed as cumulative depreciation across the 28-year horizon.



Y1 STACKED TOTAL

**\$49,695**

5+15+\$179+27.5 • INCL. BONUS

Y10 CUMULATIVE

**\$191,737**

42.8% OF TOTAL BASIS RECOVERED

Y28 CUMULATIVE

**\$448,000**

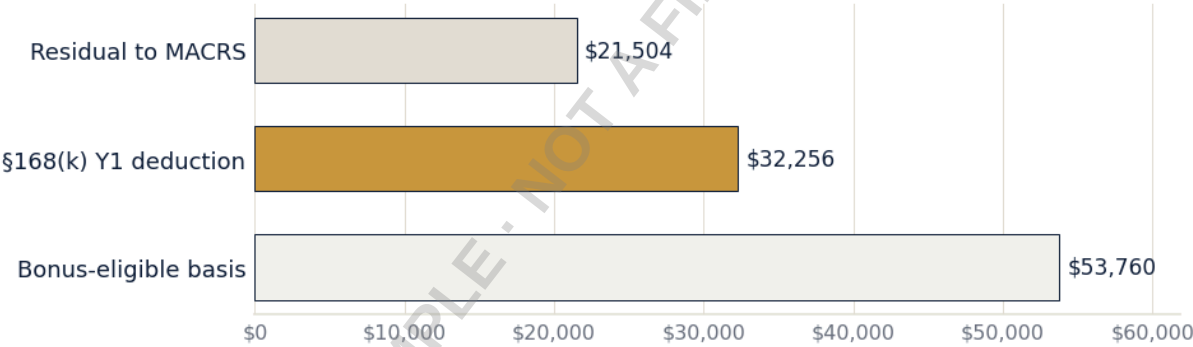
100% • END OF RECOVERY

9 • C Bonus Depreciation Analysis

Section 168(k) of the Internal Revenue Code allows an additional first-year depreciation deduction (commonly called "bonus depreciation") for property with a recovery period of 20 years or less. The Tax Cuts and Jobs Act (TCJA) of 2017 set the §168(k) bonus rate at 100% for property placed in service from September 28, 2017 through 2022, with a phase-down beginning in 2023 (80% for 2023, 60% for 2024). For this property (placed in service 2024), the §168(k) bonus rate in effect under the TCJA schedule is 60.0%.

| BONUS-ELIGIBLE BASIS                                  | BONUS RATE · TCJA §168(K)           | Y1 BONUS DEDUCTION                     |
|-------------------------------------------------------|-------------------------------------|----------------------------------------|
| <b>\$32,256</b><br>5-YR (\$35,840) + 15-YR (\$17,920) | <b>60.0%</b><br>PIS AUGUST 20, 2024 | <b>\$32,256</b><br>FULL ELIGIBLE BASIS |

Bonus Year-1 deduction of \$32,256 = \$53,760 eligible × 60.0% bonus rate. This amount is included in the Year 1 deduction figure shown in the Executive Summary. 27.5-year structural property is not eligible for §168(k) bonus depreciation.



STACKING WITH §179

The §179 election is taken first (subject to the active-trade-or-business income limitation, \$8,960 in this study); §168(k) bonus is then applied to the remaining basis in the bonus-eligible classes. Federal law treats §179 and §168(k) as additive within their respective classes. State conformity may decouple from one or both regimes — see §11 State Conformity for state treatment.

AUTHORITIES     §168(k) as enacted by TCJA §13201 (12/22/2017) · §168(k)(2)(D) definition of qualified property · TCJA phase-down at §168(k)(6)(B) for transition cases.

## §168(K) BONUS DEPRECIATION RATE HISTORY

The §168(k) bonus depreciation rate has changed several times since the Tax Cuts and Jobs Act (TCJA) of 2017 introduced the 100% first-year bonus. The TCJA scheduled a phase-down beginning in 2023; the One Big Beautiful Bill Act (OBBBA), signed July 4, 2025, permanently restored 100% bonus depreciation for property both acquired and placed in service after January 19, 2025:

|                      |      |                                                                                                                         |
|----------------------|------|-------------------------------------------------------------------------------------------------------------------------|
| SEP 27, 2017 – 2022  | 100% | TCJA · Tax Cuts and Jobs Act of 2017 introduces full first-year bonus.                                                  |
| 2023                 | 80%  | TCJA phase-down · first reduction step.                                                                                 |
| 2024                 | 60%  | TCJA phase-down · second reduction step. <i>Applies to this study.</i>                                                  |
| JAN 1 – JAN 19, 2025 | 40%  | TCJA transition · phase-down step for property that does not qualify for OBBBA.                                         |
| 2026                 | 20%  | TCJA phase-down (residual) · property acquired and/or placed in service before Jan 20, 2025 stays on the TCJA schedule. |
| 2027 ONWARD          | 0%   | TCJA phase-down (residual) · final step — no bonus for residual-TCJA property placed in service in 2027 or later.       |
| JAN 20, 2025 ONWARD  | 100% | OBBBA · permanent · 100% bonus restored for property both acquired and placed in service after Jan 19, 2025.            |

## TRANSITION RULE

Property placed in service Jan 1–19, 2025, OR acquired (binding contract signed) on or before Jan 19, 2025, remains on the TCJA phase-down schedule (40% / 20% / 0% for 2025 / 2026 / 2027). All other property acquired and placed in service on or after January 20, 2025 qualifies for permanent 100% bonus depreciation under OBBBA.

## 9 • D Full 28-Year Depreciation Schedule

Year-by-year depreciation under the cost-segregation classifications in this study, in a single consolidated view. Each row aligns to a calendar year beginning at the placed-in-service year. The **Bonus (Y1)** column is a memo breakout of the §168(k) bonus depreciation already included in the 5-Year and 15-Year Y1 amounts; it is shown so the taxpayer's preparer can identify the bonus component when completing Form 4562.

| YEAR       | 5-YEAR   | 15-YEAR  | BONUS Y1 | §179    | 27.5-YEAR | TOTAL     | CUMULATIVE | TAX EFFECT | PV @ 8% |
|------------|----------|----------|----------|---------|-----------|-----------|------------|------------|---------|
| 2024 · PIS | \$21,504 | \$10,752 | \$53,760 | \$8,960 | \$5,254   | \$46,470  | \$46,470   | —          | —       |
| 2025       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$60,480   | —          | —       |
| 2026       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$74,490   | —          | —       |
| 2027       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$88,500   | —          | —       |
| 2028       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$102,510  | —          | —       |
| 2029       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$116,520  | —          | —       |
| 2030       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$130,530  | —          | —       |
| 2031       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$144,540  | —          | —       |
| 2032       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$158,550  | —          | —       |
| 2033       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$172,560  | —          | —       |
| 2034       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$186,570  | —          | —       |
| 2035       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$200,580  | —          | —       |
| 2036       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$214,590  | —          | —       |
| 2037       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$228,600  | —          | —       |
| 2038       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$242,610  | —          | —       |
| 2039       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$256,620  | —          | —       |
| 2040       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$270,630  | —          | —       |
| 2041       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$284,640  | —          | —       |
| 2042       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$298,650  | —          | —       |
| 2043       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$312,660  | —          | —       |
| 2044       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$326,670  | —          | —       |
| 2045       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$340,680  | —          | —       |
| 2046       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$354,690  | —          | —       |
| 2047       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$368,700  | —          | —       |
| 2048       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$382,710  | —          | —       |
| 2049       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$396,720  | —          | —       |
| 2050       | —        | —        | —        | —       | \$14,010  | \$14,010  | \$410,730  | —          | —       |
| 2051       | —        | —        | —        | —       | \$15,766  | \$15,766  | \$426,496  | —          | —       |
| Total      | \$35,840 | \$17,920 | \$53,760 | \$8,960 | \$385,280 | \$448,000 | —          | —          | —       |

**BONUS Y1** column is a memo of §168(k) bonus depreciation already included in the 5-Year + 15-Year Y1 amounts (highlighted gold) — not additive. **TAX EFFECT** applies the federal marginal rate of 37.0% to the difference between with-cost-seg and straight-line 27.5-year baseline. **PV @ 8%** — present value of cumulative tax effect at 8.0% annual discount rate (v6 model default; rerunning with a different rate scales PV proportionally).

CPA-VERIFIED

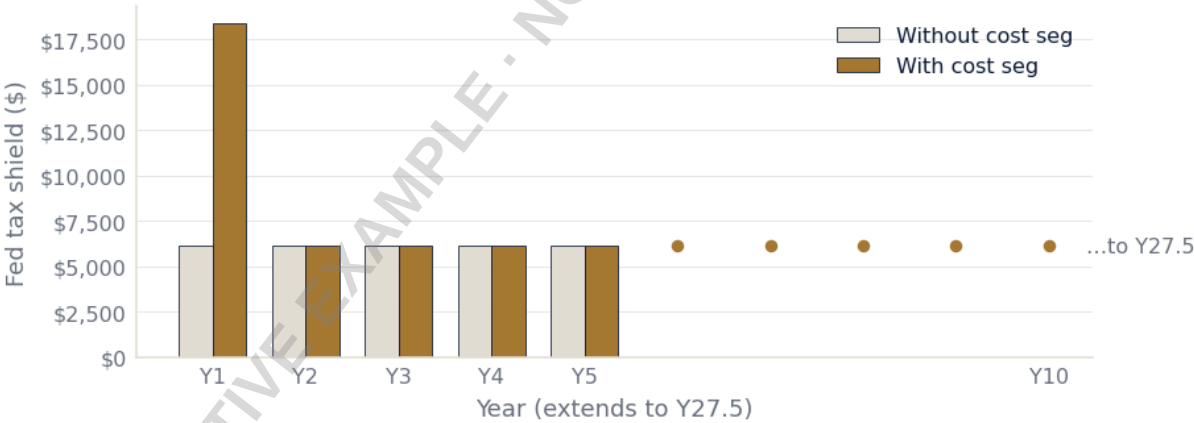
§ 10 Tax Impact Summary

YEAR-1 FEDERAL & STATE

The cost segregation deductions claimed in Year 1 reduce taxable income by \$49,695 at the federal level. Applied against the taxpayer's assumed federal marginal rate of 37.0%, this produces a federal tax shield of \$18,387. State-level treatment depends on the state's §168(k) conformity (see §11 State Conformity).

Year-1 Tax Impact Detail

| METRIC                                  | VALUE    |
|-----------------------------------------|----------|
| Year 1 federal deduction                | \$49,695 |
| Federal marginal rate assumed           | 37.0%    |
| Federal Year 1 tax shield               | \$18,387 |
| State marginal rate assumed (Tennessee) | 0%       |
| State Year 1 tax shield                 | \$0      |
| Total Year 1 tax benefit                | \$18,387 |



STATE-RATE METHODOLOGY

State marginal rate is the top marginal income tax bracket for the customer's state (sourced from 7\_State\_Conformity.column D in the v6 model). 0% for no-income-tax states (AK, FL, NH, NV, SD, TN, TX, WA, WY). The customer's effective state rate may differ from the top bracket; the state-shield figure shown here is the upper-bound benefit. **State §168(k) conformity further limits the Y1 deduction recognized for state purposes** – see the State Adjusted Depreciation Schedule for the detailed federal-vs-state comparison and addback recovery math.

§ 11

State Conformity

TENNESSEE • §168(K) NO INDIVIDUAL INCOME TAX

For CSL — residential rental owners holding property in their OWN name pay ZERO TN tax (no individual income tax). Only matters if held via LLC/corp subject to F&E. TN explicitly does NOT follow OBBBA bonus restoration to 100% — stays on TCJA schedule (TY 2025 = 40%). Also does NOT allow bonus for OBBBA §168(n) QPP.

| ITEM                                | FEDERAL (IRC)         | TENNESSEE                              |
|-------------------------------------|-----------------------|----------------------------------------|
| §168(k) bonus depreciation          | 60.0% (TCJA)          | No individual income tax               |
| §179 expensing cap (annual)         | \$1,220,000 (TY 2024) | Same as federal                        |
| 5-Year MACRS — recovery method      | 200% DB               | State-specific (confirm with preparer) |
| 15-Year — recovery method           | 150% DB               | State-specific (confirm with preparer) |
| 27.5-Year residential rental — life | 27.5 yr SL            | State-specific (confirm with preparer) |

STATE §179 CAP IMPACT

The federal §179 election in this study is \$8,960. The Tennessee state-level §179 cap is Same as federal. Where the state cap is lower than the federal election, the difference recovers via state-only depreciation under regular MACRS conventions over the applicable class life.

State Bonus Conformity — National Reference Map

Four classifications of state §168(k) conformity, sourced from the v6 model's 50-state table. Tax preparation must apply the rule for the customer's filing state, not the property location, where these differ. Tennessee falls in the "No individual income tax" group.

|                                                                                                                                           |                                                                                  |                                                                                                                                                             |                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <div>FULL CONFORMITY</div> <div>16</div> <div>AL • CO • DE • IA • IL • KS<br/>• LA • MO • MT • ND • NE •<br/>NM • OK • OR • UT • WV</div> | <div>PARTIAL / ADDBACK</div> <div>6</div> <div>ID • MD • MI • MN • NC • OH</div> | <div>DECOUPLED</div> <div>20</div> <div>AR • AZ • CA • CT • DC • GA<br/>• HI • IN • KY • MA • ME •<br/>MS • NJ • NY • PA • RI • SC<br/>• VA • VT • WI</div> | <div>NO INDIVIDUAL INCOME TAX</div> <div>9</div> <div>AK • FL • NH • NV • SD • TN<br/>• TX • WA • WY</div> |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|

CPA-VERIFIED

11 • A State-Adjusted Depreciation Schedule

The schedule below summarizes the Year-1 federal-vs-state depreciation comparison for Tennessee. State §168(k) conformity status: **No individual income tax**. Tennessee does not impose an individual income tax; no state-level depreciation adjustments apply.

| ITEM                                              | FEDERAL Y1 | TENNESSEE Y1 | ADDBACK |
|---------------------------------------------------|------------|--------------|---------|
| 5-Year property (with 60.0% bonus federal)        | \$35,840   | \$21,504     | \$0     |
| 15-Year property (with 60.0% bonus federal)       | \$17,920   | \$10,752     | \$0     |
| §179 election (federal vs state cap)              | \$8,960    | \$8,960      | \$0     |
| 27.5-Year residential rental (typically conforms) | \$5,254    | \$5,254      | \$0     |
| Total Year 1 MACRS depreciation                   | \$46,470   | \$46,470     | \$0     |

|                                                      |                                            |
|------------------------------------------------------|--------------------------------------------|
| TENNESSEE Y1 ADDBACK (STATE TAXABLE INCOME INCREASE) | TENNESSEE Y1 FEDERAL-STATE DELTA           |
| \$0                                                  | \$46,470 - \$46,470                        |
| RECOVERS OVER ASSET LIFE • STATE-ONLY DEPR.          | STATE DEPRECIATION DEDUCTION               |
|                                                      | \$46,470                                   |
|                                                      | Est. Tennessee tax savings (0% rate) • \$0 |

The state-only depreciation table is included in the v6 model output; only the Year-1 totals are shown in this workpaper. The customer's CPA receives the full state schedule alongside the federal schedule when filing the state return.

|             |                                                                                                                                                                                                                                  |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AUTHORITIES | State of Tennessee — confirm specific §168(k) conformity, addback reporting line items, and §179 cap with the taxpayer's state preparer at filing time. State conformity may differ from the federal treatment shown in §§ 8-11. |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

• CPA-VERIFIED

§ 12 Taxpayer-Provided Evidence Registry

INPUT FINGERPRINTS & PROVENANCE

Every numeric input materially affecting the allocation is logged with its source and a provenance fingerprint at study time. Sources are categorized as *Taxpayer Certified* (declared by the taxpayer at intake), *Database / Modeled* (derived from the cost-segregation library), *Public Record* (county assessor or comparable public source), and *Photo Verified* (corroborated against uploaded property photos when applicable).

| INPUT                          | VALUE                                     | SOURCE              | VERIFICATION |
|--------------------------------|-------------------------------------------|---------------------|--------------|
| Property address               | Gatlinburg, TN                            | Taxpayer-certified  | VERIFIED     |
| Total acquisition basis        | \$640,000                                 | Taxpayer-certified  | VERIFIED     |
| Land allocation                | \$192,000 (30.00%)                        | County assessor     | PUBLIC       |
| Building basis (depreciable)   | \$448,000                                 | Computed            | DERIVED      |
| Placed-in-service date         | August 20, 2024                           | Taxpayer-certified  | VERIFIED     |
| Property type                  | Single-Family Residence                   | Taxpayer-certified  | VERIFIED     |
| Construction type              | Existing-purchase (acquired property)     | Taxpayer-certified  | VERIFIED     |
| Square footage                 | 2,000 sqft                                | Taxpayer-certified  | VERIFIED     |
| Number of bedrooms / bathrooms | 3 / 3.0                                   | Taxpayer-certified  | VERIFIED     |
| Lot size                       | —                                         | County assessor     | PUBLIC       |
| Climate zone                   | Tennessee                                 | NREL CBECS          | DERIVED      |
| Allocation library version     | v6 • Residential Cost-Seg Library 2025-Q2 | CostSegLogic engine | VERSIONED    |

Photo / Document Attachments

Photos and supporting documents collected at intake are referenced in the allocation analysis. This CPA-Verified study includes a licensed-CPA documentation review — the curated property photo log and invoice cross-reference appendix are provided in the CPA-Verified pack at the end of this workpaper. Study reference: SCN SCN-SAMPLE-361-EP-CPA.

PROVENANCE FINGERPRINT • MODEL RUN  
MODEL: v6 • costseglogic-engine-residential-2025q2  
FINGERPRINT: 9f2e4a7c8b5d1e6f3a8c9b2d7e4f1a3c • sha256-trunc  
RUN ID: run-May062026-customer  
OUTPUT VERSION: cpa-verified-v1  
DATA INPUTS: 20 of 20 confirmed • 0 estimated

## § 13 Recommended Site Documentation

AUDIT-DEFENSE DOCUMENTATION KIT

The following site-level documentation, while not required for the residual-method allocation in this study, strengthens audit-defense posture if maintained alongside this workpaper. None of these items are produced by CostSegLogic; they are taxpayer- or contractor-sourced and held in the taxpayer's records.

| DOCUMENT                                | PURPOSE                                                                                                                                  | PRIORITY |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------|
| <b>Property photo log</b>               | Interior + exterior photos of permanent improvements (cabinets, flooring, landscaping). Time-stamped at study date.                      | HIGH     |
| <b>Closing statement (HUD-1 / ALTA)</b> | Confirms the total acquisition basis and closing-cost capitalization treatment used in §3.                                               | HIGH     |
| <b>Construction contracts</b>           | Final contractor agreement(s) and invoices for new construction or major renovation. Supports the §168(k)-eligible-basis figure.         | HIGH     |
| <b>Property assessor records</b>        | Most recent county assessor record for land-vs-improvement allocation (the 30.00% land split in §3 is sourced from this).                | STANDARD |
| <b>Blueprint or architectural plans</b> | Building floor plan and elevation drawings. Supports the per-component allocation in §8-B.                                               | STANDARD |
| <b>Change-order log</b>                 | If a renovation or post-PIS improvement occurred, the change-order log identifies which components were added or replaced.               | STANDARD |
| <b>Appraisal report</b>                 | If a contemporaneous appraisal was performed, it can corroborate the land vs improvement split independent of the assessor.              | OPTIONAL |
| <b>Pre-renovation photos</b>            | For renovation scenarios only: pre-work photos document what was demolished vs retained, supporting partial-asset-disposition elections. | OPTIONAL |

All HIGH-priority items should be retained as long as the property is held + 7 years post-disposition to support the §168(i)-8 partial-asset-disposition election framework. STANDARD items are recommended but not strictly required for residual-method audit-defense.

The following actions complete the filing process. Items 1–3 are taxpayer responsibilities; items 4–7 are CPA / preparer responsibilities. Item 8 covers the future-year compliance hooks established by this workpaper.

**1 Provide this workpaper to your tax preparer (CPA, EA, or other licensed professional)**

Forward the entire 49-page PDF, not extracts. The schedules in §9 and §11 are the inputs your preparer needs to populate Form 4562 and any state addback schedules.

**2 Confirm passive-activity loss eligibility (§469) with your CPA**

If real-estate-professional status (REPS) does not apply and the property is passive, the Year-1 deduction may be limited and suspended losses carried forward. Confirm *before* assuming the full Y1 tax shield is currently usable.

**3 Retain this workpaper with your tax records for the property's life + 7 years**

The §168(i)-8 partial-asset-disposition election relies on the per-component basis schedule in this workpaper; it must be available when a future replacement is performed.

**4 CPA — Form 4562 line preparation**

Lines 14 (§168(k) bonus), 12 (§179 election), 17–20 (MACRS classes). Use the §9-D 28-year schedule to confirm Year-1 amounts for each class.

**5 CPA — State addback (Tennessee · No individual income tax)**

Tennessee does not impose an individual income tax; no state-level adjustments apply — see §11-A.

**6 CPA — Form 3115 evaluation (if PIS year < current year)**

For PIS year ≤ TY 2024, a Form 3115 §481(a) automatic accounting-method change is required to claim catch-up depreciation (DCN 7). For PIS year = TY 2025, 3115 is not needed; deductions flow on the timely-filed return.

**7 Document review — assumptions & representations**

Confirm the §14 assumptions against the taxpayer's facts. Confirm the §15 representations are accurate as of the placed-in-service date and the filing date.

**8 Future years — recapture & partial-asset-disposition**

If the property is sold within 5 years, the 5-Year and 15-Year property is subject to *§1245 recapture* at ordinary rates on accelerated portion only. CostSegLogic offers a \$99 recapture-on-sale memo when needed; reference SCN SCN-SAMPLE-361-EP-CPA.

## § 14 Assumptions

ALL MATERIAL ASSUMPTIONS FOR REVIEW

The figures throughout this workpaper depend on the following material assumptions. Each is sourced and labelled with the page where it is consumed downstream. If any assumption is incorrect for the taxpayer's facts, the corresponding line items must be reconsidered before filing.

| ASSUMPTION                          | VALUE                        | SOURCE & DOWNSTREAM IMPACT                                                                                        |
|-------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------------------------|
| Federal marginal tax rate           | 37.0%                        | Highest individual bracket; assumed unless confirmed otherwise. Drives §10 tax-shield.                            |
| State marginal tax rate (Tennessee) | 0%                           | Top state bracket. Drives §11-A state-shield.                                                                     |
| Discount rate for PV calc           | 8.0%                         | v6 model default. Drives §9-D PV column.                                                                          |
| Active T-or-B for §179              | Yes                          | Required for §179 election; if false, §179 amount must be recharacterized as MACRS.                               |
| Material-participation status       | Active / non-passive         | Drives §469 PAL applicability. If passive, Y1 benefit is potentially deferred.                                    |
| Real-estate-professional status     | Not assumed                  | If REPS qualifies, full Y1 deduction is currently usable against ordinary income.                                 |
| Bonus depreciation election         | Default • accept             | §168(k) is automatic unless taxpayer elects out. Election out requires written election with timely-filed return. |
| §179 election                       | Default • accept             | Federal §179 of \$8,960 is elected. State conformity: No individual income tax; state §179 cap Same as federal.   |
| Property holding period             | ≥ 5 years                    | Affects §1245 recapture exposure on 5-Yr and 15-Yr property at sale.                                              |
| Allocation library                  | Residential ADU v6 • 2025-Q2 | Library version pinned; updates do not retroactively apply to this study.                                         |

## IF ANY ASSUMPTION IS WRONG

Contact CostSegLogic support with the corrected values. The model is rerun and a v2 of this workpaper issued at no charge within 14 days of original delivery for assumption corrections. Beyond 14 days, re-issue is treated as a new study.

## § 15 Representations

CERTIFIED AT INTAKE

The taxpayer has certified the following representations to CostSegLogic at intake. The model output in §§ 8–11 is conditional on each representation being accurate as of the placed-in-service date. False or materially inaccurate representations invalidate the conclusions of this study.

- 01 **Title.** Taxpayer is the legal owner of record of the subject property as of the placed-in-service date and at the time of this filing, and holds the property in the entity identified in §1.
- 02 **Acquisition cost.** The total acquisition basis of \$640,000 represents the actual cost paid, including capitalized closing costs and any capitalized improvements completed prior to placed-in-service.
- 03 **Land allocation.** The land allocation of \$192,000 (30.00%) is supported by either the most recent county assessor allocation, an appraisal, or an arms-length purchase price allocation. Where the assessor allocation is materially below market, an appraisal-based allocation has been used.
- 04 **Placed-in-service date.** The property was placed in service for use as a rental on August 20, 2024. "Placed in service" means available for use; rental advertising and active marketing alone are not sufficient if the property is not yet habitable.
- 05 **Use.** The property is used as a residential rental dwelling unit and not as a primary residence, second home, or short-term-rental subject to non-passive treatment under Treas. Reg. §1.469-1T(e)(3)(ii)(A).
- 06 **Scenario basis.** The basis represents the Existing Purchase scenario as identified on the cover, §3 Executive Summary, and §7 Property Details. The customer affirms the scenario classification (existing purchase, new construction, renovation, or look-back §481(a) catch-up) is correct for the property's actual disposition.
- 07 **No prior cost-seg study.** No prior cost segregation study has been performed on this property; no §168(i)-8 partial-asset-disposition elections have been claimed against this basis.
- 08 **No related-party financing.** Acquisition financing is not from a related party such that §267 disallowance or §263A interest-capitalization rules would alter the depreciable basis.
- 09 **Tax positions.** Taxpayer will consult a licensed CPA, EA, or tax professional before filing the return on which this workpaper is relied upon. Taxpayer accepts that CostSegLogic does not file the return, sign Form 4562, or represent the taxpayer in audit.
- 10 **Audit support.** Taxpayer agrees to retain this workpaper and the supporting attachments for the property's life plus 7 years and to provide them on request to a CPA, the IRS, or any state taxing authority.

TAXPAYER SIGNATURE

DATE PLACED IN SERVICE

PRINT NAME • ENTITY TITLE • DATE

CONFIRM MATCHES §1

## § 16 Disclaimers

LIMITATIONS &amp; SCOPE OF WORK

### A • Scope of work

CostSegLogic has prepared a residual-method cost segregation study (per IRS ATG Chapter 4) using the taxpayer-certified inputs identified in §12 Evidence Registry. The study has not included a site visit; engineering observations of physical components were not performed; invoice-level review was not performed.

### B • Not tax advice

CostSegLogic is not a CPA firm, law firm, or enrolled agent. This workpaper is a numerical computation, prepared as a tool for the taxpayer and the taxpayer's licensed tax preparer. Nothing in this document constitutes tax, legal, accounting, or investment advice. Taxpayer must obtain independent professional advice before relying on these figures.

### C • Reliance & representations

All conclusions are conditional on the accuracy of taxpayer-certified inputs at §12 Evidence Registry and the representations at §15. CostSegLogic has not verified the inputs against original source documents (deeds, invoices, appraisals, blueprints) and accepts the taxpayer's certification as received.

### D • Audit support

This CPA-Verified study includes signed CPA review and an audit-defense letter on request. If the IRS or any state taxing authority opens an audit of this study, CostSegLogic will respond to taxpayer's CPA or counsel within 5 business days with a packet containing the model run, fingerprints, and methodology references, and the signed CPA attestation in the CPA-Verified pack supports the positions taken.

### E • Limitation of liability

CostSegLogic's aggregate liability for any claim arising from this workpaper is limited to the fees paid for this study. CostSegLogic specifically disclaims liability for tax penalties, interest, additional tax, or third-party claims that depend on (i) facts not in CostSegLogic's possession at study time, (ii) post-study changes in law, (iii) inaccuracies in taxpayer-certified inputs, or (iv) treatment of the study by any subsequent preparer that diverges from the conclusions herein.

### F • Circular 230 disclosure

*To ensure compliance with requirements imposed by IRS Circular 230, any U.S. federal tax advice contained in this document is not intended or written to be used, and cannot be used, by any taxpayer for the purpose of avoiding tax-related penalties under the Internal Revenue Code. This statement is provided to comply with applicable practice standards.*

## A Input Data

FULL INTAKE RECORD · 20 FIELDS

Complete intake record for this study. Each field shows its label, value, and verification source. Taxpayer-certified fields are accepted as-is per §15; database/derived fields are computed from the v6 allocation library; public-record fields are sourced from county assessor or comparable open records.

| #  | FIELD                           | VALUE                                                           | SOURCE       |
|----|---------------------------------|-----------------------------------------------------------------|--------------|
| 01 | Taxpayer / Entity               | Demo Holdings LLC                                               | CERTIFIED    |
| 02 | Property address                | Gatlinburg, TN                                                  | CERTIFIED    |
| 03 | APN / parcel number             | —                                                               | COUNTY       |
| 04 | Property type                   | Single-Family Residence · existing-purchase (acquired property) | CERTIFIED    |
| 05 | Square footage                  | 2,000 sqft                                                      | CERTIFIED    |
| 06 | Bedrooms / bathrooms            | 3 / 3.0                                                         | CERTIFIED    |
| 07 | Lot size                        | —                                                               | COUNTY       |
| 08 | Year of construction            | 2021                                                            | CERTIFIED    |
| 09 | Construction type               | Existing-purchase (acquired property)                           | CERTIFIED    |
| 10 | Total acquisition basis         | \$640,000                                                       | CERTIFIED    |
| 11 | Land allocation                 | \$192,000 (30.00%)                                              | COUNTY       |
| 12 | Building basis (depreciable)    | \$448,000                                                       | DERIVED      |
| 13 | Placed-in-service date          | August 20, 2024                                                 | CERTIFIED    |
| 14 | Federal marginal rate (assumed) | 37.0%                                                           | DEFAULT      |
| 15 | State marginal rate (Tennessee) | 0%                                                              | STATE DOR    |
| 16 | State §168(k) conformity        | No individual income tax                                        | STATE DOR    |
| 17 | Active T-or-B for §179          | Yes (assumed)                                                   | DEFAULT      |
| 18 | §179 federal cap (TY 2024)      | \$1,220,000                                                     | IRC          |
| 19 | §179 state cap (Tennessee)      | Same as federal                                                 | STATE DOR    |
| 20 | Allocation library version      | v6 · Residential Cost-Seg Library 2025-Q2                       | COSTSEGLOGIC |

## TIER-SPECIFIC DOCUMENTATION DEPTH

This CPA-Verified study includes a licensed-CPA documentation review: invoice cross-reference appendix, curated property photo log (8–12 captioned photos), blueprint verification pass, and contractor change-order log, together with the signed CPA attestation in the CPA-Verified pack at the end of this workpaper. The residual-method allocation is complete on its own; the CPA review deepens audit-defense without changing the underlying numbers.

B

Glossary

PLAIN-LANGUAGE TAX TERMS

|                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| §168(k) — Bonus depreciation                      | An additional first-year depreciation deduction available for qualifying property with a recovery period of 20 years or less. Currently 100% under OBBBA (2025) for property both acquired and placed in service after Jan 19, 2025.                                                                                                                                                                               |
| §179 — Election to expense                        | An election to deduct the cost of qualifying tangible personal property in the year placed in service rather than depreciating it. Subject to a federal annual cap and a phaseout above a threshold of qualifying property; some states (notably California and New Jersey) cap their §179 election at \$25,000 vs the \$2.5M federal limit. See §11 State Conformity for the customer's state-specific treatment. |
| §469 — Passive activity loss (PAL)                | Limits the deductibility of losses from passive rental activities against non-passive (active) income. Real-estate-professional status (REPS) is the principal exception; without REPS, accelerated losses may be suspended and carried forward.                                                                                                                                                                   |
| §481(a) adjustment                                | The catch-up depreciation amount that is included in income (or deducted) when an accounting method change is made under Form 3115. Used for PIS years before the current year to claim missed depreciation in the year of the change.                                                                                                                                                                             |
| §1245 recapture                                   | On sale, gain attributable to depreciation taken on personal property (5-Yr, 15-Yr) is recaptured at ordinary rates rather than capital-gains rates. Cost segregation accelerates the depreciation that becomes subject to this recapture; the dollar amount recaptured does not exceed accelerated depreciation taken.                                                                                            |
| §1250 unrecaptured gain                           | For 27.5-Yr structural property, depreciation recapture on sale is taxed at a maximum 25% rate (vs. 37%+ ordinary). The cost-seg short-life classes do not affect §1250 directly.                                                                                                                                                                                                                                  |
| ATG — Audit Technique Guide                       | An IRS internal manual providing examination guidance to revenue agents. Cost segregation ATG (Chapter 4 — Cost Segregation Methodologies, residual method) is the primary procedural authority for residential cost-seg studies.                                                                                                                                                                                  |
| MACRS — Modified Accelerated Cost Recovery System | The IRS depreciation regime introduced in 1986 (TRA-86). Uses class lives, declining-balance methods (200% / 150% DB), straight-line crossover, and half-year / mid-month conventions.                                                                                                                                                                                                                             |
| Mid-month convention                              | For residential rental property (27.5-yr SL), the property is treated as placed in service at the midpoint of the month of actual placed-in-service. Year-1 depreciation is therefore prorated.                                                                                                                                                                                                                    |
| PIS — Placed in service                           | The date the property is available and ready for its intended use. For residential rental, this is generally the date the unit is habitable and offered for rent — not the date of close, completion, or first tenant occupancy.                                                                                                                                                                                   |
| Residual method                                   | The cost segregation methodology recommended by ATG Ch. 4 for residential studies: identify and value the personal-property and land-improvement components; the residual is allocated to 27.5-yr structural. Used in this workshop.                                                                                                                                                                               |
| SL • DB • 200% • 150%                             | Depreciation methods. <b>SL</b> = straight-line (equal annual amounts). <b>DB</b> = declining balance, applied at 200% (5-Yr) or 150% (15-Yr) of the straight-line rate, with crossover to SL when SL produces a larger deduction.                                                                                                                                                                                 |
| TD 9636                                           | Treasury Decision 9636 (Sept. 17, 2013) — the Tangible Property Final Regulations governing capital-vs-expense determinations and partial-asset-disposition elections. The nine-systems allocation in §8-E supports both.                                                                                                                                                                                          |
| SCN — Study Control Number                        | CostSegLogic's internal identifier for this study. The SCN is included on every page footer; reference it when contacting support.                                                                                                                                                                                                                                                                                 |

C FAQ MOST-ASKED QUESTIONS

**Q • Can my CPA file my return without me?**

Yes. This workpaper is for your CPA's use; you don't need to do anything with the schedules personally. Forward this PDF along with your other return-preparation materials.

**Q • Does this study guarantee my deduction will be allowed?**

No. CostSegLogic does not guarantee any tax position. The figures here are computed using a methodology aligned with the IRS Cost Segregation ATG; final allowance depends on accurate inputs, applicable law at the time of filing, and the preparer's exercise of professional judgment.

**Q • What's the difference between Standard and CPA-Verified tiers?**

CPA-Verified (\$1,199) adds: signed CPA review of the workpaper, audit-defense letter on request, photo log, blueprint cross-reference, and 12-month assumption-correction window. Standard tier is the same engine output without the signed review and extended support.

**Q • What if the IRS audits my return?**

CostSegLogic will respond within 5 business days with a model-run packet (fingerprint, methodology refs, allocation library version) for your CPA's use. This CPA-Verified study additionally includes a signed audit-defense letter.

**Q • I'm selling the property — what happens to the deductions I took?**

The accelerated depreciation on 5-Yr and 15-Yr property is subject to §1245 recapture at ordinary rates on sale. The 27.5-Yr structural is §1250 (max 25% rate). CostSegLogic offers a \$99 recapture-on-sale memo that quantifies this in advance. Reference your SCN.

**Q • I made a mistake on my intake — can the study be redone?**

Yes. Within 14 days of original delivery, we re-issue the workpaper at no charge for assumption corrections. Reference your SCN. Beyond 14 days, the re-issue is treated as a new study.

**Q • Can this be used for a property placed in service in a prior year?**

Yes. For prior-year PIS, your CPA files Form 3115 with §481(a) catch-up adjustment (DCN 7) on the current-year return. No amended returns are required.

**Q • My CPA says they'd prefer a different methodology. What should I do?**

Forward this workpaper to your CPA and ask which lines they would like reconsidered. We accommodate methodology preferences (e.g., excluding §179, electing out of bonus) within 14 days at no charge. Reference your SCN.



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REFERENCE

SCN SCN-  
SAMPLE-  
361-EP-  
CPA

§  
11-B

## State Adjusted Depreciation Schedule

TENNESSEE • NO STATE INCOME TAX

Year-by-year federal vs. Tennessee depreciation comparison. Tennessee is classified as **No state income tax** with respect to §168(k) bonus depreciation. The *addback* column shows the timing-difference dollar amount that must be added back on the state return each year — positive in early years where federal accelerates, negative in later years as the state continues to depreciate after the federal residual is exhausted. Net of all years, the addback nets to approximately zero: cost segregation is a federal-vs-state timing difference, not a permanent benefit difference.

| YEAR       | FEDERAL DEPR. | TN DEPR. | ADDBACK | FEDERAL SHIELD | TN SHIELD |
|------------|---------------|----------|---------|----------------|-----------|
| 2024 • PIS | \$46,470      | \$46,470 | —       | \$17,194       | \$0       |
| 2025       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2026       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2027       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2028       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2029       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2030       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2031       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2032       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2033       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2034       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2035       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2036       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2037       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2038       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2039       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2040       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2041       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2042       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2043       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2044       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |
| 2045       | \$14,010      | \$14,010 | —       | \$5,184        | \$0       |

Continued on next page (years 2047–2052 and totals).

§  
11·B  
(cont.)

## State Adjusted Schedule • Continuation

YEARS 2047-2052 + 28-YEAR TOTALS

| YEAR        | FEDERAL DEPR. | TN DEPR.  | ADDBACK | FEDERAL SHIELD | TN SHIELD | COMBINED SHIELD |
|-------------|---------------|-----------|---------|----------------|-----------|-----------------|
| 2046        | \$14,010      | \$14,010  | —       | \$5,184        | \$0       | \$5,184         |
| 2047        | \$14,010      | \$14,010  | —       | \$5,184        | \$0       | \$5,184         |
| 2048        | \$14,010      | \$14,010  | —       | \$5,184        | \$0       | \$5,184         |
| 2049        | \$14,010      | \$14,010  | —       | \$5,184        | \$0       | \$5,184         |
| 2050        | \$14,010      | \$14,010  | —       | \$5,184        | \$0       | \$5,184         |
| 2051        | \$15,766      | \$15,766  | —       | \$5,833        | \$0       | \$5,833         |
| 28-YR TOTAL | \$426,496     | \$426,496 | —       | \$157,811      | \$0       | \$157,811       |

**Reading this schedule.** Federal marginal rate 37.0%; TN top marginal rate 0% (top bracket — the taxpayer's effective state rate may differ). The "Addback" column equals federal depreciation minus state depreciation per year. State §179 expense is computed at the state recognition factor times federal §179; for states with low §179 caps (CA \$25k, NJ \$25k), the actual state §179 may be capped lower — confirm the cap with the state preparer. State-level addback recovery for the bonus portion varies by state-prescribed schedule and is approximated here using the same MACRS rates as the federal schedule.

### 11·B·i Tax Filing Considerations

#### 1. State Schedule M-style addback line.

Most non-conforming states require an addition modification to federal taxable income on the state return for the portion of bonus depreciation not allowed at the state level. The 2024 addback of \$0 reconciles to the M-1 / M-2 equivalent on the Tennessee return schedule.

#### 2. State recovery in years 2-N.

Negative addback amounts in later years represent the state's continued depreciation of the deferred bonus basis after the federal schedule is exhausted on those components. These are subtraction modifications on the state return.

#### 3. Net-zero over the recovery period.

Total federal-vs-state addback nets to ≈\$0 (rounding) over 28 years. The state recovers the same dollar basis as the federal schedule; only the timing differs.

## § 18

## CPA Review Note

LIMITED-SCOPE REASONABLENESS REVIEW

REVIEWED &amp; SIGNED · JUNE 26, 2026

## 18·A Scope of Review

The undersigned has reviewed the key assumptions and elections underlying this cost segregation study for reasonableness in the context of the property and tax characteristics provided by the taxpayer. *This review does not constitute an audit, examination, or assurance engagement*, and does not independently verify the taxpayer-provided inputs.

Based on this review, the key assumptions underlying the study appear reasonable; the §168(k) bonus rate applied is consistent with the phase-down schedule in effect at the property's placed-in-service date; the asset class allocation is consistent with industry-standard residential rental cost segregation practice; and the methodology cited (Residual Estimation Approach with Cost Estimation Using Industry Databases) is an ATG-recognized approach.

## 17·B Items the Taxpayer Should Confirm with Their Preparer Before Filing

## 1. Activity classification (Active vs. Passive) under §469.

Real estate professional status (REPS) or short-term rental with material participation is required for current-year loss recognition without §469 limitation. If the activity is passive, current-year deductions may be limited and carried forward.

## 2. §179 election eligibility &amp; the active-trade-or-business income limitation.

Confirm before claiming the §179 bucket. Passive investors do not benefit from §179. The §179 cap and active-trade limitation apply at the taxpayer level, not the property level.

## 3. State filing &amp; §168(k) addback rules.

Apply the state-specific addback schedule for the placed-in-service state — see § 11 State Conformity and the State Adjusted Depreciation Schedule for the federal-vs-state timing reconciliation. Confirm any state §179 cap that may differ from the federal cap.

## 4. Basis &amp; at-risk limitations under §§465, 1366.

Deductibility of any resulting loss is limited to the taxpayer's adjusted basis and at-risk amount in the activity. Confirm the taxpayer's basis schedule before applying the Year 1 deduction shown in the Tax Impact Summary.

REVIEWED BY

Limited-Scope Reviewer

JUNE 26, 2026

Limited-scope reasonableness review per AR-C §60. Not an audit, examination, or assurance engagement.

ENGAGEMENT REFERENCE

CSL-CPA-SCN-SAMPLE-361-EP-CPA

STUDY DATE JUNE 26, 2026 · PIS AUGUST 20, 2024

Property: Gatlinburg, TN · Taxpayer: Demo Holdings LLC · Tier: CPA-Verified

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## Allocation Method Tables

MODELED — ARCHETYPE RESIDUAL REFERENCE

These percentages are a modeled archetype-residual reference, not the taxpayer's asserted allocation. Each percentage represents the share of the class basis a component would carry under the Residual Estimation Approach (ATG Ch. 4) with Cost Estimation Using Industry Databases, calibrated to the property archetype and the building grade declared in § 7 Property Details. They are reproduced for reviewer transparency and do not override any taxpayer-provided actuals in § 8-B.

## D • 1 5-Year Personal Property — Within-Class Allocation

\$35,840 • 8.0% OF BASIS • IRS CLASS 57.0

| IRS CLASS | COMPONENT                               | SOURCE                      | WITHIN-CLASS % | ALLOCATED \$ | METHOD  |
|-----------|-----------------------------------------|-----------------------------|----------------|--------------|---------|
| 57.0      | Appliances                              | Modeled — Archetype Library | 5.9%           | \$2,114.56   | 200% DB |
| 57.0      | Appliance Wiring                        | Modeled — Archetype Library | 5.6%           | \$2,007.04   | 200% DB |
| 57.0      | Kitchen Cabinets & Countertops          | Modeled — Archetype Library | 45.3%          | \$16,235.52  | 200% DB |
| 57.0      | Kitchen & Appliance Plumbing            | Modeled — Archetype Library | 7.8%           | \$2,795.52   | 200% DB |
| 57.0      | Blinds & Curtains                       | Modeled — Archetype Library | 3.4%           | \$1,218.56   | 200% DB |
| 57.0      | Removable Flooring                      | Modeled — Archetype Library | 19.8%          | \$7,096.32   | 200% DB |
| 57.0      | Decorative Lighting                     | Modeled — Archetype Library | 2.7%           | \$967.68     | 200% DB |
| 57.0      | Furniture & Fixtures (Asset Class 57.0) | Modeled — Archetype Library | 7.5%           | \$2,688      | 200% DB |
| 57.0      | Specialty Technology / A/V              | Modeled — Archetype Library | 2.0%           | \$716.80     | 200% DB |

## D • 2 15-Year Land Improvements — Within-Class Allocation

\$17,920 • 4.0% OF BASIS • IRS CLASS 00.3

| IRS CLASS | COMPONENT          | SOURCE                      | WITHIN-CLASS % | ALLOCATED \$ | METHOD  |
|-----------|--------------------|-----------------------------|----------------|--------------|---------|
| 00.3      | Landscaping        | Modeled — Archetype Library | 35.0%          | \$6,272      | 150% DB |
| 00.3      | Paving & Driveways | Modeled — Archetype Library | 30.0%          | \$5,376      | 150% DB |
| 00.3      | Fencing            | Modeled — Archetype Library | 15.0%          | \$2,688      | 150% DB |
| 00.3      | Site Lighting      | Modeled — Archetype Library | 10.0%          | \$1,792      | 150% DB |
| 00.3      | Outdoor Structures | Modeled — Archetype Library | 10.0%          | \$1,792      | 150% DB |

SAMPLE — ILLUSTRATIVE EXAMPLE · NOT A FILED RETURN · NOT FOR TAX FILING

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(cont.) **Allocation • 27.5-Year Residential &  
\$179**

RESIDUAL + IMMEDIATE-EXPENSE ELECTION

D • 3 **27.5-Year Residential Rental — Within-Class Allocation**

\$385,280 • 86.0% OF BASIS • IRS CLASS 45.0

| IRS CLASS | COMPONENT                        | SOURCE                      | WITHIN-CLASS % | ALLOCATED \$ | METHOD  |
|-----------|----------------------------------|-----------------------------|----------------|--------------|---------|
| 45.0      | Building Shell & Foundation      | Modeled — Archetype Library | 23.0%          | \$88,614.40  | SL • MM |
| 45.0      | Roof Structure                   | Modeled — Archetype Library | 7.5%           | \$28,896     | SL • MM |
| 45.0      | Roof Covering                    | Modeled — Archetype Library | 5.0%           | \$19,264     | SL • MM |
| 45.0      | Interior Partitions & Ceilings   | Modeled — Archetype Library | 33.0%          | \$127,142.40 | SL • MM |
| 45.0      | Doors                            | Modeled — Archetype Library | 2.5%           | \$9,632      | SL • MM |
| 45.0      | Windows                          | Modeled — Archetype Library | 3.0%           | \$11,558.40  | SL • MM |
| 45.0      | Bathroom Vanities                | Modeled — Archetype Library | 1.2%           | \$4,623.36   | SL • MM |
| 45.0      | Other Permanent Flooring         | Modeled — Archetype Library | 9.5%           | \$36,601.60  | SL • MM |
| 45.0      | Plumbing — Bathroom Fixtures     | Modeled — Archetype Library | 4.0%           | \$15,411.20  | SL • MM |
| 45.0      | Plumbing — Water & Waste Utility | Modeled — Archetype Library | 1.4%           | \$5,393.92   | SL • MM |
| 45.0      | Electrical Service & Wiring      | Modeled — Archetype Library | 7.2%           | \$27,740.16  | SL • MM |
| 45.0      | Permanent Lighting               | Modeled — Archetype Library | 1.4%           | \$5,393.92   | SL • MM |
| 45.0      | HVAC System                      | Modeled — Archetype Library | 1.1%           | \$4,238.08   | SL • MM |
| 45.0      | Fire Protection                  | Modeled — Archetype Library | 0.2%           | \$770.56     | SL • MM |

D • 4 **\$179 Immediate-Expense Election**

\$8,960 • 2.0% OF BASIS • \$179(a)

The \$179 bucket is the qualifying personal-property carve-out the taxpayer elects to expense in Year 1 under §179(a), subject to the active-trade-or-business income limitation. The \$8,960 allocation here represents the upper-bound election within the available 5-year property; the actual amount claimed must be further limited by the taxpayer's active business income for the year and by the \$179 cap in effect at filing.

| IRS CLASS | COMPONENT                | SOURCE                      | WITHIN-CLASS % | ALLOCATED \$ | METHOD  |
|-----------|--------------------------|-----------------------------|----------------|--------------|---------|
| n/a       | HVAC System (\$179)      | Modeled — Archetype Library | 50.0%          | \$4,480      | §179(a) |
| n/a       | Roof System (\$179)      | Modeled — Archetype Library | 35.0%          | \$3,136      | §179(a) |
| n/a       | Electrical Panel (\$179) | Modeled — Archetype Library | 15.0%          | \$1,344      | §179(a) |

**Reviewer note · §179 vs. §168(k).** Where both elections are available, §179 is generally preferred for taxpayers with sufficient active income because it does not require the asset to remain on the §168(k) bonus schedule. Passive investors cannot use §179 and should rely on §168(k) bonus depreciation alone for the same components.

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## Full Depreciation • Without Cost Segregation

SL-27.5 BASELINE • 28-YEAR HORIZON

Year-by-year depreciation under the SL-27.5 residential rental baseline, with no cost segregation applied. Mid-month convention places the property in service August 20, 2024. The full \$448,000 depreciable basis recovers ratably over 27.5 years.

| YEAR        | 27.5-YR SL DEPR. | CUMULATIVE | BASIS REMAINING | FEDERAL SHIELD (37.0%) |
|-------------|------------------|------------|-----------------|------------------------|
| 2024 • PIS  | \$8,824          | \$8,824    | \$439,176       | \$3,265                |
| 2025        | \$16,291         | \$25,115   | \$422,885       | \$6,028                |
| 2026        | \$16,291         | \$41,406   | \$406,594       | \$6,028                |
| 2027        | \$16,291         | \$57,697   | \$390,303       | \$6,028                |
| 2028        | \$16,291         | \$73,988   | \$374,012       | \$6,028                |
| 2029        | \$16,291         | \$90,279   | \$357,721       | \$6,028                |
| 2030        | \$16,291         | \$106,570  | \$341,430       | \$6,028                |
| 2031        | \$16,291         | \$122,861  | \$325,139       | \$6,028                |
| 2032        | \$16,291         | \$139,152  | \$308,848       | \$6,028                |
| 2033        | \$16,291         | \$155,443  | \$292,557       | \$6,028                |
| 2034        | \$16,291         | \$171,734  | \$276,266       | \$6,028                |
| 2035        | \$16,291         | \$188,025  | \$259,975       | \$6,028                |
| 2036        | \$16,291         | \$204,316  | \$243,684       | \$6,028                |
| 2037        | \$16,291         | \$220,607  | \$227,393       | \$6,028                |
| 2038        | \$16,291         | \$236,898  | \$211,102       | \$6,028                |
| 2039        | \$16,291         | \$253,189  | \$194,811       | \$6,028                |
| 2040        | \$16,291         | \$269,480  | \$178,520       | \$6,028                |
| 2041        | \$16,291         | \$285,771  | \$162,229       | \$6,028                |
| 2042        | \$16,291         | \$302,062  | \$145,938       | \$6,028                |
| 2043        | \$16,291         | \$318,353  | \$129,647       | \$6,028                |
| 2044        | \$16,291         | \$334,644  | \$113,356       | \$6,028                |
| 2045        | \$16,291         | \$350,935  | \$97,065        | \$6,028                |
| 2046        | \$16,291         | \$367,226  | \$80,774        | \$6,028                |
| 2047        | \$16,291         | \$383,517  | \$64,483        | \$6,028                |
| 2048        | \$16,291         | \$399,808  | \$48,192        | \$6,028                |
| 2049        | \$16,291         | \$416,099  | \$31,901        | \$6,028                |
| 2050        | \$16,291         | \$432,390  | \$15,610        | \$6,028                |
| 2051        | \$15,610         | \$448,000  | \$0             | \$5,776                |
| 28-yr Total | \$448,000        | —          | —               | \$165,760              |

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## Full Depreciation • With Cost Segregation

5-YR • 15-YR • §179 • 27.5-YR • W/ §168(K) BONUS

Year-by-year depreciation under the cost-segregation classifications. Year 1 stacks \$35,840 of 5-year personal property + \$17,920 of 15-year land improvements (both eligible for §168(k) at 60.0% bonus = \$53,760 bonus deduction) + \$8,960 of §179 expense + mid-month-convention 27.5-year recovery on the residual structural basis = **\$46,470 first-year deduction**.

| YEAR        | 5-YR     | 15-YR    | §179    | 27.5-YR   | TOTAL     | CUMULATIVE |
|-------------|----------|----------|---------|-----------|-----------|------------|
| 2024 • PIS  | \$21,504 | \$10,752 | \$8,960 | \$5,254   | \$46,470  | \$46,470   |
| 2025        | —        | —        | —       | \$14,010  | \$14,010  | \$60,480   |
| 2026        | —        | —        | —       | \$14,010  | \$14,010  | \$74,490   |
| 2027        | —        | —        | —       | \$14,010  | \$14,010  | \$88,500   |
| 2028        | —        | —        | —       | \$14,010  | \$14,010  | \$102,510  |
| 2029        | —        | —        | —       | \$14,010  | \$14,010  | \$116,520  |
| 2030        | —        | —        | —       | \$14,010  | \$14,010  | \$130,530  |
| 2031        | —        | —        | —       | \$14,010  | \$14,010  | \$144,540  |
| 2032        | —        | —        | —       | \$14,010  | \$14,010  | \$158,550  |
| 2033        | —        | —        | —       | \$14,010  | \$14,010  | \$172,560  |
| 2034        | —        | —        | —       | \$14,010  | \$14,010  | \$186,570  |
| 2035        | —        | —        | —       | \$14,010  | \$14,010  | \$200,580  |
| 2036        | —        | —        | —       | \$14,010  | \$14,010  | \$214,590  |
| 2037        | —        | —        | —       | \$14,010  | \$14,010  | \$228,600  |
| 2038        | —        | —        | —       | \$14,010  | \$14,010  | \$242,610  |
| 2039        | —        | —        | —       | \$14,010  | \$14,010  | \$256,620  |
| 2040        | —        | —        | —       | \$14,010  | \$14,010  | \$270,630  |
| 2041        | —        | —        | —       | \$14,010  | \$14,010  | \$284,640  |
| 2042        | —        | —        | —       | \$14,010  | \$14,010  | \$298,650  |
| 2043        | —        | —        | —       | \$14,010  | \$14,010  | \$312,660  |
| 2044        | —        | —        | —       | \$14,010  | \$14,010  | \$326,670  |
| 2045        | —        | —        | —       | \$14,010  | \$14,010  | \$340,680  |
| 2046        | —        | —        | —       | \$14,010  | \$14,010  | \$354,690  |
| 2047        | —        | —        | —       | \$14,010  | \$14,010  | \$368,700  |
| 2048        | —        | —        | —       | \$14,010  | \$14,010  | \$382,710  |
| 2049        | —        | —        | —       | \$14,010  | \$14,010  | \$396,720  |
| 2050        | —        | —        | —       | \$14,010  | \$14,010  | \$410,730  |
| 2051        | —        | —        | —       | \$15,766  | \$15,766  | \$426,496  |
| 28-yr Total | \$35,840 | \$17,920 | \$8,960 | \$385,280 | \$448,000 | —          |

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## 50-State §168(k) Conformity Matrix

AS OF REPORT DATE • CONFIRM WITH STATE PREPARER

Each cell shows the state, its §168(k) bonus-depreciation conformity classification, and the top marginal individual income-tax rate sourced from the v6 model's 50-state conformity table. **Full** = state allows federal §168(k) bonus in full; **Partial** = state allows a fractional amount with addback recovery; **None** = state disallows §168(k); **No tax** = no individual income tax.

|                                |                             |                               |                               |                            |
|--------------------------------|-----------------------------|-------------------------------|-------------------------------|----------------------------|
| <b>AK</b><br>NO TAX<br>0%      | <b>AL</b><br>FULL<br>5%     | <b>AR</b><br>NONE<br>3.9%     | <b>AZ</b><br>NONE<br>2.5%     | <b>CA</b><br>NONE<br>13.3% |
| <b>CO</b><br>FULL<br>4.4%      | <b>CT</b><br>NONE<br>6.99%  | <b>DC</b><br>NONE<br>10.75%   | <b>DE</b><br>FULL<br>6.6%     | <b>FL</b><br>NO TAX<br>0%  |
| <b>GA</b><br>NONE<br>5.19%     | <b>HI</b><br>NONE<br>11%    | <b>IA</b><br>FULL<br>3.8%     | <b>ID</b><br>PARTIAL<br>5.3%  | <b>IL</b><br>FULL<br>4.95% |
| <b>IN</b><br>NONE<br>3%        | <b>KS</b><br>FULL<br>5.58%  | <b>KY</b><br>NONE<br>4%       | <b>LA</b><br>FULL<br>3%       | <b>MA</b><br>NONE<br>9%    |
| <b>MD</b><br>PARTIAL<br>6.5%   | <b>ME</b><br>NONE<br>7.15%  | <b>MI</b><br>PARTIAL<br>4.25% | <b>MN</b><br>PARTIAL<br>9.85% | <b>MO</b><br>FULL<br>4.7%  |
| <b>MS</b><br>NONE<br>4.4%      | <b>MT</b><br>FULL<br>5.9%   | <b>NC</b><br>PARTIAL<br>4.25% | <b>ND</b><br>FULL<br>2.5%     | <b>NE</b><br>FULL<br>5.2%  |
| <b>NH</b><br>NO TAX<br>0%      | <b>NJ</b><br>NONE<br>10.75% | <b>NM</b><br>FULL<br>5.9%     | <b>NV</b><br>NO TAX<br>0%     | <b>NY</b><br>NONE<br>10.9% |
| <b>OH</b><br>PARTIAL<br>3.125% | <b>OK</b><br>FULL<br>4.75%  | <b>OR</b><br>FULL<br>9.9%     | <b>PA</b><br>NONE<br>3.07%    | <b>RI</b><br>NONE<br>5.99% |
| <b>SC</b><br>NONE<br>6%        | <b>SD</b><br>NO TAX<br>0%   | <b>TN</b><br>NO TAX<br>0%     | <b>TX</b><br>NO TAX<br>0%     | <b>UT</b><br>FULL<br>4.5%  |
| <b>VA</b><br>NONE<br>5.75%     | <b>VT</b><br>NONE<br>8.75%  | <b>WA</b><br>NO TAX<br>0%     | <b>WI</b><br>NONE<br>7.65%    | <b>WV</b><br>FULL<br>4.82% |
| <b>WY</b><br>NO TAX<br>0%      |                             |                               |                               |                            |

■ FULL CONFORMITY ■ PARTIAL / ADDBACK ■ NONE / DECOUPLED ■ NO INDIVIDUAL INCOME TAX

**Reviewer caveat.** Conformity classifications and top marginal rates are sourced from the v6 model's 50-state table as of the study date. State legislatures revisit §168(k) conformity periodically; the taxpayer's preparer should confirm the rule in effect at the time of filing for any state with addback recovery.