



# COST SEG SMART

Cost Segregation Study  
Short-Term Rental Property

**1847 Wears Valley Rd**  
Sevierville, TN 37862

Purchase Price

**\$450,000**

Depreciable Basis

**\$356,355**

Accelerated Asset Reclassification

**\$96,691**

Report Number

**CSS-20260425-65932**

Prepared for: Sample Report — Gatlinburg STR Investor

Study Date: April 25, 2026

**CONFIDENTIAL — FOR TAX PREPARATION PURPOSES ONLY**

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# Engineering Cost Segregation Report

CSS-WP-010

Dear Sample Report — Gatlinburg STR Investor,

Cost Seg Smart was engaged to perform an engineering cost segregation study for the property located at 1847 Wears Valley Rd, Sevierville, TN 37862.

The procedures involved an engineering cost analysis utilizing construction cost manuals, IRS asset classification guidance, and property characteristics derived from public records and taxpayer-provided information. This study was performed in accordance with the IRS Cost Segregation Audit Techniques Guide (ATG).

The key findings of the study identified a total of \$96,691 in accelerated depreciation, with \$71,272 classified as 5-year property and \$23,486 as 15-year property. The applicable bonus depreciation rate for assets placed in service in 2025 is 100%.

This study was conducted based on information provided by the taxpayer, and the results are subject to the accuracy of this data. The findings are contingent upon the taxpayer's specific circumstances and should be verified against any additional documentation available.

The scope of this study was limited to the identification and classification of assets for depreciation purposes and does not constitute a valuation. It is recommended that the findings be reviewed with a qualified tax advisor to ensure alignment with the taxpayer's overall tax strategy.

Report No.: CSS-20260425-65932

Sincerely,

Cost Seg Smart [costsegsmart.com](http://costsegsmart.com)

If your CPA has questions about this report, they can reach us directly at [support@costsegsmart.com](mailto:support@costsegsmart.com).

# 1. Executive Summary

## Short-Term Rental Property

CSS-WP-100

*The study identified \$96,691 of assets eligible for accelerated depreciation — 27.1% of the property's depreciable basis.*

The property located at 1847 Wears Valley Rd, Sevierville, TN 37862, is classified as a Residential Rental Property under IRC §168(e)(2), with a default recovery period of 27.5 years under the Modified Accelerated Cost Recovery System (MACRS). The purpose of this study is to identify and classify components of the property for accelerated depreciation.

In the context of a short-term rental (STR), material participation under IRC §469 is a relevant consideration, as is the analysis of furniture, fixtures, and equipment (FF&E;) due to the hospitality nature of the property. The study identified 27.1% of the property's depreciable basis as eligible for accelerated depreciation, reflecting the allocation of personal property and land improvements.

The property features three bedrooms and two and a half bathrooms, with unit-level components such as kitchen and bathroom fixtures contributing to the classification of personal property. This allocation is distinct from any common area systems, which are not applicable in this context.

### Scope of Work

This cost segregation study identifies property components eligible for accelerated depreciation under MACRS (IRC §168). The analysis applies an engineering cost approach using construction cost data, public records, and taxpayer-provided information, consistent with the IRS Cost Segregation Audit Techniques Guide (ATG).

All cost allocations represent estimates derived from construction cost data, property characteristics, and applicable tax guidance. This study does not constitute tax, legal, or accounting advice and should be reviewed by a qualified tax advisor prior to filing.

### Reclassification Results

Our analysis identified **\$96,691** (27.1% of depreciable basis) in building systems eligible for reclassification into shorter MACRS recovery periods.

This study identified **\$96,691** of building components eligible for shorter MACRS recovery periods, which may generate a first-year deduction of up to **\$96,691** assuming full expensing of eligible assets under IRC §168(k), subject to the taxpayer's individual tax circumstances.

### Tax Timing Impact

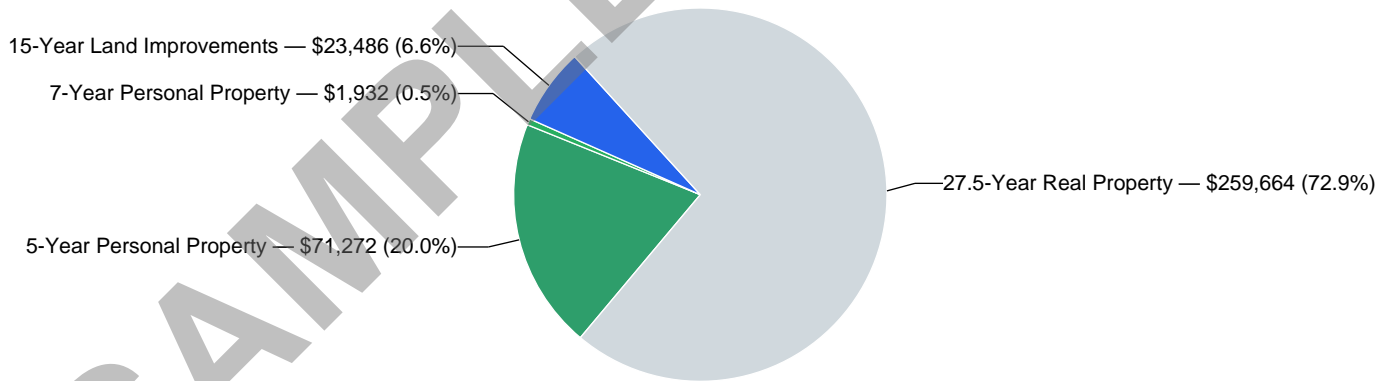
The placed-in-service year for this property is 2025, making it eligible for applicable bonus depreciation rate under IRC §168(k). This analysis assumes full expensing of eligible assets based on applicable bonus depreciation provisions, contingent upon current law for the placed-in-service year.

## Engineering Analysis Summary

Based on the wood frame residential construction typical of 2020-era builds in the Sevierville, TN market, our analysis identified component-level allocations consistent with properties of this age, construction class, and quality tier. This short-term rental property includes hospitality-grade furnishings, fixtures, and equipment (FF&E;) classified as 5-year personal property under Rev. Proc. 87-56. FF&E; items identified include furniture, electronics, linens, kitchen smallwares, and decorative items subject to accelerated recovery periods.

Metric	Value
Purchase Price	\$450,000
Land Value (Non-Depreciable)	\$93,645
<b>Total Depreciable Basis</b>	<b>\$356,355</b>
5-Year Personal Property	\$71,272 (20.0%)
15-Year Land Improvements	\$23,486 (6.6%)
27.5-Year Real Property	\$259,664 (72.9%)
<b>Total Accelerated Asset Reclassification</b>	<b>\$96,691 (27.1%)</b>

Depreciable Basis Allocation by MACRS Class



### Estimated First-Year Tax Savings (Full Expensing Assumed)

Tax Bracket	First-Year Deduction	Estimated Tax Savings
24%	\$96,691	\$23,206
32%	\$96,691	\$30,941
37%	\$96,691	\$35,776

Replacement Cost New (RCN) estimates were developed using industry construction cost databases and calibrated to the subject property's market-implied improvement value. The resulting cost allocation is reconciled to the taxpayer's depreciable basis of **\$356,355** so that all component-level costs collectively equal the recorded acquisition price less land value, consistent with cost approach methodology described in the IRS Cost Segregation Audit Techniques Guide (ATG). Modeled construction costs closely align with the transaction price, consistent with typical construction cost patterns for this property type and market.

### Industry Benchmarks

This study identified 27.1% accelerated depreciation, which falls within the commonly observed range of 25%-40% for comparable short-term rental properties of similar age and construction class.

This allocation profile is consistent with short-term rental properties of comparable size and vintage in the Sevierville market.

# Year 1 Tax Impact Analysis

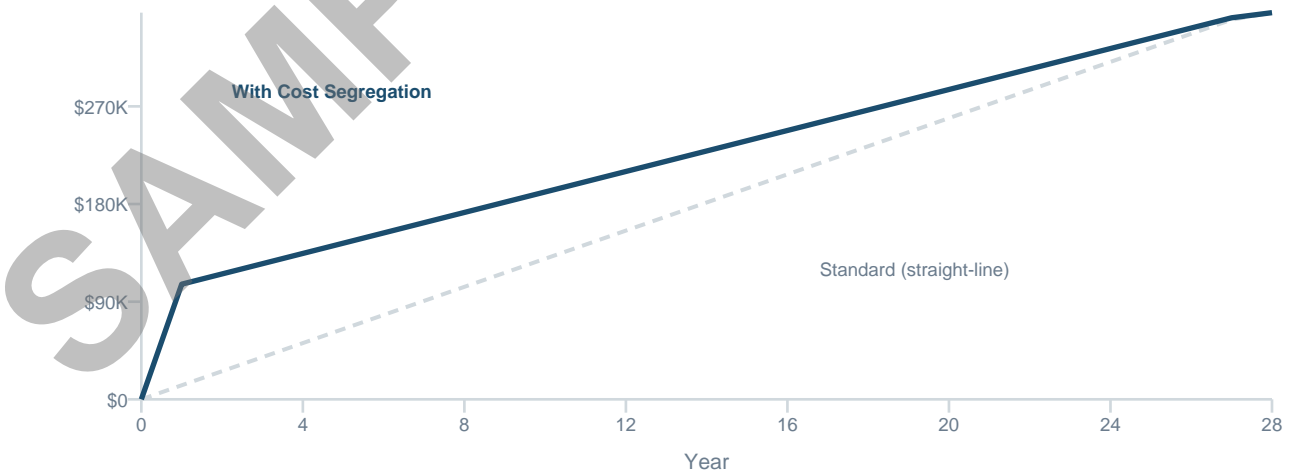
The following analysis compares first-year depreciation under standard straight-line treatment versus accelerated depreciation with cost segregation and applicable bonus depreciation provisions.

Scenario	Total Year 1 Depreciation (All Classes)
Without Cost Segregation	\$12,958 (straight-line: basis / 27.5)
<b>With Cost Segregation</b>	<b>\$106,133</b> (accelerated + remaining straight-line)
<b>Additional First-Year Benefit</b>	<b>\$93,175</b>

## Year 1 Depreciation Comparison



## Cumulative Depreciation Over Time



*Cost segregation accelerates depreciation into earlier years without changing total lifetime depreciation. The benefit derives from the time value of deductions.*

This analysis accelerates **\$93,175** of additional deductions into Year 1. Total lifetime depreciation remains unchanged; the benefit derives from timing.

## IRS Cost Segregation ATG Compliance

The following scorecard maps each IRS Audit Techniques Guide requirement to how this study satisfies it:

IRS ATG Requirement	How This Study Meets It
<b>Preparation by qualified individual</b>	Engineering cost approach applied using standardized cost data and classification rules
<b>Component identification</b>	52 components individually identified and classified
<b>Cost estimation method</b>	Engineering cost approach using construction cost data
<b>Legal authority citations</b>	IRC §§1245, 1250; Rev. Proc. 87-56; case law (Whiteco, Hospital Corp.)
<b>Reconciliation to basis</b>	All allocations reconcile to depreciable basis (\$0 variance)
<b>Asset classification rationale</b>	Written engineering rationale for each component category
<b>Depreciation schedules</b>	MACRS schedules provided for all recovery periods

*This study is designed to align with the documentation standards described in the IRS Cost Segregation Audit Techniques Guide.*

## Allocation Bridge

### Purchase Price to MACRS Classification

The following table presents a reconciliation of the total acquisition cost of the subject property to its classification under the Modified Accelerated Cost Recovery System (MACRS). This bridge illustrates how the depreciable basis is allocated across asset classes based on the analysis described in this report.

Step	Amount	Notes
<b>Purchase Price</b>	\$450,000	Total acquisition cost
Less: Land Value	(\$93,645)	Non-depreciable
<b>Depreciable Basis</b>	<b>\$356,355</b>	<b>Basis subject to depreciation</b>
5-Year Personal Property	\$71,272	Interior finishes, fixtures, removable components
7-Year Property	\$1,932	Equipment and specialized fixtures
15-Year Land Improvements	\$23,486	Site improvements, landscaping, hardscape
27.5-Year Real Property	\$259,664	Structural building components

<b>Total Allocated</b>	<b>\$356,355</b>	<b>Reconciles to depreciable basis</b>
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All component allocations reconcile exactly to the total depreciable basis of the property.

### Allocation Summary by Class

Asset Class	Amount	% of Basis
5-Year Property	\$71,272	20.0%
7-Year Property	\$1,932	0.5%
15-Year Property	\$23,486	6.6%
27.5-Year Property	\$259,664	72.9%
<b>Total</b>	<b>\$356,355</b>	<b>100.0%</b>

### Where the Depreciation Comes From



In comparable short-term rental properties, personal property and land improvement allocations commonly range from approximately 25% to 40% of depreciable basis, depending on finish quality, renovation scope, and property characteristics. This study identified 27.1% accelerated depreciation.

# CPA Quick-Reference Summary

## Property Facts

Property Address	1847 Wears Valley Rd, Sevierville, TN 37862
Property Type	Short-Term Rental
Year Built	2020
Purchase Price	\$450,000
Land Value (Non-Depreciable)	\$93,645
Depreciable Basis	<b>\$356,355</b>
Placed in Service	2025-06-15

## Basis Allocation Summary

Asset Class	Amount	% of Basis
5-Year Personal Property	\$71,272	20.0%
7-Year Personal Property	\$1,932	0.5%
15-Year Land Improvements	\$23,486	6.6%
27.5-Year Real Property	\$259,664	72.9%
<b>Total Accelerated Property</b>	<b>\$96,691</b>	<b>27.1%</b>

## Estimated Year-1 Depreciation (100% Bonus)

Asset Class	Accelerated Basis	Bonus Rate	Year-1 Deduction
5-Year Property	\$71,272	100%	\$71,272
7-Year Property	\$1,932	100%	\$1,932
15-Year Property	\$23,486	100%	\$23,486
<b>Total Year-1 Deduction</b>			<b>\$96,691</b>

## Estimated Tax Savings

Tax Bracket	Estimated Tax Savings

24%	\$23,206
32%	\$30,941
37%	\$35,776

Typical accelerated depreciation ranges for short-term rental properties constructed between 1980 and 2020 are approximately 25%–40% of depreciable basis. The **27.1%** allocation identified in this study falls within the expected range for properties of this type and construction class.

### Method Summary

- Engineering cost approach using construction cost data and public records
- Allocation based on IRS Cost Segregation Audit Techniques Guide (ATG)
- Asset classifications supported by IRC §168, Rev. Proc. 87-56, and relevant case law

# CPA Filing Sheet

**Property:** 1847 Wears Valley Rd, Sevierville, TN 37862  
**Placed in Service:** 2025-06-15  
**Total Depreciable Basis:** \$356,355

## Accelerated Asset Schedule

Asset Class	Amount	Recovery Period	Convention	Bonus Eligible
Personal Property	\$71,272	5 years	Half-year	Yes (100%)
Personal Property (7-yr)	\$1,932	7 years	Half-year	Yes (100%)
Land Improvements	\$23,486	15 years	Half-year	Yes (100%)
Building (27.5-yr)	\$259,664	27.5 years	Mid-month	No

## Depreciation Software Entry Instructions

Enter the following assets in your depreciation software (Lacerte, ProSeries, Drake, UltraTax, or equivalent):

### Asset 1 — Personal Property (5-Year)

Basis: \$71,272  
 Life: 5 years | Method: 200% DB | Convention: Half-year  
 Bonus Depreciation: 100%

### Asset 2 — Personal Property (7-Year)

Basis: \$1,932  
 Life: 7 years | Method: 200% DB | Convention: Half-year  
 Bonus Depreciation: 100%

### Asset 3 — Land Improvements (15-Year)

Basis: \$23,486  
 Life: 15 years | Method: 150% DB | Convention: Half-year  
 Bonus Depreciation: 100%

### Asset 4 — Building (27.5-Year)

Basis: \$259,664  
 Life: 27.5 years | Method: Straight-line | Convention: Mid-month  
 Bonus Depreciation: Not eligible

*Note: These entries reflect the reclassification identified in this study. The taxpayer should file Form 3115 (Change in Accounting Method) if the property was placed in service in a prior tax year. Consult with your tax advisor regarding the appropriate filing method.*

SAMPLE REPORT

## 2. Property Summary

CSS-WP-200

Property Detail	Information
Owner	Sample Report — Gatlinburg STR Investor
Property Address	1847 Wears Valley Rd, Sevierville, TN 37862
Property Type	Short-Term Rental
Date of Acquisition	2025-06-15
Placed in Service	2025-06-15
Purchase Price	\$450,000
Building Area	1,800 SF
Year Built	2020
Bedrooms / Bathrooms	3 BR / 2.5 BA
Construction Type	Wood Frame Residential
Property Features	Standard

### Property Classification

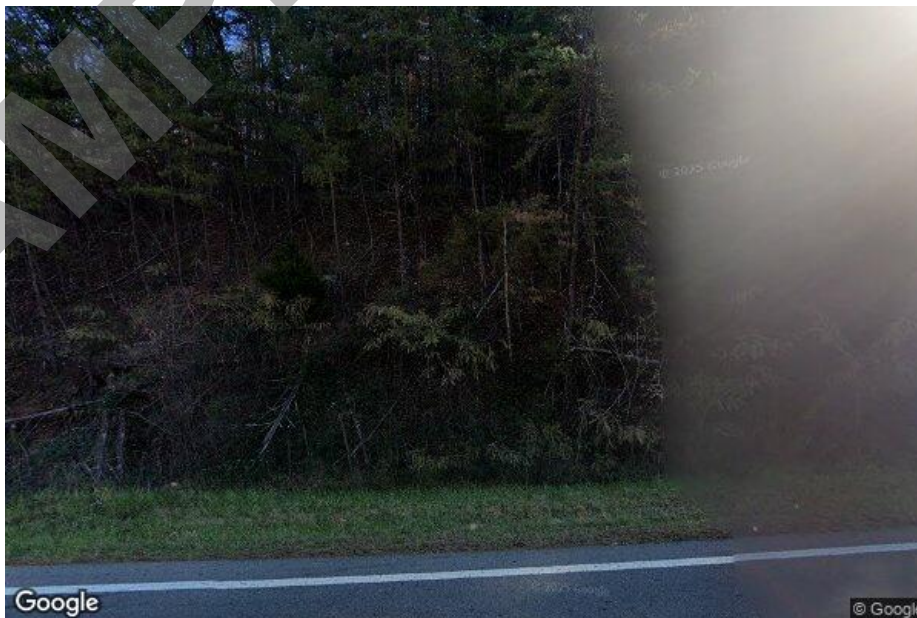
This property is classified as **Residential Rental Property** under IRC Section 168(e)(2)(A). The default recovery period for the building structure is **27.5 years** under the General Depreciation System (GDS) of MACRS. Through cost segregation, certain components are reclassified to shorter recovery periods as permitted by the Internal Revenue Code.

## Property Observation & Classification Support

Publicly available imagery and property data were reviewed to support identification of site improvements and non-structural components. These observations are used as supporting visual evidence in conjunction with cost modeling, public records, and taxpayer-provided information to inform component identification and classification decisions.



*Aerial view (based on available imagery) — visible site improvements include landscaped areas, hardscape, and paved surfaces. These features support classification of land improvements depreciated over 15 years under IRC §168(e)(4).*



*Street-level view (based on available imagery) — exterior finishes, site hardscape, and structural elements are visible. Structural components (roofing, framing, envelope) are classified as 27.5-year property; non-structural site elements are classified as 15-year land*

improvements.

### Observed Features — Tax Treatment Mapping

The following table maps observable property features to their tax classification as identified in this study. Classifications are based on the component's function, construction, and relationship to the building structure.

Observable Feature	Classification	Recovery	Rationale
Bedroom Furniture (Beds, Dressers, Nightstands)	Personal property	5-year	Non-structural, removable; not permanently affixed to building
Living Area Furniture (Sofas, Tables, Chairs)	Personal property	5-year	Non-structural, removable; not permanently affixed to building
Carpet & Pad	Personal property	5-year	Non-structural, removable; not permanently affixed to building
Wood Deck/Porch	Land improvement	15-year	Site improvement; not integral to building structure
Concrete Paving & Walks	Land improvement	15-year	Site improvement; not integral to building structure
Landscaping	Land improvement	15-year	Site improvement; not integral to building structure
Framing	Real property	27.5-year	Structural building component; inherently permanent

**Interpretation:** Observable site and exterior features support the presence of non-structural components that are separable from the building and appropriately classified as shorter-life property. These observations corroborate modeled allocations derived from cost estimation methods. Visual observations are consistent with the component allocations presented in Section 4 of this report.

*These observations are based on publicly available imagery and are used to support reasonable cost allocations. They do not constitute a physical inspection.*

## 3. Cost Allocation Summary

CSS-WP-210

\$96,691 of the property's \$356,355 depreciable basis was reclassified into shorter recovery periods.

The following table summarizes the allocation of the property's depreciable basis among the various MACRS recovery period categories. Components have been classified based on their function, construction, and relationship to the building per IRS guidelines.

Asset Category	IRS Recovery Period	Allocated Cost	% of Basis
Personal Property	5-Year MACRS	\$71,272	20.0%
Personal Property	7-Year MACRS	\$1,932	0.5%

<b>Land Improvements</b>	15-Year MACRS	\$23,486	6.6%
<b>Real Property (Building)</b>	27.5-Year Straight Line	\$259,664	72.9%
<b>Total Depreciable Basis</b>		<b>\$356,355</b>	<b>100.0%</b>
<b>Total Accelerated (Reclassified)</b>		<b>\$96,691</b>	<b>27.1%</b>

This study identifies shorter-life personal property and land improvements eligible for accelerated depreciation from the property's total depreciable basis. Modeled replacement cost components are reconciled to actual basis so that total allocated costs tie to the taxpayer's transaction price less land. Detailed component support appears in Sections 4 and 5; cost derivation methodology is documented in Appendix A.

### Key Accelerated Components

The following table summarizes the principal components reclassified to shorter recovery periods. Items below 1% of total accelerated basis are grouped into category subtotals.

Component	Allocated Cost	MACRS Class
Bedroom Furniture (Beds, Dressers, Nightstands)	\$12,078	5-Year
Living Area Furniture (Sofas, Tables, Chairs)	\$10,153	5-Year
Carpet & Pad	\$7,680	5-Year
Appliances	\$6,980	5-Year
Vinyl/Laminate Flooring	\$4,040	5-Year
Televisions & Electronics	\$3,690	5-Year
Light Fixtures	\$3,649	5-Year
Outdoor Furniture & Accessories	\$3,049	5-Year
Linens, Bedding & Towels	\$2,841	5-Year
Removable Kitchen Fixtures	\$2,440	5-Year
Kitchen Smallwares & Cookware	\$1,918	5-Year
Dining Furniture	\$1,824	5-Year
Window Treatments	\$1,711	5-Year
Bathroom Accessories & Fixtures	\$1,401	5-Year

Removable Laminate Surfaces	\$1,077	5-Year
Closet Shelving	\$1,059	5-Year
<i>Other 5-Year Components (8 items)</i>	\$5,683	5-Year
<b>Subtotal — 5-Year</b>	<b>\$71,272</b>	
Decorative Items & Artwork	\$1,932	7-Year
<b>Subtotal — 7-Year</b>	<b>\$1,932</b>	
Wood Deck/Porch	\$4,631	15-Year
Concrete Paving & Walks	\$4,452	15-Year
Landscaping	\$4,172	15-Year
Fencing	\$3,577	15-Year
Asphalt Paving	\$1,654	15-Year
Storm Drainage & Grading	\$1,488	15-Year
Irrigation System	\$1,307	15-Year
Exterior Lighting	\$1,125	15-Year
<i>Other 15-Year Components (2 items)</i>	\$1,080	15-Year
<b>Subtotal — 15-Year</b>	<b>\$23,486</b>	
<b>Total Accelerated (Reclassified)</b>	<b>\$96,691</b>	

### Property Characterization (IRC §1245 / §1250)

Asset Category	IRC Section	Recapture Treatment	Amount
5-Year Personal Property	§1245	Ordinary income recapture	\$71,272
7-Year Personal Property	§1245	Ordinary income recapture	\$1,932
15-Year Land Improvements	§1250	25% unrecaptured §1250 gain	\$23,486
27.5-Year Real Property	§1250	25% unrecaptured §1250 gain	\$259,664

### Tax Impact Analysis

Tax Scenario	Amount
Year 1 Depreciation WITHOUT Cost Segregation	\$12,958
<b>Year 1 Depreciation WITH Cost Segregation + 100% Bonus</b>	<b>\$106,133</b>
<b>Additional First-Year Deduction</b>	<b>\$93,175</b>
Estimated Federal Tax Reduction (37% marginal rate)	<b>\$34,475</b>
Estimated Federal Tax Reduction (32% marginal rate)	\$29,816
Estimated Federal Tax Reduction (24% marginal rate)	\$22,362

*Note: The reclassified asset total (\$96,691) differs from the additional first-year deduction (\$93,175) because these assets would have received \$3,516 in standard straight-line depreciation regardless of cost segregation.*

### First-Year Depreciation Comparison

Cost segregation increases first-year depreciation by \$93,175, concentrating the majority of tax benefits in Year 1 through bonus depreciation.



## 4. Detailed Component Breakdown

CSS-WP-220

35 components reclassified into accelerated categories; 17 structural components itemized at their default recovery period.

The following tables provide a detailed breakdown of all building components identified in this study, organized by MACRS recovery period. Each component has been individually assessed based on its function, construction type, and applicable IRS asset classification. Direct asset costs and indirect cost allocations are shown separately for full transparency.

### 5-Year Personal Property (IRC Section 1245)

Component	Description	Classification	Method	Asset Cost	Indirect	Total Basis
Carpet & Pad	Interior floor coverings, non-structural	Reg 1.48-1 \$2.5/SF x 0.89 geo	Cost estimate	\$6,529	\$1,632	\$7,680
Vinyl/Laminate Flooring	Non-structural finish flooring	Reg 1.48-1 \$1.4/SF x 0.89 geo	Cost estimate	\$3,435	\$859	\$4,040
Removable Kitchen Fixtures	Non-permanent kitchen installations	Reg 1.48-1 \$0.9/SF x 0.89 geo	Cost estimate	\$2,074	\$519	\$2,440
Bathroom Accessories & Fixtures	Removable bathroom fittings	Reg 1.48-1 \$0.55/SF x 0.89 geo	Cost estimate	\$1,191	\$298	\$1,401
Removable Laminate Surfaces	Non-permanent decorative surfaces	Reg 1.48-1 \$0.45/SF x 0.89 geo	Cost estimate	\$915	\$229	\$1,077
Appliances	Freestanding kitchen equipment	00.11 \$2.3/SF x 0.89 geo	Cost estimate	\$5,934	\$1,484	\$6,980
Window Treatments	Non-permanent window coverings	Reg 1.48-1 \$0.6/SF x 0.89 geo	Cost estimate	\$1,454	\$364	\$1,711
Door Hardware & Accessories	Non-structural door components	Reg 1.48-1 \$0.35/SF x 0.89 geo	Cost estimate	\$797	\$199	\$938
Light Fixtures	Decorative and specialty lighting	00.11 \$1.45/SF x 0.89 geo	Cost estimate	\$3,102	\$776	\$3,649
Ceiling Fans	Removable ventilation fixtures	00.11 \$0.35/SF x 0.89 geo	Cost estimate	\$749	\$187	\$881
Removable Plumbing Trim	Non-structural plumbing accessories	Reg 1.48-1 \$0.3/SF x 0.89 geo	Cost estimate	\$765	\$191	\$899
Smoke/CO Detectors	Life safety detection devices	00.11 \$0.1/SF x 0.89 geo	Cost estimate	\$255	\$64	\$300

Closet Shelving	Removable storage systems	Reg 1.48-1 \$0.4/SF x 0.89 geo	Cost estimate	\$900	\$225	\$1,059
Decorative Millwork	Non-structural decorative elements	Reg 1.48-1 \$0.25/SF x 0.89 geo	Cost estimate	\$528	\$132	\$622
Specialty Electrical	Dedicated circuits and specialty wiring	00.12 \$0.3/SF x 0.89 geo	Cost estimate	\$635	\$159	\$746
Bathroom Hardware	Removable bathroom accessories	Reg 1.48-1 \$0.25/SF x 0.89 geo	Cost estimate	\$630	\$157	\$740
Kitchen Hood & Ventilation	Kitchen exhaust equipment	00.11 \$0.2/SF x 0.89 geo	Cost estimate	\$473	\$118	\$557
Bedroom Furniture (Beds, Dressers, Nightstands)	Personal property — shorter recovery	00.11 \$3.8/SF x 0.89 geo	Cost estimate	\$10,268	\$2,567	\$12,078
Living Area Furniture (Sofas, Tables, Chairs)	Personal property — shorter recovery	00.11 \$3.4/SF x 0.89 geo	Cost estimate	\$8,631	\$2,158	\$10,153
Dining Furniture	Personal property — shorter recovery	00.11 \$0.65/SF x 0.89 geo	Cost estimate	\$1,550	\$388	\$1,824
Televisions & Electronics	Personal property — shorter recovery	00.11 \$1.4/SF x 0.89 geo	Cost estimate	\$3,137	\$784	\$3,690
Linens, Bedding & Towels	Personal property — shorter recovery	00.11 \$0.85/SF x 0.89 geo	Cost estimate	\$2,415	\$604	\$2,841
Kitchen Smallwares & Cookware	Personal property — shorter recovery	00.11 \$0.65/SF x 0.89 geo	Cost estimate	\$1,630	\$408	\$1,918
Outdoor Furniture & Accessories	Personal property — shorter recovery	00.11 \$1.1/SF x 0.89 geo	Cost estimate	\$2,592	\$648	\$3,049
<b>Subtotal</b>				<b>\$60,590</b>	<b>\$15,147</b>	<b>\$71,272</b>

### 7-Year Personal Property (IRC Section 1245)

Component	Description	Classification	Method	Asset Cost	Indirect	Total Basis
Decorative Items & Artwork	Equipment — shorter recovery	00.11 \$0.8/SF x 0.89 geo	Cost estimate	\$1,643	\$411	\$1,932
<b>Subtotal</b>				<b>\$1,643</b>	<b>\$411</b>	<b>\$1,932</b>

### 15-Year Land Improvements (IRC Section 1250)

Component	Description	Classification	Method	Asset Cost	Indirect	Total Basis
Concrete Paving & Walks	Exterior hardscape improvements	00.3 \$2.15/SF x 0.89 geo	Cost estimate	\$3,785	\$946	\$4,452
Asphalt Paving	Exterior paved surfaces	00.3 \$0.85/SF x 0.89 geo	Cost estimate	\$1,406	\$351	\$1,654
Fencing	Exterior boundary improvements	00.3 \$1.45/SF x 0.89 geo	Cost estimate	\$3,041	\$760	\$3,577
Landscaping	Exterior plantings and grading	00.3 \$1.8/SF x 0.89 geo	Cost estimate	\$3,547	\$887	\$4,172
Irrigation System	Landscape watering infrastructure	00.3 \$0.6/SF x 0.89 geo	Cost estimate	\$1,111	\$278	\$1,307
Exterior Lighting	Outdoor illumination fixtures	00.3 \$0.55/SF x 0.89 geo	Cost estimate	\$957	\$239	\$1,125
Retaining Walls	Site grade management structure	00.3 \$0.45/SF x 0.89 geo	Cost estimate	\$735	\$184	\$865
Wood Deck/Porch	Exterior recreational structure	00.3 \$1.9/SF x 0.89 geo	Cost estimate	\$3,937	\$984	\$4,631
Storm Drainage & Grading	Site water management	00.3 \$0.65/SF x 0.89 geo	Cost estimate	\$1,265	\$316	\$1,488
Mailbox & Site Accessories	Exterior site amenities	00.3 \$0.1/SF x 0.89 geo	Cost estimate	\$183	\$46	\$215
<b>Subtotal</b>				<b>\$19,966</b>	<b>\$4,991</b>	<b>\$23,486</b>

### 27.5-Year Real Property (IRC Section 1250)

The following components constitute the structural building envelope and core building systems that remain classified as residential rental property under IRC §168(e)(2)(A). These components — including foundation, framing, roofing, exterior envelope, core HVAC, plumbing, and electrical distribution — are inherently permanent and integral to the building's operation. They are depreciated over 27.5 years using the straight-line method.

Component	Description	Classification	Method	Asset Cost	Indirect	Total Basis
Foundation	Structural building foundation	N/A \$12.75/SF x 0.89 geo	Cost estimate	\$18,702	\$4,675	\$21,999
Framing	Structural wood/steel framing	N/A \$21.5/SF x 0.89 geo	Cost estimate	\$29,628	\$7,407	\$34,851
Roofing	Structural roof system	N/A \$10.1/SF x 0.89 geo	Cost estimate	\$17,650	\$4,413	\$20,762

Exterior Walls & Siding	Building envelope	N/A \$11.25/SF x 0.89 geo	Cost estimate	\$18,470	\$4,618	\$21,727
Windows & Exterior Doors	Building envelope openings	N/A \$7.75/SF x 0.89 geo	Cost estimate	\$11,954	\$2,988	\$14,062
Insulation	Thermal building envelope	N/A \$4.2/SF x 0.89 geo	Cost estimate	\$6,086	\$1,522	\$7,159
Drywall & Finishing	Interior wall surfaces	N/A \$9.7/SF x 0.89 geo	Cost estimate	\$15,022	\$3,755	\$17,670
Interior Paint	Interior wall finishes	N/A \$3.3/SF x 0.89 geo	Cost estimate	\$6,481	\$1,620	\$7,624
Kitchen Cabinets (Built-in)	Permanently affixed cabinetry	N/A \$3.55/SF x 0.89 geo	Cost estimate	\$6,550	\$1,638	\$7,705
Bathroom Vanities (Built-in)	Permanently affixed vanities	N/A \$1.0/SF x 0.89 geo	Cost estimate	\$1,733	\$433	\$2,039
Interior Doors	Structural interior partitions	N/A \$1.25/SF x 0.89 geo	Cost estimate	\$1,789	\$447	\$2,105
Tile Flooring	Permanent floor surfaces	N/A \$5.05/SF x 0.89 geo	Cost estimate	\$7,726	\$1,932	\$9,088
Plumbing Systems	Core building plumbing	N/A \$14.6/SF x 0.89 geo	Cost estimate	\$29,064	\$7,266	\$34,188
Electrical Systems	Core building electrical	N/A \$12.65/SF x 0.89 geo	Cost estimate	\$23,658	\$5,915	\$27,829
HVAC Systems	Central heating and cooling	N/A \$10.75/SF x 0.89 geo	Cost estimate	\$18,888	\$4,722	\$22,218
Fire Sprinkler System	Life safety suppression system	N/A \$2.25/SF x 0.89 geo	Cost estimate	\$3,714	\$929	\$4,369
Permanently Affixed Countertops	Built-in surface installations	N/A \$2.4/SF x 0.89 geo	Cost estimate	\$3,628	\$907	\$4,267
<b>Subtotal</b>				<b>\$220,744</b>	<b>\$55,186</b>	<b>\$259,664</b>

## 4b. Indirect Cost Allocation

Construction costs include both direct costs (labor and materials for individual components) and indirect costs (overhead expenses necessary for the overall construction project). Indirect costs are allocated proportionally across all building components based on their direct cost share, consistent with the IRS Cost Segregation Audit Techniques Guide (ATG) methodology.

Indirect Cost Category	% of Direct Costs	Allocated Amount
Architectural & Engineering Fees	4.0%	\$12,118
General Conditions & Supervision	5.5%	\$16,662
Equipment Rentals & Tools	3.5%	\$10,603
Permits & Inspections	2.0%	\$6,059
Insurance & Bonding	2.5%	\$7,574
Contractor Overhead & Profit	5.0%	\$15,147
Miscellaneous Indirects	2.5%	\$7,574
<b>Total Indirect Costs</b>	<b>25.0%</b>	<b>\$75,736</b>

Total direct costs: \$302,942. Indirect cost rate applied: 25.0% of direct costs. Indirect costs are allocated pro-rata to each component based on its share of total direct costs, consistent with IRS ATG guidance on indirect cost allocation for cost segregation studies.

## 4c. Reconciliation of Costs

The IRS Cost Segregation Audit Techniques Guide requires that estimated costs be reconciled back to actual costs or purchase price. The following reconciliation demonstrates that all allocated costs sum to the property's actual depreciable basis, with no unexplained variance.

### A. Basis Determination

Item	Amount	Notes
Purchase Price / Total Project Cost	\$450,000	Per closing statement
Less: Land Value (20.8%)	(\$93,645)	Land allocation per statistical
<b>Depreciable Basis</b>	<b>\$356,355</b>	<b>= Total Project Cost - Land</b>

## B. Cost Segregation Allocation

Asset Category	Recovery Period	Allocated Cost
Non-Depreciable Land	N/A	\$93,645
Personal Property	5-Year MACRS	\$71,272
Personal Property	7-Year MACRS	\$1,932
Land Improvements	15-Year MACRS	\$23,486
Real Property (Building)	27.5-Year Straight Line	\$259,664
<b>Total</b>		<b>\$450,000</b>

## C. Reconciliation Verification

Reconciliation Item	Amount
A. Total Project Cost (Purchase Price)	\$450,000
B. Total Allocated per Cost Segregation Study	\$450,000
<b>Variance (A - B)</b>	<b>\$0</b>

All allocated costs reconcile to the property's total project cost to the penny. No unexplained variance exists between the purchase price and the sum of all cost segregation allocations (land + depreciable components).

## 5. Engineering Rationale by Category

CSS-WP-230

The following narratives describe the engineering basis for reclassifying specific building components from the default recovery period to accelerated MACRS classes. Each classification is supported by IRS guidance, Treasury Regulations, and relevant Tax Court precedent.

### Floor Coverings

Floor coverings such as carpet and vinyl/laminate flooring are classified as 5-year property based on the Whiteco six-factor test and Treas. Reg. 1.48-1(e)(1). These materials typically have a replacement cycle of 5-10 years, supporting their classification as tangible personal property.

### Cabinetry

Removable cabinetry is classified as 5-year property due to its method of attachment and lack of functional interdependence with the building structure. Built-in cabinetry, which is integral to the building's design, would

be classified as 27.5-year property.

### Electrical

Decorative and specialized electrical components are classified as 5-year property, consistent with Rev. Proc. 87-56 Asset Classes 00.11 and 00.12, which distinguish these from core building electrical systems classified as 27.5-year property.

### Plumbing Fixtures

Removable plumbing accessories, such as trim and bathroom hardware, are classified as 5-year property, as they are not integral to the building's plumbing infrastructure, which is classified as 27.5-year property.

### Site Work

Site improvements such as concrete paving, asphalt paving, and landscaping are classified as 15-year land improvements under IRC §168(e)(4). These improvements are identified as separate from the building structure and contribute to the property's overall utility.

### Appliances

Appliances are classified as 5-year personal property based on the distinction between freestanding and built-in units, as outlined in the IRS ATG guidance. Freestanding appliances are not permanently affixed and thus qualify as tangible personal property.

### Finishes

Finish materials such as removable laminate surfaces and decorative millwork are classified as 5-year property due to their non-permanent nature. Permanently affixed surfaces are classified as 27.5-year property, reflecting their integration with the building structure.

### FF&E;

In the context of a short-term rental, FF&E; such as furnishings consistent with typical short-term rental use are classified as 5-year property under Rev. Proc. 87-56 Asset Class 00.11. These items are distinct from structural improvements and are essential to the operation of the rental property.

*FF&E; Substantiation Note: The FF&E; values in this study are estimated using per-square-foot cost models calibrated to hospitality-industry furnishing standards, not from a physical inventory or purchase receipts. If the taxpayer maintains itemized FF&E; purchase records, invoices, or a furnished-unit inventory list, those actual costs should be substituted for the estimates in this report. Actual cost documentation strengthens the defensibility of FF&E; allocations under IRS examination. The taxpayer's CPA should review FF&E; totals against available records before filing.*

## 6. MACRS Depreciation Schedules

CSS-WP-300

With 100% bonus depreciation, the estimated first-year depreciation deduction on reclassified assets is \$96,691.

The following schedules show the annual depreciation deductions under MACRS for each asset category. The 5-year and 15-year property schedules assume full expensing of eligible assets under IRC §168(k), based on applicable bonus depreciation rates for the placed-in-service year.

### 5-Year Personal Property (with 100% Bonus)

Year	Annual Deduction	Cumulative	Remaining Basis
1	\$71,272	\$71,272	\$0
2	\$0	\$71,272	\$0
3	\$0	\$71,272	\$0
4	\$0	\$71,272	\$0
5	\$0	\$71,272	\$0
6	\$0	\$71,272	\$0

### 7-Year Personal Property (with 100% Bonus)

Year	Annual Deduction	Cumulative	Remaining Basis
1	\$1,932	\$1,932	\$0
2	\$0	\$1,932	\$0
3	\$0	\$1,932	\$0
4	\$0	\$1,932	\$0
5	\$0	\$1,932	\$0
6	\$0	\$1,932	\$0
7	\$0	\$1,932	\$0
8	\$0	\$1,932	\$0

### 15-Year Land Improvements (with 100% Bonus)

Year	Annual Deduction	Cumulative	Remaining Basis
1	\$23,486	\$23,486	\$0

2	\$0	\$23,486	\$0
3	\$0	\$23,486	\$0
4	\$0	\$23,486	\$0
5	\$0	\$23,486	\$0
6	\$0	\$23,486	\$0
7	\$0	\$23,486	\$0
8	\$0	\$23,486	\$0
9	\$0	\$23,486	\$0
10	\$0	\$23,486	\$0
11	\$0	\$23,486	\$0
12	\$0	\$23,486	\$0
13	\$0	\$23,486	\$0
14	\$0	\$23,486	\$0
15	\$0	\$23,486	\$0
16	\$0	\$23,486	\$0

**27.5-Year Real Property (Straight-Line)**

Year	Annual Deduction	Cumulative	Remaining Basis
1	\$4,721	\$4,721	\$254,943
2	\$9,442	\$14,164	\$245,501
3	\$9,442	\$23,606	\$236,058
4	\$9,442	\$33,048	\$226,616
5	\$9,442	\$42,491	\$217,174
6	\$9,442	\$51,933	\$207,731
7	\$9,442	\$61,375	\$198,289
8	\$9,442	\$70,818	\$188,847
9	\$9,442	\$80,260	\$179,404
10	\$9,442	\$89,702	\$169,962
11	\$9,442	\$99,145	\$160,520
12	\$9,442	\$108,587	\$151,077
13	\$9,442	\$118,029	\$141,635
14	\$9,442	\$127,472	\$132,193

15	\$9,442	\$136,914	\$122,750
16	\$9,442	\$146,356	\$113,308
17	\$9,442	\$155,799	\$103,866
18	\$9,442	\$165,241	\$94,423
19	\$9,442	\$174,683	\$84,981
20	\$9,442	\$184,126	\$75,539
21	\$9,442	\$193,568	\$66,096
22	\$9,442	\$203,010	\$56,654
23	\$9,442	\$212,453	\$47,212
24	\$9,442	\$221,895	\$37,769
25	\$9,442	\$231,337	\$28,327
26	\$9,442	\$240,780	\$18,885
27	\$9,442	\$250,222	\$9,442
28	\$4,721	\$254,943	\$4,721

## 8. Depreciation Recapture Considerations

CSS-WP-320

*Cost segregation accelerates when deductions are taken, not how much — total lifetime depreciation remains the same.*

Depreciation recapture considerations for this property involve IRC §1245 for personal property, which may be subject to ordinary income recapture, and IRC §1250 for real property, which involves a 25% unrecaptured gain. Cost segregation accelerates depreciation timing but does not create additional depreciation. The economic benefit derives from the time value of money, and it is advisable to consult a CPA for property-specific recapture planning.

### Recapture Categories

Category	Amount	Recapture Type	Max Rate
5-Year Property & 7-Year Property	\$73,205	IRC §1245 — Ordinary Income	37%
15-Year Property	\$23,486	IRC §1250 — Unrecaptured Gain	25%
27.5-Year Property	\$259,664	IRC §1250 — Unrecaptured Gain	25%

## Key Considerations

Depreciation recapture applies only to the extent of actual gain realized upon sale. If the property is sold at or below adjusted basis, no recapture tax is owed. Section 1245 property (5-year and 7-year personal property) is recaptured as ordinary income up to the amount of depreciation claimed. Section 1250 property (15-year land improvements and 27.5-year real property) is subject to a maximum 25% rate on unrecaptured depreciation under IRC §1(h)(1)(E).

The economic benefit of cost segregation derives from the time value of money: deductions taken earlier are worth more than deductions taken later, even after accounting for recapture at disposition. The NPV analysis in Section 7 quantifies this timing benefit. Actual recapture liability depends on the sale price, adjusted basis, and the taxpayer's marginal rate at the time of sale. We recommend consulting your CPA for property-specific recapture planning.

## Sensitivity Considerations

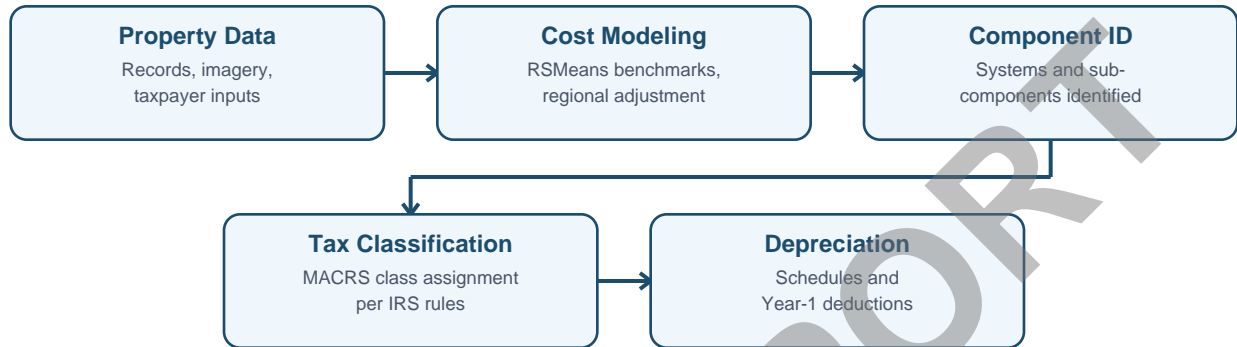
The following factors may materially affect component classification and allocation results. This section is provided to assist the taxpayer and their tax advisor in evaluating the study results in context.

Factor	Potential Impact
Detailed contractor invoices available	May refine or increase 5-year personal property allocations based on actual costs
Major renovations or improvements	Increases short-life property share; renovated components may qualify for accelerated treatment
Higher-end or custom finishes	Shifts allocation toward personal property; premium finishes increase 5-year component values
Limited FF&E; documentation	May reduce supportability of personal property allocations under examination
Property condition differs from age-based assumptions	Significant deferred maintenance or recent upgrades may shift allocation proportions
Furnished vs unfurnished status	FF&E; allocations assume hospitality-grade furnishing; unfurnished units would reduce 5-year property

The allocations presented represent a reasonable estimate based on available data and standard cost segregation practices. Taxpayers with additional documentation (invoices, contractor records, renovation receipts) may provide this information for potential refinement of specific component allocations.

# 9. Methodology & Basis of Analysis

CSS-WP-400



*This study applies an engineering cost approach consistent with IRS Cost Segregation Audit Techniques Guide methodology.*

*Cost estimates were developed using construction cost data, public records, and taxpayer-provided information, consistent with IRS cost segregation guidance.*

## Cost Approach Methodology

This cost segregation study employs an engineering cost approach using construction cost data, public records, and taxpayer-provided information, consistent with the principles outlined in the IRS Cost Segregation Audit Techniques Guide (revised 2022), Chapter 7.3 (Detailed Engineering Cost Approach). This methodology is the same general approach used by national engineering and accounting firms performing cost segregation studies.

No physical site inspection was conducted for this study. Property observations were derived from remote data sources as described below. The IRS Cost Segregation Audit Techniques Guide does not require a physical site inspection; it requires a defensible engineering methodology and detailed documentation of cost derivations. This study satisfies those requirements through calibrated construction cost databases, verified property characteristics, and component-level cost allocation with source references.

## Data Sources & Observation Methodology

Property observations were derived from aerial imagery, street-level photography, county assessor records, property listing data, taxpayer-provided inputs, and third-party API data sources. Engineering cost estimates were developed using industry-standard construction cost references (RSMeans, BLS Producer Price Index) and observed property characteristics derived from these sources. The IRS ATG recognizes that cost estimates may be developed from available records, construction cost databases, and property characteristics observable through public data.

Sources consulted include:

- County assessor and parcel records — assessed values, land/improvement ratios, property characteristics, and building descriptions

- Aerial and street-level imagery — building footprint, exterior materials, site improvements, and observable property condition
- Property listing and transaction data — features, finishes, renovation history, and comparable property characteristics
- Third-party property data APIs — building metadata, year built verification, square footage confirmation, and geospatial attributes
- Industry construction cost databases — national and regional cost benchmarks by building type, quality tier, and geographic location
- IRS classification guidance — Revenue Procedure 87-56, IRC §§168, 1245, 1250, and the Cost Segregation Audit Techniques Guide

### Cost Allocation Summary by Category

The following table summarizes the primary categories of property components identified and the basis used to allocate costs.

Component Category	Recovery	Allocation Basis
Furniture, Fixtures & Equipment (FF&E;)	5 years	Hospitality-grade furnishings, electronics, linens, kitchen smallwares, and decorative items per Rev. Proc. 87-56 Asset Class 00.11
Interior Finishes & Fixtures	5 years	Removable cabinetry, decorative lighting, floor coverings, window treatments, appliances, and specialty electrical/plumbing components not structurally integrated
Land Improvements	15 years	Exterior improvements including driveways, walkways, landscaping, fencing, retaining walls, and site drainage per Rev. Proc. 87-56 asset class 00.3
<b>Building Structure</b>	27.5 years	Remaining structural building components — foundation, framing, roofing, exterior walls, core mechanical/electrical/plumbing systems

### Component Extraction Framework

The study applies a systematic component extraction process: (1) identification of all building systems and sub-systems from property characteristics, public records, and taxpayer-provided information; (2) classification of each component under IRC §1245 (tangible personal property), IRC §1250 (real property and land improvements), and Revenue Procedure 87-56 asset classes; (3) estimation of Replacement Cost New (RCN) for each component using industry-standard cost databases adjusted by BLS PPI time index; (4) physical depreciation / remaining life is tracked per component for context (allocation is based on RCN); and (5) reconciliation of total component costs to the taxpayer's actual depreciable basis.

### Cost Reference Databases

Component cost estimates are derived from and cross-referenced against the following industry-standard construction cost databases and references:

- Industry construction cost databases — national construction cost benchmarks by building type, quality tier, and geographic region
- Marshall Valuation Service (CoreLogic) — replacement cost estimation and depreciation schedules for commercial and residential property
- Bureau of Labor Statistics Producer Price Index (PPI) — construction cost time index applied to adjust base cost schedules from anchor date to current period
- IRS Cost Segregation Audit Techniques Guide — component percentage allocation guidelines and classification criteria (Chapters 6-8)

Regional cost adjustments are applied using public price-level indices to account for geographic variation in labor and material costs. Quality tier adjustments reflect the property's value per square foot relative to regional construction cost averages. A BLS Producer Price Index (PPI) time adjustment inflates base cost schedules from their anchor date to the current period. This report should be reviewed by the taxpayer's CPA or qualified tax professional prior to filing.

### Replacement Cost New (RCN) Derivation Workflow

The following table summarizes the five-step derivation from base replacement cost to final allocated depreciable basis for this property:

Step	Description	Factor	Result
1	Modeled Replacement Cost New (all components)	\$210.38/SF	\$378,678
2	Market Reconciliation Factor	× 0.94	<b>\$356,355</b>

**Note:** The final allocated basis equals the property's depreciable basis (purchase price less land value). Component-level RCN estimates are calibrated to the taxpayer's actual cost basis using cost approach normalization.

Replacement Cost New (RCN) estimates were developed using industry construction cost databases. Each component retains the same proportional share of total basis. The aggregate modeled cost is normalized to equal the taxpayer's actual depreciable basis, consistent with cost approach methodology described in the IRS Cost Segregation Audit Techniques Guide (ATG).

### Land Value Allocation

The land allocation of 20.8% for this property in Sevierville, TN, is derived from county assessor data and comparable sales analysis. This allocation is consistent with the median land-to-improvement ratios for residential properties in the local market, adjusted for the property's price-per-square-foot.

This allocation is consistent with the cost approach methodology described in the IRS Cost Segregation Audit Techniques Guide (ATG), which permits the use of assessor data and market-derived inputs when direct land valuation data is not available.

### Cost Estimation Sources & Databases

Component costs are derived from a proprietary cost database calibrated against industry-standard construction cost references including Marshall Valuation Service cost tables, RS Means Square Foot Cost Data, and publicly available construction cost indices published by the Bureau of Labor Statistics. Regional cost multipliers are based on RS Means City Cost Index data adjusted for local construction market conditions. Quality tier adjustments reflect property value per square foot relative to regional averages.

### Square Footage Allocation & Reconciliation

Base component costs are estimated on a per-square-foot basis using the property’s gross building area. This method is consistent with the residual cost approach recognized by the IRS Cost Segregation Audit Techniques Guide (Chapter 7.3), which identifies per-unit cost estimation as an acceptable methodology for cost segregation analyses. Component costs are calibrated against RSMeans Square Foot Cost Data and Marshall Valuation Service cost tables for the applicable building type and quality tier.

Metric	Value
Gross Building Area	1,800 SF
Purchase Price	\$450,000
Land Value Allocation	\$93,645 (20.8%)
<b>Depreciable Basis</b>	<b>\$356,355</b>
<b>Implied Cost per SF</b>	<b>\$197.97/SF</b>
Accelerated Reclassification per SF	\$53.72/SF
27.5-Year Property per SF	\$144.26/SF

### Cost Calculation Methodology

For each building component, the following calculation methodology is applied:

**Step 1 - Base Cost Estimation:** Component costs are estimated on a per-square-foot basis using construction cost data appropriate for the property type, construction class, and quality tier.

**Step 2 - Regional Adjustment:** Base costs are adjusted using regional cost multipliers that reflect local construction costs relative to the national average.

**Step 3 - Indirect Costs:** A 25% indirect cost factor is applied to account for contractor overhead, profit, architectural and engineering fees, and other soft costs. Industry studies indicate residential indirect costs range between 20%–30%, consistent with RSMeans contractor markup benchmarks and IRS ATG guidelines

for cost segregation.

#### **Step 4 - Remaining Life Adjustment:**

For a property built in 2020, components are considered to be at or near full remaining useful life. This assumption supports the classification of assets for depreciation purposes, as physical depreciation has not significantly impacted the cost allocation.

#### **Step 5 - Premium/Discount Reconciliation:**

The reconciliation factor of 0.94 indicates that the replacement cost closely approximates the depreciable basis. This factor reflects the alignment between the estimated cost of components and their allocated basis within the study.

### **Asset Classification Criteria**

Each component is classified into the appropriate MACRS recovery period based on IRS guidelines, Revenue Rulings, and relevant Tax Court decisions. Classification criteria include the six-factor functional interdependence test established in *Whiteco Industries v. Commissioner* (65 T.C. 664):

**(1)** Whether the property is capable of being moved without damage to the building; **(2)** Whether the property is designed for permanent installation; **(3)** Whether there are permanent connections to utility systems; **(4)** Whether the property is designed for a specific purpose; **(5)** Whether removal would cause damage to the property or the building; **(6)** The weight and size of the property relative to the building.

Components meeting the functional test for personal property under Treas. Reg. 1.48-1(e)(1) are classified as 5-year or 7-year MACRS property per Rev. Proc. 87-56. Land improvements are classified under IRS Asset Class 00.3 (15-year recovery). Structural components integral to the building are classified as real property under IRC §1250 with a recovery period of 27.5 years (residential rental).

### **Placed-in-Service & Depreciation Eligibility**

This property was placed in service on 2025-06-15 for purposes of IRC §167 and §168. Based on the placed-in-service year of 2025, eligible reclassified assets may qualify for bonus depreciation under IRC §168(k) under current federal tax law.

This property is classified as residential rental property under IRC §168(e)(2)(A), with structural components assigned a 27.5-year recovery period under MACRS. The property must be held for use in a trade or business or for the production of income (IRC §167(a)) and must be 'placed in service' — available and ready for its intended use. For short-term rental properties, the taxpayer must materially participate in the rental activity or qualify under the real estate professional exception to claim current-year depreciation deductions against ordinary income.

## Legal Authority for Asset Classification

This cost segregation study was performed using an engineering cost approach consistent with the guidance outlined in the IRS Cost Segregation Audit Techniques Guide. Asset classifications were established based on the following authorities:

Authority	Description
<b>IRC §168</b>	Modified Accelerated Cost Recovery System (MACRS) — establishes recovery periods for tangible depreciable property
<b>IRC §1245</b>	Tangible personal property classification — property not inherently permanent or structural in nature
<b>IRC §1250</b>	Real property classification — structural components and land improvements
<b>Rev. Proc. 87-56</b>	Asset class recovery periods — assigns MACRS lives by asset class (e.g., 00.11 Office Furniture, 00.3 Land Improvements)
<b>IRC §168(k)</b>	Bonus depreciation — allows first-year deduction of qualifying property placed in service in the applicable tax year
<b>Treas. Reg. §1.48-1(e)(1)</b>	Defines the functional interdependence test for distinguishing personal property from structural components
<b>IRS ATG (2022)</b>	Cost Segregation Audit Techniques Guide — IRS reference for reviewing cost segregation studies, including methodology standards and quality elements

Assets classified as **5-year property** represent tangible personal property that is not structural in nature, including removable fixtures, appliances, cabinetry, decorative finishes, and specialty electrical and plumbing components.

Assets classified as **15-year property** represent land improvements such as landscaping, walkways, paving, fencing, and site drainage consistent with Rev. Proc. 87-56 asset class 00.3.

All remaining building components are depreciated as **27.5-year residential rental property** under MACRS.

*This report is intended to support the taxpayer's depreciation treatment and may be provided to tax advisors or taxing authorities upon request.*

# 11. Schedule for Fixed Asset Ledger Entry

CSS-WP-500

*This schedule can be entered directly into your CPA's tax preparation software — no manual reclassification required.*

The following schedule is provided for direct entry into the taxpayer's fixed asset ledger or tax preparation software. Each line item represents a reclassified asset with the applicable MACRS method, convention, recovery period, and allocated cost.

Asset Description	Method	Conv.	Life	PIS Date	Cost Basis
Bedroom Furniture (Beds, Dressers, Nightstands)	200DB	HY	5 yr	2025-06-15	\$12,078
Living Area Furniture (Sofas, Tables, Chairs)	200DB	HY	5 yr	2025-06-15	\$10,153
Carpet & Pad	200DB	HY	5 yr	2025-06-15	\$7,680
Appliances	200DB	HY	5 yr	2025-06-15	\$6,980
Vinyl/Laminate Flooring	200DB	HY	5 yr	2025-06-15	\$4,040
Televisions & Electronics	200DB	HY	5 yr	2025-06-15	\$3,690
Light Fixtures	200DB	HY	5 yr	2025-06-15	\$3,649
Outdoor Furniture & Accessories	200DB	HY	5 yr	2025-06-15	\$3,049
Linens, Bedding & Towels	200DB	HY	5 yr	2025-06-15	\$2,841
Removable Kitchen Fixtures	200DB	HY	5 yr	2025-06-15	\$2,440
Kitchen Smallwares & Cookware	200DB	HY	5 yr	2025-06-15	\$1,918
Dining Furniture	200DB	HY	5 yr	2025-06-15	\$1,824
Window Treatments	200DB	HY	5 yr	2025-06-15	\$1,711
Bathroom Accessories & Fixtures	200DB	HY	5 yr	2025-06-15	\$1,401
Removable Laminate Surfaces	200DB	HY	5 yr	2025-06-15	\$1,077
Closet Shelving	200DB	HY	5 yr	2025-06-15	\$1,059
Door Hardware & Accessories	200DB	HY	5 yr	2025-06-15	\$938
Removable Plumbing Trim	200DB	HY	5 yr	2025-06-15	\$899
Ceiling Fans	200DB	HY	5 yr	2025-06-15	\$881
Specialty Electrical	200DB	HY	5 yr	2025-06-15	\$746
Bathroom Hardware	200DB	HY	5 yr	2025-06-15	\$740

Decorative Millwork	200DB	HY	5 yr	2025-06-15	\$622
Kitchen Hood & Ventilation	200DB	HY	5 yr	2025-06-15	\$557
Smoke/CO Detectors	200DB	HY	5 yr	2025-06-15	\$300
Decorative Items & Artwork	200DB	HY	7 yr	2025-06-15	\$1,932
Wood Deck/Porch	150DB	HY	15 yr	2025-06-15	\$4,631
Concrete Paving & Walks	150DB	HY	15 yr	2025-06-15	\$4,452
Landscaping	150DB	HY	15 yr	2025-06-15	\$4,172
Fencing	150DB	HY	15 yr	2025-06-15	\$3,577
Asphalt Paving	150DB	HY	15 yr	2025-06-15	\$1,654
Storm Drainage & Grading	150DB	HY	15 yr	2025-06-15	\$1,488
Irrigation System	150DB	HY	15 yr	2025-06-15	\$1,307
Exterior Lighting	150DB	HY	15 yr	2025-06-15	\$1,125
Retaining Walls	150DB	HY	15 yr	2025-06-15	\$865
Mailbox & Site Accessories	150DB	HY	15 yr	2025-06-15	\$215
<b>Remaining 27.5-Year Real Property</b>	SL	MM	27.5 yr	2025-06-15	<b>\$259,664</b>
<b>TOTAL DEPRECIABLE BASIS</b>					<b>\$356,355</b>

**Legend:** 200DB = 200% Declining Balance; 150DB = 150% Declining Balance; SL = Straight-Line; HY = Half-Year Convention; MM = Mid-Month Convention; PIS = Placed in Service.

**Note:** Assets with recovery periods of 20 years or less qualify for 100% bonus depreciation under IRC §168(k). Apply bonus depreciation before entering the remaining basis into MACRS schedules.

**CPA Filing Note**

Most CPAs incorporate the results of this study into the taxpayer's return by entering the asset schedule above directly into their depreciation software (Lacerte, ProSeries, Drake, UltraTax, or equivalent) and applying the bonus depreciation calculation to qualifying assets. For lookback studies where the property was placed in service in a prior year, the report includes Form 3115 catch-up calculations so the CPA can file a change of accounting method. If the taxpayer's CPA has questions about this report, they may contact us directly at support@costsegsmart.com.

## CPA Review Considerations

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The following items are provided for review by the taxpayer's CPA or tax advisor:

- **Form 3115 (Lookback Study):** This property was placed in service in 2025. To claim accelerated depreciation retroactively, the taxpayer should file Form 3115 (Application for Change in Accounting Method) with the current-year return. The Section 481(a) adjustment captures all prior-year missed depreciation in a single year.
- **Post-Acquisition Improvements:** Capital improvements placed in service after the original acquisition date should be evaluated separately for depreciation treatment. These may qualify for bonus depreciation or repair expense treatment under applicable regulations.
- **Passive Activity Limitations:** Accelerated depreciation deductions may be subject to passive activity loss rules under IRC §469. The taxpayer's ability to utilize these deductions depends on their participation level and other income sources.
- **State Tax Conformity:** State-level conformity to federal bonus depreciation rules should be reviewed for TN. Not all states conform to federal bonus depreciation provisions.
- **Bonus Depreciation:** The applicable bonus depreciation rate should be confirmed with the taxpayer's tax advisor based on the placed-in-service year and current federal tax law.

This study provides the asset classification framework; final tax treatment should be confirmed based on the taxpayer's specific filing position.

## 12. Conclusion

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Based on the analysis performed, it is our opinion that the subject property at **1847 Wears Valley Rd, Sevierville, TN 37862** contains identifiable components that qualify for accelerated depreciation under applicable federal tax law.

Using an engineering cost approach, this study allocated **\$96,691** of the property's **\$356,355** depreciable basis to shorter recovery periods, including 5-year, 7-year, and 15-year property classifications, in accordance with the Internal Revenue Code and supporting authority. All allocations reconcile to the total depreciable basis of the property.

Under applicable bonus depreciation provisions (IRC §168(k)), the full **\$96,691** in reclassified assets may be deductible in the year placed in service, subject to the taxpayer's individual tax circumstances.

The allocations presented represent a reasonable and supportable classification of property components, consistent with IRS guidance, applicable case law, and standard cost segregation practices.

This report is intended to assist the taxpayer and their tax advisor in calculating depreciation deductions, preparing federal income tax filings (including Form 4562), and supporting accounting positions related to asset classification. This report may be relied upon by the taxpayer and their tax advisor for tax reporting purposes. Final tax treatment should be determined in consultation with a qualified tax professional.

**Audit Support.** In the event of an IRS inquiry, Cost Seg Smart will provide supplementary documentation, cost derivation workpapers, and methodology explanations to support the classifications and allocations in this report at no additional cost.

*Prepared by Cost Seg Smart*

*Study Date: April 25, 2026*

## A. Appendix A — Cost Derivation Summary

CSS-WP-510

The following table summarizes the cost derivation methodology applied to each major component category. Replacement Cost New (RCN) estimates are adjusted for regional factors, PPI time index, and market reconciliation to equal the property's actual depreciable basis. Physical depreciation / remaining life is tracked per component for context; allocation is based on RCN.

Category	RCN (Pre-Recon)	Avg RLF (Info)	Recon. Factor	Final Allocated Basis
5-Year Personal Property	\$75,737	0.60	0.94	\$71,272
7-Year Personal Property	\$2,053	0.70	0.94	\$1,932
15-Year Land Improvements	\$24,957	0.80	0.94	\$23,486
27.5-Year Real Property	\$275,930	0.89	0.94	\$259,664
<b>Total Depreciable Basis</b>	<b>\$378,678</b>	—	0.94	<b>\$356,355</b>

**Location Cost Index:** 0.89 (state level — Sevierville, TN). Applied to modeled RCN to reflect local construction cost conditions.

**Reconciliation:** Component-level RCN estimates are normalized to the property's depreciable basis so that all allocated costs collectively equal the recorded acquisition price less land value. Remaining life factors (RLF) are shown for transparency but are not applied to component costs pre-reconciliation.

### Land Allocation Analysis

The IRS Cost Segregation ATG (Chapter 4) requires that cost segregation studies clearly identify and support the land allocation. The following methods were considered in determining the land value for this property:

Method	Result	Description	Weight
<b>A.1 County Tax Assessor Allocation</b>	N/A	County assessor data not available for this property. When available, assessor allocations provide a recognized IRS-accepted benchmark per ATG Chapter 4.	Not Available
<b>A.2 Statistical Market Analysis</b>	20.8%	Metro-area land ratio analysis based on median land-to-value ratios for the Sevierville, TN submarket, calibrated against comparable property sales data and construction cost indices.	Primary
<b>A.3 Replacement Cost Residual</b>	20.8%	Purchase price less estimated replacement cost of improvements (Marshall Valuation Service / RSMMeans). The residual represents the implied land value under the cost approach.	Corroborating

<p><b>A.4 Comparable Sales Analysis</b></p>	<p>—</p>	<p>Vacant land sales in the immediate submarket would provide direct market evidence. This method is referenced for completeness but was not independently performed for this study.</p>	<p>Not Performed</p>
<p><b>A.5 Purchase Agreement Allocation</b></p>	<p>—</p>	<p>If the purchase contract or HUD-1/ALTA settlement statement contains a land/improvement allocation, that buyer-seller negotiated split may be used. Not provided for this study.</p>	<p>Not Provided</p>
<p><b>A.6 Adopted Land Allocation</b></p>	<p><b>20.8%</b></p>	<p>Based on the statistical market analysis as the primary method, corroborated by replacement cost residual analysis. Land value of \$93,645 (20.8% of purchase price) is adopted for this study.</p>	<p><b>Adopted</b></p>

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## B. Appendix B — IRS ATG Quality Elements

CSS-WP-600

The IRS Cost Segregation Audit Techniques Guide identifies 13 principal elements of a quality cost segregation study. This report addresses each element as follows:

ATG Element	How Addressed
<b>1. Preparation by individuals with expertise</b>	Engineering-informed methodology using industry-standard cost databases and IRS classification criteria.
<b>2. Detailed description of methodology</b>	Section 9 — Methodology & Basis of Analysis describes the cost approach, data sources, and reconciliation process.
<b>3. Use of appropriate documentation</b>	Property details, construction data, regional cost factors, and county assessor records are incorporated.
<b>4. Interviews &amp; site inspection alternatives</b>	Property photos and detailed intake questionnaire substitute for physical site inspection, consistent with ATG guidance for desk reviews.
<b>5. Use of actual cost records</b>	Where available, purchase records and assessor data supplement engineering cost estimates.
<b>6. Determination of unit costs</b>	Per-square-foot cost estimation using RSMeans and Marshall Valuation Service references.
<b>7. Identification of section 1245 property</b>	Components are individually classified under Treas. Reg. 1.48-1 and the Whiteco six-factor functional test.
<b>8. Identification of section 1250 property</b>	Land improvements classified under IRS Asset Class 00.3 with 15-year recovery per Rev. Proc. 87-56.
<b>9. Identification of land/land improvements</b>	Land allocation based on statistical metro-level data consistent with county assessor records.
<b>10. Accuracy of computations</b>	All allocations reconcile to depreciable basis. Depreciation schedules verified computationally.
<b>11. Support for conclusions</b>	Engineering narratives, IRS citations, and Whiteco functional analysis provided for each category.
<b>12. Overall reasonableness</b>	Acceleration percentages consistent with IRS audit benchmarks for property type and construction class.
<b>13. Preparation or review by qualified professional</b>	Report should be reviewed by the taxpayer's CPA or qualified tax professional prior to filing.

## C. Appendix C — Revenue Procedure 87-56 & IRC Framework

CSS-WP-610

This cost segregation study is prepared in accordance with the following Internal Revenue Code sections, Treasury Regulations, and IRS guidance:

Reference	Application
<b>IRC §167</b>	Depreciation deduction for property used in trade/business or production of income.
<b>IRC §168</b>	Modified Accelerated Cost Recovery System (MACRS) — recovery periods by asset class.
<b>IRC §168(e)(2)(A)</b>	Residential rental property: 80%+ gross income from dwelling units. Recovery: 27.5 years.
<b>IRC §168(e)(2)(B)</b>	Nonresidential real property. Recovery: 39 years.
<b>IRC §168(k)</b>	Bonus depreciation — rates vary by placed-in-service year. Confirm applicable rate with tax advisor.
<b>IRC §1245</b>	Personal property: accelerated depreciation subject to ordinary income recapture.
<b>IRC §1250</b>	Real property: structural components subject to unrecaptured §1250 gain (25%).
<b>Treas. Reg. §1.48-1(e)(1)</b>	Tangible personal property: all tangible property except land, land improvements, buildings, and structural components.
<b>Treas. Reg. §1.1250-1(e)(2)</b>	Building: any structure enclosing a space within walls and covered by a roof.
<b>Rev. Rul. 68-4</b>	Criteria for structural component vs. tangible personal property classification.
<b>Rev. Proc. 87-56</b>	Class lives and recovery periods for depreciable assets under MACRS.
<b>IRS ATG (Rev. 2022)</b>	Cost Segregation Audit Techniques Guide — 13 elements of a quality study.

## D. Appendix D — Case Law & IRS Rulings

CSS-WP-620

The following court decisions and IRS rulings establish the legal framework for component classification in cost segregation studies:

Case / Ruling	Citation	Significance
<b>Hospital Corp. of America v. Commissioner</b>	109 T.C. 21 (1997)	Established that items which are affixed to a building may still constitute personal property if they serve the taxpayer's business activity rather than the building itself.
<b>Whiteco Industries v. Commissioner</b>	65 T.C. 664 (1975)	Established the six-factor test for determining whether property is a structural component or tangible personal property: (1) manner of affixation, (2) whether designed to be permanently affixed, (3) damage upon removal, (4) function of the property, (5) relationship to building operation, (6) intent at installation.
<b>Scott Paper Co. v. Commissioner</b>	74 T.C. 137 (1980)	Reinforced that the 'intent at time of installation' is a relevant factor in determining whether property is personal or structural.
<b>Morrison Inc. v. Commissioner</b>	T.C. Memo 1986-129	Applied the Whiteco factors to restaurant properties, finding that decorative items, specialty lighting, and removable kitchen equipment qualify as personal property.
<b>Meyers Parking System Inc. v. Commissioner</b>	T.C. Memo 1991-18	Addressed the classification of site improvements and their treatment as land improvements with a 15-year recovery period.
<b>IRS Cost Segregation ATG, Chapter 3</b>	Rev. 2022	Provides detailed guidance on the engineering approach to cost segregation, including acceptable methodologies (detailed engineering, residual estimation, sampling/modeling) and the 13 principal elements of a quality study.

## E. Appendix E — Audit Documentation & Support

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This section provides guidance for audit documentation preparedness and documentation retention in support of the cost segregation reclassifications contained in this study.

### Workpaper Retention

Cost Seg Smart maintains complete workpapers for this study, including component-level cost calculations, classification rationale, and reconciliation documentation. These workpapers are retained for the applicable IRS statute of limitations period (generally three years from the filing date, or six years if gross income is understated by more than 25%). The taxpayer should retain a copy of this report and all supporting documentation for the same period.

### Component-Level Allocation Methodology

Each component in this study has been individually identified, classified, and costed using the detailed engineering cost approach. This methodology satisfies the IRS requirement for component-level analysis as described in the Cost Segregation Audit Techniques Guide (ATG), Chapter 4. The study provides:

- Individual component identification with IRS asset class assignment
- Cost estimation per component using industry-standard cost databases
- Classification rationale citing IRC sections, Treasury Regulations, and case law
- Reconciliation of modeled costs to actual taxpayer basis
- IRS asset class assignment with supporting legal citations for each classification

### IRS ATG Compliance Affirmation

This cost segregation study has been prepared in compliance with the 13 principal elements of a quality cost segregation study as identified in the IRS Cost Segregation Audit Techniques Guide (ATG), Chapter 4.4. These elements include: preparation by an individual with appropriate expertise; use of appropriate documentation and methodology; identification of the property analyzed; description of the analytical approach; determination of all direct and indirect costs; identification and classification of each asset; an explanation of the legal analysis; and a clear summary of allocations and conclusions.

### Recordkeeping Recommendations

To support audit defensibility, the taxpayer should maintain the following documentation in addition to this report:

- Purchase agreement and closing statement (HUD-1 / ALTA settlement statement)
- Property photographs documenting building systems and site improvements
- Construction plans, specifications, or renovation invoices (if available)

- County tax assessor records showing land and improvement values
- Any independent appraisal or environmental reports
- Insurance policy declarations page showing replacement cost estimates

For questions regarding audit documentation or support, contact Cost Seg Smart at [support@costsegsmart.com](mailto:support@costsegsmart.com).

SAMPLE REPORT

# NPV Analysis (Illustrative Only)

CSS-WP-310

*This section is provided for illustrative purposes only and is not part of the cost segregation allocation. Actual tax outcomes depend on the taxpayer's specific circumstances, income, and applicable tax rates.*

*Accelerating deductions into earlier years increases their present value — a dollar of tax savings today is worth more than one spread over decades.*

The NPV analysis methodology assumes a 5% discount rate and a 37% marginal tax rate. Accelerated deductions in earlier years are valued more in present-value terms, enhancing the economic benefit. Actual savings depend on the taxpayer's specific rate and circumstances.

Cost segregation does not change the total depreciation allowed over the life of the property. It accelerates deductions into earlier years, increasing the present value of the associated tax savings.

Scenario	NPV of Tax Savings from Depreciation
Without Cost Segregation (Straight-Line)	\$68,536
<b>With Cost Segregation + Bonus Depreciation</b>	<b>\$84,012</b>
<b>NPV Benefit of Cost Segregation</b>	<b>\$15,476</b>

**Assumptions:** Discount rate: 5.0% | Marginal tax rate: 37% (illustrative — actual rate depends on taxpayer's specific situation) | 100% bonus depreciation applied to eligible 5-year and 15-year property (per IRC §168(k) for placed-in-service year) | Half-year convention applied to first and last years of all MACRS schedules. This analysis does not account for passive activity loss limitations, depreciation recapture, or state tax variations.

## F. Appendix F — Exhibits & Supporting Documentation

CSS-WP-700

The following exhibits and supporting documentation are maintained for audit documentation purposes.

### Property Photo Documentation

Property photographs and imagery are presented in the Property Visual Context section of this report. 1 photograph(s) and satellite/aerial imagery were used to inform component classifications for the subject property at 1847 Wears Valley Rd, Sevierville, TN 37862.

## Aerial / Satellite Imagery

Aerial imagery of the subject property at 1847 Wears Valley Rd, Sevierville, TN 37862, obtained via Google Maps Static API.



Aerial View — Subject Property

## Audit Documentation Checklist

Document	Status
Purchase/closing documentation (HUD-1 or settlement statement)	Recommended
Property tax assessment showing land/improvement split	Recommended
Property photographs (exterior and interior)	Included
This cost segregation study report	Required
IRS Form 3115 (if lookback study — change in accounting method)	If applicable
MACRS depreciation schedules (provided in this report)	Included
Component classification support (engineering narratives)	Included
IRS legal citations and regulatory framework	Included
Entity formation and ownership documentation	Recommended
Loan documents and financing records	Optional
Prior appraisal or inspection reports	Optional

Floor plans or architectural drawings	Optional
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SAMPLE REPORT

## G. Appendix G — Disclaimers & Limitations

CSS-WP-800

**Professional Review:** This cost segregation study was prepared in accordance with the engineering cost approach outlined in the IRS Cost Segregation Audit Techniques Guide. Component classifications follow established IRS guidance, Treasury Regulations, and relevant Tax Court precedent. This report should be reviewed by a licensed Certified Public Accountant (CPA) or qualified tax professional prior to filing to ensure compatibility with the taxpayer's specific tax situation, including passive activity limitations, at-risk rules, and state conformity considerations.

**Scope of Services:** This report is provided for tax preparation and planning purposes. Cost Seg Smart provides engineering cost allocation analysis using proprietary cost databases and IRS-compliant classification methodology. This report does not constitute tax advice, legal advice, or accounting advice. The taxpayer's CPA or tax professional should apply these findings to the taxpayer's specific return.

**CPA Review Note:** This report is intended to assist the taxpayer and their tax advisor in determining appropriate depreciation treatment under applicable tax law. The allocations presented represent engineering cost estimates derived from construction cost references and applicable IRS guidance. Final tax treatment, including the decision to claim accelerated depreciation and the application of passive activity rules, remains at the sole discretion of the taxpayer's qualified tax professional.

**Accuracy of Information:** The accuracy of this study depends on the completeness and accuracy of the property information provided by the user. Cost Seg Smart makes no warranty regarding the accuracy of estimated component costs, as actual costs may vary based on specific construction details, materials, and conditions not captured in the standard input process.

**IRS Audit Risk:** While cost segregation is a well-established tax strategy recognized by the IRS, any depreciation deduction may be subject to IRS examination. The IRS may challenge the classification of specific components. Users should maintain supporting documentation including purchase agreements, inspection reports, and photographs for audit documentation.

**Bonus Depreciation:** This study applies 100% bonus depreciation based on the property's placed-in-service year. Historical rates: 100% (2022 and prior), 80% (2023), 60% (2024). Bonus depreciation treatment depends on applicable federal tax law for the placed-in-service year. This analysis assumes full expensing of eligible assets for qualified property acquired and placed in service in 2025 and later. Users should verify current bonus depreciation availability with their tax professional at the time of filing.

**State Tax Considerations:** Some states do not conform to federal bonus depreciation provisions. State depreciation deductions may differ from the federal amounts shown in this report. Consult your CPA regarding state-specific rules.

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This report was prepared by Cost Seg Smart using engineering cost allocation methodology. For questions regarding this study, please contact [support@costsegsmart.com](mailto:support@costsegsmart.com).

Report generated: April 25, 2026 at 05:14 PM

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