



# COST SEG SMART

Cost Segregation Study  
Short-Term Rental Property

**1407 Shelby Ave**  
Nashville, TN 37206

Purchase Price

**\$500,000**

Depreciable Basis

**\$384,300**

Accelerated Asset Reclassification

**\$103,042**

Report Number

**CSS-20260425-26408**

Prepared for: Sample Report — Nashville 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 — Nashville STR Investor,

Cost Seg Smart was engaged to perform an engineering cost segregation study for the property located at 1407 Shelby Ave, Nashville, TN 37206.

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

The study identified a total of \$103,042 in accelerated depreciation, with \$76,205 allocated to 5-year property and \$24,711 to 15-year property. The applicable bonus depreciation rate for the placed-in-service year is 100%.

The 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 accordingly.

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 these findings be reviewed with a qualified tax advisor.

Report No.: CSS-20260425-26408

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 \$103,042 of assets eligible for accelerated depreciation — 26.8% of the property's depreciable basis.*

The property at 1407 Shelby Ave, Nashville, TN 37206 is classified as Residential Rental Property under IRC §168(e)(2), with a default recovery period of 27.5 years under MACRS. The purpose of this study was to identify and classify components eligible for accelerated depreciation.

In the context of a short-term rental, material participation under IRC §469 is relevant, and the analysis of furniture, fixtures, and equipment (FF&E) is critical. The study identified 26.8% of the property's depreciable basis as eligible for accelerated depreciation, reflective of the property's use and asset composition. The property consists of 3 bedrooms and 2 bathrooms, with unit-level systems such as kitchens and bathrooms contributing to the personal property allocation.

### 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 **\$103,042** (26.8% of depreciable basis) in building systems eligible for reclassification into shorter MACRS recovery periods.

This study identified **\$103,042** of building components eligible for shorter MACRS recovery periods, which may generate a first-year deduction of up to **\$103,042** assuming full expensing of eligible assets under IRC §168(k), subject to the taxpayer's individual tax circumstances.

### Tax Timing Impact

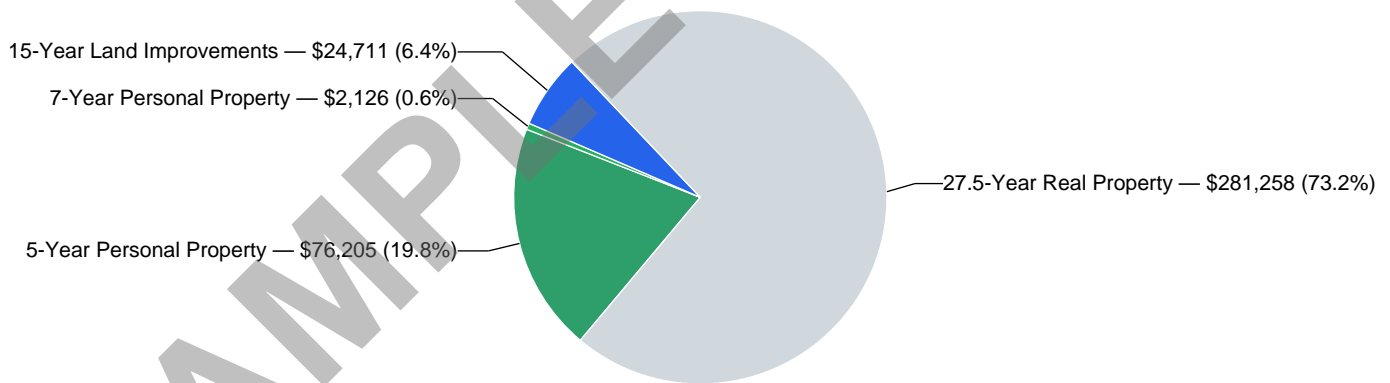
This analysis assumes full expensing of eligible assets based on applicable bonus depreciation provisions. For the placed-in-service year 2025, the applicable bonus depreciation rate depends on applicable law for the placed-in-service year under IRC §168(k). This rate is contingent upon current law for the placed-in-service year and is subject to legislative changes.

### Engineering Analysis Summary

Based on the wood frame residential construction typical of 2019-era builds in the Nashville, 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                                  | \$500,000                |
| Land Value (Non-Depreciable)                    | \$115,700                |
| <b>Total Depreciable Basis</b>                  | <b>\$384,300</b>         |
| 5-Year Personal Property                        | \$76,205 (19.8%)         |
| 15-Year Land Improvements                       | \$24,711 (6.4%)          |
| 27.5-Year Real Property                         | \$281,258 (73.2%)        |
| <b>Total Accelerated Asset Reclassification</b> | <b>\$103,042 (26.8%)</b> |

Depreciable Basis Allocation by MACRS Class



Estimated First-Year Tax Savings (Full Expensing Assumed)

| Tax Bracket | First-Year Deduction | Estimated Tax Savings |
|-------------|----------------------|-----------------------|
| 24%         | \$103,042            | \$24,730              |
| 32%         | \$103,042            | \$32,973              |
| 37%         | \$103,042            | \$38,126              |

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 **\$384,300** 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 26.8% accelerated depreciation, which is consistent with the observed market range of 25%-40% for short-term rental properties of this vintage and quality tier.

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

# Year 1 Tax Impact Analysis

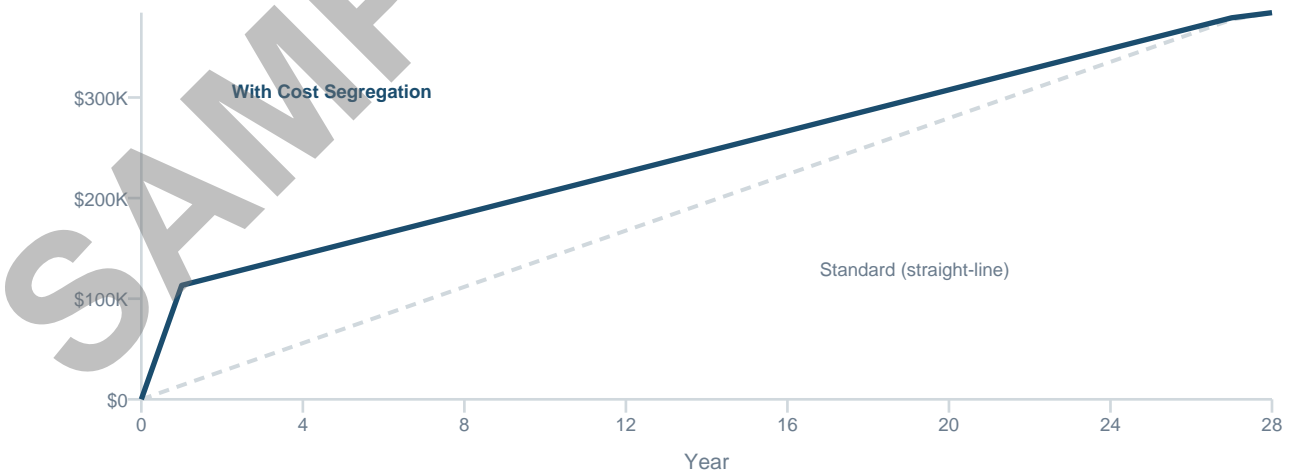
The following analysis compares first-year depreciation under standard straight-line treatment versus accelerated depreciation with cost segregation and applicable bonus depreciation provisions.

| Scenario                             | Total Year 1 Depreciation (All Classes)                  |
|--------------------------------------|--|
| Without Cost Segregation             | \$13,975 (straight-line: basis / 27.5)                   |
| <b>With Cost Segregation</b>         | <b>\$113,269</b> (accelerated + remaining straight-line) |
| <b>Additional First-Year Benefit</b> | <b>\$99,295</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 **\$99,295** 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>     | \$500,000        | Total acquisition cost                            |
| Less: Land Value          | (\$115,700)      | Non-depreciable                                   |
| <b>Depreciable Basis</b>  | <b>\$384,300</b> | <b>Basis subject to depreciation</b>              |
| 5-Year Personal Property  | \$76,205         | Interior finishes, fixtures, removable components |
| 7-Year Property           | \$2,126          | Equipment and specialized fixtures                |
| 15-Year Land Improvements | \$24,711         | Site improvements, landscaping, hardscape         |
| 27.5-Year Real Property   | \$281,258        | Structural building components                    |

|                        |                  |  |
|------------------------|------------------|--|
| <b>Total Allocated</b> | <b>\$384,300</b> | <b>Reconciles to depreciable basis</b> |
|------------------------|------------------|--|

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    | \$76,205         | 19.8%         |
| 7-Year Property    | \$2,126          | 0.6%          |
| 15-Year Property   | \$24,711         | 6.4%          |
| 27.5-Year Property | \$281,258        | 73.2%         |
| <b>Total</b>       | <b>\$384,300</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 26.8% accelerated depreciation.

# CPA Quick-Reference Summary

## Property Facts

|                              |                                      |
|------------------------------|--------------------------------------|
| Property Address             | 1407 Shelby Ave, Nashville, TN 37206 |
| Property Type                | Short-Term Rental                    |
| Year Built                   | 2019                                 |
| Purchase Price               | \$500,000                            |
| Land Value (Non-Depreciable) | \$115,700                            |
| Depreciable Basis            | <b>\$384,300</b>                     |
| Placed in Service            | 2025-06-15                           |

## Basis Allocation Summary

| Asset Class                       | Amount           | % of Basis   |
|-----------------------------------|------------------|--------------|
| 5-Year Personal Property          | \$76,205         | 19.8%        |
| 7-Year Personal Property          | \$2,126          | 0.6%         |
| 15-Year Land Improvements         | \$24,711         | 6.4%         |
| 27.5-Year Real Property           | \$281,258        | 73.2%        |
| <b>Total Accelerated Property</b> | <b>\$103,042</b> | <b>26.8%</b> |

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

| Asset Class                   | Accelerated Basis | Bonus Rate | Year-1 Deduction |
|-------------------------------|-------------------|------------|------------------|
| 5-Year Property               | \$76,205          | 100%       | \$76,205         |
| 7-Year Property               | \$2,126           | 100%       | \$2,126          |
| 15-Year Property              | \$24,711          | 100%       | \$24,711         |
| <b>Total Year-1 Deduction</b> |                   |            | <b>\$103,042</b> |

## Estimated Tax Savings

| Tax Bracket | Estimated Tax Savings |
|-------------|-----------------------|
|-------------|-----------------------|

|     |          |
|-----|----------|
| 24% | \$24,730 |
| 32% | \$32,973 |
| 37% | \$38,126 |

Typical accelerated depreciation ranges for short-term rental properties constructed between 1980 and 2020 are approximately 25%–40% of depreciable basis. The **26.8%** 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:** 1407 Shelby Ave, Nashville, TN 37206  
**Placed in Service:** 2025-06-15  
**Total Depreciable Basis:** \$384,300

## Accelerated Asset Schedule

| Asset Class              | Amount    | Recovery Period | Convention | Bonus Eligible |
|--------------------------|-----------|-----------------|------------|----------------|
| Personal Property        | \$76,205  | 5 years         | Half-year  | Yes (100%)     |
| Personal Property (7-yr) | \$2,126   | 7 years         | Half-year  | Yes (100%)     |
| Land Improvements        | \$24,711  | 15 years        | Half-year  | Yes (100%)     |
| Building (27.5-yr)       | \$281,258 | 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: \$76,205  
 Life: 5 years | Method: 200% DB | Convention: Half-year  
 Bonus Depreciation: 100%

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

Basis: \$2,126  
 Life: 7 years | Method: 200% DB | Convention: Half-year  
 Bonus Depreciation: 100%

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

Basis: \$24,711  
 Life: 15 years | Method: 150% DB | Convention: Half-year  
 Bonus Depreciation: 100%

### Asset 4 — Building (27.5-Year)

Basis: \$281,258  
 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 — Nashville STR Investor |
| Property Address     | 1407 Shelby Ave, Nashville, TN 37206   |
| Property Type        | Short-Term Rental                      |
| Date of Acquisition  | 2025-06-15                             |
| Placed in Service    | 2025-06-15                             |
| Purchase Price       | \$500,000                              |
| Building Area        | 1,800 SF                               |
| Year Built           | 2019                                   |
| Bedrooms / Bathrooms | 3 BR / 2 BA                            |
| Construction Type    | Wood Frame Residential                 |
| Property Features    | Standard                               |

### Property Classification

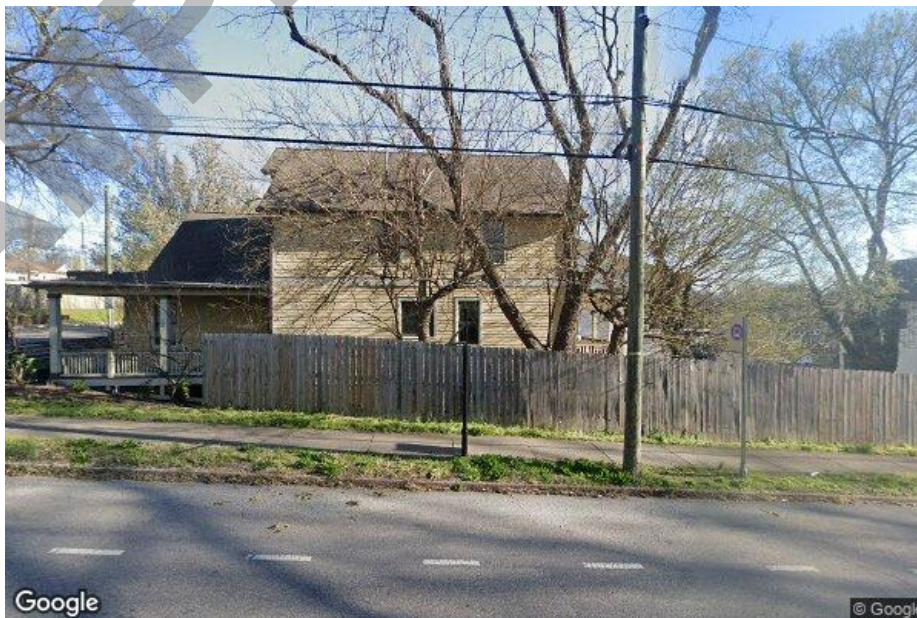
This property is classified as **Residential Rental Property** under IRC Section 168(e)(2)(A). The default recovery period for the building structure is **27.5 years** under the General Depreciation System (GDS) of MACRS. Through cost segregation, certain components are reclassified to shorter recovery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

\$103,042 of the property's \$384,300 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        | \$76,205       | 19.8%      |
| Personal Property | 7-Year MACRS        | \$2,126        | 0.6%       |

|   |                         |                  |               |
|---|-------------------------|------------------|---------------|
| <b>Land Improvements</b>                | 15-Year MACRS           | \$24,711         | 6.4%          |
| <b>Real Property (Building)</b>         | 27.5-Year Straight Line | \$281,258        | 73.2%         |
| <b>Total Depreciable Basis</b>          |                         | <b>\$384,300</b> | <b>100.0%</b> |
| <b>Total Accelerated (Reclassified)</b> |                         | <b>\$103,042</b> | <b>26.8%</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) | \$13,289       | 5-Year      |
| Living Area Furniture (Sofas, Tables, Chairs)   | \$11,171       | 5-Year      |
| Carpet & Pad                                    | \$7,858        | 5-Year      |
| Appliances                                      | \$7,142        | 5-Year      |
| Vinyl/Laminate Flooring                         | \$4,134        | 5-Year      |
| Televisions & Electronics                       | \$4,060        | 5-Year      |
| Light Fixtures                                  | \$3,734        | 5-Year      |
| Outdoor Furniture & Accessories                 | \$3,354        | 5-Year      |
| Linens, Bedding & Towels                        | \$3,126        | 5-Year      |
| Removable Kitchen Fixtures                      | \$2,497        | 5-Year      |
| Kitchen Smallwares & Cookware                   | \$2,110        | 5-Year      |
| Dining Furniture                                | \$2,006        | 5-Year      |
| Window Treatments                               | \$1,750        | 5-Year      |
| Bathroom Accessories & Fixtures                 | \$1,434        | 5-Year      |

|   |                  |         |
|---|------------------|---------|
| Ceiling Fans                              | \$1,196          | 5-Year  |
| Removable Laminate Surfaces               | \$1,102          | 5-Year  |
| Closet Shelving                           | \$1,083          | 5-Year  |
| <i>Other 5-Year Components (7 items)</i>  | \$5,157          | 5-Year  |
| <b>Subtotal — 5-Year</b>                  | <b>\$76,205</b>  |         |
| Decorative Items & Artwork                | \$2,126          | 7-Year  |
| <b>Subtotal — 7-Year</b>                  | <b>\$2,126</b>   |         |
| Wood Deck/Porch                           | \$4,872          | 15-Year |
| Concrete Paving & Walks                   | \$4,684          | 15-Year |
| Landscaping                               | \$4,390          | 15-Year |
| Fencing                                   | \$3,764          | 15-Year |
| Asphalt Paving                            | \$1,740          | 15-Year |
| Storm Drainage & Grading                  | \$1,566          | 15-Year |
| Irrigation System                         | \$1,375          | 15-Year |
| Exterior Lighting                         | \$1,184          | 15-Year |
| <i>Other 15-Year Components (2 items)</i> | \$1,136          | 15-Year |
| <b>Subtotal — 15-Year</b>                 | <b>\$24,711</b>  |         |
| <b>Total Accelerated (Reclassified)</b>   | <b>\$103,042</b> |         |

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

| Asset Category            | IRC Section | Recapture Treatment         | Amount    |
|---------------------------|-------------|-----------------------------|-----------|
| 5-Year Personal Property  | §1245       | Ordinary income recapture   | \$76,205  |
| 7-Year Personal Property  | §1245       | Ordinary income recapture   | \$2,126   |
| 15-Year Land Improvements | §1250       | 25% unrecaptured §1250 gain | \$24,711  |
| 27.5-Year Real Property   | §1250       | 25% unrecaptured §1250 gain | \$281,258 |

### Tax Impact Analysis

| Tax Scenario  | Amount           |
|---|------------------|
| Year 1 Depreciation WITHOUT Cost Segregation                  | \$13,975         |
| <b>Year 1 Depreciation WITH Cost Segregation + 100% Bonus</b> | <b>\$113,269</b> |
| <b>Additional First-Year Deduction</b>                        | <b>\$99,295</b>  |
| Estimated Federal Tax Reduction (37% marginal rate)           | <b>\$36,739</b>  |
| Estimated Federal Tax Reduction (32% marginal rate)           | \$31,774         |
| Estimated Federal Tax Reduction (24% marginal rate)           | \$23,831         |

*Note: The reclassified asset total (\$103,042) differs from the additional first-year deduction (\$99,295) because these assets would have received \$3,747 in standard straight-line depreciation regardless of cost segregation.*

### First-Year Depreciation Comparison

Cost segregation increases first-year depreciation by \$99,295, 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<br>\$2.5/SF x 0.98 geo  | Cost estimate | \$6,822    | \$1,705  | \$7,858     |
| Vinyl/Laminate Flooring         | Non-structural finish flooring           | Reg 1.48-1<br>\$1.4/SF x 0.98 geo  | Cost estimate | \$3,589    | \$897    | \$4,134     |
| Removable Kitchen Fixtures      | Non-permanent kitchen installations      | Reg 1.48-1<br>\$0.9/SF x 0.98 geo  | Cost estimate | \$2,168    | \$542    | \$2,497     |
| Bathroom Accessories & Fixtures | Removable bathroom fittings              | Reg 1.48-1<br>\$0.55/SF x 0.98 geo | Cost estimate | \$1,244    | \$311    | \$1,434     |
| Removable Laminate Surfaces     | Non-permanent decorative surfaces        | Reg 1.48-1<br>\$0.45/SF x 0.98 geo | Cost estimate | \$957      | \$239    | \$1,102     |
| Appliances                      | Freestanding kitchen equipment           | 00.11<br>\$2.3/SF x 0.98 geo       | Cost estimate | \$6,200    | \$1,550  | \$7,142     |
| Window Treatments               | Non-permanent window coverings           | Reg 1.48-1<br>\$0.6/SF x 0.98 geo  | Cost estimate | \$1,520    | \$380    | \$1,750     |
| Door Hardware & Accessories     | Non-structural door components           | Reg 1.48-1<br>\$0.35/SF x 0.98 geo | Cost estimate | \$833      | \$208    | \$959       |
| Light Fixtures                  | Decorative and specialty lighting        | 00.11<br>\$1.45/SF x 0.98 geo      | Cost estimate | \$3,241    | \$810    | \$3,734     |
| Ceiling Fans                    | Removable ventilation fixtures           | 00.11<br>\$0.35/SF x 0.98 geo      | Cost estimate | \$1,038    | \$260    | \$1,196     |
| Removable Plumbing Trim         | Non-structural plumbing accessories      | Reg 1.48-1<br>\$0.3/SF x 0.98 geo  | Cost estimate | \$799      | \$200    | \$920       |
| Smoke/CO Detectors              | Life safety detection devices            | 00.11<br>\$0.1/SF x 0.98 geo       | Cost estimate | \$262      | \$65     | \$302       |

|   |   |                                    |               |                 |                 |                 |
|---|---|------------------------------------|---------------|-----------------|-----------------|-----------------|
| Closet Shelving                                 | Removable storage systems               | Reg 1.48-1<br>\$0.4/SF x 0.98 geo  | Cost estimate | \$940           | \$235           | \$1,083         |
| Decorative Millwork                             | Non-structural decorative elements      | Reg 1.48-1<br>\$0.25/SF x 0.98 geo | Cost estimate | \$552           | \$138           | \$636           |
| Specialty Electrical                            | Dedicated circuits and specialty wiring | 00.12<br>\$0.3/SF x 0.98 geo       | Cost estimate | \$879           | \$220           | \$1,013         |
| Bathroom Hardware                               | Removable bathroom accessories          | Reg 1.48-1<br>\$0.25/SF x 0.98 geo | Cost estimate | \$658           | \$164           | \$758           |
| Kitchen Hood & Ventilation                      | Kitchen exhaust equipment               | 00.11<br>\$0.2/SF x 0.98 geo       | Cost estimate | \$494           | \$124           | \$569           |
| Bedroom Furniture (Beds, Dressers, Nightstands) | Personal property — shorter recovery    | 00.11<br>\$3.8/SF x 0.98 geo       | Cost estimate | \$11,536        | \$2,884         | \$13,289        |
| Living Area Furniture (Sofas, Tables, Chairs)   | Personal property — shorter recovery    | 00.11<br>\$3.4/SF x 0.98 geo       | Cost estimate | \$9,697         | \$2,424         | \$11,171        |
| Dining Furniture                                | Personal property — shorter recovery    | 00.11<br>\$0.65/SF x 0.98 geo      | Cost estimate | \$1,742         | \$435           | \$2,006         |
| Televisions & Electronics                       | Personal property — shorter recovery    | 00.11<br>\$1.4/SF x 0.98 geo       | Cost estimate | \$3,524         | \$881           | \$4,060         |
| Linens, Bedding & Towels                        | Personal property — shorter recovery    | 00.11<br>\$0.85/SF x 0.98 geo      | Cost estimate | \$2,714         | \$678           | \$3,126         |
| Kitchen Smallwares & Cookware                   | Personal property — shorter recovery    | 00.11<br>\$0.65/SF x 0.98 geo      | Cost estimate | \$1,832         | \$458           | \$2,110         |
| Outdoor Furniture & Accessories                 | Personal property — shorter recovery    | 00.11<br>\$1.1/SF x 0.98 geo       | Cost estimate | \$2,912         | \$728           | \$3,354         |
| <b>Subtotal</b>                                 |   |                                    |               | <b>\$66,154</b> | <b>\$16,538</b> | <b>\$76,205</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<br>\$0.8/SF x 0.98 geo | Cost estimate | \$1,846        | \$461        | \$2,126        |
| <b>Subtotal</b>            |                              |                              |               | <b>\$1,846</b> | <b>\$461</b> | <b>\$2,126</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<br>\$2.15/SF x 0.98 geo | Cost estimate | \$4,066         | \$1,017        | \$4,684         |
| Asphalt Paving             | Exterior paved surfaces           | 00.3<br>\$0.85/SF x 0.98 geo | Cost estimate | \$1,510         | \$378          | \$1,740         |
| Fencing                    | Exterior boundary improvements    | 00.3<br>\$1.45/SF x 0.98 geo | Cost estimate | \$3,267         | \$817          | \$3,764         |
| Landscaping                | Exterior plantings and grading    | 00.3<br>\$1.8/SF x 0.98 geo  | Cost estimate | \$3,811         | \$953          | \$4,390         |
| Irrigation System          | Landscape watering infrastructure | 00.3<br>\$0.6/SF x 0.98 geo  | Cost estimate | \$1,193         | \$298          | \$1,375         |
| Exterior Lighting          | Outdoor illumination fixtures     | 00.3<br>\$0.55/SF x 0.98 geo | Cost estimate | \$1,028         | \$257          | \$1,184         |
| Retaining Walls            | Site grade management structure   | 00.3<br>\$0.45/SF x 0.98 geo | Cost estimate | \$790           | \$197          | \$910           |
| Wood Deck/Porch            | Exterior recreational structure   | 00.3<br>\$1.9/SF x 0.98 geo  | Cost estimate | \$4,230         | \$1,057        | \$4,872         |
| Storm Drainage & Grading   | Site water management             | 00.3<br>\$0.65/SF x 0.98 geo | Cost estimate | \$1,359         | \$340          | \$1,566         |
| Mailbox & Site Accessories | Exterior site amenities           | 00.3<br>\$0.1/SF x 0.98 geo  | Cost estimate | \$196           | \$49           | \$226           |
| <b>Subtotal</b>            |                                   |                              |               | <b>\$21,451</b> | <b>\$5,363</b> | <b>\$24,711</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<br>\$12.75/SF x 0.98 geo | Cost estimate | \$20,409   | \$5,102  | \$23,510    |
| Framing    | Structural wood/steel framing  | N/A<br>\$21.5/SF x 0.98 geo  | Cost estimate | \$32,333   | \$8,083  | \$37,246    |
| Roofing    | Structural roof system         | N/A<br>\$10.1/SF x 0.98 geo  | Cost estimate | \$19,262   | \$4,816  | \$22,189    |

|                                 |                                |                              |               |                  |                 |                  |
|---------------------------------|--------------------------------|------------------------------|---------------|------------------|-----------------|------------------|
| Exterior Walls & Siding         | Building envelope              | N/A<br>\$11.25/SF x 0.98 geo | Cost estimate | \$20,157         | \$5,039         | \$23,219         |
| Windows & Exterior Doors        | Building envelope openings     | N/A<br>\$7.75/SF x 0.98 geo  | Cost estimate | \$13,045         | \$3,261         | \$15,028         |
| Insulation                      | Thermal building envelope      | N/A<br>\$4.2/SF x 0.98 geo   | Cost estimate | \$6,642          | \$1,660         | \$7,651          |
| Drywall & Finishing             | Interior wall surfaces         | N/A<br>\$9.7/SF x 0.98 geo   | Cost estimate | \$21,188         | \$5,297         | \$24,407         |
| Interior Paint                  | Interior wall finishes         | N/A<br>\$3.3/SF x 0.98 geo   | Cost estimate | \$6,772          | \$1,693         | \$7,801          |
| Kitchen Cabinets (Built-in)     | Permanently affixed cabinetry  | N/A<br>\$3.55/SF x 0.98 geo  | Cost estimate | \$6,844          | \$1,711         | \$7,884          |
| Bathroom Vanities (Built-in)    | Permanently affixed vanities   | N/A<br>\$1.0/SF x 0.98 geo   | Cost estimate | \$1,811          | \$453           | \$2,086          |
| Interior Doors                  | Structural interior partitions | N/A<br>\$1.25/SF x 0.98 geo  | Cost estimate | \$1,953          | \$488           | \$2,250          |
| Tile Flooring                   | Permanent floor surfaces       | N/A<br>\$5.05/SF x 0.98 geo  | Cost estimate | \$10,898         | \$2,724         | \$12,553         |
| Plumbing Systems                | Core building plumbing         | N/A<br>\$14.6/SF x 0.98 geo  | Cost estimate | \$29,992         | \$7,498         | \$34,549         |
| Electrical Systems              | Core building electrical       | N/A<br>\$12.65/SF x 0.98 geo | Cost estimate | \$24,414         | \$6,103         | \$28,123         |
| HVAC Systems                    | Central heating and cooling    | N/A<br>\$10.75/SF x 0.98 geo | Cost estimate | \$19,491         | \$4,873         | \$22,453         |
| Fire Sprinkler System           | Life safety suppression system | N/A<br>\$2.25/SF x 0.98 geo  | Cost estimate | \$3,833          | \$958           | \$4,415          |
| Permanently Affixed Countertops | Built-in surface installations | N/A<br>\$2.4/SF x 0.98 geo   | Cost estimate | \$5,116          | \$1,279         | \$5,894          |
| <b>Subtotal</b>                 |                                |                              |               | <b>\$244,160</b> | <b>\$61,040</b> | <b>\$281,258</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%              | \$13,344         |
| General Conditions & Supervision | 5.5%              | \$18,349         |
| Equipment Rentals & Tools        | 3.5%              | \$11,676         |
| Permits & Inspections            | 2.0%              | \$6,672          |
| Insurance & Bonding              | 2.5%              | \$8,340          |
| Contractor Overhead & Profit     | 5.0%              | \$16,681         |
| Miscellaneous Indirects          | 2.5%              | \$8,340          |
| <b>Total Indirect Costs</b>      | <b>25.0%</b>      | <b>\$83,403</b>  |

Total direct costs: \$333,610. 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 | \$500,000        | Per closing statement              |
| Less: Land Value (23.1%)            | (\$115,700)      | Land allocation per statistical    |
| <b>Depreciable Basis</b>            | <b>\$384,300</b> | <b>= Total Project Cost - Land</b> |

## B. Cost Segregation Allocation

| Asset Category           | Recovery Period         | Allocated Cost   |
|--------------------------|-------------------------|------------------|
| Non-Depreciable Land     | N/A                     | \$115,700        |
| Personal Property        | 5-Year MACRS            | \$76,205         |
| Personal Property        | 7-Year MACRS            | \$2,126          |
| Land Improvements        | 15-Year MACRS           | \$24,711         |
| Real Property (Building) | 27.5-Year Straight Line | \$281,258        |
| <b>Total</b>             |                         | <b>\$500,000</b> |

## C. Reconciliation Verification

| Reconciliation Item                           | Amount     |
|---|------------|
| A. Total Project Cost (Purchase Price)        | \$500,000  |
| B. Total Allocated per Cost Segregation Study | \$500,000  |
| <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 their nature as tangible personal property under Treas. Reg. 1.48-1(e)(1). The Whiteco six-factor test supports this classification due to their typical 5-10 year replacement cycle and lack of permanent attachment to the structure.

### 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, in contrast, is classified as 27.5-year property, as it is permanently affixed and integral to the building's function.

### Electrical

Decorative and specialized electrical components, such as light fixtures and ceiling fans, are classified as 5-year property under Rev. Proc. 87-56 Asset Classes 00.11 and 00.12. These components are distinct from core building electrical systems, which are classified as 27.5-year property due to their integral role in the building's infrastructure.

### Plumbing Fixtures

Removable plumbing accessories, such as bathroom hardware, are classified as 5-year property due to their lack of integration with the building's plumbing infrastructure. In contrast, the building's plumbing systems are classified as 27.5-year property, as they are permanently installed and essential to the building's operation.

### 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 distinct from the building structure and have a longer useful life than personal property.

### Appliances

Appliances are classified as 5-year personal property, consistent with IRS ATG guidance. The distinction between freestanding and built-in appliances is critical, with freestanding units typically qualifying for shorter recovery periods.

### Finishes

Finish materials such as removable laminate surfaces and decorative millwork are classified as 5-year property due to their decorative nature and lack of permanent attachment. Permanently affixed surfaces are classified as 27.5-year property, reflecting their integral role in the building's 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 subject to more frequent replacement cycles.

*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 \$103,042.

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    | \$76,205         | \$76,205   | \$0             |
| 2    | \$0              | \$76,205   | \$0             |
| 3    | \$0              | \$76,205   | \$0             |
| 4    | \$0              | \$76,205   | \$0             |
| 5    | \$0              | \$76,205   | \$0             |
| 6    | \$0              | \$76,205   | \$0             |

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

| Year | Annual Deduction | Cumulative | Remaining Basis |
|------|------------------|------------|-----------------|
| 1    | \$2,126          | \$2,126    | \$0             |
| 2    | \$0              | \$2,126    | \$0             |
| 3    | \$0              | \$2,126    | \$0             |
| 4    | \$0              | \$2,126    | \$0             |
| 5    | \$0              | \$2,126    | \$0             |
| 6    | \$0              | \$2,126    | \$0             |
| 7    | \$0              | \$2,126    | \$0             |
| 8    | \$0              | \$2,126    | \$0             |

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

| Year | Annual Deduction | Cumulative | Remaining Basis |
|------|------------------|------------|-----------------|
| 1    | \$24,711         | \$24,711   | \$0             |

|    |     |          |     |
|----|-----|----------|-----|
| 2  | \$0 | \$24,711 | \$0 |
| 3  | \$0 | \$24,711 | \$0 |
| 4  | \$0 | \$24,711 | \$0 |
| 5  | \$0 | \$24,711 | \$0 |
| 6  | \$0 | \$24,711 | \$0 |
| 7  | \$0 | \$24,711 | \$0 |
| 8  | \$0 | \$24,711 | \$0 |
| 9  | \$0 | \$24,711 | \$0 |
| 10 | \$0 | \$24,711 | \$0 |
| 11 | \$0 | \$24,711 | \$0 |
| 12 | \$0 | \$24,711 | \$0 |
| 13 | \$0 | \$24,711 | \$0 |
| 14 | \$0 | \$24,711 | \$0 |
| 15 | \$0 | \$24,711 | \$0 |
| 16 | \$0 | \$24,711 | \$0 |

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

| Year | Annual Deduction | Cumulative | Remaining Basis |
|------|------------------|------------|-----------------|
| 1    | \$5,114          | \$5,114    | \$276,144       |
| 2    | \$10,228         | \$15,341   | \$265,917       |
| 3    | \$10,228         | \$25,569   | \$255,689       |
| 4    | \$10,228         | \$35,796   | \$245,462       |
| 5    | \$10,228         | \$46,024   | \$235,234       |
| 6    | \$10,228         | \$56,252   | \$225,006       |
| 7    | \$10,228         | \$66,479   | \$214,779       |
| 8    | \$10,228         | \$76,707   | \$204,551       |
| 9    | \$10,228         | \$86,934   | \$194,324       |
| 10   | \$10,228         | \$97,162   | \$184,096       |
| 11   | \$10,228         | \$107,389  | \$173,869       |
| 12   | \$10,228         | \$117,617  | \$163,641       |
| 13   | \$10,228         | \$127,845  | \$153,413       |
| 14   | \$10,228         | \$138,072  | \$143,186       |

|    |          |           |           |
|----|----------|-----------|-----------|
| 15 | \$10,228 | \$148,300 | \$132,958 |
| 16 | \$10,228 | \$158,527 | \$122,731 |
| 17 | \$10,228 | \$168,755 | \$112,503 |
| 18 | \$10,228 | \$178,982 | \$102,276 |
| 19 | \$10,228 | \$189,210 | \$92,048  |
| 20 | \$10,228 | \$199,438 | \$81,821  |
| 21 | \$10,228 | \$209,665 | \$71,593  |
| 22 | \$10,228 | \$219,893 | \$61,365  |
| 23 | \$10,228 | \$230,120 | \$51,138  |
| 24 | \$10,228 | \$240,348 | \$40,910  |
| 25 | \$10,228 | \$250,575 | \$30,683  |
| 26 | \$10,228 | \$260,803 | \$20,455  |
| 27 | \$10,228 | \$271,030 | \$10,228  |
| 28 | \$5,114  | \$276,144 | \$5,114   |

## 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 under IRC §1245 and §1250 apply to this property. Cost segregation accelerates the timing of depreciation but does not create additional depreciation. The economic benefit derives from the time value of money. 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 | \$78,331  | IRC §1245 — Ordinary Income   | 37%      |
| 15-Year Property                  | \$24,711  | IRC §1250 — Unrecaptured Gain | 25%      |
| 27.5-Year Property                | \$281,258 | 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

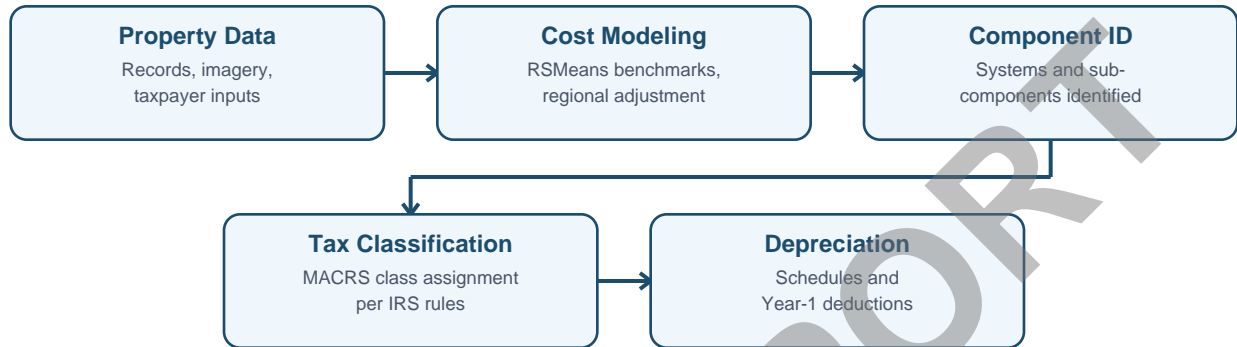
The following factors may materially affect component classification and allocation results. This section is provided to assist the taxpayer and their tax advisor in evaluating the study results in context.

| 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) | \$231.67/SF | \$417,013        |
| 2    | Market Reconciliation Factor                  | × 0.92      | <b>\$384,300</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 23.1% for this property in Nashville, TN, was determined using metro-area statistical averages and county assessor median land-to-improvement ratios. This allocation reflects the local market conditions and price-per-square-foot considerations. The taxpayer should verify this allocation against independent appraisals or county tax assessor data.

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                      | \$500,000          |
| Land Value Allocation               | \$115,700 (23.1%)  |
| <b>Depreciable Basis</b>            | <b>\$384,300</b>   |
| <b>Implied Cost per SF</b>          | <b>\$213.50/SF</b> |
| Accelerated Reclassification per SF | \$57.25/SF         |
| 27.5-Year Property per SF           | \$156.25/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 7-year-old property, components are generally at or near full remaining life, particularly given the property's recent construction in 2019. Physical depreciation is minimal, allowing for a cost allocation reflective of near-new condition.

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

The reconciliation factor of 0.92 indicates that the replacement cost closely approximates the depreciable basis. This factor suggests that the cost segregation study aligns well with the property's acquisition cost and market conditions.

### 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 | \$13,289   |
| Living Area Furniture (Sofas, Tables, Chairs)   | 200DB  | HY    | 5 yr | 2025-06-15 | \$11,171   |
| Carpet & Pad                                    | 200DB  | HY    | 5 yr | 2025-06-15 | \$7,858    |
| Appliances                                      | 200DB  | HY    | 5 yr | 2025-06-15 | \$7,142    |
| Vinyl/Laminate Flooring                         | 200DB  | HY    | 5 yr | 2025-06-15 | \$4,134    |
| Televisions & Electronics                       | 200DB  | HY    | 5 yr | 2025-06-15 | \$4,060    |
| Light Fixtures                                  | 200DB  | HY    | 5 yr | 2025-06-15 | \$3,734    |
| Outdoor Furniture & Accessories                 | 200DB  | HY    | 5 yr | 2025-06-15 | \$3,354    |
| Linens, Bedding & Towels                        | 200DB  | HY    | 5 yr | 2025-06-15 | \$3,126    |
| Removable Kitchen Fixtures                      | 200DB  | HY    | 5 yr | 2025-06-15 | \$2,497    |
| Kitchen Smallwares & Cookware                   | 200DB  | HY    | 5 yr | 2025-06-15 | \$2,110    |
| Dining Furniture                                | 200DB  | HY    | 5 yr | 2025-06-15 | \$2,006    |
| Window Treatments                               | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,750    |
| Bathroom Accessories & Fixtures                 | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,434    |
| Ceiling Fans                                    | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,196    |
| Removable Laminate Surfaces                     | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,102    |
| Closet Shelving                                 | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,083    |
| Specialty Electrical                            | 200DB  | HY    | 5 yr | 2025-06-15 | \$1,013    |
| Door Hardware & Accessories                     | 200DB  | HY    | 5 yr | 2025-06-15 | \$959      |
| Removable Plumbing Trim                         | 200DB  | HY    | 5 yr | 2025-06-15 | \$920      |
| Bathroom Hardware                               | 200DB  | HY    | 5 yr | 2025-06-15 | \$758      |

|  |       |    |         |            |                  |
|--|-------|----|---------|------------|------------------|
| Decorative Millwork                      | 200DB | HY | 5 yr    | 2025-06-15 | \$636            |
| Kitchen Hood & Ventilation               | 200DB | HY | 5 yr    | 2025-06-15 | \$569            |
| Smoke/CO Detectors                       | 200DB | HY | 5 yr    | 2025-06-15 | \$302            |
| Decorative Items & Artwork               | 200DB | HY | 7 yr    | 2025-06-15 | \$2,126          |
| Wood Deck/Porch                          | 150DB | HY | 15 yr   | 2025-06-15 | \$4,872          |
| Concrete Paving & Walks                  | 150DB | HY | 15 yr   | 2025-06-15 | \$4,684          |
| Landscaping                              | 150DB | HY | 15 yr   | 2025-06-15 | \$4,390          |
| Fencing                                  | 150DB | HY | 15 yr   | 2025-06-15 | \$3,764          |
| Asphalt Paving                           | 150DB | HY | 15 yr   | 2025-06-15 | \$1,740          |
| Storm Drainage & Grading                 | 150DB | HY | 15 yr   | 2025-06-15 | \$1,566          |
| Irrigation System                        | 150DB | HY | 15 yr   | 2025-06-15 | \$1,375          |
| Exterior Lighting                        | 150DB | HY | 15 yr   | 2025-06-15 | \$1,184          |
| Retaining Walls                          | 150DB | HY | 15 yr   | 2025-06-15 | \$910            |
| Mailbox & Site Accessories               | 150DB | HY | 15 yr   | 2025-06-15 | \$226            |
| <b>Remaining 27.5-Year Real Property</b> | SL    | MM | 27.5 yr | 2025-06-15 | <b>\$281,258</b> |
| <b>TOTAL DEPRECIABLE BASIS</b>           |       |    |         |            | <b>\$384,300</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 **1407 Shelby Ave, Nashville, TN 37206** contains identifiable components that qualify for accelerated depreciation under applicable federal tax law.

Using an engineering cost approach, this study allocated **\$103,042** of the property's **\$384,300** 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 **\$103,042** 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       | \$82,692         | 0.53           | 0.92          | <b>\$76,205</b>       |
| 7-Year Personal Property       | \$2,307          | 0.65           | 0.92          | <b>\$2,126</b>        |
| 15-Year Land Improvements      | \$26,814         | 0.77           | 0.92          | <b>\$24,711</b>       |
| 27.5-Year Real Property        | \$305,200        | 0.87           | 0.92          | <b>\$281,258</b>      |
| <b>Total Depreciable Basis</b> | <b>\$417,013</b> | —              | 0.92          | <b>\$384,300</b>      |

**Location Cost Index:** 0.98 (metro (calibrated) level — Nashville, 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>    | 23.1%  | Metro-area land ratio analysis based on median land-to-value ratios for the Nashville, TN submarket, calibrated against comparable property sales data and construction cost indices. | Primary       |
| <b>A.3 Replacement Cost Residual</b>      | 23.1%  | 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>23.1%</b></p> | <p>Based on the statistical market analysis as the primary method, corroborated by replacement cost residual analysis. Land value of \$115,700 (23.1% of purchase price) is adopted for this study.</p> | <p><b>Adopted</b></p> |

SAMPLE REPORT

## 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   |
|---|---|
| 1. Preparation by individuals with expertise        | Engineering-informed methodology using industry-standard cost databases and IRS classification criteria.                                  |
| 2. Detailed description of methodology              | Section 9 — Methodology & Basis of Analysis describes the cost approach, data sources, and reconciliation process.                        |
| 3. Use of appropriate documentation                 | Property details, construction data, regional cost factors, and county assessor records are incorporated.                                 |
| 4. Interviews & site inspection alternatives        | Property photos and detailed intake questionnaire substitute for physical site inspection, consistent with ATG guidance for desk reviews. |
| 5. Use of actual cost records                       | Where available, purchase records and assessor data supplement engineering cost estimates.  |
| 6. Determination of unit costs                      | Per-square-foot cost estimation using RSMeans and Marshall Valuation Service references.  |
| 7. Identification of section 1245 property          | Components are individually classified under Treas. Reg. 1.48-1 and the Whiteco six-factor functional test.                               |
| 8. Identification of section 1250 property          | Land improvements classified under IRS Asset Class 00.3 with 15-year recovery per Rev. Proc. 87-56.                                       |
| 9. Identification of land/land improvements         | Land allocation based on statistical metro-level data consistent with county assessor records.  |
| 10. Accuracy of computations                        | All allocations reconcile to depreciable basis. Depreciation schedules verified computationally.  |
| 11. Support for conclusions                         | Engineering narratives, IRS citations, and Whiteco functional analysis provided for each category.  |
| 12. Overall reasonableness                          | Acceleration percentages consistent with IRS audit benchmarks for property type and construction class.                                   |
| 13. Preparation or review by qualified professional | 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>Meiers 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 assumes a 5% discount rate and a 37% marginal tax rate. Accelerated deductions in earlier years are more valuable in present-value terms. Actual savings depend on the taxpayer's specific tax 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)          | \$73,910                             |
| <b>With Cost Segregation + Bonus Depreciation</b> | <b>\$90,403</b>                      |
| <b>NPV Benefit of Cost Segregation</b>            | <b>\$16,493</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 1407 Shelby Ave, Nashville, TN 37206.

## Aerial / Satellite Imagery

Aerial imagery of the subject property at 1407 Shelby Ave, Nashville, TN 37206, 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 |
|---------------------------------------|----------|

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 05:10 PM

SAMPLE REPORT