

TAX LOGIC™ CRE — 2025 INVESTMENT SUMMARY

Turning IRS Rules Into Growth Capital™ for Commercial Real Estate

The **One Big Beautiful Bill Act (OBBBA)**, signed in July 2025, permanently reinstated **100% bonus depreciation** for eligible property placed in service on or after **January 19, 2025**. Combined with **Cost Segregation, §179D Energy Deductions**, and **Reusable Wall Systems (GreenZip™)**, this update delivers stronger after-tax ROI for developers and investors.

2025 Update — Permanent 100% Bonus Depreciation (OBBBA)

- Applies to eligible property placed in service on or after **January 19, 2025**.
- Property placed in service before that date follows the prior phase-down schedule (e.g., 40%).
- Removes all step-downs to 80% in 2026 or later — the phase-out is now obsolete.
- Acquisition date matters: only assets acquired (binding contract or purchased) and placed in service after Jan 19, 2025, qualify.
- Qualified property definitions under §168(k) remain unchanged; 5-, 7-, and 15-year categories identified through cost segregation.

Example — \$10 Million Property (Illustrative)

Assumptions (engineering-based study required):

Purchase Price	\$10,000,000
Land Allocation	15% → depreciable basis \$8,500,000
Reclassified to Short-Life Assets	30% → \$2,550,000 bonus-eligible
Remaining 39-Year Basis	\$5,950,000 → Year-1 straight-line ≈ \$152,564

Year-1 Deduction: \$2,550,000 (bonus) + \$152,564 (regular) = **\$2,702,564**

Tax Bracket	Approx. Federal Tax Savings
24%	\$648,615
32%	\$864,820
37%	\$999,948
21% (C-Corp)	\$567,539

GreenZip™ reusable wall systems: Non-load-bearing, demountable partitions and related finishes typically qualify as **§1245 personal property (typically 5-year)** and may receive bonus depreciation when placed in service. Final classification is determined by the cost segregation study and supporting documentation.

Form 3115 Look-Back — Buildings Before 2025: Owners of existing properties can capture missed depreciation through a **Change in Accounting Method (Form 3115)** and a **§481(a)** catch-up—without amending prior returns.

Nicola J. (Nick) Coppola — CRE Tax & Sustainability Strategist
nick@taxlogiccre.com • (919) 632-0133 • TaxLogicCRE.com

Tax Logic™ collaborates with CSSI for certified cost-segregation studies. For informational and marketing purposes only; not tax advice.