

Digital Asset Allocation Plan

Per Rev Proc 2024-28

Purpose

This record documents my plan to transition from a universal or multi-wallet accounting method for my digital assets to a wallet-by-wallet method, in accordance with § 1.10121(j) of the 2024 final regulations.

Scope

- I confirm that, as of **January 1, 2025**, I possess digital assets with **unused basis**.
- I understand that I **cannot** apply my safe harbor cost basis allocation method to any assets that are **acquired or transferred** to me on or after **January 1, 2025**, and that I will adhere to the accounting methods described in **Section 1.1012-1(j)** of the 2024 final regulations for those assets.
- I confirm that I do **not** currently have any digital assets under consideration by a United States court, under IRS Independent Office of Appeals review, or under IRS examination.

Requirements

1. I confirm that **all my digital assets** qualify as **capital assets**.
2. I confirm that **all units of unused basis** were originally associated with a digital asset that is a **capital asset**.
3. I confirm that I will allocate **unused basis only** to digital assets of the **same type** as the asset from which the basis originally derived.
4. I confirm that I have documented and retained records showing the **total number of digital assets** in each wallet and account as of **January 1, 2025**.
5. I confirm that, **before the due date of my 2025 tax return (including extensions)**, I will prepare sufficient documentation to show:
 - The **number of units of unused basis**.
 - The **original cost basis** of each unit of unused basis.
 - The **acquisition date** of the digital asset unit to which the unused basis was originally attached.
6. I understand that this allocation is **irrevocable** for all purposes under **section 1012**.

Safe Harbor Allocation Plan (Specific Unit Allocation)

- I choose to **allocate my units of unused cost basis using a Specific Unit (Manual) Allocation method**.
- **The method by which my remaining units of unused cost basis will be individually identified and allocated** across my digital assets in each wallet or account is: "I will specify each lot and apply it to the chosen wallet or account on a per-unit basis."

- I will **manually select** which units of basis go to each wallet or account, ensuring that I do not exceed the account's overall asset balance and that each unit remains with the same asset type from which the basis originated.
- I have elected to use this plan for **all digital assets acquired before January 1, 2025**. I understand that all such pre-2025 assets are bound by this allocation method and that, **after January 1, 2025**, I do not have discretion to change how these unused basis units are allocated.
- I agree to **adopt** this allocation plan and include it in my records.

Name:

Signature:

Date:

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