

Digital Asset Allocation Plan

Per Rev Proc 2024-28

Purpose: The purpose of this record is to document my plan to transition my digital assets from a universal or multi-wallet method of accounting to a wallet-by-wallet method of accounting, per the rules in § 1.10121(j) of the 2024 final regulations.

Scope

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

Requirements

- I confirm that all of my digital assets are considered capital assets.
- I confirm that all units of unused basis were originally attached to a digital asset that was considered a capital asset.
- I confirm that I will allocate unused basis of digital assets only to the same type of digital asset that the basis originally derived from.
- I confirm that I have documented and maintained records to show the total number of digital assets being held in each of my wallets and accounts as of 1/1/25.
- I confirm that prior to the due date of my 2025 tax return (including extensions), I will prepare records sufficient to show the number of units of unused basis, the original cost basis of each unit of unused basis, and the acquisition date of the digital asset unit to which the unused basis was originally attached.
- I understand that this allocation is irrevocable for all purposes of section 1012.

Safe Harbor Allocation Plan

I am choosing to allocate my units of unused cost basis based on the **global allocation** method. The method in which my remaining units of unused cost basis will be ordered and then allocated to the pool of remaining digital assets within each wallet or account is:

Please note that I will apply this method first to hosted wallets and then to unhosted wallets in order of acquisition date, from oldest to newest.

I am choosing to apply this method of allocation to all of my digital assets that were acquired before January 1, 2025. I understand that all of my pre-2025 assets will follow this allocation method and that I do not have discretion on or after January 1, 2025 with respect to how units of unused basis are allocated.

I agree to adopt this allocation plan and add it to my books and records.

Name: _____

Signature: _____

Date: _____