

**COMMUNITY RESOURCE
EXCHANGE, INC.**

**Financial Statements
For the Years Ended
September 30, 2022
and
September 30, 2021**

Independent Auditor's Report

To the Board of Directors of
Community Resource Exchange, Inc.

Opinion

We have audited the financial statements of Community Resource Exchange, Inc. ("CRE"), which comprise the statement of financial position as of September 30, 2022 and September 30, 2021 and the related statements of activities, functional expenses and cash flows for the years then ended and the related notes to the financial statements.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of CRE as of September 30, 2022 and September 30, 2021, and the results of its activities and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of CRE and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about CRE's ability to continue as a going concern within one year after the date that the financial statements are available to be issued.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements, as a whole, are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of CRE's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about CRE's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Condon O'Meara McGinty + Donnelly LLP

March 10, 2023

COMMUNITY RESOURCE EXCHANGE, INC.

Statement of Financial Position

	September 30	
	<u>2022</u>	<u>2021</u>
Assets		
Assets		
Cash and cash equivalents	\$1,592,645	\$2,127,065
Certificates of deposit	1,551,210	1,729,462
Investments, at fair value	641,572	782,146
Foundation grants and pledges receivable	218,654	291,423
Consulting fees receivable, net	314,486	436,631
Government grants receivable	174,842	62,627
Accrued interest receivable	3,193	4,747
Prepaid expenses and other assets	126,906	110,367
Property and equipment, at cost, net	<u>3,926</u>	<u>8,227</u>
Total assets	<u>\$4,627,434</u>	<u>\$5,552,695</u>
Liabilities and Net Assets		
Liabilities		
Accounts payable and accrued expenses	\$ 298,590	\$ 365,676
Unearned revenue	217,681	411,458
Loans payable	<u>-</u>	<u>587,242</u>
Total liabilities	<u>516,271</u>	<u>1,364,376</u>
Net assets		
Without donor restrictions		
Operating	2,085,025	2,159,487
Board designated	<u>1,501,354</u>	<u>1,501,354</u>
Total without donor restrictions	3,586,379	3,660,841
With donor restrictions	<u>524,784</u>	<u>527,478</u>
Total net assets	<u>4,111,163</u>	<u>4,188,319</u>
Total liabilities and net assets	<u>\$4,627,434</u>	<u>\$5,552,695</u>

See notes to financial statements.

COMMUNITY RESOURCE EXCHANGE, INC.

Statement of Activities

	Year Ended September 30							
	2022			2021				
	Without Donor Restrictions	Board Designated	With Donor Restrictions	Total	Without Donor Restrictions	Board Designated	With Donor Restrictions	Total
Revenue and support								
Consulting fees	\$ 1,761,612	\$ -	\$ -	\$ 1,761,612	\$ 1,817,357	\$ -	\$ -	\$ 1,817,357
Contributions of cash and other financial assets	145,611	-	-	145,611	173,922	-	-	173,922
Contributions of nonfinancial assets	8,079	-	-	8,079	50,333	-	-	50,333
Foundation and corporate grants	4,295	-	890,292	894,587	104,732	-	674,652	779,384
Government grants and contracts	1,262,845	-	-	1,262,845	1,133,056	-	-	1,133,056
Investment return, net – operating	68,156	-	-	68,156	78,547	-	-	78,547
Other	5,572	-	-	5,572	9,742	-	-	9,742
Net assets released from restrictions	892,986	-	(892,986)	-	754,064	-	(754,064)	-
Total revenue and support	<u>4,149,156</u>	<u>-</u>	<u>(2,694)</u>	<u>4,146,462</u>	<u>4,121,753</u>	<u>-</u>	<u>(79,412)</u>	<u>4,042,341</u>
Expenses								
Program services	3,264,392	-	-	3,264,392	3,159,155	-	-	3,159,155
Supporting activities								
Management and general	650,798	-	-	650,798	598,817	-	-	598,817
Fundraising	45,883	-	-	45,883	66,770	-	-	66,770
Total supporting activities	696,681	-	-	696,681	665,587	-	-	665,587
Total expenses	<u>3,961,073</u>	<u>-</u>	<u>-</u>	<u>3,961,073</u>	<u>3,824,742</u>	<u>-</u>	<u>-</u>	<u>3,824,742</u>
Increase (decrease) in net assets before investment return, net-non-operating	188,083	-	(2,694)	185,389	297,011	-	(79,412)	217,599
Investment return, net – non-operating	<u>(262,545)</u>	<u>-</u>	<u>-</u>	<u>(262,545)</u>	<u>98,474</u>	<u>-</u>	<u>-</u>	<u>98,474</u>
Increase (decrease) in net assets	<u>(74,462)</u>	<u>-</u>	<u>(2,694)</u>	<u>(77,156)</u>	<u>395,485</u>	<u>-</u>	<u>(79,412)</u>	<u>316,073</u>
Net assets, beginning of year	<u>2,159,487</u>	<u>1,501,354</u>	<u>527,478</u>	<u>4,188,319</u>	<u>1,764,002</u>	<u>1,501,354</u>	<u>606,890</u>	<u>3,872,246</u>
Net assets, end of year	<u>\$ 2,085,025</u>	<u>\$ 1,501,354</u>	<u>\$ 524,784</u>	<u>\$ 4,111,163</u>	<u>\$ 2,159,487</u>	<u>\$ 1,501,354</u>	<u>\$ 527,478</u>	<u>\$ 4,188,319</u>

See notes to financial statements.

COMMUNITY RESOURCE EXCHANGE, INC.

Statement of Functional Expenses

	Year Ended September 30			
	2022		2021	
	Program Services	Supporting Activities Management and General	Program Services	Supporting Activities Management and General
Payroll and related expenses				
Salaries and related expenses	\$ 2,280,132	\$ 495,599	\$ 2,808,639	\$ 2,141,851
Payroll taxes and benefits	555,118	57,335	614,623	520,691
Total payroll and related expenses	<u>2,835,250</u>	<u>552,934</u>	<u>3,423,262</u>	<u>2,662,542</u>
				\$ 49,411
				6,189
				<u>55,600</u>
				\$ 2,622,512
				587,056
				<u>3,209,568</u>
Other expenses				
Contracted services	122,121	25,291	148,370	98,120
Professional fees	26,702	5,898	32,823	59,649
Occupancy	49,725	10,983	61,124	49,770
Insurance	14,947	3,302	18,375	13,038
Office equipment	-	-	-	251
Office supplies	19,188	383	19,584	23,882
Subscriptions and memberships	63,933	8,352	78,141	52,980
Subcontractors and client expenses	51,700	-	51,700	82,977
Events and meetings	14,626	2,563	17,578	4,773
Marketing and communications	6,122	583	8,227	10,399
Staff development	30,175	3,904	34,227	73,488
Bank charges and other fees	25,266	5,581	31,962	21,861
Depreciation and amortization	4,637	1,024	5,700	5,425
Uncollectable accounts	-	30,000	30,000	-
Total other expenses	<u>429,142</u>	<u>97,864</u>	<u>537,811</u>	<u>496,613</u>
				11,170
				<u>66,770</u>
Total expenses	\$ 3,264,392	\$ 650,798	\$ 3,961,073	\$ 3,159,155
				\$ 598,817
				\$ 3,824,742

See notes to financial statements.

COMMUNITY RESOURCE EXCHANGE, INC.

Statement of Cash Flows

	Year Ended	
	September 30	
	<u>2022</u>	<u>2021</u>
Cash flows from operating activities		
Increase (decrease) in net assets	\$ (77,156)	\$ 316,073
Adjustments to reconcile increase (decrease) in net assets to net cash (used in) operating activities		
Depreciation and amortization	5,700	6,870
Forgiveness of loan	(587,242)	(587,241)
Realized (gain) on sale of investments	(32,899)	(49,208)
Unrealized (gain) loss on investments	262,545	(98,474)
Donated securities	(25,227)	(25,373)
Sale of donated securities	25,227	25,373
(Increase) decrease in assets		
Foundation grants and pledges receivable	72,769	(91,514)
Consulting fees receivable	122,145	(58,435)
Government grants receivable	(112,215)	69,115
Accrued interest receivable	1,554	(587)
Prepaid expenses and other assets	(16,539)	18,169
Increase (decrease) in liabilities		
Accounts payable and accrued expenses	(67,086)	67,918
Unearned revenue	(193,777)	215,285
Net cash (used in) operating activities	<u>(622,201)</u>	<u>(192,029)</u>
Cash flows from investing activities		
Purchases of property and equipment	(1,399)	(4,589)
Proceeds from the maturity of certificates of deposit	446,000	175,000
Purchases of certificates of deposit	(343,856)	(1,107,861)
Proceeds from sales of investments	110,657	302,445
Purchases of investments	(123,621)	(218,256)
Net cash provided by (used in) investing activities	<u>87,781</u>	<u>(853,261)</u>
Cash flows from financing activities		
Proceeds from loan payable	<u>-</u>	<u>587,242</u>
Net (decrease) in cash and cash equivalents	(534,420)	(458,048)
Cash and cash equivalents, beginning of year	<u>2,127,065</u>	<u>2,585,113</u>
Cash and cash equivalents, end of year	<u>\$1,592,645</u>	<u>\$2,127,065</u>

See notes to financial statements.

COMMUNITY RESOURCE EXCHANGE, INC.**Notes to Financial Statements
September 30, 2022 and September 30, 2021****Note 1 – Nature of organization**

Community Resource Exchange, Inc. (“CRE”) is a nonprofit consulting firm that provides the strategies and tools needed to build sustainable, high-performing organizations that improve people’s lives and drive social change. CRE specializes in serving organizations that have deep roots in urban communities, particularly those groups working to fight poverty, promote equity, and expand opportunity. For over 40 years, CRE has worked at the intersection of nonprofits and communities - building leaders and strengthening organizations to deliver impact. CRE provides customized local solutions that blend deep consulting experience and operational expertise to help leaders manage in an environment of complexity and change. CRE taps the transformative power of assessment, data, leadership, collaboration, and strategy to help organizations plan smartly, operate effectively and produce results.

Through consulting, coaching and leadership and management training programs, CRE strengthens organizations by focusing on the basics: effective leadership, high performing staff, financial stability, effective programs, and a culture of learning and continuous improvement. We know that a strong organizational foundation and a clear direction allows leadership and staff to focus their time and resources on making a difference in the communities they serve. When a CRE engagement is through, organizations are stronger and leaders are better able to achieve their goals. CRE harnesses the lessons learned from each engagement to develop strategies that benefit the social sector as a whole. Today, CRE is proud to be the go-to partner annually for over 500 organizations – large and small – working to create opportunity and catalyze change.

Each year, CRE raises funds from corporations, foundations, government entities, and individuals to allow us to offer our services at no cost to our clients or at subsidized rates.

Note 2 – Summary of significant accounting policies**Financial reporting**

CRE reports information regarding its financial position and activities in two classes of net assets which are as follows:

Without donor restrictions

- Operating - net assets that are used to account for the general activities of CRE.
- Board designated - monies or assets contributed to CRE which are designated by the Board of Directors to provide long-term financial support for uses including investments and emergencies. Use of these funds requires Board approval.

With donor restrictions

Net assets with donor restrictions of CRE which have been limited by donor-imposed stipulations that either expire with the passage of time or can be fulfilled and removed by the actions of CRE pursuant to those stipulations.

COMMUNITY RESOURCE EXCHANGE, INC.**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021****Note 2 – Summary of significant accounting policies (continued)**Cash and cash equivalents

CRE deems highly liquid investments with original maturities of 90 days or less to be cash equivalents.

Certificates of deposit

CRE values certificates of deposit in the statement of financial position using a cost-based measure.

Fair value measurements

CRE's investments are composed of exchange-traded funds. At September 30, 2022 and September 30, 2021, CRE's exchange-traded funds are classified in the highest level of the fair value hierarchy (Level 1). The quoted prices for these assets are in active markets for identical assets.

Foundation grants and pledges receivable

Pledges and contributions are recognized when a donor makes a promise to give to CRE that is unconditional. Pledges and contributions that are restricted for purpose or the passage of time are reported as increases in net assets with donor restrictions. When a restriction expires, net assets with donor restrictions are reclassified to net assets without donor restrictions as net assets released from restrictions.

Allowance for doubtful accounts

As of September 30, 2022 and September 30, 2021, CRE has an allowance of approximately \$130,000 and \$115,000, respectively, for any potentially uncollectible consulting fees. The estimate is based on management's experience, the aging of the receivables, subsequent receipts and current economic conditions.

Property and equipment

Office equipment and furniture acquisitions are stated at cost and depreciated on a straight line basis over an estimated useful life of five years. Leasehold improvements are stated at cost and amortized on a straight-line basis over the shorter of the lease term or their estimated useful life. CRE capitalizes all expenditures for property and equipment in excess of \$1,000 with a useful life greater than one year.

COMMUNITY RESOURCE EXCHANGE, INC.**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021****Note 2 – Summary of significant accounting policies (continued)**Revenue recognition

Revenue from government contracts and grants is recognized when costs are incurred or other services are performed. Unearned revenue represents primarily consulting fees received in advance of the performance of services.

Contributions of nonfinancial assets

CRE recognizes donated services which have an ascertainable value and are an integral part of CRE's program and supporting activities. For the fiscal years ended September 30, 2022 and September 30, 2021, donated services consisted of legal services totaling \$3,088 and \$50,333, respectively. Legal services are value and reported at the estimated fair value based on current rates for similar legal services. The legal services were from attorneys for administrative issues. CRE also received other miscellaneous contributed nonfinancial assets in 2022 valued at \$4,991.

Use of estimates

The preparation of financial statements requires management to make estimates and assumptions that affect the amounts reported in the financial statements. Actual results could differ from these estimates.

Allocation of expenses

The costs of providing the various programs and other activities have been summarized on a functional basis. Accordingly, certain shared costs have been allocated among the program services and supporting activities benefited. Expenses attributable to more than one functional category are allocated based on time and effort.

Concentrations of credit risk

CRE's financial instruments that are potentially exposed to concentrations of credit risk consist of cash, cash equivalents, certificates of deposit, investments and receivables. CRE places its cash, cash equivalents and certificates of deposit with what it believes to be quality financial institutions. At times during the year, CRE's bank account balances exceeded the FDIC insurance limit. CRE has not incurred any losses in these accounts to date. Investments are exposed to various risks such as interest rate, market volatility, liquidity and credit. Due to the level of uncertainty related to these risks, it is reasonably possible that changes in these risks could materially affect the fair value of the investments reported in the statement of financial position at September 30, 2022. CRE regularly monitors the collectability of its receivables. Accordingly, CRE believes no significant concentrations of credit risk exist with respect to its cash, cash equivalents, certificates of deposit, investments and receivables.

COMMUNITY RESOURCE EXCHANGE, INC.

**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021**

Note 2 – Summary of significant accounting policies (continued)

Subsequent events

CRE has evaluated subsequent events and transactions for potential recognition or disclosure through March 10, 2023, which is the date the financial statements were available to be issued.

Note 3 – Liquidity and availability of financial assets

CRE's cash flows are subject to seasonal fluctuations due to the timing of collections of consulting fees, grants, contracts and other revenue items.

As of September 30, 2022 and September 30, 2021, financial assets and liquidity resources available within one year of the statement of financial position date for general expenditure were as follows:

	<u>2022</u>	<u>2021</u>
Financial assets		
Cash and cash equivalents	\$ 1,592,645	\$ 2,127,065
Certificates of deposit	1,551,210	1,729,462
Investments, at fair value	641,572	782,146
Foundation grants and pledges receivable	218,654	291,423
Consulting fees receivable, net	314,486	436,631
Government grants receivable	174,842	62,627
Accrued interest receivable	<u>3,193</u>	<u>4,747</u>
Total financial assets	4,496,602	5,434,101
Less: Board designated net assets	<u>(1,501,354)</u>	<u>(1,501,354)</u>
Total	<u>\$ 2,995,248</u>	<u>\$ 3,932,747</u>

At September 30, 2022 and September 30, 2021, CRE had Board-designated net assets of \$1,501,354 which are available for general expenditure with Board approval.

Note 4 – Investments, at fair value

Investments, at fair value, consisted of the following as of September 30, 2022 and September 30, 2021:

	<u>2022</u>		<u>2021</u>	
	<u>Cost</u>	<u>Fair Value</u>	<u>Cost</u>	<u>Fair Value</u>
Exchange traded funds	<u>\$ 638,448</u>	<u>\$ 641,572</u>	<u>\$ 592,585</u>	<u>\$ 782,146</u>

COMMUNITY RESOURCE EXCHANGE, INC.

**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021**

Note 4 – Investments, at fair value (continued)

Investment return, net, consisted of the following for the years ended September 30, 2022 and September 30, 2021:

	<u>2022</u>	<u>2021</u>
Interest and dividends	\$ 40,649	\$ 34,839
Unrealized gain (loss)	(262,545)	98,474
Realized gains	32,899	49,208
Fees	<u>(5,392)</u>	<u>(5,500)</u>
Total	<u>\$ (194,389)</u>	<u>\$ 177,021</u>

Investment return, net, is summarized as follows for the years ended September 30, 2022 and September 30, 2021:

	<u>2022</u>	<u>2021</u>
Investment return, net – operating	\$ 68,156	\$ 78,547
Investment return, net – non-operating	<u>(262,545)</u>	<u>98,474</u>
Total	<u>\$ (194,389)</u>	<u>\$ 177,021</u>

Note 5 – Government grants receivable

Government grants receivable as of September 30, 2022 and September 30, 2021 consist of amounts due from the City of New York Department of Youth and Community Development for \$174,842 and \$62,627, respectively. The government grants and contracts receivable at September 30, 2022 are expected to be collected in 2023.

Reimbursement under government contracts and contracts is subject to audit by the various government agencies. The effect of any potential audit disallowances is not reflected in these financial statements. Management is of the opinion that any potential disallowances will not be material to the accompanying financial statements.

Note 6 – Foundation grants and pledges receivable

Foundation grants and pledges receivable consisted of the following as of September 30, 2022 and September 30, 2021:

	<u>2022</u>	<u>2021</u>
Booth Ferris Foundation	\$ -	\$ 150,000
Mary J. Hutchins Foundation	-	50,000
Research Foundation of the City University of NY	-	19,290
Robert Sterling Clark Foundation	165,000	-
William T. Grant Foundation	32,500	-
Other	<u>21,154</u>	<u>72,133</u>
Total	<u>\$ 218,654</u>	<u>\$ 291,423</u>

COMMUNITY RESOURCE EXCHANGE, INC.

**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021**

Note 7 – Property and equipment, net

As of September 30, 2022 and September 30, 2021, property and equipment and accumulated depreciation and amortization were as follows:

	<u>2022</u>	<u>2021</u>
Leasehold improvements	\$ 201,615	\$ 201,615
Office equipment and furniture	<u>180,697</u>	<u>179,298</u>
	382,312	380,913
Less accumulated depreciation and amortization	<u>378,386</u>	<u>372,686</u>
Total property and equipment, net	<u>\$ 3,926</u>	<u>\$ 8,227</u>

Note 8 – Loans payable

In April 2020, CRE applied for and received \$587,241 under the Paycheck Protection Program (“PPP”) which was a business loan program established under the Coronavirus Aid, Relief and Economic Security Act. At September 30, 2020, CRE elected to record the proceeds as a liability until the loan was, in part or wholly, forgiven and CRE was legally released. On January 6, 2021, the SBA authorized the PPP loan to be forgiven and it is considered paid in full. As a result, CRE has recorded the loan as part of government grants and contracts revenue in the 2021 statement of activities.

On February 22, 2021, CRE received a second PPP loan totaling \$587,242, under similar terms, as similar as outlined above. CRE elected to record the proceeds as a liability until the loan is, in part or wholly, forgiven and CRE is legally released. On November 16, 2021, the SBA authorized the second PPP loan to be forgiven and it is considered paid in full. As a result, has recorded the loan as part of government grants and contracts revenue in the 2022 statement of activities.

Note 9 – Net assets with donor restrictions

As of September 30, 2022 and September 30, 2021, net assets with donor restrictions consisted of the following:

	<u>2022</u>	<u>2021</u>
Program restrictions	\$ 223,797	\$ 294,866
Time restrictions	<u>300,987</u>	<u>232,612</u>
Total	<u>\$ 524,784</u>	<u>\$ 527,478</u>

Note 10 – Retirement plan

CRE has a 403(b) plan available to all eligible employees. CRE’s contributions to the plan are at the discretion of the Board of Directors. CRE’s contributions were approximately \$113,000 and \$108,000 for the years ended September 30, 2022 and September 30, 2021, respectively.

COMMUNITY RESOURCE EXCHANGE, INC.**Notes to Financial Statements (continued)
September 30, 2022 and September 30, 2021****Note 11 – Employee Retention Credits**

In response to the coronavirus emergency, the Coronavirus Aid, Relief and Economic Security Act and subsequent legislations (the “Acts”) were signed into law. The Acts provide, among other things, a refundable credit of certain of qualified wages per eligible employee for wages paid or incurred from March 13, 2020 through September 30, 2021. In connection therewith, CRE applied for credits totaling approximately \$688,000. CRE will record the credits as revenue in the 2023 statement of activities when received.

Note 12 – Commitments

During May 2020, CRE extended the term of its office lease for a period of three months which expired August 6, 2020 and is now leasing the space on a month-to-month basis. The rental expense for CRE for the years ended September 30, 2022 and September 30, 2021 was approximately \$61,000 and \$63,000. CRE has a \$33,333 security deposit with the landlord which is included in prepaid expenses and other assets on the statement of financial position.

CRE has a subtenant whose license agreement expired March 31, 2020 is now subletting on a month-to-month basis. At September 30, 2022 and September 30, 2021, the license rental revenue associated with these agreements totaled \$1,800 and \$6,633, respectively, and is included in other revenue on the statement of activities.

Note 13 – Tax status

CRE is exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code (the “Code”). In addition, CRE has been determined by the Internal Revenue Service to be a publicly supported organization and not a private foundation under the meaning of Section 509(a)(1) of the Code.