

**Code of Support Foundation**

Financial Statements  
and Independent Auditor's Report

December 31, 2022 and 2021

# **Code of Support Foundation**

Financial Statements  
December 31, 2022 and 2021

## **Contents**

Independent Auditor's Report.....	1-3
<i>Financial Statements</i>	
Statements of Financial Position.....	4
Statements of Activities .....	5-6
Statements of Functional Expenses .....	7-8
Statements of Cash Flows.....	9
Notes to Financial Statements.....	10-17

## **INDEPENDENT AUDITOR'S REPORT**

To the Board of Directors of  
Code of Support Foundation

### ***Opinion***

We have audited the accompanying financial statements of Code of Support Foundation (COSF), which comprise the statements of financial position as of December 31, 2022 and 2021; 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 financial statements referred to above present fairly, in all material respects, the financial position of COSF as of December 31, 2022 and 2021, and the changes in its net assets 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 COSF 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.

***Responsibilities of Management for the Financial Statements (continued)***

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 COSF'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, including omissions, 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 COSF'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 COSF's ability to continue as a going concern for a reasonable period of time.

*Auditor's Responsibilities for the Audit of the Financial Statements (continued)*

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.

Handwritten signature of Rogers & Company PLLC in black ink.

Vienna, Virginia  
July 17, 2023

## Code of Support Foundation

### Statements of Financial Position December 31, 2022 and 2021

	2022	2021
<b>Assets</b>		
Cash	\$ 265,922	\$ 312,017
Contributions receivable	-	37,000
Employee retention credit receivable	172,172	172,172
Prepaid expenses and deposits	16,043	12,462
Property and equipment, net	452,465	617,293
Total assets	<u>\$ 906,602</u>	<u>\$ 1,150,944</u>
<b>Liabilities and Net Assets</b>		
<b>Liabilities</b>		
Accounts payable and accrued expenses	\$ 40,054	\$ 64,209
Lines of credit	-	165,769
Note payable	-	50,000
Total liabilities	<u>40,054</u>	<u>279,978</u>
<b>Net Assets</b>		
Without donor restrictions	661,389	570,429
With donor restrictions	205,159	300,537
Total net assets	<u>866,548</u>	<u>870,966</u>
Total liabilities and net assets	<u>\$ 906,602</u>	<u>\$ 1,150,944</u>

See accompanying notes.

## Code of Support Foundation

### Statement of Activities For the Year Ended December 31, 2022

	Without Donor Restrictions	With Donor Restrictions	Total
<b>Revenue and Support</b>			
Contributions and grants	\$ 1,091,296	\$ 275,000	\$ 1,366,296
Sponsorships	52,500	-	52,500
Released from restrictions	370,378	(370,378)	-
Total revenue and support	1,514,174	(95,378)	1,418,796
<b>Expenses</b>			
Program services:			
Case coordination	414,239	-	414,239
Patriot Link	356,775	-	356,775
Education and engagement	221,214	-	221,214
Total program services	992,228	-	992,228
Supporting services:			
Management and general	284,596	-	284,596
Fundraising	146,390	-	146,390
Total supporting services	430,986	-	430,986
Total expenses	1,423,214	-	1,423,214
<b>Change in Net Assets</b>	90,960	(95,378)	(4,418)
<b>Net Assets, beginning of year</b>	570,429	300,537	870,966
<b>Net Assets, end of year</b>	\$ 661,389	\$ 205,159	\$ 866,548

See accompanying notes.

## Code of Support Foundation

### Statement of Activities For the Year Ended December 31, 2021

	Without Donor Restrictions	With Donor Restrictions	Total
<b>Revenue and Support</b>			
Contributions and grants	\$ 1,174,473	\$ 397,500	\$ 1,571,973
Sponsorships	105,000	-	105,000
Released from restrictions	485,627	(485,627)	-
Total revenue and support	1,765,100	(88,127)	1,676,973
<b>Expenses</b>			
Program services:			
Case coordination	516,599	-	516,599
Patriot Link	538,879	-	538,879
Education and engagement	134,538	-	134,538
Total program services	1,190,016	-	1,190,016
Supporting services:			
Management and general	193,113	-	193,113
Fundraising	342,624	-	342,624
Total supporting services	535,737	-	535,737
Total expenses	1,725,753	-	1,725,753
<b>Change in Net Assets</b>	39,347	(88,127)	(48,780)
<b>Net Assets, beginning of year</b>	531,082	388,664	919,746
<b>Net Assets, end of year</b>	\$ 570,429	\$ 300,537	\$ 870,966

See accompanying notes.



# Code of Support Foundation

## Statement of Functional Expenses For the Year Ended December 31, 2022

	Program Services				Supporting Services			
	Case Coordination	Patriot Link	Education and Engagement	Total Program Services	Management and General	Fundraising	Total Supporting Services	Total Expenses
Salary and benefits	\$ 320,694	\$ 123,176	\$ 188,231	\$ 632,101	\$ 166,977	\$ 68,619	\$ 235,596	\$ 867,697
Consulting and professional fees	24,780	40,280	14,592	79,652	77,602	20,182	97,784	177,436
Client services expense	49,424	-	-	49,424	-	-	-	49,424
Other program services	1,414	-	2,252	3,666	10,325	1,500	11,825	15,491
Events	-	-	143	143	563	35,969	36,532	36,675
Travel	137	1,210	2,683	4,030	843	1,247	2,090	6,120
Rent	1,653	1,424	883	3,960	1,305	584	1,889	5,849
Insurance	-	-	-	-	825	-	825	825
Dues and subscriptions	5,800	15,810	6,793	28,403	3,666	8,496	12,162	40,565
Supplies	-	-	-	-	59	-	59	59
Depreciation and amortization	-	165,986	-	165,986	141	-	141	166,127
Interest	-	-	-	-	13,837	-	13,837	13,837
Other office expenses	10,337	8,889	5,637	24,863	8,453	9,793	18,246	43,109
<b>Total Expenses</b>	<b>\$ 414,239</b>	<b>\$ 356,775</b>	<b>\$ 221,214</b>	<b>\$ 992,228</b>	<b>\$ 284,596</b>	<b>\$ 146,390</b>	<b>\$ 430,986</b>	<b>\$ 1,423,214</b>

See accompanying notes.

**Code of Support Foundation**

Statement of Functional Expenses  
For the Year Ended December 31, 2021

	Program Services				Supporting Services			Total Expenses
	Case Coordination	Patriot Link	Education and Engagement	Total Program Services	Management and General	Fundraising	Total Supporting Services	
Salary and benefits	\$ 301,862	\$ 193,796	\$ 122,150	\$ 617,808	\$ 87,876	\$ 258,762	\$ 346,638	\$ 964,446
Consulting and professional fees	27,307	155,464	3,174	185,945	82,642	11,602	94,244	280,189
Client services expense	135,839	-	-	135,839	-	-	-	135,839
Other program services	19,661	2,988	233	22,882	1,037	4,031	5,068	27,950
Events	1,806	-	217	2,023	-	7,861	7,861	9,884
Travel	368	786	26	1,180	519	4,570	5,089	6,269
Rent	14,237	10,324	3,679	28,240	2,816	8,391	11,207	39,447
Insurance	-	579	-	579	4,665	-	4,665	5,244
Dues and subscriptions	3,602	2,088	1,929	7,619	239	5,055	5,294	12,913
Supplies	316	229	82	627	62	186	248	875
Depreciation and amortization	-	164,126	-	164,126	-	-	-	164,126
Advertising	-	-	-	-	-	5,410	5,410	5,410
Interest	-	-	-	-	9,467	-	9,467	9,467
Other office expenses	11,601	8,499	3,048	23,148	3,790	36,756	40,546	63,694
<b>Total Expenses</b>	<b>\$ 516,599</b>	<b>\$ 538,879</b>	<b>\$ 134,538</b>	<b>\$ 1,190,016</b>	<b>\$ 193,113</b>	<b>\$ 342,624</b>	<b>\$ 535,737</b>	<b>\$ 1,725,753</b>

See accompanying notes.

## Code of Support Foundation

### Statements of Cash Flows For the Years Ended December 31, 2022 and 2021

	2022	2021
<b>Cash Flows from Operating Activities</b>		
Change in net assets	\$ (4,418)	\$ (48,780)
Adjustment to reconcile change in net assets to net cash provided by (used in) operating activities:		
Depreciation and amortization	166,127	164,126
Forgiveness of Paycheck Protection Program loan	-	(146,511)
Change in operating assets and liabilities:		
Decrease (increase) in:		
Contributions receivable	37,000	33,000
Employee retention credit receivable	-	(172,172)
Prepaid expenses and deposits	(3,581)	(3,505)
(Decrease) increase in:		
Accounts payable and accrued expenses	(24,155)	29,085
Deferred rent	-	(20,572)
Net cash provided by (used in) operating activities	<u>170,973</u>	<u>(165,329)</u>
<b>Cash Flows from Investing Activity</b>		
Purchase of property and equipment	<u>(1,299)</u>	<u>(31,310)</u>
Net cash used in investing activity	<u>(1,299)</u>	<u>(31,310)</u>
<b>Cash Flows from Financing Activities</b>		
Payments on note payable	(50,000)	(50,000)
Payments on lines of credit	(275,769)	(10)
Borrowings on lines of credit	110,000	-
Proceeds from Paycheck Protection Program loan	<u>-</u>	<u>146,511</u>
Net cash (used in) provided by financing activities	<u>(215,769)</u>	<u>96,501</u>
<b>Net Decrease in Cash</b>	(46,095)	(100,138)
<b>Cash, beginning of year</b>	<u>312,017</u>	<u>412,155</u>
<b>Cash, end of year</b>	<u><u>\$ 265,922</u></u>	<u><u>\$ 312,017</u></u>
<b>Supplementary Disclosure of Cash Flow Information</b>		
Cash paid during the year for interest	<u><u>\$ 13,837</u></u>	<u><u>\$ 9,467</u></u>

See accompanying notes.

## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 1. Nature of Operations

The Code of Support Foundation (COSF) provides essential and critical one-on-one assistance to those struggling service members, veterans, and their families who have the most complex needs. COSF is dedicated to leveraging the nation's full spectrum of resources to ensure all members of our military, veterans, and their families receive the support services they need and, through their collective sacrifice, have earned.

### 2. Summary of Significant Accounting Policies

#### Basis of Accounting and Presentation

COSF's financial statements have been prepared on the accrual basis of accounting. Net assets are reported based on the presence or absence of donor-imposed restrictions as follows:

- *Net Assets Without Donor Restrictions* – Net assets available for use in general operations and not subject to donor (or certain grantor) restrictions.
- *Net Assets With Donor Restrictions* – Net assets subject to donor- (or certain grantor-) imposed restrictions. COSF reports contributions and grants restricted by donors as increases in net assets without donor restrictions if the restrictions expire (that is, when a stipulated time restriction ends or purpose restriction is accomplished) in the reporting period in which the revenue is recognized. All other donor-restricted contributions are reported as increases in net assets with donor restrictions, depending on the nature of the restrictions. When a restriction expires, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the statements of activities as net assets released from restrictions.

#### Contributions Receivable

Contributions receivable represent unconditional amounts committed to COSF. All contributions receivable are expected to be collected within one year. COSF provides an allowance for doubtful accounts using the allowance method, which is based on management's judgment, considering historical information. Accounts are individually analyzed for collectability and will be reserved based on individual evaluation and specific circumstances. When all collection efforts have been exhausted, the amounts are written-off against the related allowance. No allowance was recorded as management believes the contributions are fully collectible at both December 31, 2022 and 2021.

## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 2. Summary of Significant Accounting Policies (continued)

#### Property and Equipment

Property and equipment purchased at a cost of \$500 or more and with a projected useful life exceeding one year are capitalized and recorded at cost. Depreciation and amortization are computed using the straight-line method over the estimated useful lives of the related assets, which range from three to seven years. Repair and maintenance costs are expensed as incurred.

#### Operating Lease

COSF records a right-of-use asset and lease liability for its operating lease at the lease commencement date. The right-of-use asset is amortized over the shorter of the lease term or the economic life of the leased asset. The associated lease liability represents the net present value of the future amounts due under the lease, calculated using a risk-free rate of return selected based on the term of the lease. For real estate lease, non-lease components are separated from the lease components for accounting purposes. COSF does not apply the recognition requirements under Accounting Standards Codification (ASC) Topic 842, *Leases*, to short-term leases. All operating leases were short-term for the year ended December 31, 2022.

#### Revenue Recognition

##### *Revenue Accounted for in Accordance with Contribution Accounting*

COSF recognizes contributions and grants when cash, securities, or other assets, or an unconditional promise to give, is received. Conditional promises to give, that is, those with a measurable performance or other barrier, and a right of return, are not recognized until the conditions on which they depend have been substantially met.

##### *Revenue Accounted for as Contracts with Customers*

Revenue is recognized when COSF satisfies a performance obligation by transferring a promised good to, or performing a service for, a customer. The amount of revenue recognized reflects the consideration COSF expects to receive in exchange for satisfying distinct performance obligations. If a performance obligation does not meet the criteria to be considered distinct, COSF combines it with other performance obligations until a distinct bundle of goods or services exists. Fees or amounts received in advance of satisfying contractual performance obligations are reflected as deferred revenue in the statements of financial position. Revenue is recognized either over time or at the point in time that contractual obligations are met.

## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 2. Summary of Significant Accounting Policies (continued)

#### Revenue Recognition (continued)

##### *Revenue Accounted for as Contracts with Customers (continued)*

Specifically, for the various types of contracts, COSF recognizes revenue as follows:

Sponsorships are exchange transactions and recognized as revenue in the month the event takes place, which is when the sole performance obligation is satisfied. Sponsorships received that are applicable to the following year are included in deferred revenue in the accompanying statements of financial position.

#### Functional Allocation of Expenses

The costs of program and supporting services activities have been summarized on a functional basis in the statements of activities. The statements of functional expenses present the natural classification detail of expenses by function. Accordingly, certain costs have been allocated among the programs and supporting services benefited.

#### Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results could differ from those estimates.

#### Subsequent Events

In preparing these financial statements, COSF has evaluated events and transactions for potential recognition or disclosure through July 17, 2023, the date the financial statements were available to be issued.

## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 3. Liquidity and Availability

COSF manages its cash available to meet general expenditures following two guiding principles:

- Operating within a prudent range of financial soundness and stability; and
- Maintaining adequate liquidity to operate and meet its obligations in a timely manner.

Financial assets available for general expenditures, that is, without donor or other restrictions limiting their use, within one year of the statements of financial position date, comprise the following at December 31:

	2022	2021
Cash	\$ 265,922	\$ 312,017
Contributions receivable	-	37,000
Total financial assets	265,922	349,017
Less: restricted by donors	(205,159)	(300,537)
Total available for general expenditures	<u>\$ 60,763</u>	<u>\$ 48,480</u>

### 4. Concentration of Credit Risk

Financial instruments that potentially subject COSF to significant concentrations of credit risk consist of cash. COSF maintains cash deposit and transaction accounts with various financial institutions and these values, from time to time, exceed insurable limits under the Federal Deposit Insurance Corporation (FDIC). The uninsured portions of these accounts are backed solely by the asset of the underlying financial institution. Therefore, the failure of an underlying institution could result in financial loss for COSF. COSF has not experienced any credit losses on its cash to date as it relates to FDIC insurance limits. Management periodically assesses the financial condition of these financial institutions and believes that the risk of any credit loss is minimal.

## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 5. Property and Equipment

Property and equipment consists of the following at December 31:

	2022	2021
Patriot Link hardware and software	\$ 1,161,900	\$ 1,161,901
Furniture and equipment	1,300	-
Total property and equipment	1,163,200	1,161,901
Less: accumulated depreciation and amortization	(710,735)	(544,608)
Property and equipment, net	<u>\$ 452,465</u>	<u>\$ 617,293</u>

### 6. Lines of Credit

COSF maintains a \$150,000 line of credit with Capital Bank, payable on demand, with a maturity date of August 21, 2023. Amounts borrowed under this line of credit bear a variable interest rate based on the bank's prime rate plus 4.0% with a floor rate of 5.75%. Interest rate on this line of credit was 8.50% and 5.75% at December 31, 2022 and 2021, respectively. The outstanding balance on this line of credit was \$0 and \$145,714 at December 31, 2022 and 2021, respectively.

COSF also maintains a \$150,000 revolving line of credit with M&T Bank, payable on demand. Amounts borrowed under this line of credit bear a variable interest rate based on the bank's prime rate plus 0.75%, which was 8.25% and 4.00% at December 31, 2022 and 2021, respectively. The outstanding balance on this line of credit was \$0 and \$20,055 at December 31, 2022 and 2021, respectively.

### 7. Note Payable

Note payable consisted of a promissory note of \$50,000 that was due in full on March 31, 2023. COSF fully paid off this note during the year ended December 31, 2022.



## Code of Support Foundation

Notes to Financial Statements  
December 31, 2022 and 2021

### 8. Net Assets With Donor Restrictions

Net assets with donor restrictions are restricted for the following at December 31:

	2022	2021
Purpose restricted:		
Case coordination	\$ 179,117	\$ 137,881
Patriot Link	20,209	67,656
Time restricted	5,833	95,000
Total net assets with donor restrictions	<u>\$ 205,159</u>	<u>\$ 300,537</u>

### 9. Paycheck Protection Program Loans

COSF applied for two loans under the Paycheck Protection Program (PPP) pursuant to Division A, Title 1 of the CARES Act, which was enacted on March 27, 2020. The PPP is a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll through the COVID-19 pandemic, for which COSF qualified. After the loans are granted, the Small Business Administration (SBA) will forgive loans if all employee retention criteria are met, and the funds are used for eligible expenses (which primarily consist of payroll costs, costs used to continue group healthcare benefits, rent, and utilities). The Paycheck Protection Program Flexibility Act of 2020 was enacted on June 5, 2020, and amends the PPP to give borrowers more freedom in how and when loan funds are spent while retaining the possibility of full forgiveness.

The first PPP loan was granted to COSF on April 23, 2020 in the amount of \$159,100. During the covered period, COSF incurred qualifying expenditures and applied for forgiveness of the full amount of the first PPP loan. Management determined the conditions had been substantially satisfied as of December 31, 2020, and the related amount was recognized as grant revenue in the statement of activities for the year ended December 31, 2020. On June 16, 2021, the full amount of this loan was forgiven by the SBA.

In 2021, COSF applied for a second loan under the PPP. The second PPP loan was granted to COSF on January 29, 2021 in the amount of \$146,511. During the covered period, COSF incurred qualifying expenditures and applied for forgiveness of the full amount of the second PPP loan. The second PPP loan was fully forgiven by the SBA on November 16, 2021, and the related amount was recognized as grant revenue in the accompanying statement of activities for the year ended December 31, 2021.

## **Code of Support Foundation**

Notes to Financial Statements  
December 31, 2022 and 2021

### **10. Commitments and Contingencies**

#### Operating Lease

In July 2019, COSF entered into an agreement to lease office space that commenced on September 23, 2019 and was set to expire on January 22, 2025. The terms of the lease called for base monthly payments of \$3,740 and annual rental increases of 4%. Effective May 1, 2021, COSF amended this lease to reduce office space and terminate the lease early on September 30, 2022. The terms of the lease amendment call for base monthly payments of \$475 for the remainder of the lease term, and a payment of \$45,000 in two equal installments on May 15, 2021 and June 15, 2021. On September 12, 2022, COSF further amended this lease to extend the lease through September 30, 2023. The terms of the lease amendment call for base monthly payments of \$525 for the remainder of the lease term. COSF does not apply the recognition requirements under ASC Topic 842, *Leases*, to short-term leases.

Rent expense totaled \$5,849 and \$39,447 for the years ended December 31, 2022 and 2021, respectively.

Future minimum lease payments under the lease agreement for the year ending December 31, 2023 totaled \$4,725.

#### Service Organization

COSF has contracted with Insperity PEO Services, L.P. (“Insperity”) as their professional employer organization. As such, Insperity is the employer of record for tax, benefits, and insurance purposes for COSF employees. This co-employment relationship allows COSF to maintain direct control of the day-to-day activities of employees, while Insperity assumes the administrative functions of human resources and absorbs many employer-related liabilities.

### **11. Allocation of Expenses from Management and General Activities**

The financial statements report certain categories of expenses that are attributed to more than one program or supporting function. Therefore, expenses require allocation on a reasonable basis that is consistently applied. The expenses that are allocated include salaries and benefits reported on the statements of functional expenses, which are allocated on the basis of estimates of time and effort. In addition to time and effort, some indirect costs are allocated proportionally based on total direct costs.

## **Code of Support Foundation**

Notes to Financial Statements  
December 31, 2022 and 2021

### **12. Employee Retention Credit**

The Employee Retention Credit (ERC) was established by the CARES Act in March 2020. It was intended to help businesses retain their workforces and avoid layoffs during the coronavirus pandemic. It provides a per employee credit to eligible businesses based on a percentage of qualified wages and health insurance benefits paid to employees. It works as a refundable payroll tax credit claimed quarterly, and it can provide reductions to payroll taxes or cash refunds. The CARES Act did not allow businesses that received PPP loans to also claim the ERC, but the Consolidated Appropriations Act, which was enacted at the end of 2020, retroactively removed the limitation so entities that had applied for or received PPP loans could still get the ERC.

With this restriction removed, COSF was eligible for total credits of \$172,172 for the year ended December 31, 2021. Outstanding credits are shown as employee retention credit receivable in the accompanying statements of financial position.

Laws and regulations concerning government programs, including the ERC established by the CARES Act, are complex and subject to varying interpretations. Claims made under the CARES Act may also be subject to retroactive audit and review. There can be no assurance that regulatory authorities will not challenge COSF's claim to the ERC, and it is not possible to determine the impact, if any, this would have upon COSF.

### **13. Income Taxes**

COSF is exempt from payment of taxes on income other than net unrelated business income under Section 501(c)(3) of the Internal Revenue Code (IRC). For the years ended December 31, 2022 and 2021, there were no unrelated business activities. Contributions to COSF are deductible as provided in IRC Section 170(b)(1)(A)(vi). Management evaluated COSF's tax positions and concluded that there are no significant uncertain tax positions that qualify for either recognition or disclosure in the financial statements.