

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: Dawn Dickerson, Program Analyst
FR: Denise Wiktor, General Counsel
DT: November 20, 2023
RE: ANC 3B Glover Park Day Grant

DZW

You asked about the appropriateness of spending grant monies on a stage. ANC 3B funded a grant to the Glover Park Citizen's Association to support Glover Park Day. The ANC grant went specifically to rent tables, chairs, and a stage.

The Office of the Attorney General (OAG) has opined that an ANC cannot make a direct expenditure on stage rental if the stage is solely for entertainment purposes.¹ However, in 2017 the OAG issued an opinion that money issued via a grant could be used for entertainment purposes.² This was a complete change from previous OAG opinions that did not allow the use of ANC funds for entertainment whether by grant or direct expenditure. As an aside, the OAG did say in the first opinion if the primary purpose of the stage rental was for use by the commissioners, such as to speak to the audience, that a band merely used because the ANC had chosen to rent it, then that would have been a permissible use of ANC monies.

In this case, the ANC awarded a grant which was used by the grantee to rent a stage. Under the changed of position by the OAG, this is a permissible use of ANC monies.

¹ Letter to Commissioner Israel Re Expenditure for Outdoor Event, September 23, 2021, found at: <https://oag.dc.gov/sites/default/files/2021-09/ANC-4D-Letter-to-Commissioner-Israel-re-Expenditure-%20for-Outdoor-Event-.pdf>

² Letter to Gottlieb Simon, July 7, 2017 found at: <https://oag.dc.gov/sites/default/files/2018-02/ANC-July-7-2017-Expending-Grant-Funds-for-Food-and-Entertainment-at-Block-Parties.pdf>