Government of the District of Columbia

Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: Miguel Trindade Deramo, Chairperson, ANC 1B
Aaron Lemon-Strauss, Treasurer, ANC 1B
FR: Denise Wiktor, General Counsel
DT: August 28, 2025
RE: Grant Request for LeDroit Park Civic Association Block Party

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The Office of Advisory Neighborhood Commissions ("OANC") has received a copy of a grant request from ANC 1B for the LeDroit Park Civic Association ("LPCA" or "applicant") regarding a block party for the LeDroit Park community. The applicant states that the block party will take place on Sunday, September 28, 2025, from 3:00 p.m. to 6:00 p.m. on the 400 block of U Street NW, and that it will be a free event for all residents and local businesses. The applicant additionally states that it will be providing a BBQ cookout, non-alcoholic beverages and desserts, as well as "family-focused entertainment" such as games, live music, a magic show, and face painting. Volunteers from the LPCA will set up, maintain, and break down the event.

The applicant is requesting a grant amount of $500 for marketing operational costs for the event, for such items as flyers, signs and posters. (The total amount of such costs is projected to be $700.)

I have reviewed the application sent to OANC and have found that the request is a **permissible** expenditure of ANC monies, as outlined below.

Analysis

There are five prongs a grant must meet to be a permissible expense[1], and there is also a sixth requirement of the D.C. Official Code that limits the amount of a grant that can be spent on overhead[2]. These are, respectively:

[1] See *Letter to Schanette Grant on Seasoned Settlers and Grants Generally,* April 14, 2022, found at https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-.pdf.

[2] D.C. Official Code 1-309.13(m)(2)(D) provides that "[n]o Commission shall provide a grant for which the grantee estimates that the overhead costs would exceed 15% of the entire grant amount."

1. **Public Purpose:** ANC grants must be for "public purposes within the Commission area."[3] A public purpose is one "that includes a significant benefit for the community and is not done for the primary purpose of benefitting a private entity."[4] The grant requested here meets this public purpose test. The purpose of the grant is to help advertise a block party to assist in bringing the community together and build stronger bonds among the residents of the community. The applicant also states that the event "will provide an afternoon of safe, family friendly entertainment for all neighbors."

2. **Local Benefit**: A grant must "benefit persons who work or reside in the Commission area."[5] This does not mean the grant may only benefit Commission residents; it simply means the grant's benefits should be focused on those residents.[6] A block party such as the one planned here meets this test as long as it is not closed to other areas of the ANC. The applicant states that this block party will be a free event for all residents and local businesses. Therefore, the grant request also meets this prong of the overall test.

3. **Proposed Project:** A grant must be for a proposed project.[7] This is a discrete single event, with a proposed beginning date and end date.

4. **Organization:** A grant must be to an "organization," not an individual or a government entity,[8] although the organization need not be incorporated[9]. The applicant is an organization under this prong of the test, even though it is not a 501(c)(3) organization for purposes of the Internal Revenue Service (IRS). It is also important to note that if this organization does not have a bank account, a check cannot be made out to an individual for a grant. In that case, the group would need to seek a fiscal sponsor, such as a non-profit or a local business to whom the check could be made out.

5. **Non-Duplication:** A grant cannot duplicate any services offered by the District of Columbia government.[10] This grant is not duplicative of any service or program provided by the District government.

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[3] D.C. Official Code § 1-309.13(l)(1).

[4] *Id.*

[5] D.C. Official Code § 1-309.13(m)(1).

[6] See *Letter to Deborah K. Nichols*, Nov. 9, 2006, at 2, n.2, found at Letter-to-Deborah-Nichols-Re-Whether-an-ANC-may-approve-a-grant-to-commission-plans-and-drawings-.pdf (ANC 4C grant was permissible where the "[b]enefit to other ANCs would be incidental to the benefit conferred on ANC 4C residents," because a grant's benefits need not "be exclusive to the ANC that gives the grant funds"); see *Letter to Comm'r Fletcher*, Mar. 15, 2022, at 2, available at https://oag.dc.gov/sites/default/files/2022-03/ANC-7E-Letter-to-Commissioner-Fletcher-RePublic-Purposes-Within-the-Commission-Area-.pdf (making the same point with respect to the public-purpose requirement).

[7] D.C. Official Code § 1-309.13(m)(2)(A).

[8] D.C. Official Code § 1-309.13(m)(1); see also *Letter to Deborah K. Nichols*, Jan. 14, 2010, at 4, available at https://oag.dc.gov/sites/default/files/2018-02/ANC-January-14-2010-Guidelines-for-Use-of-ANC-Funds.pdf.

[9] See *Letter to Deborah K. Nichols*, Aug. 4, 2000, at 3, available at https://oag.dc.gov/sites/default/files/201802/ANC-August-4-2000-Grants-by-ANCs-Public-Purpose-and-Corporate-Status-of-Recipients.pdf ("The plain meaning of the term 'organization' includes unincorporated associations").

[10] D.C. Official Code § 1-309.13(m)(1).

6. **Overhead:** Overhead cannot exceed 15% of the grant amount.[11] None of the grant monies would be used here for overhead costs.

Conclusion[12]

For the reasons stated above, this grant is a **permissible** expenditure of ANC funds.

[11] D.C. Official Code § 1-309.13(m)(1)(2)(D).
[12] Andrew Gerst assisted in the preparation of this memo