

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
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MEMORANDUM

TO: ANC 7F
FR: Denise Wiktor, General Counsel
DT: 5/20/2025
RE: Juneteenth Grant request from the Juneteenth Planning Committee

The OANC has received a copy of a grant request to ANC 7F for \$5,000 for the Juneteenth day parade and surrounding events. I have reviewed the application, budget and supplemental materials sent to the OANC and have found that the request is a **permissible** expenditure of ANC monies as outlined below. The budget for the ANC grant was changed slightly to remove an impermissible and overhead expenses and bring it up to the \$5,000 that was requested. The items that are to be covered are sanitation and post event cleanup-\$1750, social media\$2500.00, and marching bands and performers \$2,000. These items total slightly more than the requested amount, which is not a problem. The grant may partially fund an item so long as there is a receipt or proof of payment that is at least the grant amount. I discussed with the applicant that with regard to the performers that checks cannot be made out to individuals so it is possible not all of the performance expenses will be eligible.

There are five prongs a grant must meet to be a permissible expense¹ and a 6th requirement of the D.C. Official Code that limits the amount of a grant that can be spent on overhead². They are:

1. **Public Purpose:** ANC grants must be for “public purposes.”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 parade and the events stage will be entirely within ANC 7B and will be open to the public. It is expected that there will be significant participation and attendance from the residents of 7F. Many residents of ANC 7F live within walking distance of the events. In addition, groups consisting largely of 7F residents will be participating in the parade.

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) “No Commission shall provide a grant for which the grantee estimates that the overhead costs would exceed 15% of the entire grant amount.”

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

⁴ *Id.*

2. **I 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 Again, while this event is not located within 7F it is close enough to 7E to provide a benefit to the residents and a significant effort has been made to get residents of 7E to participate and/or attend the event.
3. **Proposed Project.** A grant must be for a proposed project.⁷ This is a discrete single event.
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 Juneteenth Planning Committee is an organization within the meaning of the code and they will be using the Marshall Heights Community Development Organization as a fiscal sponsor.
5. **Non-Duplication.** A grant cannot duplicate any services offered by the D.C. government.¹⁰
6. **Overhead.** Overhead cannot exceed 15% of the grant amount.¹¹ None of the grant monies will be used for overhead as the Code defines it.

Conclusion

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

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).

¹¹ D.C. Official Code §1-309.13(m)(1)(2)(D).