

Government of the District of Columbia



Office of Advisory Neighborhood Commissions
1350 Pennsylvania Avenue, NW
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(202) 727-9945

MEMORANDUM

TO: ANC 5D
FR: Denise Wiktor, General Counsel
DT: 9/25/2025
RE: Trinidad Future and History Grant

The Office of Advisory Neighborhood Commissions (“OANC”) has received a copy of a grant request from the Wheatley School Community Organization regarding a grant for Trinidad Future and History Festival 2025. The applicant states that this is a free festival which will take place alongside the weekly farmers market at the Wheatley Education Campus. It will have historical exhibits, Activities for envisioning the future of Trinidad. Additionally, some of the materials will be put on permanent display at the Wheatley campus.

The applicant is requesting a grant amount of \$2500.00. All of the categories of expense were permissible except for \$100 for contingency. The Applicant has requested (see attached email) that the \$100.00 be allocated to signage and display as they expect it to be more than the \$200.00. This would bring the permissible expenses to the requested \$2500.00

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

Additionally, once a grant has been voted on by the ANC *the purpose of the grant cannot be changed without an additional vote by the ANC.*

Analysis

There are five prongs a grant must meet to be a permissible expense¹, 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 overhead². 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 This is a free public event focused on the Trinidad community which is within ANC 5D. It will bring together neighbors, some of whom may be already in the area for the farmer’s market.
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 This event is focused on a are within ANC 5D, is open to all 5D residents and will primarily benefit the residents and business in 5D.
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 incorporated⁹. The Wheatley School Community Organization is an organization as defined by the Code for ANC grants. Additionally, the OANC verified in the IRS TEOS system that is a 501(c)(3) organization in good standing with the IRS.
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.
6. **Overhead:** Overhead cannot exceed 15% of the grant amount.¹¹ None of the grant monies would be used here for overhead costs.

Conclusion

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

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).

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

From: [Young Kim](#)
To: [Wiktor, Denise \(OANC\)](#)
Subject: Re: Trinidad Grant
Date: Thursday, September 25, 2025 1:57:15 PM

CAUTION: This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to phishing@dc.gov for additional analysis by OCTO Security Operations Center (SOC).

Hi Denise,

Could we allocate the entire \$100 to "event signage and promotion?"

The \$200 for "event signage and promotion" that is requested is well below what I expect to spend for the event this year.

Thank you for letting me know.

Young Kim

On Thu, Sep 25, 2025 at 1:40 PM Wiktor, Denise (OANC) <denise.wiktor@dc.gov> wrote:

I am reviewing your grant request for the Trinidad Future and History Grant. Everything looks good except for one thing, the \$100 budget item for contingencies. The notation appears that it is so you can adjust other budget categories. Unfortunately, unstated contingencies cannot be funded with ANC money. I have some suggestions. You can take that \$100 and spread it out among the other categories and as long as you use those categories for expenses if they are up or down a bit that shouldn't be a problem.

If that is a category for last minute supplies, you could recategorize it as "supplies" with some examples.

You can send me any adjustments back by email and I will attach them to the grant or since your budget is inside the grant application you can adjust it there.

If I don't get adjustments or you would prefer, I can do the memo disallowing the category with the suggestion that it either be disallowed or adjusted at the time of the ANC vote. It would be better to have an adjustment in advance of any vote so there is a clean record for the vote.

Thank you,

Denise

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