## Government of the District of Columbia



Office of Advisory Neighborhood Commissions 1350 Pennsylvania Avenue, NW Suite 11 Washington, DC 20004 (202) 727-9945

## **MEMORANDUM**

TO: Dawn Dickerson, Program Manager FR: Denise Wiktor, General Counsel

DT: September 5, 2023

RE: ANC 1C Platform of Hope Grant

You requested an opinion on whether ANC 1C's grant to Platform of Hope was a permissible use of ANC grant monies. It is not a permissible expenditure allowed for an ANC under the D.C. Code.

ANC 1C made a grant to Platform of Hope in the amount of \$2500.00 to support the purchase of computers for 20 families in the Adams Morgan neighborhood. The grant application does not state how many computers were to be purchased and access to the supporting documents is by a Google drive link that requires access permission.

The D.C. Official Code states that ANC "Expenditures may be in the form of grants by the Commission for public purposes." <sup>1</sup> It further states that "A public purpose shall be a purpose that benefits the community as a whole..." <sup>2</sup> The population of ANC 1C is 17,563 persons. <sup>3</sup> This grant proposes to support 20 families. If these are families of four the grant serves about ½ of a percent of the population of ANC 1A. There is no benefit to the "community as a whole" with this grant.

The Office of Attorney General discussed public purpose in Seasoned Settlers and Grants Generally<sup>4</sup> where it found that a grant that only "students of a specific age group at a specific school" was too small a target to meet the public purpose requirement.<sup>5</sup>

This grant will not benefit the community as a whole and therefore is not a permissible use of ANC funds. Please remind the ANC that the use of funds not in accordance with the D.C. Code will affect the next quarter's fund allotment.

<sup>&</sup>lt;sup>1</sup> D.C. Official Code § 1-309.13(I)(1)

<sup>2</sup> Id.

<sup>&</sup>lt;sup>3</sup> According to the 2020 census found at <u>2023 Advisory Neighborhood Commissions by 2020 Census Population.xlsx</u> (live.com)

<sup>&</sup>lt;sup>4</sup> See Letter to Schanette Grant on Seasoned Settlers and Grants Generally found at <a href="https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-pdf">https://oag.dc.gov/sites/default/files/2022-04/Letter-to-OANC-Re-Seasoned-Settlers-Grant-and-Grants-Generally-pdf</a>

<sup>&</sup>lt;sup>5</sup> Id. at p. 6.