



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON FORT HAMILTON
BROOKLYN, NEW YORK 11252-5300

AMIM-HAG-ZA

14 July 2023

MEMORANDUM FOR All Members of the USAG Fort Hamilton Community

SUBJECT: Fundraising Activities on Fort Hamilton – Command Policy #29

1. REFERENCES:

- a. DoD 5500.7-R (Joint Ethics Regulation).
- b. AR 1-10 (Fundraising within the Department of the Army), 16 DEC 2022.
- c. AR 210-22 (Support for Non-Federal Entities Authorized to Operate on Department of the Army Installations), 12 MAY 2022.
- d. AR 215-1 (Military Morale, Welfare, and Recreation Programs and Nonappropriated Fund Instrumentalities), 24 SEP 2010.
- e. AR 600-20 (Army Command Policy), 24 JUL 2020.
- f. AR 608-1 (Army Community Service), 19 OCT 2017.
- g. Fort Hamilton Garrison Policy – #28 (Private Organizations), 31 MAR 2023.
- h. Chapter 59 of the 2017 Laws of New York, Part "MM" (Charitable Gaming Laws).

2. PURPOSE: To provide requirements to conduct fundraising activities on Fort Hamilton.

3. POLICY:

- a. Fundraising is defined as "any activity conducted for the purpose of collecting money, goods, or a non-Federal fund support for the benefit of others." (AR 1-10)
- b. Any local fundraising conducted on Fort Hamilton and/or any local fundraising that will use Fort Hamilton resources must first be coordinated with the USAG Fort Hamilton PO/Fundraising Coordinator, DFMWR, Mr. Trevor M. Loew, 718-630-4771, trevor.m.loew.naf@army.mil for approval. "Any local fundraising" includes fundraising for any purpose, by any entity or person, to include Cup and Flower Funds (which must be conducted in accordance with AR 600-20) and/or any other official or unofficial fundraising unless excluded below. Fundraising that occurs outside a unit or

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organization's area of control and/or that occurs in a garrison's publicly accessible areas, such as events at a commissary or military exchange, the Garrison Commander is the approval authority. (AR 1-10) All requests must go through the Fort Hamilton PO/Fundraising Coordinator.

c. Fundraising requests require prior Directorate of Family and Morale, Welfare, and Recreation (DFMWR) approval except the Combined Federal Campaign (CFC) conducted in the fall and the Army Emergency Relief (AER) Fund Campaign in the spring. Occasional fundraising in support of on-post Private Organization (PO) / Non-Federal Entity (NFE) or a Family Readiness Group (FRG) to assist those in need may be authorized by the Fort Hamilton Garrison Commander or the Fort Hamilton PO/Fundraising Coordinator. NFEs, and FRGs must have a copy of their DFMWR fundraising approval letter on hand when conducting their events.

d. Official Government entities such as military units, government offices, and advisory councils may not engage in fundraising activities. Specifically, Retiree Councils are not private organizations, but rather an Army-created advisory organization to assist the Commander with advice and recommendations regarding issues and concerns of Retired Soldiers and their families. Moreover, none of the four enumerated objectives of a Retiree Council, as set forth in AR 600-8-7, para. 5-7b, state or imply that fundraising is an authorized (or practically necessary) aspect of the Council's existence.

e. Private organizations found violating fundraising policies may result in future fundraising requests denials or installation permit suspension/revocation by the Garrison Commander (GC). The DFMWR will provide suspension/revocation letter copy to the unit's command team. If a PO conducts a fundraiser without DFMWR approval, the penalty for the first offense is a six-month suspension. If the second offense occurs within a 12-month period, the GC will suspend the PO's operating permit. A PO's fundraising activities will be suspended for overdue audits and will not be restored until the PO provides DFMWR proof an audit was performed.

f. Youth Services' cheerleading squads/sports teams may raise funds for a team banquet and trophies. Funds raised are limited to \$25 per individual (players, coach, and team parent). The team's head coach will submit a financial statement to the Youth Sports Director for approval no later than 1600 the first Wednesday following each team's last game of the season.

g. Fundraising activities will not duplicate services AAFES or DFMWR provides, e.g., t-shirts, car washes, unless AAFES and/or the DFMWR, as appropriate, concur.

h. Veterans organizations are the only off-post organizations permitted to conduct fundraisers on Fort Hamilton. They may request approval to exchange poppies or

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similar tokens for donations no more than two consecutive days a year. (AR 1-10, para. 1-8)

i. Private organizations and FRGs are limited to no more than eight (8) fundraisers in a calendar year beginning 1 January. POs and FRGs providing a service to the community or Family members, e.g., for unit graduations, may request an exception. Written request justifying the exception must be approved by the DFMWR.

j. Only MWR Tickets and Travel may sell tickets on post to off-post commercial events. With advance authorization, Boy/Girl Scouts and POs may sell tickets on post to their own organization's off-post activities.

k. Raffles are prohibited as fundraisers on Fort Hamilton; however, the GC may grant an exception based on extenuating circumstances and the Installation Legal Office's legal opinion. The POs must submit exception to policy requests through the DFMWR to the GC. The requests must include:

(1) A copy of the PO's 501(c) status from the Internal Revenue Service. The PO must have maintained 501(c) status for at least two (2) years.

(2) Proof of incorporation by the State of New York affirming the PO is authorized to operate in the State of New York.

(3) Documents regarding State of New York laws and local City of New York requirements (AR 215-1).

l. An FRG may officially fundraise from its own community members or dependents. Fundraising must be in the unit area, for the organization's informal fund, as opposed to a private charity, a particular military member, or a similar case, and have the unit commander's approval. In some instances, a FRG may benefit people outside its membership in which case the DFMWR may grant the FRG an exception to fundraise in those areas. The FRG must submit a written request for exception along with a justification. The FRG will refer to its Standard Operation Procedure (SOP), approved by the commander, for guidance on raising and expending funds. Commanders will consult with their SJA to ensure compliance with regulations and policies and to avoid conflicts with other authorized fundraising activities before the FRG submits a written request to the DFMWR. FRGs are prohibited from conducting fundraising activities outside Fort Hamilton.

4. Private organizations and FRGs must provide fundraising requests to DFMWR no less than 14 working days before the event. POs must not use official Army letterhead stationery to type the requests. FRGs must use the company letterhead on all their

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fundraising requests. They may e-mail requests to trevor.m.loew.naf@army.mil or hand carry to him at DFMWR, 404 Sterling Drive, between 0800 and 1700. Include the following information in requests:

- a. Name of organization requesting to fundraise.
 - b. Purpose of fundraiser.
 - c. Date, time, and specific location (specify name and phone number of individual who approved the location for the fundraiser).
 - d. Description of fundraiser.
 - e. The PO or FRG will deposit funds raised into its account and show the income as a separate line entry on the PO's financial statement provided to DFMWR.
 - f. Name, address, and phone number of the PO's point of contact.
5. The DFMWR PO/Fundraising Coordinator will inspect POs and their fundraising activities, e.g., meeting minutes, financial statements, bank statements, permits to operate, at least annually to ensure compliance with regulations and policies.
6. Private organizations and their fundraising activities will be included as a Staff Inspection Program (SIP) functional area. During the unit SIP, DFMWR PO/Fundraising Coordinator will inspect the POs operating in unit areas for compliance with regulations and policies at least annually. The PO/Fundraising Coordinator reports SIP results to the major subordinate commander and integrates results into DFMWR's Management Control Program.
7. SUPERSESSION: This policy memorandum supersedes any and all previously issued policies memorandum pertaining to its subject matter.
8. PROPONENT: Trevor M. Loew, PO/Fundraising Coordinator, DFMWR, 718-630-4771, trevor.m.loew.naf@army.mil.



BRIAN A. JACOBS
COL, AD
Commanding