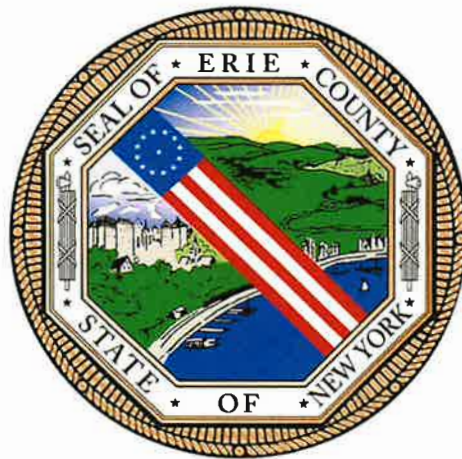


January 2026

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**Erie County Cultural Funding Grant Monitoring Program
Black Rock Historical Society
January 1, 2020 through December 31, 2022**



**HON. KEVIN R. HARDWICK
ERIE COUNTY COMPTROLLER**

**HON. KEVIN R. HARDWICK
ERIE COUNTY COMPTROLLER'S OFFICE
DIVISION OF AUDIT & CONTROL
95 FRANKLIN STREET
BUFFALO, NEW YORK 14202**



January 9, 2026

Erie County Legislature
92 Franklin Street, Fourth Floor
Buffalo, New York 14202

Dear Honorable Members:

In 2023, the Erie County Comptroller's Office, Division of Audit & Control initiated a regular Monitoring Program of Erie County Cultural Funding Grants. The Erie County Cultural Funding program provides annual grants to non-profit arts and cultural organizations operating within the County. County funds are intended to be limited in their use to current operating expenses including salaries, program costs, fringe benefits, rents, utilities, office supplies, and equipment. Grant funds may not be used for or applied towards capital projects or physical improvements of buildings or facilities, nor as a revenue offset against accounts receivable. No funds received shall be used for any services provided or activities performed outside Erie County. The County's Department of Environment and Planning executes contracts with organizations and is the primary agency charged with monitoring.

Objective

The objective of the Cultural Funding Monitoring Program is to verify that the recipients have utilized County funds according to the terms and conditions associated with the Erie County Cultural Funding grant process and the recipient's contract with the County. In order to verify the proper use of the grant award, a number of agencies were selected in order to review their expenses and financial records.

Scope and Methodology

Approximately 120 different organizations receive funding annually from Erie County. The Comptroller's Cultural Funding Grant Monitoring Program is intended to review organizations that received a minimum of \$5,000 in funding during any of the three prior years. Approximately 80 agencies were identified as receiving \$5,000 or more in grant funding. The list of recipient organizations was split into two groups of approximately 40 agencies. The first batch of letters announcing the commencement of a review was sent to the selected non-profit organizations during mid-February 2023, with a second batch scheduled to be sent in early October 2023. The review of all agencies is expected to be completed by December 31, 2025.

2023 Program

During the interview phase, the Auditor identifies use of funding to narrow down the expenses to be verified. A table of agencies which meet the criteria for review along with the amount of grant awards can be found on the following page.

Monitoring Program – Phase I

ACT #	APPROPRIATION	VENUE	TAX YEAR 2000	TAX YEAR 2001	TAX YEAR 2002
517125	Enlightenment Literary Arts Center & Dog Ears Bookstore	517125	\$ 24,600.00	\$ 34,600.00	\$ 35,000.00
518004	African American Cultural Center	518004	\$ 275,450.00	\$ 311,950.00	\$ 208,000.00
518012	Alleyway Theatre	518012	\$ 7,500.00	\$ 7,500.00	\$ 45,000.00
518016	American Legion Band of	518016	\$ 2,500.00	\$ 2,500.00	\$ 28,740.00
518017	Amherst Symphony Orchestra	518017	\$ 26,050.00	\$ 26,050.00	\$ 30,000.00
518019	Arts Services Initiative of WNY Inc	518019	\$ 24,000.00	\$ 24,000.00	\$ 30,000.00
518025	Ballet Artists Of WNY (Negra)	518025	\$ 24,000.00	\$ 24,000.00	\$ 30,000.00
518040	Buffalo Arts Studio (Arts Studio of Western New York, Inc)	518040	\$ 18,000.00	\$ 45,000.00	\$ 51,000.00
518044	Buffalo Inner City Ballet Co. Inc	518044	\$ 27,000.00	\$ 27,000.00	\$ 27,000.00
518050	Buffalo Music Hall of Fame	518050	\$ 4,500.00	\$ 5,500.00	\$ 5,500.00
518051	Buffalo Heritage Carousel	518051	\$ 30,000.00	\$ 30,000.00	\$ 30,000.00
518074	Colored Musicians Club	518074	\$ 1,000.00	\$ 1,000.00	\$ 12,500.00
518046	El Museo Gallery	518046	\$ 12,585.00	\$ 5,385.00	\$ 11,000.00
518104	Grayliff Conservancy	518104	\$ 59,200.00	\$ 59,200.00	\$ 60,000.00
518113	Hull House Foundation	518113	\$ 15,375.00	\$ 5,375.00	\$ 7,500.00
518119	Jewish Community Center Cultural (Jewish Ctr of Greater Buff)	518119	\$ 15,500.00	\$ 6,750.00	\$ 13,500.00
518120	Just Buffalo Literacy Center	518120	\$ 78,100.00	\$ 78,100.00	\$ 83,500.00
518132	Locust St Neighborhood Art Classes	518132	\$ 29,250.00	\$ 25,250.00	\$ 28,500.00
518136	Martin Luther Restoration	518136	\$ 175,500.00	\$ 175,500.00	\$ 190,000.00
518139	Music is Art	518139	\$ 48,000.00	\$ 48,000.00	\$ 50,000.00
518144	Polish Arts Club Of Buffalo Inc	518144	\$ 7,000.00	\$ 7,000.00	\$ 8,800.00
518167	Preservation Buffalo Niagara	518167	\$ 4,615.00	\$ 4,615.00	\$ 6,000.00
518160	Springville Center For The Arts	518160	\$ 20,505.00	\$ 20,505.00	\$ 36,000.00
518164	Squeaky Wheel	518164	\$ 20,920.00	\$ 20,920.00	\$ 27,000.00
518172	Theodore Roosevelt Inaugural Site	518172	\$ 12,320.00	\$ 12,320.00	\$ 17,000.00
518176	Ujima Company	518176	\$ 83,000.00	\$ 83,000.00	\$ 57,714.00
518147	Westside New York Artists Group	518147	\$ 6,375.00	\$ 6,375.00	\$ 7,500.00
518181	WNY Book Arts Collaborative, Inc	518181	\$ 6,640.00	\$ 6,640.00	\$ 6,000.00
518186	Young Audiences Of WNY	518186	\$ 10,500.00	\$ 10,500.00	\$ 14,000.00
518196	Buffalo Niagara Heritage Village	518196	\$ 18,500.00	\$ 18,500.00	\$ 24,500.00
518200	M. Chegeza En African Art Heritage	518200	\$ 15,000.00	\$ 15,000.00	\$ 12,500.00
518203	General Pulaski Association	518203	\$ 10,000.00	\$ 11,000.00	\$ 12,500.00
518204	Brighton Place, Inc	518204	\$ 10,000.00	\$ 16,000.00	\$ 20,000.00
518213	Hispanic Heritage Council of WNY	518213	\$ 22,500.00	\$ 7,500.00	\$ 10,000.00
518216	Rock Riverside Alliance	518216	\$ 25,000.00	\$ 20,000.00	\$ 15,000.00
518223	Centro Culturale Italiano di Buffalo	518223	\$ 18,000.00	\$ 18,000.00	\$ 13,000.00
518249	South Buffalo Irish Fest/Can You Dig	518249	\$ 1,000.00	\$ 5,000.00	\$ 5,000.00
518256	Net Positive DBA The Foundry	518256	\$ 1,000.00	\$ 5,000.00	\$ 5,000.00

Monitoring Program – Phase II

517551	Buffalo Orchestral Parks Conservancy	517551	\$ 21,910.00	\$ 25,910.00	\$ 35,000.00
518008	Allegory Arts Gallery	518008	\$ 575,000.00	\$ 575,000.00	\$ 875,000.00
518009	Argyle Park Public Art Council	518009	\$ 48,250.00	\$ 48,250.00	\$ 62,500.00
518015	Assembly House 150, Inc	518015	\$ 1,000.00	\$ 1,000.00	\$ 4,500.00
518034	B. Mac & Eric County Historical Garden	518034	\$ 102,000.00	\$ 122,000.00	\$ 150,000.00
518036	Buffalo & Erie Co Historical Society	518036	\$ 417,000.00	\$ 467,000.00	\$ 417,000.00
518037	Buffalo & Erie Co Historical Society	518037	\$ 35,000.00	\$ 35,000.00	\$ 50,000.00
518040	Buffalo Philharmonic Ork Society	518040	\$ 126,000.00	\$ 126,000.00	\$ 940,000.00
518061	Choral Harmonic Chorus	518061	\$ 34,200.00	\$ 34,200.00	\$ 33,000.00
518064	Buffalo Society Natural Sciences	518064	\$ 955,000.00	\$ 955,000.00	\$ 955,000.00
518065	Buffalo Society Natural Sciences	518065	\$ 1,500.00	\$ 1,500.00	\$ 3,350.00
518068	Buffalo Society Natural Sciences	518068	\$ 155,000.00	\$ 155,000.00	\$ 140,000.00
518072	Center for Excellence in Theater	518072	\$ 35,000.00	\$ 35,000.00	\$ 1,300.00
518080	Chenango Valley	518080	\$ 3,500.00	\$ 3,500.00	\$ 3,000.00
518096	Explore & More Children's Museum	518096	\$ 42,000.00	\$ 42,000.00	\$ 78,000.00
518108	Helix Contemporary Arts Center	518108	\$ 57,000.00	\$ 57,000.00	\$ 60,000.00
518117	Heritage Arts Workshop/Arts Foundation	518117	\$ 4,114.00	\$ 4,114.00	\$ 9,114.00
518118	Irish Classical Theatre Company	518118	\$ 85,500.00	\$ 85,500.00	\$ 93,500.00
518124	O'Connell College/Kawich Theater	518124	\$ 11,750.00	\$ 11,750.00	\$ 3,500.00
518128	Lancaster Opera House	518128	\$ 43,500.00	\$ 36,500.00	\$ 35,000.00
518130	Madison Park Theatre	518130	\$ 61,500.00	\$ 61,500.00	\$ 69,500.00
518141	New Phoenia Theatre	518141	\$ 7,500.00	\$ 7,500.00	\$ 7,500.00
518144	Lead Less Travelled Productions	518144	\$ 63,500.00	\$ 63,500.00	\$ 67,000.00
518152	Reynolds Campus Cooperation	518152	\$ 50,000.00	\$ 40,000.00	\$ 50,000.00
518158	Shakespeare in The Park	518158	\$ 9,000.00	\$ 9,000.00	\$ 9,000.00
518168	Theatre Of Youth	518168	\$ 69,400.00	\$ 69,400.00	\$ 74,000.00
518173	Town Square Theatre	518173	\$ 20,400.00	\$ 15,100.00	\$ 29,500.00
518184	Zoological Society Of Buffalo	518184	\$ 5,700,000.00	\$ 5,700,000.00	\$ 7,700,000.00
518191	Chenango Valley Symphony Orchestra	518191	\$ 4,815.00	\$ 4,815.00	\$ 5,000.00
518202	Buffalo Opera Unlimited Incorporated	518202	\$ 1,300.00	\$ 2,300.00	\$ 10,000.00
518211	Buffalo Toronto Public Media WNYO, WFO	518211	\$ 7,750.00	\$ 7,750.00	\$ 1,000.00
518225	Cheektowaga Community Symphony Orchestra	518225	\$ 1,500.00	\$ 1,500.00	\$ 5,000.00
518229	Newfound Historical Society	518229	\$ 3,500.00	\$ 3,500.00	\$ 3,500.00
518231	O'Connell & Company Productions	518231	\$ 23,100.00	\$ 23,100.00	\$ 31,500.00
518239	Amherst Music Users Club/Don Red Blazer	518239	\$ 3,000.00	\$ 3,000.00	\$ 4,500.00
518242	Buffalo Center for Arts and Technology	518242	\$ 1,000.00	\$ 1,000.00	\$ 7,500.00
518245	Cheektowaga Cultural Association	518245	\$ 1,500.00	\$ 1,500.00	\$ 4,200.00
518249	Second Generation Theatre Company	518249	\$ 2,000.00	\$ 2,000.00	\$ 1,000.00
518250	Westside New York Artists Group	518250	\$ 2,000.00	\$ 2,000.00	\$ 1,000.00
518251	Alden Christian Theater Society	518251	\$ 10,000.00	\$ 10,000.00	\$ 1,000.00
518254	Clare LeLacert Association	518254	\$ 1,500.00	\$ 1,500.00	\$ 1,000.00
518255	Clarence Museum Historical Soc of the	518255	\$ 5,500.00	\$ 5,500.00	\$ 6,000.00

BEST PRACTICES

Over the course of the Monitoring Program, the Division of Audit found a number of problematic practices and questionable expense categories on a recurring basis. In order to address issues pertaining to a large number of organizations, certain generally applicable best practices and recommendations are included here.

Alcohol

Several organizations used or appeared to use CGF funds to obtain alcohol. While the Division of Audit does not recommend that CGF awards be made contingent on the absence of alcohol from events hosted by the organization, alcohol should not be purchased with CGF funds. The Division of Audit found dozens of alcohol purchases that appeared to be personal in nature and several more which likely violated NYS Alcoholic Beverage Control Laws. Furthermore, the NYS Comptroller has long held that alcohol is not a "lawful county charge", meaning that government officials and employees may not use taxpayer funds to purchase alcohol. The Division of Audit sees no reason that organizations receiving taxpayer funds should be treated differently.

Debit Cards

Credit cards, particularly with smaller organizations, can provide a critical layer of expense control. The Division of Audit found a large quantity of small-dollar expenses appearing personal in nature. If a debit card is used, the money is gone by the time statements are typically reviewed, while a credit card bill often needs to be paid and approved by the organization's board of directors.

Alternate Funding Sources and Segregation of Accounts

Organizations may have several sources of governmental or philanthropic funding. One way to ensure that CGF funds go farthest is to tailor awards to the needs of the organization. Such an assessment would require applicants to provide certain financial documents covering prior years and a disclosure of current year funding applications. Furthermore, accounts received from Erie County should not be comingled with the other funds of the organization. Having source information upfront and requiring the segregation of accounts substantially decreases the likelihood of wasted CGF funds.

BLACK ROCK HISTORICAL SOCIETY

BACKGROUND

The Black Rock Historical Society (BRHS) is a 501(c)(3) tax-exempt nonprofit organization dedicated to preserving and promoting the history of the Black Rock, Grant-Amherst, Riverside, and West Hertel neighborhoods in Buffalo, New York. Its mission is to educate the public about the significant contributions of these communities by collecting, preserving, interpreting, and exhibiting historical materials. Through its programs and stewardship, BRHS seeks to inspire residents and visitors and to deepen public appreciation of the communities' influence on local, national, and global history.

Erie County Cultural Grant funding awarded to BRHS during the review period:

- \$22,500 in 2020 (including \$20,000 above the Executive Recommended Budget)
- \$7,500 in 2021 (including \$5,000 above the Executive Recommended Budget)
- \$10,000 in 2022 (including \$5,000 above the Executive Recommended Budget)

AUDITOR'S OBSERVATION

BRHS, initially operating as a subcommittee of the Black Rock Riverside Alliance (BRRA), became an independent entity and received its IRS 501(c)(3) determination on November 4, 2019. Evidence indicates that BRHS and BRRA operated from the same physical location, sharing expenses such as rent, utilities, insurance, alarm services, and other facility costs. According to Board minutes dated January 21, 2020, Erie County Cultural Grant funds awarded to BRHS were used to pay these shared expenses.

BRHS maintains and preserves a substantial collection of historical artifacts donated by community members. The collection includes items such as trophies from the Black Rock Cycle Club, sewing machines from the Domestic Sewing Machine Company, a fragment of the Black Rock, and numerous other artifacts. BRHS also holds an extensive archive of photographs documenting the history of the Black Rock community. Through these collections and its historic facility, BRHS preserves and interprets community history for the benefit of current and future generations.

During the review period, BRHS's primary revenue sources were contributions and grants, which represented the majority of total revenue. Membership fees served as the second-largest revenue source. Additional revenue was derived from fundraising activities and gross profit from merchandise sales.

The COVID-19 pandemic significantly affected BRHS's operations. All scheduled programming was suspended until museums were permitted to reopen at limited capacity in September 2020. In response, BRHS offered its Fall Speaker Series via its YouTube channel. BRHS is a fully volunteer-run organization with no paid staff. The Society did not receive Paycheck Protection Program (PPP) funding but was awarded an Erie County Industrial Development Agency (ECIDA) grant of \$1,264.50 for COVID-19 personal protective equipment (PPE) and related fixtures.

For the years under review, BRHS's primary operating expenses included occupancy-related costs. Other expenditures included costs for exhibits and storage, computer and internet services, office supplies, insurance, and food and beverages associated with programming and events. CGF funds received from Erie County were primarily used to offset rent.

AUDITOR'S CONCLUSIONS

BRHS provided sufficient documentation to substantiate its use of Erie County Cultural Grant funding for each year under review. Documentation reviewed included IRS Form 990 filings, bank statements, Board records, general ledgers, and organizational policies and procedures. In each year examined, BRHS's total operating expenses exceeded the amount of Cultural Grant funding received from Erie County.

During the site visit and discussions with the organization's Board President, the Auditor was informed that Erie County Cultural Grant funding is primarily used to offset rent expenses, while City of Buffalo grant funding supports general operating costs such as utilities, supplies, and programming, as City funds may not be applied toward rent. However, a review of organizational records indicates that BRHS received funding through the North District Arts and Cultural (NDAC) program, a City of Buffalo district arts grant, which was designated to support rent and other operating expenses. Additionally, BRHS received further NDAC funding in 2022, and organizational records reflect that these funds were used for rent, utilities, and related operating costs.

The Auditor further noted that multiple City and County grants were applied toward similar operating expenses. Although BRHS's total operating expenses exceeded the combined funding received from City and County grants indicating reliance on additional revenue sources to support overall operations this observation raises concerns related to the County's grant requirement that funding requests not exceed 20% of an organization's operating budget. While BRHS met this requirement when considering County funding independently, the Auditor notes that the County's calculation does not appear to account for operating support received from other governmental grantors. Given that many organizations receive multiple public funding sources, consideration of total governmental operating support may be necessary to ensure consistent application and monitoring of the County's 20% operating budget limitation.

BRHS is governed by an 11-member Board of Directors. Officer terms are limited to two years, and director terms are limited to three years. The organization reported that the Board plays a central role in its internal control structure, including the review and approval of IRS Form 990 filings, oversight of financial operations, decision-making related to grants and loans, and monitoring of conflict-of-interest disclosures.

At the conclusion of the review, the Auditor determined that AKG was in compliance with IRS Form 990 filing requirements, New York State Form CHAR500 requirements, and all other relevant federal and state regulatory obligations for all years under review.