

<b>Respondent Name</b>
Housing Solutions Coalition
<b>Complainant Name</b>
Abby Lawlor
<b>Complaint Description</b>
<a href="#">Abby Lawlor</a> reported via the portal (Wed, 26 Mar 2025 at 11:12 AM)  Please see attached complaint and accompanying evidence submitted on behalf of Washington Housing Alliance Action Fund.
<b>What impact does the alleged violation(s) have on the public?</b>
<b>List of attached evidence or contact information where evidence may be found</b>
Photos of Housing Solutions Coalition mailer attached.
<b>List of potential witnesses with contact information to reach them</b>
<b>Certification (Complainant)</b>
I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.



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**Abby Lawlor**  
Associate Attorney  
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*Submitted via [www.wapdc.gov](http://www.wapdc.gov)*

March 26, 2025

Peter Frey Lavallee  
Executive Director  
Washington Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908

Re: Formal Complaint - Housing Solutions Coalition  
BIL No.: 6605-002

Dear Executive Director Lavallee:

I am writing on behalf of Washington Housing Alliance Action Fund (WA HAAF or Action Fund) to report violations of the Fair Campaign Practices Act, RCW 42.17A, by Housing Solutions Coalition. Housing Solutions Coalition, an opaque Washington D.C.-based advocacy organization that opposes rent control, is conducting a grass roots lobbying campaign to discourage the state legislature from passing House Bill 1217 (HB 1217). It appears that Housing Solutions Coalition has not registered this campaign with the Public Disclosure Commission (PDC) and has sent mailers to Washington residents with incomplete sponsor information. WA HAAF urges the PDC to quickly investigate these violations so that information related to this campaign is properly disclosed to the public before the legislature takes final action on HB 1217.

## BACKGROUND

Earlier this month, Washington residents received a mailer urging them to tell their legislators to oppose Substitute House Bill 1217 (SHB 1217). The mailer has two halves: one half contains information and instructions for the recipient of the mailer, and one half consists of a preaddressed form postcard for the recipient to send to a state legislator.

The front of the informational half of the mailer states: “Rent caps = less housing. They limit your future housing options.” On the reverse, the mailer includes additional claims about SHB 1217 and rent caps, and the statement: “ENCOURAGE YOUR LEGISLATOR TO VOTE NO ON SHB 1217” followed by a QR code.<sup>1</sup> The mailer appears to be personalized based on state senate district. Thus, one mailer

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<sup>1</sup> The QR code in turn links to the following webform [Tell Your Legislators to Build More Housing](#). The webform features a form letter to Washington legislators with the instruction: “**Please use the form on this page to send a pre-written message to your legislators, urging them to oppose rent cap policies and work towards common sense solutions like building more housing.**” The pre-written message includes the statement: “Please OPPOSE SHB 1217.”

instructs a recipient in the 24<sup>th</sup> Legislative District: “Mail the attached card or scan here to contact **Sen. Mike Chapman.**”

The front of the postcard half of the mailer is preaddressed to a state legislator—again, in one case, to Senator Mike Chapman’s capitol mailing address. On the reverse of the postcard, it reads: “Dear Sen. Mike Chapman, As your constituent, I urge you to vote NO on SHB 1217.” The postcard includes additional claims about rent caps, followed by blank spaces for the recipient to fill in their signature, printed name and date. The postcard also includes mailing instructions.

A text box on the informational half of the mailer states: “Paid for by Housing Solutions Coalition.” The text box does not include an address for Housing Solutions Coalition or any additional information about Top Five Contributors. Housing Solutions Coalition has not filed a form L-6 registering a grassroots lobbying campaign with the PDC.<sup>2</sup> While Housing Solutions Coalition employs several registered lobbyists,<sup>3</sup> these lobbyists have also not reported any expenditures related to grassroots lobbying.<sup>4</sup>

The mailer’s QR code links to a webform that allows the recipient to send a digital form letter to their legislators. The webform does not mention Housing Solutions Coalition. Instead, it includes a logo for “BuildUp Washington.” At the bottom of the form, a disclaimer reads “The information you provide using the form above will be used to match you with your elected officials and for follow-up communication by NAA or one of its member affiliates.” There is no Sponsor ID on the webform, nor is there any link to another website with additional information about Housing Solutions Coalition, BuildUp Washington, NAA, or any other potential sponsor. Instead, a link at the bottom of the webform connects to the homepage for “Speak4,” the company behind the webform platform.

BuildUp Washington filed a form L-6 registering a grassroots lobbying campaign on January 24, 2025<sup>5</sup> and has subsequently filed monthly reports on February 10<sup>6</sup> and March 10.<sup>7</sup> These reports indicate that the campaign is focused on rent control/rent stabilization, including HB 1217 and SB 5222. The reports do not list Housing Solutions Coalition as an additional sponsor of the campaign, nor do they report any expenditures for a mailing.

## ALLEGED VIOLATIONS

### I. Failure to timely register a grass roots lobbying campaign in violation of RCW 42.17A.640.

The FCPA requires that a person who has made grassroots lobbying expenditures not otherwise reported—and that exceed \$1,500 in a one-month period, or \$3,000 in a three-month period—register as

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<sup>2</sup> Reports | Washington State Public Disclosure Commission (PDC).

<sup>3</sup> <https://accesshub.pdc.wa.gov/node/123022>.

<sup>4</sup> See <https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2005881> (Northwest Communications, Inc., March 2025); <https://apollo.pdc.wa.gov/lobbyist/public/-/#/public/12-report/2006151> (Dewey Square Group, February 2025).

<sup>5</sup> <https://web.pdc.wa.gov/rptimg/default.aspx?docid=5005501>.

<sup>6</sup> <https://web.pdc.wa.gov/rptimg/default.aspx?docid=5005595>.

<sup>7</sup> <https://web.pdc.wa.gov/rptimg/default.aspx?docid=5005682>.

the sponsor of a grassroots lobbying campaign.<sup>8</sup> RCW 42.17A.640(1); *see* WAC 390-20-150 (adjusted value of reporting thresholds). Beginning on the 30<sup>th</sup> day before a regular legislative session through the date of final adjournment, a sponsor must register within 24 hours of the initial presentation of a grassroots lobbying campaign to the public. RCW 42.17A.640(2)(a)(i).

This initial registration must include the sponsor's name and address, and the names, addresses, and titles of the controlling persons responsible for managing the sponsor's affairs. RCW 42.17A.640(2)(b)(i). The registration must also report additional information including the names, addresses, and business or occupation and employer of persons organizing and managing the campaign or hired to assist the campaign. RCW 42.17A.640(2)(b)(ii). Both the initial registration and subsequent monthly reports must further disclose each source of funding for the campaign of \$25 or more as well as the totals of all expenditures made or incurred to date on behalf of the campaign segregated according to financial category. RCW 42.17A.640(2)(b)(iii), (2)(b)(v), (3).

If a campaign sponsor is a lobbyist employer, grass roots lobbying activities may be reported on a lobbyist's L-2 Reports, rather than on L-6 Reports, only if 1) the sponsor timely registered the grassroots lobbying campaign; 2) the sponsor did not receive any contributions for the campaign other than the sponsor's own funds, including general treasury funds; and 3) the campaign is identified on the L-2 Report. WAC 390-20-125(3)(a). If a grass roots lobbying campaign has more than one sponsor, the sponsors must register collectively. WAC 390-20-125(3)(b).

Housing Solutions Coalition sent mailers to Washington residents during the legislative session urging them to tell their legislators to vote no on SHB 1217. While it is unknown how many mailers were sent, or the total cost of the mailings, it appears highly likely that these mailers triggered an obligation for Housing Solutions Coalition to register as the sponsor of a grass roots lobbying campaign under RCW 42.17A.640 and to report any contributions received and expenditures made in the course of the campaign. To date, Housing Solutions Coalition has not filed an L-6 Report registering its grassroots lobbying campaign. And it has not reported any grassroots lobbying expenditures, including through its lobbyists' L-2 Reports. If Housing Solutions Coalition is engaged in a coalitional effort with BuildUp Washington to drive opposition to HB 1217, as the QR link indicates, the two entities should have registered together through an L-6 Report disclosing joint sponsorship of a campaign.

Housing Solutions Coalition's failure to register its grassroots lobbying campaign has deprived members of the public, as well as members of the legislature, of important background information on a national organization that is seeking to influence the legislature's current work on tenant protections.

## **II. Failure to include a complete Sponsor ID on written advertising in violation of RCW 42.17A.640.**

The FCPA requires that any written advertising or other mass communication<sup>9</sup> produced as part of a grassroots lobbying campaign must include the sponsor's name and address. RCW 42.17A.640(5)(a)(i).

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<sup>8</sup> Grassroots lobbying "involves an appeal to the public to solicit, urge, or encourage the public to influence legislation." WAC 390-20-125(1).

<sup>9</sup> A mass communication means "a communication, digital or otherwise, intended to reach a large audience," including through online or other electronic transmission methods, or through one hundred or more letters or similar communications that are identical or substantially similar in nature. WAC 390-05-290.

Additionally, if the communication cost \$1,000 or more, the communication must include the statement “Top Five Contributors” followed by the names of each of the five largest sources of funding of \$1,000 or more. RCW 42.17A.640(5)(a)(iii)(A). If one of the top five largest sources of funding is a political committee, the names of the “Top Three Donors to PAC Contributors” must also be disclosed. RCW 42.17A.640(5)(a)(iii)(B).

The Housing Solutions Coalition mailer failed to disclose the organization’s address in its Sponsor ID.<sup>10</sup> Though it is unknown whether this grassroots lobbying campaign has additional contributors (because Housing Solutions Coalition has not filed an L-6 Report), any contributors of \$1,000 or more also should have been included as Top Five Contributors alongside the Sponsor ID. Additionally, the Housing Solutions Coalition mailer QR code links to a webform that does not include any Sponsor ID. It is unclear whether the webform was paid for by BuildUp Washington (whose logo appears on the page), NAA (who is referenced in the text of the webform), Housing Solutions Coalition (whose mailing linked to the webform), or some other entity.

The incomplete Sponsor ID on the Housing Solutions Coalition mailer, and the absence of a Sponsor ID on the associated webform, again deprive the public of important information related to current efforts to influence Washington legislation.

## CONCLUSION

As the legislature is currently considering passage of HB 1217, WA HAAF urges the PDC to quickly investigate these violations and require Housing Solutions Coalition to register and report on its contributors and expenditures as soon as possible. Please contact me with any questions or concerns at (206) 644-6002.

Sincerely,

A handwritten signature in black ink, appearing to read 'Abby Lawlor', with a stylized, cursive script.

Abby Lawlor

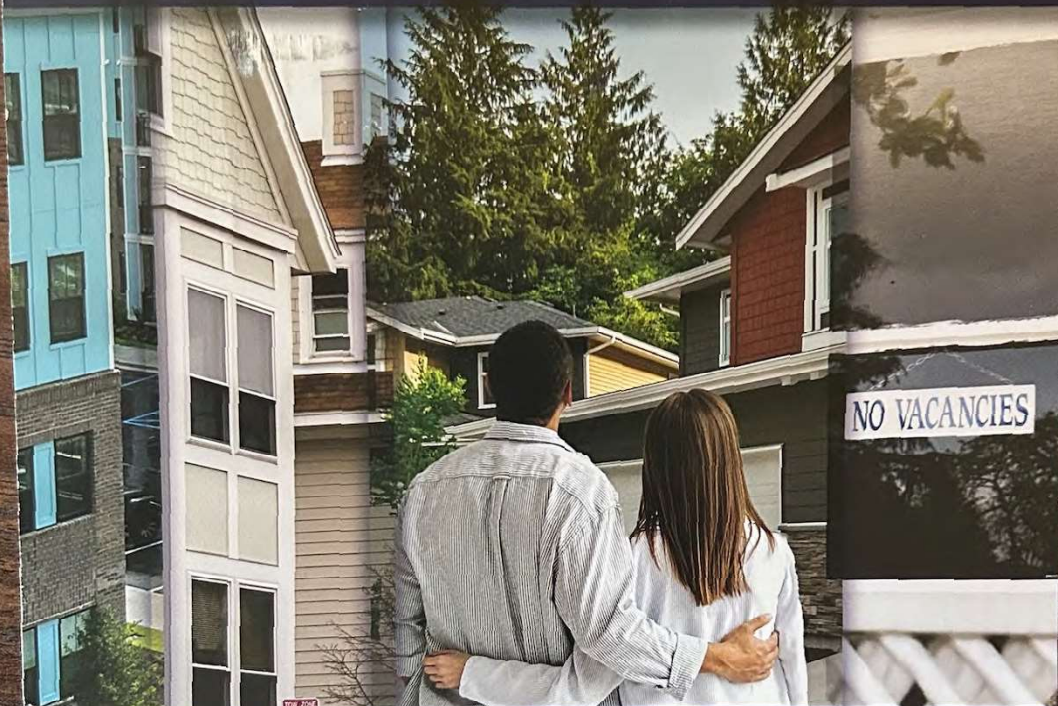
*Counsel for Washington Housing Alliance Action Fund*

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<sup>10</sup> Housing Solutions Coalition is based in Washington, D.C. See [Housing Solutions Coalition | accesshub](#).



**Rent caps = less housing.**  
**They limit your future housing options.**



**SHB 1217 WILL MAKE WASHINGTON'S HOUSING CHALLENGES WORSE.**

PLACE  
STAMP  
HERE

Sen. Mike Chapman  
402 Legislative Building  
PO Box 40424  
Olympia, WA 98504



Dear Sen. Mike Chapman,

**As your constituent,  
I urge you to vote NO on SHB 1217.**

Rent cap policies limit options for renting and selling. This leads to higher rents in the long term. Washington State needs 1.1 million more homes<sup>1</sup> over the next 20 years to support current and future residents, and rent caps will prevent reaching that goal.

The data is clear, SHB 1217 will hinder development of housing for everyone and make our housing situation worse.<sup>2</sup>

Sincerely,

Signature

Print your name

Date

1. Washington State Department of Commerce, "Washington state will need more than 1 million homes in next 20 years," March 2, 2023.  
2. EConorthwest, "Rent Control in Washington State: The Impact on Housing and Affordability," December 2023.

**MAILING INSTRUCTIONS:**

1. Tear off card at perforation
2. Sign your name, fill in your return address, and attach a postage stamp
3. Place card in the mail

**Rent caps** sound like they would help,  
but the data is clear<sup>3</sup> –  
**they make our housing problems worse.**

**SHB 1217 will:**

- Create fewer housing options for all of us and our neighbors
- Stifle investment, which is essential for more housing to be built
- Place financial strain on taxpayers



3. Brannon, Ite and Hanson, Andrew and Hawley, Zackary and Wolf, Samuel, "Modeling the Impact of Rent Growth Caps On Washington State's Apartment Market," February 7, 2024.

Paid for by Housing Solutions Coalition

**ENCOURAGE YOUR LEGISLATOR**

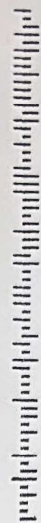
**TO VOTE NO ON SHB 1217.**

Mail the attached card or scan here to contact  
Sen. Mike Chapman:



7 65465

PRSR STD  
US POSTAGE  
PAID  
BPS  
97218



\*\*\*\*\*ALTO\*\*5-DIGIT 98349

Or Current Resident

Sequim WA 98382-8238

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