



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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August 13, 2025

Delivered electronically to Josh Rosenstein on behalf of Housing Solutions Coalition at rosenstein@sandlerreiff.com

Subject: PDC Case 169883 regarding Housing Solutions Coalition

Mr. Rosenstein:

The Public Disclosure Commission (PDC) completed its review of the complaint filed against Housing Solutions Coalition by Abby Lawler on behalf of her client Washington Housing Alliance Action Fund on March 26, 2025. The complaint alleged violations of RCW 42.17A.640 for failure to register and report a grassroots lobbying campaign and for failure to include complete sponsor identification on grassroots lobbying materials.

Applicable Laws and Rules

[RCW 42.17A.640\(2\)\(a\)](#) requires the sponsor of a grassroots lobbying campaign to register within 24 hours of the initial presentation of the campaign to the public.

[WAC 390-20-125\(3\)\(a\)](#) allows a registered lobbyist to report grassroots lobbying expenses on their monthly L-2 reports in lieu of disclosure on the grassroots lobbying report (L-6 report) only if: (1) the sponsor used its own funds, including general treasury funds; (2) the sponsor timely registered the campaign pursuant to RCW 42.17A.640; and (3) the campaign is identified on the L-2 report.

[RCW 42.17A.640\(5\)\(a\)\(i\)](#) requires that any written advertising produced as part of a grassroots lobbying campaign includes the sponsor's name and address.

Background and Findings

- According to the written response provided, Housing Solutions Coalition (HSC) is a 501(c)(4) tax-exempt corporation with an interest in legislative matters before the state legislature (during the 2025 Regular Session). HSC retained the services of Dewey Square Group (DSG) to plan and execute a direct and indirect grassroots lobbying effort aimed at specific legislation.
- House Bill 1217 (HB 1217), also known as the "Housing Stability" or "Rent Stabilization" act, passed during the 2025 Regular Legislative Session and took effect in May 2025.

- DSG is a lobbying firm registered and reporting monthly lobbying activity with the PDC during the 2023/2024 and 2025/2026 biennia. DSG submitted a registration to lobby on behalf of HSC on February 24, 2025.
- The complaint described a mailer sent in March 2025 that urged recipients to tell their legislators to oppose Substitute House Bill 1217 (SHB 1217). The mailer included an informational portion regarding SHB 1217, a pre-addressed postcard for the recipient to complete and send to their respective legislator, and a QR code linking to a webform containing similar instructions to contact legislators and oppose SHB 1217. In addition, the mailer stated it was “Paid for by Housing Solutions Coalition”.
- The complaint alleged that the mailer and its messaging to oppose SHB 1217 was grassroots lobbying required to be reported to the PDC. Additionally, it alleged the mailer was a grassroots lobbying advertisement paid for by HSC and, as such, required the address of the sponsor, HSC, to be included.
- In his response, Josh Rosenstein, counsel for HSC, confirmed the relationship between HSC and DSG regarding the grassroots lobbying effort, stating that DSG received income and incurred expenses related to that grassroots effort and reported the expenses on its monthly expense reports (L-2 reports). He stated that HSC used its own funds for the grassroots lobbying expenses and did not solicit funds from outside sources. Regarding the missing address on the mailer, Mr. Rosenstein asserts that the statute could be interpreted to say HSC is not subject to the sponsor identification requirements. However, he stated that if a disclaimer was required, the omission of HSC’s address was inadvertent.
- During the investigation, PDC staff reviewed the L-2 reports submitted by DSG for February 2025 and March 2025, noting that in the indirect lobbying expenses section of the March L-2 report, no campaign name was identified for the advertising mailing costs paid by HSC.
- The original March 2025 L-2 report was submitted on April 15, 2025. Per staff’s request, DSG amended the March 2025 L-2 report on July 18, 2025, to add “Effort to Oppose HB 1217” as the campaign name.
- It is staff’s assessment that HSC was a sponsor of a grassroots lobbying campaign and as a sponsor should have included its name and address on written advertising, including the mailer described in the complaint. In addition, while staff agree that DSG complied with PDC statutes and rules by disclosing HSC’s grassroots lobbying expenses on its March L-2 report, the disclosure should have been done earlier and should have included the campaign name.

Summary and Resolution

It appears that the Respondent acted in good faith when using its registered lobbyist to disclose its grassroots lobbying activity. Additionally, while the mailer did not include the address of the sponsor, it clearly identified that Housing Solutions Coalition had paid for the ad. The Respondent has not been the subject of prior enforcement action.

Based on our findings, staff has determined that, in this instance, any violation that may have occurred was minor and has been cured. After consideration of the circumstances, further proceedings would not serve the purposes of this chapter. Under WAC 390-37- 060, the executive director, at any time prior to consideration by the commission, may dismiss a complaint which on its face, or as shown by investigation, provides reason to believe that a violation has occurred, but also shows that the respondent

is in substantial compliance with the relevant statutes or rules, or shows that formal enforcement action is not warranted.

Pursuant to WAC 390-37-060(1)(d), however, the Respondent is receiving a formal written warning concerning failure to timely registration and accurate disclosure of a grassroots lobbying campaign, and failure to include complete sponsor identification on written advertising for a grassroots lobbying campaign. The formal written warning includes staff's expectation that the Respondent timely register and report grassroots lobbying and include the required sponsor information on written advertisement in the future. The Commission will consider this formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Endorsed by,

Electronically signed by Jennifer Hansen

Jennifer Hansen
Compliance Officer

Electronically signed by Peter Frey Lavallee

Peter Frey Lavallee
Executive Director

cc: Abby Lawler on behalf of Washington Housing Alliance Action Fund