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Testimony Before the District of Columbia Council  
Committee on Public Works and Operations  
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Public Hearing:  
Performance Oversight Hearing  
Department of Licensing and Consumer Protection

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## **Introduction**

Good morning, Chairperson Nadeau, and members of the Committee. My name is Makenna Osborn. I am a Policy Attorney at Children’s Law Center and a resident of the District. Children’s Law Center believes every child should grow up with a strong foundation of family, health and education and live in a world free from poverty, trauma, racism and other forms of oppression. Our more than 100 staff – together with DC children and families, community partners and pro bono attorneys – use the law to solve children’s urgent problems today and improve the systems that will affect their lives tomorrow. Since our founding in 1996, we have reached more than 50,000 children and families directly and multiplied our impact by advocating for city-wide solutions that benefit hundreds of thousands more.

Thank you for the opportunity to testify regarding the performance of the Department of Licensing and Consumer Protection (DLCP). The conditions in a child’s home can profoundly impact their physical and mental well-being.<sup>1</sup> District families who rent their homes depend on their landlords to provide “safe and sanitary” living conditions in compliance with the District’s housing code.<sup>2</sup> Each year Children’s Law Center works with hundreds of families whose landlord is failing to meet this obligation – harming the health and well-being of their children.<sup>3</sup> Our attorneys regularly help families exercise their right to enforce the District’s housing standards through litigation.<sup>4</sup> To do so, we need to be able to identify who a family’s landlord is and how they can be

reached for proper service.<sup>5</sup> When a rental property's registered owner is a corporate entity – as is the case for most of our clients – we should be able to retrieve that information from DLCP.

District law requires that all corporations operating in DC provide DLCP with comprehensive, up-to-date ownership and contact information.<sup>6</sup> Unfortunately—as we have reported previously to this Committee—during our representation of clients in housing conditions cases, Children's Law Center regularly finds that the data DLCP has on a corporation does not fully comply with the District's corporate reporting requirements.<sup>7</sup> When DLCP does not have complete and accurate information for a landlord, our staff must conduct time-consuming and sophisticated research to ascertain who is ultimately responsible for the property and how to successfully contact them, increasing the time it takes to address the harmful housing conditions our clients are experiencing.

Children's Law Center thanks Councilmember Nadeau, as Chair of the Committee, for meaningfully engaging on this issue over the past two years and providing DLCP with additional staff to improve implementation and enforcement of the District's corporate transparency laws.<sup>8</sup> We also want to thank DLCP's Corporations Division for maintaining an open and collaborative dialogue with Children's Law Center. In Fiscal Year 2024, DLCP showed an increased appreciation for the importance of moving beyond superficial compliance—whether a required field in a corporate filing is

filled in—to *substantive* compliance—whether the information provided is complete and accurate. Children’s Law Center would like to see DLCP continue taking steps to implement a proactive approach to corporate transparency enforcement because based on our experience, significant improvements are still needed to ensure most landlords are in substantive compliance. To that end, my testimony will detail how 1) DC tenants continue to be harmed by pervasive non-compliance with corporate transparency requirements; 2) DLCP can establish a more effective proactive enforcement regime for corporate transparency; and 3) DLCP can use planned updates to its corporate registration system to increase compliance with transparency requirements and support District-wide efforts to identify landlords with a pattern of exploitative practices across multiple properties.

**Inaccurate and Incomplete Corporate Filings Allow Landlords to Delay and Evade Accountability for Illegal Housing Conditions**

As the District agency responsible for corporate registration and regulatory compliance, DLCP collects and maintains records on all corporations operating in the District.<sup>9</sup> Under DC law, corporate entities doing business in the District must, “designate and maintain a registered agent” with an address where the agent can receive legal correspondence on the corporation’s behalf.<sup>10</sup> Additionally corporations must disclose:

the names, residence and business addresses of each person whose aggregate share of direct or indirect, legal or beneficial ownership of a governance or total distributional interest of the entity:

- (A) Exceeds 10%; or
- (B) Does not exceed 10%; provided, that the person:

- (i) Controls the financial or operational decisions of the entity;
- or
- (ii) Has the ability to direct the day-to-day operations of the entity.<sup>11</sup>

Corporations need to provide DLCP with the names and contact information for their registered agent and beneficial owners in their initial corporate registration and biannual report filings, and are required to notify DLCP of any changes that occur between filings.<sup>12</sup> These requirements are designed to ensure that unscrupulous actors cannot evade accountability by hiding behind layers of single-purpose corporations.<sup>13</sup> The Council specifically enacted the requirement to disclose beneficial owner to both 1) empower individual residents with information about from whom they are buying or renting, and 2) enable the District government to easily identify all of the properties developed or owned by bad actors to target enforcement efforts.<sup>14</sup>

If the District's corporate transparency requirements were operating as intended, once an individual has the name of the LLC that owns a rental property, they should be able to look the entity up on the public-facing corporate registry system operated by DLCP, CorpOnline,<sup>15</sup> and find the name and address of the LLC's registered agent and all the beneficial owners behind the LLC. With this information, the individual would be able to understand who has ultimate responsibility for maintaining the property's habitability and how to contact them, including for the purposes of serving notice for a housing conditions case.<sup>16</sup> However, as Children's Law Center has raised to this

Committee in the past, the information available on CorpOnline is often insufficient for to fully identify and serve a landlord.<sup>17</sup>

In the past year while using CorpOnline to look up LLCs listed as a property's registered owner, Children's Law Center staff have encountered:

- outdated registered agents who can no longer accept service on behalf of the corporation;
- addresses for registered agents or beneficial owners that lead to vacant offices or are not in fact connected to either; and
- blatantly inaccurate beneficial owner disclosures – for example, naming the LLC as a beneficial owner of itself.

In these circumstances, our staff must conduct time-consuming research of other public records and make multiple service attempts at different addresses to reach the landlord Children's Law Center is trying to hold accountable. If that fails, Children's Law Center will likely have to pay for Service of Process<sup>18</sup> via DLCP before a legal action can move forward, which can take weeks unless we also pay for expedited service.

Delays in our ability to properly serve a landlord can result in material delays to the correction of harmful conditions in our client's homes. For example, this fall a family seeking repairs to multiple housing code violations that pose safety dangers for their young children had their initial court hearing delayed by over three months after proper service was hampered by an outdated registered agent in CorpOnline. Further, while

incomplete and inaccurate data on CorpOnline delays proceedings—and therefore, relief—for Children’s Law Center’s clients, it can pose an insurmountable hurdle for tenants without legal representation. In a recent article detailing the deceitful and exploitative business practices of Sam Razjooyan, a residential property owner and developer who continues to operate in the District despite years of documented harm to low-income tenants in his properties, one tenant’s attempt to hold Razjooyan accountable did not go anywhere because “when she tried to sue Razjooyan, she was unable to locate him or serve him with legal papers.”<sup>19</sup>

### **DLCP Needs to Continue Increasing its Capacity for Proactive Enforcement of Corporate Transparency Requirements**

Children’s Law Center appreciates that DLCP’s Consumer Protection Unit will investigate a corporation if they receive a complaint reporting issues with information supplied in CorpOnline.<sup>20</sup> We believe DLCP is appropriately investigating these complaints and revoking the good standing, and therefore ability to legally operate a business in the District, for corporations that fail to address compliance failures in a timely manner. However, we maintain that solely reactive enforcement is not sufficient. For families experiencing harmful housing conditions—especially emergency situations like lack of electricity, heat, and hot water—every day that procedural hurdles like incomplete service delay their relief is unacceptable; they should not have to endure further harm because their landlord has failed to provide complete and accurate information to DLCP.

To best protect the health and safety of District tenants, DLCP needs to ensure that a corporation has provided complete and accurate information *before* a tenant is attempting to bring a legal action against their landlord. DLCP should be systematically checking the content of information supplied by corporations *at the time of filing* and proactively auditing its records for willful or ignorant noncompliance rather than relying primarily on complaint-based enforcement. After DLCP reported in its Fiscal Year 2024 budget hearing that the agency did not have sufficient staffing to “ensure full compliance” with the District’s corporate transparency requirements, this Committee found funding for five new full-time equivalents (FTEs) at DLCP—three in the Corporations Division and two in the Enforcement Unit.<sup>21</sup> Based on communications with DLCP, the Committee believed these new positions would enable the agency to proactively “review more of the documentation received by the agency—rather than random spot-checks—and have the enforcement resources to back it up.”<sup>22</sup> DLCP agreed that “these additional FTEs [would] greatly assist the agency in enforcing the District’s laws and regulations, including adherence to the beneficial owner disclosure requirements.”<sup>23</sup>

At the time of last year’s Performance Oversight hearing, DLCP had only filled three of the five positions and as those hires were still new, could not share a detailed update on how they were being utilized.<sup>24</sup> However, Children’s Law Center was encouraged to hear from Director Crowe that DLCP anticipated using at least one of the



positions “to actually do more evaluation of this beneficial ownership information proactively so we can see what [information] is being provided [and] does it make sense . . . allow[ing] [DLCP] to dig in further and improve the way [corporate filing review] is working now.”<sup>25</sup> This is precisely the kind of substantive review of corporate filings necessary to fully implement the District’s corporate disclosure requirements. We urge the Committee to ask DLCP about the status of these FTEs and how they are being used by DLCP. It would be especially useful to know if the new staff are able to conduct the kind of work envisioned by the Committee and Director Crowe to proactively identify inaccurate and incomplete filings and bring more corporations into substantive compliance.

### **DLCP Should Use its Corporate Registration System Update to Increase Substantive Compliance With Transparency Requirements and Support Information Sharing Across Agencies**

DLCP has consistently reported that its “old and fragile” corporate registration system (CorpOnline) limits its capacity ability implement changes aimed at proactively increasing substantive compliance with corporate transparency requirements.<sup>26</sup> Therefore, in its report on the Fiscal Year 2024 budget this Committee made a policy recommendation that DLCP modernize the technology used to collect corporate filings and supporting documentation “to make it easier to monitor compliance with [DC’s corporate transparency laws].”<sup>27</sup> During last year’s Performance Oversight and Fiscal Year 2025 Budget hearings, Director Crowe told the Committee that DLCP was moving

forward with plans to “revamp” its corporate registration system and, having secured a vendor, anticipated that the project would be completed within a year.<sup>28</sup>

Children’s Law Center greatly appreciated that DLCP’s Corporations Division reached out in the fall of 2024 to gather feedback on what we would ideally like to see included in an updated corporate registration system. Based on our experiences, we believe the new registry should have:

- improved validation at the point of entry—to ensure that data like email and physical addresses entered in online corporate filing forms are valid;
- user friendly information bubbles that provide further details and instructions on what is being asked for in a particular field;<sup>29</sup> and
- more sophisticated search functions, which allow users to search by a variety of fields, including beneficial owner.

These features could increase voluntary compliance at time of filing by better explaining disclosure requirements and not allowing inputs of invalid or incomplete information, such as addresses that do not include a necessary suite or unit number. The updated system will also hopefully have increased ease of administration on the DLCP-facing end so DLCP can more easily review the substance of data supplied in a corporate filing and move beyond just looking at whether a required field has any information in it.

Additionally, researchers have found that analysis of corporate records is “the key to uncover[ing] intentional ownership obscurity” and identifying a landlord’s true

footprint in a market.<sup>30</sup> With increased data validity and more sophisticated search functions, DLCP's corporate records can be a valuable source for the District's multi-agency work to identify the worst landlords in DC, hold them accountable for harm to tenants, and prevent them from continuing to operate as housing providers. For example, with the capacity to search across DLCP's corporate records by beneficial owner—and hopefully registered agent and address as well<sup>31</sup>—the Department of Buildings (DOB) and Office of the Attorney General (OAG) could more easily identify all the properties owned by a particular landlord and target enforcement accordingly.

Children's Law Center urges the Committee to ask DLCP for a detailed update on its plan to update its corporate registry system, including anticipated features, a timeline for next steps, and any barriers to full implementation. Additionally, we hope the Committee will ask DLCP about its current practices for sharing data from CorpOnline with other agencies and anticipated changes to those practices with the new system. Once DLCP's new corporate registration system is operational, it may be prudent for the Committee to hold a public roundtable with representatives from agencies and organizations dedicated to tenant and consumer protection in the District to discuss how DLCP's corporate records can best be put to use for the protection of DC residents.

## **Conclusion**

Thank you for the opportunity to testify and your ongoing attention to this issue. Children's Law Center looks forward to continuing to partner with the Committee and

DLCP to ensure that DC landlords cannot use single-purpose corporations to delay or evade accountability for harm to tenants.

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<sup>1</sup> Living in housing with substandard conditions is a consistent and strong predictor of emotional and behavioral problems in children and exposure to certain conditions, especially mold and pests, is closely associated with increased asthma prevalence and severity in children. See Levine Coley et. al., *Poor Quality Housing Is Tied to Children's Emotional and Behavioral Problems*, MacArthur Foundation: How Housing Matter (September 2013), <https://housingmatters.urban.org/sites/default/files/wp-content/uploads/2014/09/How-Housing-Matters-Policy-Research-Brief-Poor-Quality-Housing-Is-Tied-to-Childrens-Emotional-and-Behavioral-Problems.pdf>; Ganesh et. al., *The Relationship between Housing and Asthma Among School-Age Children*, Urban Institute (October 2017), [https://www.urban.org/sites/default/files/publication/93881/the-relationship-between-housing-and-asthma\\_2.pdf](https://www.urban.org/sites/default/files/publication/93881/the-relationship-between-housing-and-asthma_2.pdf).

<sup>2</sup> See *District of Columbia Tenant Bill of Rights*, DC Office of the Tenant Advocate (2015), <https://ota.dc.gov/sites/default/files/dc/sites/ota/publication/attachments/2015%2007%2003%20OTA%20DC%20Tenant%20Bill%20of%20Rights%20ODAI-OTA%20FINAL.pdf>; 14 D.C.M.R. §§ 301, 400-999 (DC Housing Code).

<sup>3</sup> Children's Law Center's innovative medical legal partnership, Healthy Together, places attorneys at primary care pediatric clinics throughout the city with Children's National, Unity Health Care, and Mary's Center to receive referrals from pediatric providers for assistance with non-medical barriers to a child's health and well-being. See Children's Law Center, available at: <https://childrenslawcenter.org/our-impact/health/>.

<sup>4</sup> Our attorneys represent clients in the Housing Conditions Court, a court of limited jurisdiction within the DC Superior Court's Civil Division where tenants may sue landlords for housing code violations on an expedited basis and seek the relief of an order requiring the landlord to make necessary repairs to the tenant's rental unit. See Housing Conditions Calendar, <https://www.dccourts.gov/services/civil-matters/housing-conditions-calendar>

<sup>5</sup> "Service is the formal delivery of litigation documents to give the opposing litigant notice of the suit against them. . . . Proper service is a requirement before an individual can be brought to court." *Service*, Legal Information Institute (LII): Wex, Cornell Law School (April 2021), <https://www.law.cornell.edu/wex/service>.

<sup>6</sup> See D.C. Code §§ 29-104.01 – 29-104.14, Registered Agent; D.C. Code § 29-102.01(a)(6), Entity Filing Requirements.

<sup>7</sup> See Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Council Committee on Public Works and Operations (February 22, 2023), <https://childrenslawcenter.org/wp-content/uploads/2023/02/DLCP-Performance-Oversight-CLC-Written-Testimony-with-Attachments-Final-2.21.23.pdf>; Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Council Committee on Public Works and Operations (January 24, 2024), <https://childrenslawcenter.org/wp-content/uploads/2024/01/DLCP-Performance-Oversight-Hearing-2024-Childrens-Law-Center-Written-Testimony-with-Attachments-01.23.24.pdf>.

<sup>8</sup> Council of the District of Columbia, Committee on Public Works and Operations, Committee Report on the Fiscal Year 2024 Budget and Financial Plan for Agencies Under its Purview, p. 178-180, (April 26, 2023), available at: [https://lims.dccouncil.gov/downloads/LIMS/52615/Committee\\_Report/B25-0203-Committee\\_Report6.pdf?Id=162494](https://lims.dccouncil.gov/downloads/LIMS/52615/Committee_Report/B25-0203-Committee_Report6.pdf?Id=162494) [Hereinafter Committee Report on the Fiscal Year 2024 Budget].

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- <sup>9</sup> See Corporations: What We Do, DC Department of Licensing and Consumer Protection, <https://dlcp.dc.gov/node/1614386>, (“The [DLCP] Business and Professional Licensing Administration’s Corporations Division serves as the Office of Corporate Registrar for the District of Columbia. The Corporations Division registers all entities, domestic (DC) or foreign (organizations formed outside of DC) that conduct business in the District of Columbia.”).
- <sup>10</sup> D.C. Code §§ 29-104.01 – 29-104.14, Registered Agent.
- <sup>11</sup> D.C. Code § 29-102.01(a)(6), Entity Filing Requirements. D.C. Code § 29-102.11(a)(6), Biennial Report for Mayor.
- <sup>12</sup> D.C. Code § 29-101.06(a)(5), Civil Fines for Violations of Title (Authorizing DLCP to impose civil fines and penalties on an entity doing business in the District that “[f]ails to designate and **maintain** a registered agent as required by this title.” (emphasis added)); see also, D.C. Code §§ 29-104.06 – 29-104.10 (instructions for notifying DLCP of a change in registered agent. D.C. Code § 29-102.01(a)(9) (Requiring entities to file articles of amendment to reflect any changes in beneficial ownership that occur “at any time after the submission of the entity registration filing.”).
- <sup>13</sup> Council of the District of Columbia, Committee of the Whole, Committee Report on B22-317, p. 5-6, (November 9, 2017), available at: [https://lims.dccouncil.gov/downloads/LIMS/38265/Committee\\_Report/B22-0317-CommitteeReport1.pdf](https://lims.dccouncil.gov/downloads/LIMS/38265/Committee_Report/B22-0317-CommitteeReport1.pdf) (“Recent news stories have come to light that have shown that negligent landlords operate in the District under the protection of the District’s LLC law. . . . The Committee is [also] aware of instances in which developers have been using multiple LLCs when unlawfully renovating houses in the District, also known as house flipping.”).
- <sup>14</sup> *Id.* at 5 (“By requiring disclosure of the ownership behind an LLC when one building is identified to be in poor condition, DCRA [now DOB] will be better able to pursue housing code enforcement at other buildings under the same ownership.”).
- <sup>15</sup> CorpOnline, <https://corponline.dcrd.dc.gov/Home.aspx>.
- <sup>16</sup> The Housing Conditions Court’s instructions for service of process state that for proper service on a corporation, the corporation’s “registered agent on record . . . should be served” and specifically directs tenants to use the District’s corporate registry web portal to find that information. If a corporation has failed to maintain a registered agent, the Court’s instructions allow for service on “an officer or a managing or general agent of the Defendant corporation,” which should include any beneficial owners. *Instructions for Service of Process of the Verified Complaint to Enforce Housing Code Regulations and Summons to Appear in Court and Notice of Hearing*, Superior Court of the District of Columbia, [https://www.dccourts.gov/sites/default/files/HCC\\_InstructionSheetForServiceOfHousingCodeComplaintAndSummons.pdf](https://www.dccourts.gov/sites/default/files/HCC_InstructionSheetForServiceOfHousingCodeComplaintAndSummons.pdf).
- <sup>17</sup> See Makenna Osborn, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Public Works and Operations (February 22, 2023), <https://childrenslawcenter.org/wp-content/uploads/2023/02/DLCP-Performance-Oversight-CLC-Written-Testimony-with-Attachments-Final-2.21.23.pdf>; Makenna Osborn, Children’s Law Center, Testimony Before the District of Columbia Council Committee on Public Works and Operations (January 24, 2024), <https://childrenslawcenter.org/wp-content/uploads/2024/01/DLCP-Performance-Oversight-Hearing-2024-Childrens-Law-Center-Written-Testimony-with-Attachments-01.23.24.pdf>.
- <sup>18</sup> If attempted service to an entity’s registered agent is unsuccessful, service can be made to the District’s Superintendent of Corporations, the Corporations Division Program Manager at DLCP for a minimum of a \$50 fee. See Corporations Division: Business Registration FAQs: Service of Process, DLCP, <https://dlcp.dc.gov/page/corporations-division-business-registration-faqs>; Corporations Division Fees— Filing Fee for All Entities, DLCP, <https://dlcp.dc.gov/node/1620006>.

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<sup>19</sup> Suzie Amanuel, *How a D.C. 'Slumlord' Scammed Tenants and Lenders to Build a Portfolio of Neglected Properties, According to Lawsuits and Tenant Accounts*, Washington City Paper (December 2, 2024), <https://washingtoncitypaper.com/article/754131/how-a-d-c-slumlord-scammed-tenants-and-lenders-to-build-a-portfolio-of-neglected-properties-according-to-lawsuits-and-tenant-accounts/>. It is also important to note that for most of the properties mentioned in the article, it was thorough research of other public records – not CorpOnline – that ultimately uncovered which LLCs were operated by Razjooyan and his associates because their beneficial owner disclosures were accurate.

<sup>20</sup> DLCP's Consumer Protections Unit (CPU) is "a team of investigators who are dedicated to enforcing District regulations in many areas." Consumer Protection Assistance, DC Department of Licensing and Consumer Protection, <https://dlcp.dc.gov/service/consumer-protection-assistance>.

<sup>21</sup> Committee Report on the Fiscal Year 2024 Budget, *supra* note 8, at 178.

<sup>22</sup> *Id.* at 179-180.

<sup>23</sup> Department of Licensing and Consumer Protection FY2023-2024 Performance Oversight Responses, response to Q59(b), p. 30, *available at*: <https://lims.dccouncil.gov/Hearings/hearings/275>.

<sup>24</sup> Council of the District of Columbia Committee on Public Works and Operations, Performance Oversight Hearing on the Department of Licensing and Consumer Protection (January 24, 2024) at 1:29:23, *available at*: [https://dc.granicus.com/MediaPlayer.php?view\\_id=58&clip\\_id=8631](https://dc.granicus.com/MediaPlayer.php?view_id=58&clip_id=8631).

<sup>25</sup> *Id.* at 1:29:37.

<sup>26</sup> Council of the District of Columbia, Committee on Public Works and Operations, Committee Report on the Fiscal Year 2025 Budget for Agencies Under its Purview, p. 115, (May 9, 2024), *available at*: [https://lims.dccouncil.gov/downloads/LIMS/55149/Committee\\_Report/B25-0785-Committee\\_Report2.pdf?Id=191228](https://lims.dccouncil.gov/downloads/LIMS/55149/Committee_Report/B25-0785-Committee_Report2.pdf?Id=191228) [Hereinafter Committee Report on the Fiscal Year 2025 Budget].

<sup>27</sup> Committee Report on the Fiscal Year 2024 Budget, *supra* note 8, at 182.

<sup>28</sup> *See* Committee Report on the Fiscal Year 2025 Budget, *supra* note 26, at 115.

<sup>29</sup> Well-written and functional information boxes integrated within the web portal's forms could help achieve Children's Law Center's recommendation that DLCP amend the content, organization, and functionality of their filing and biennial reporting forms (both PDF and web portal) to:

- "clearly distinguish between and provide separate space for the two prongs of beneficial owners: 1) persons with a greater than 10% interest in the entity and 2) persons with an interest of 10% or less, who have sufficient control over the entity;"
- require submission of both a residence and business address for each beneficial owner; and
- "require[e] filers to indicate each owner's interest level in the entity, for those above 10%, and affirmatively certify that none of the remaining interest levels exceed 10%."

Makenna Osborn, Children's Law Center, Testimony Before the District of Columbia Council Committee on Public Works and Operations, p. 4, (February 22, 2023), *available at*: <https://childrenslawcenter.org/wp-content/uploads/2023/02/DLCP-Performance-Oversight-CLC-Written-Testimony-with-Attachments-Final-2.21.23.pdf>.

<sup>30</sup> Forrest Hangen and Daneil T. O'Brien, *Linking Landlords to Uncover Ownership Obscurity*, Housing Studies, p. 20 (March 20, 2024), *available at*: <https://doi.org/10.1080/02673037.2024.2325508>.

<sup>31</sup> If possible, Children's Law Center would also like to see the registry include the capability to search by a registered agent's name and an address provided for an entity, registered agent, or beneficial owner as well. In Children's Law Center's experience, this information is a good starting place to identify common ownership across properties even when an actor is intentionally not complying with disclosure requirements. For example, we have noticed that some landlords we know own multiple properties do not list themselves or any other common party as a beneficial owner but do report the same address for each of their LLC's business address so searching for all LLCs that use that address would be the most helpful.