CASAA
Community Association Standards and Advocacy Alliance

# HOA ADVOCACY TOOLKIT

***Build Your Own Legislative, Consumer Protection, Antitrust or Media Submission***

**THE IDEA IS SIMPLE**

Your story + your evidence + the *CASA Alliance Behind the Curtain Consumer Protection Report*. You use your own facts, attach the documents that support them, and include the CASA report as national context and industry insight from a 35-year HOA management executive turned advocate.

*For homeowners, board members, managers, service providers and others seeking accountability in community association governance and management.*

# *INTRODUCTION*

Many people living in deed-restricted communities across America have no idea how large the community association management industry has become. Owners and board members usually see only their own association, a volunteer board, and the management company hired to help run it. What they often do not see is the national industry operating behind that local relationship.

Today, hundreds of thousands of community associations sit inside a multibillion-dollar industry overseeing trillions of dollars in homeowner assets. The industry has become more consolidated, more vertically integrated, and increasingly attractive to private equity. Management companies are no longer earning money only from a monthly management fee. Revenue can now be generated through banking, insurance, vendors, construction, technology, payments, project management, lending, and other services connected to the same association.

For years, HOA complaints were often reduced to people, parking, pets, and homeowners who supposedly did not read their governing documents or simply did not like rules. But the complaints have changed. More of them now involve money, records, legal disputes, financial control, vendor relationships, insurance, assessments, and the growing power of the companies operating behind the association.

Because the industry is fragmented across hundreds of thousands of communities and dozens of state regulatory systems, the shift has been easy to miss.

In my report, "In Their Words," I went through and collected 2,050 first person narratives from homeowners, board members, managers, and tenants across the nation in order to review the patterns emerging throughout the United States. It is the only database of its kind that I am aware of and is free to anybody willing to read. What became evident during my research is that while many complaints look like one-off issues on the surface, when gathered together they show a growing pattern of issues stemming from the new extraction model of HOA Management.

As a result of that database, I have put together this advocacy package to assist owners, board members, and industry professionals who wish to use their voice to stop the growing movement that is taking over homeownership. There is power in the collective voice.

**Homeowners**: This package is for homeowners who have exhausted reasonable efforts to resolve an HOA matter through their board and management company. The CASA report is not geared towards homeowner -v- board issues or issues that arise in self-managed communities, although providing it with your advocacy may provide insights as to the bigger picture behind the curtain.

**Board Members**: This package is for issues between the board and the managing agent where you suspect ethical or potentially improper conduct by the managing agent that is harming your community. Often the pain points within a community are not as cut and dry as what may appear on the surface, but instead part of a larger system running behind the scenes.

**Industry Professionals**: This package may be used to provide your insights and experiences involving unethical or potentially illegal dealings with one or more management companies.

**Everybody Else**: If you would simply like your voice to be heard and help educate legislators, law enforcement, and journalists as to what is happening with the industry, feel free to send along this package. Every voice counts.

Included within the report are links and insights into actual operations occurring outside of the public eye, with links and receipts to support the disclosed information. Also included are links to the CASA Alliance *In Their Words HOA Study* and a 500-narrative research database covering complaints, lawsuits, criminal matters, regulatory actions, and recurring financial or management concerns. The database preserves source links and provides a snapshot of recurring issue types and scale. It is not a statistically representative national prevalence study.

This report is provided as a means of supporting American Homeowners as to the need of reform, national standards, national accountability, consumer protection, and investigation into current operations. The more legislators, journalists, and enforcement agencies that receive this report, the better the chance of capturing the attention of those willing to step up to the plate to say, “enough, is enough.”

This is not anti-HOA. It is not pro-HOA. It is pro-truth.

# Table of Contents

*Click any entry to jump to that section. Click any section heading in the toolkit to return here.*

# How to Use This Toolkit

Do not edit CASA's research report to make it fit your story. Keep the report intact. Your submission should explain what happened to you, what documents you have, and what you want the recipient to do. CASA's report then gives the recipient the larger national picture. The CASA Alliance accepts no responsibility for the outcome of your submissions. This package is presented as a means to provide support through information and industry experience to help bring reform to the industry.

The strongest advocacy package is usually short in the front and strong in the back. A legislator, regulator or reporter should be able to understand your issue in the first two pages and then verify it from the documents you attach.

## Recommended Order

- Your personalized cover letter or complaint.
- A one-page summary of exactly what you are asking the recipient to do.
- Your strongest supporting documents, labeled as exhibits.
- A short exhibit index so the reader knows what each document proves.
- The CASA Alliance HOA Management brief as supporting national context.
- Any additional CASA research that directly relates to your issue.

### DO NOT SEND A DOCUMENT DUMP & STICK TO FACTS

More pages and emotional documentation or name calling do not automatically make a stronger case. Know what laws or covenants are actually being broken. Send the documents that prove the point you are making. If you have a lot of back up, identify the five or ten that matter the most, and explain why.

## Keep Your Evidence Separate From CASA's Evidence

Your documents are your evidence. CASA's published reports are supporting research. While referenced in the report, CASA maintains confidential vendor agreements, invoices and source communications that are not for distribution outside of written agreement and negotiation between CASA and the requesting agency. You may cite the published CASA report, but do not represent CASA's confidential source materials as evidence you personally possess.

Additionally, if you have documentation that further supports the information contained in this report, please reach out. All discussions are confidential.

# Build Your Package

| | |
|---|---|
| **Your name** | *[YOUR NAME]* |
| **City / State** | *[CITY, STATE]* |
| **Community** | *[HOA / CONDO / COMMUNITY NAME - optional]* |
| **Recipient** | *[LEGISLATOR / AGENCY / REPORTER]* |
| **Issue** | *[ONE-SENTENCE DESCRIPTION]* |
| **What you want** | *[INVESTIGATION / HEARING / LEGISLATION / ENFORCEMENT / MEDIA REVIEW]* |

## Your One-Paragraph Summary

[Write this in your own words. Keep it to one paragraph. Explain what happened, why you believe it is bigger than a routine HOA disagreement, and what documents you have that support it.]

## Your Ask

[Be specific. Do not end with only 'please help.' Ask for the investigation, hearing, statutory change, enforcement review, records inquiry, antitrust review or journalistic investigation you actually want.]

## Exhibit Index

| Exhibit | Document | What It Shows |
|---|---|---|
| *A* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |
| *B* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |
| *C* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |
| *D* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |
| *E* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |
| *F* | *[DOCUMENT NAME]* | *[ONE SENTENCE - WHY IT MATTERS]* |

The following are letter formats that you may wish to use.

# Template 1

# State or Federal Legislator

[DATE]

[LEGISLATOR NAME]
[OFFICE]
[ADDRESS]

**Re: Request for review of HOA management consumer-protection and oversight issues**

Dear [Senator / Representative / Assemblymember / Delegate / Councilmember NAME]:

I am a [homeowner / board member / community manager / service provider] in [CITY, STATE], and I am asking your office to look beyond the usual HOA disputes over rules and enforcement and examine the financial structure surrounding HOA management.

My own experience involves [BRIEFLY DESCRIBE YOUR ISSUE]. I have attached the documents that support what I am describing, including [NAME THE TWO OR THREE STRONGEST DOCUMENTS].

I am also attaching a CASA Alliance consumer-protection brief because my experience does not appear to exist in isolation. The report examines vendor pay-to-play arrangements, insurance compensation, banking incentives, private equity, vertical integration, developer control, technology platforms and the lack of meaningful oversight across a system that now operates nationally.

I am asking your office to [REQUEST A HEARING / REQUEST A STAFF REVIEW / INTRODUCE LEGISLATION / REFER THE MATTER TO THE ATTORNEY GENERAL / REQUEST AN ANTITRUST OR CONSUMER-PROTECTION REVIEW].

HOAs may be governed primarily by state law, but the businesses operating them increasingly cross state lines. Homeowners should not receive radically different financial protections simply because of the state in which their home happens to sit.

I would appreciate confirmation that your office received this package and information about the appropriate staff member or committee handling the issue.

Sincerely,
[YOUR NAME]
[PHONE]
[EMAIL]

# Template 2

## Attorney General, Consumer Protection or State Regulator

[DATE]

[AGENCY / OFFICE]
[ADDRESS]

**Re: Request for consumer-protection review of HOA management financial practices**

To Whom It May Concern:

I am submitting this package to request review of financial practices connected to my homeowners association and its management ecosystem. My concern is not simply a disagreement with an HOA board. It involves [DESCRIBE THE FINANCIAL / RECORDS / VENDOR / INSURANCE / BANKING / DEVELOPER / MANAGEMENT ISSUE].

The attached exhibits show [BRIEFLY STATE WHAT THE DOCUMENTS SHOW]. I have also included a CASA Alliance report documenting broader concerns involving separate vendor compensation agreements, percentage-based fees, banking incentives, insurance relationships, affiliated services, developer-created obligations, private equity and technology platforms operating across the community association industry.

I am asking your office to determine whether the conduct described in my exhibits warrants investigation under applicable consumer-protection, fiduciary, agency, records-access, licensing, unfair-practices or other laws within your jurisdiction.

If your office does not have jurisdiction, I am asking that the submission be referred to the agency that does, rather than closed as a private HOA dispute.

Please preserve this submission as a consumer complaint and provide a complaint or reference number if one is available.

Sincerely,
[YOUR NAME]
[PHONE]
[EMAIL]

# Template 3

# DOJ, FTC or Antitrust Review

[DATE]

[AGENCY / DIVISION]
[ADDRESS OR ONLINE SUBMISSION]

**Re: Request for review of concentration, vertical integration and financial incentives in HOA management**

To Whom It May Concern:

I am asking for a broader market review of the community association management industry and the financial ecosystem surrounding it. My own experience is described in the attached materials, but the concern extends beyond one HOA or one management contract.

Large management platforms now operate across multiple states and can sit inside or influence banking, insurance, construction, project management, lending, payment processing, resale documents, software, data and preferred-vendor networks. Private equity and consolidation have increased the scale of these relationships while ownership can remain difficult for a homeowner or volunteer board to see.

The attached CASA Alliance brief also discusses RealPage as an example of technology infrastructure crossing multiple housing markets while the company has already been subject to major federal antitrust enforcement in rental housing. The report asks whether modern market power can develop through the systems that process payments, documents, insurance workflows and data even when many different company names remain visible at the surface.

I am requesting review of market concentration, common ownership, affiliated services, contractual steering, preferred-vendor structures, data and payment infrastructure, and financial relationships that may reduce independent choice for associations and homeowners.

My supporting exhibits are attached as [LIST EXHIBITS].

Sincerely,
[YOUR NAME]
[PHONE]
[EMAIL]

# Template 4

## Journalist or Investigative Reporter

Subject: HOA management story tip - documents attached

Hi [REPORTER NAME],

I am reaching out because I have documents relating to [ONE-SENTENCE DESCRIPTION OF ISSUE], and I believe they may fit into a much larger story about how HOA management has changed.

The short version is this: [TWO OR THREE SENTENCES IN YOUR OWN WORDS]. I have attached [IDENTIFY YOUR STRONGEST DOCUMENTS], which show [WHAT THEY SHOW].

I am also including a CASA Alliance consumer-protection brief that looks at the broader system: vendor pay-to-play arrangements, insurance commissions, banking incentives, developer control, private equity, vertical integration, RealPage and the technology infrastructure now sitting underneath parts of the HOA industry.

I am not asking you to take my word for it. I am sending the documents so you can review the facts yourself. If you are interested, I can provide additional records and explain what happened from my perspective.

Thank you,
[YOUR NAME]
[PHONE]
[EMAIL]

# Evidence Checklist

Attach only what relates to your issue. Check the items you have and label the strongest ones as exhibits.

- ☐ Management agreement, schedules, addenda and fee sheets.
- ☐ Budgets, financial statements and reserve studies.
- ☐ Special-assessment notices and owner communications.
- ☐ Vendor bids, proposals, contracts and invoices.
- ☐ Evidence that a vendor is preferred, affiliated, in-house or part of a management-controlled network.
- ☐ Emails or notices discussing administrative, processing, convenience, project-management or other fees.
- ☐ Bank statements, interest rates, deposit instructions or restrictions on moving funds.
- ☐ Insurance proposals, commission disclosures, policies, renewals and broker communications.
- ☐ Construction, engineering, inspection or restoration documents.
- ☐ Loan, line-of-credit or special-assessment financing documents.
- ☐ Meeting minutes, agendas and board packets.
- ☐ Records requests and evidence of records that were not produced.
- ☐ Developer budgets, subsidies, advances, turnover documents and declarant contracts.
- ☐ Governing documents showing long-term developer rights, special voting rights or financial obligations.
- ☐ Foreclosure, lien, collection or legal notices.
- ☐ Any document showing ownership, affiliate or conflict-of-interest relationships.

**DO NOT ALTER EVIDENCE**

Keep originals. Submit copies. Do not crop out context that changes the meaning of a document. If you highlight a passage for the reader, keep an unmarked copy as well. If you must redact information for privacy, use a black marker or shape so that it is obvious that a redaction took place.

# What Are You Asking Them to Do?

Choose the request that actually fits your issue. You can ask for more than one, but do not make the recipient guess what you want.

- ☐ Open or refer an investigation.
- ☐ Hold a legislative or congressional hearing.
- ☐ Request records or information from a management company, developer, insurer, bank or vendor.
- ☐ Review the issue under state consumer-protection or unfair-practices law.
- ☐ Review conflicts of interest and undisclosed compensation.
- ☐ Review whether management licensing or direct regulatory oversight is needed.
- ☐ Require full disclosure of vendor, banking, insurance and affiliate compensation.
- ☐ Ban or restrict insurance commission sharing with non-insurance management entities.
- ☐ Protect independent bidding and prohibit penalties for using outside vendors.
- ☐ Create national minimum standards for records, disclosure, developer turnover and management practices.
- ☐ Request federal antitrust or market-structure review.
- ☐ Review private-equity ownership, vertical integration and common infrastructure.
- ☐ Create a regulator with audit, subpoena and enforcement authority.
- ☐ Investigate developer-created debt, subsidies, reserve shortfalls or turnover obligations.
- ☐ Investigate missing funds, unexplained charges or refusal to provide financial records.
- ☐ Publish or investigate the issue as a news story.

## Write Your Ask in One Sentence

[I am asking ______________________________ to ______________________________ because ______________________________.]

# Before You Submit

- ☐ Read your first two pages as if the recipient knows nothing about HOAs.  If you used ai to help you write it, please make sure to edit the document so that it does not read like ai.  Many will simply delete the document.
- ☐ Remove side stories that do not help prove the issue.
- ☐ Make sure every factual accusation is tied to a document, firsthand experience or clearly identified source.
- ☐ Label allegations as allegations when a court or regulator has not made a finding.  Outlandish or broad stroke allegations such as, “they’re all crooks,” or “make HOAs illegal,” will work against you.
- ☐ Use dates, dollar amounts and document names whenever you have them.
- ☐ Do not send passwords, Social Security numbers, bank-account numbers or other unnecessary personal information.
- ☐ Redact other homeowners' private information unless it is necessary and lawful to provide.
- ☐ Keep a complete copy of exactly what you submitted.
- ☐ Save delivery confirmations, complaint numbers and names of staff members you speak with.
- ☐ Follow up. A strong package can still disappear into an inbox.

## Submission Tracker

| | |
|---|---|
| **Date sent** | *[DATE]* |
| **Recipient** | *[NAME / OFFICE]* |
| **Method** | *[EMAIL / ONLINE PORTAL / MAIL / HAND DELIVERY]* |
| **Reference no.** | *[COMPLAINT / CASE / TRACKING NUMBER]* |
| **Contact** | *[STAFF MEMBER / REPORTER]* |
| **Follow-up date** | *[DATE]* |

## Suggested File Names

Keep them simple and professional:

- 01_Cover_Letter_[LastName].pdf
- 02_Exhibit_Index.pdf
- 03_Exhibits_A-F.pdf
- 04_CASA_HOA_Management_Consumer_Protection_Brief.pdf
- 05_CASA_In_Their_Words_HOA_Study_Link.pdf or include the live link in your cover letter

# Where to Send Your Package

One package can be sent to more than one place. Choose the recipients that fit your facts. Use official submission pages whenever possible, and save confirmation numbers, emails, or screenshots showing what you submitted and when.

## Find Your Elected Officials

- U.S. House of Representatives - Find Your Representative: Use your ZIP code to identify your U.S. representative and reach the member's official contact page.
- U.S. Senate - Contact Your Senators: Find both U.S. senators for your state and their official contact forms.
- USAGov - Federal, State and Local Elected Officials: Find state legislators, governors and local elected officials as well as federal representatives.

## State Consumer Protection and Attorneys General

- USAGov - State Attorneys General: Find the attorney general for your state or territory.
- USAGov - State Consumer Protection Offices: Find the state office that handles consumer complaints, scams, fraud and business-practice concerns.

## Federal Competition and Enforcement

- U.S. Department of Justice Antitrust Division - Report Antitrust Concerns: For possible competition, market-concentration, steering or antitrust concerns. DOJ accepts online, mail and phone reports.
- Federal Trade Commission Bureau of Competition - Antitrust Complaint Intake: For antitrust complaints and competition concerns submitted to the FTC Bureau of Competition.

## Financial Products and Industry Insiders

- Consumer Financial Protection Bureau - Submit a Complaint: For issues involving consumer financial products or services, including certain banking, lending, debt-collection and payment matters.
- CFPB - Report Potential Industry Misconduct: For current or former industry employees and insiders reporting possible violations of consumer financial rights.

## Potential Federal Criminal Conduct

- FBI - Submit a Tip: For information you believe involves a potential federal crime. Use this only when the facts actually fit a federal criminal concern.
- FBI - Find a Local Field Office: Find the FBI field office serving your area.

## Journalists and Newsrooms

- Local investigative newsroom: Look for the investigative team, consumer reporter, housing reporter, real-estate reporter or statehouse reporter at your local newspaper, television station or public-radio outlet.
- State and national reporters: When your evidence shows a broader pattern, send the short package first and offer the full supporting records. A clear subject line and two-page front summary are more useful than a large unsolicited document dump.

**CASA Alliance:** CASAAlliance.org | casa.talk@gmail.com

# Use CASA's Research, But Keep Your Story Yours

This toolkit is designed to help people put their own facts in front of lawmakers, regulators, enforcement agencies and journalists without forcing every person to become an HOA industry expert first.

Your package is strongest when the recipient can separate three things immediately: what happened to you, what your documents prove, and what CASA's national research shows about the larger system.

You do not have to prove the entire industry case by yourself. You need to clearly document your own issue and give the recipient enough context to understand why it deserves a closer look.

**YOUR STORY + YOUR EVIDENCE + CASA Alliance Report**

That is the package.