

| Respondent Names |
|---|
| Victor Lombardi |
| Complainant Name |
| Andreas Koeppen |
| Complaint Description |
| <p><u>Andrew Koeppen</u> reported via the portal (Wed, 9 Jul 2025 at 7:00 AM)</p> <p>This complaint involves repeated violations of RCW 42.17A.710/RCW 29B.55.030 by Victor Lombardi, a sitting Moses Lake City Council Member, who has consistently failed to provide the legally required details regarding his real estate holdings on his Financial Affairs Disclosure (F-1) reports.</p> <p>Across three consecutive reporting periods—submitted on May 26, 2023; April 10, 2024; and April 6, 2025—Mr. Lombardi listed his real estate assets vaguely as: "Various Moses Lake, WA 98837 Owned by: Victor Lombardi Assessed value: more than \$1,000,000.00" This format does not comply with the legal requirement to list each property by street address, parcel number, or legal description.</p> <p>Despite reporting rental income from specific properties—such as 221 S Balsam St (in the first two reports) and 305 East Third Ave (in the third)—Mr. Lombardi has failed to identify any of these holdings individually in the real estate disclosure section. This results in incomplete and misleading public filings.</p> <p>The repeated omission over multiple years, despite clear legal obligations and public accessibility of property records, reflects a continuing lack of compliance with the transparency requirements of Washington State law. This failure deprives the public of essential information necessary to assess potential conflicts of interest, determine residency status, and evaluate any financial entanglements that could influence Mr. Lombardi's decisions as a public official.</p> |
| What impact does the alleged violation(s) have on the public? |
| <p>Victor Lombardi's repeated failure to disclose specific real estate holdings over multiple years significantly undermines the transparency and accountability that Washington's Public Disclosure laws are designed to ensure. The public, including voters and journalists, is entitled to know the nature and location of a candidate's assets, especially real estate, which can directly relate to potential conflicts of interest, zoning or development issues, and residency qualifications.</p> |

By listing only "Various" properties in Moses Lake with a total value exceeding \$1 million, Mr. Lombardi has concealed information that the law requires to be made public. This prevents meaningful public oversight and inhibits the ability of citizens to assess whether Mr. Lombardi's financial interests may intersect with his public duties. Moreover, his failure to identify individual rental properties—despite reporting rental income from them, raises further concerns about the completeness and accuracy of his disclosures.

The continued pattern of noncompliance over three separate filings, despite clear legal standards and PDC guidance, erodes trust in the campaign finance system and diminishes the public's ability to hold candidates accountable.

List of attached evidence or contact information where evidence may be found

<https://apollo.pdc.wa.gov/public/financial-affairs/statement/114532>
<https://apollo.pdc.wa.gov/public/financial-affairs/statement/119736>
<https://apollo.pdc.wa.gov/public/financial-affairs/statement/125634>

List of potential witnesses with contact information to reach them

Certification (Complainant)

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.