

Information about the person filing the complaint (complainant)

Name: Catherine Kentner

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Person alleged to have committed a violation: Jesse Zamora

Name: REALTOR Candidate Political Action Committee

Address: Centennial

Alleged violation - must include the section of the code or rule # or the alleged violation:

According to submitted forms, the registered political committee, REALTOR Candidate Political Action Committee, reports a balance in the amount of over \$100,000 but fails to list any donations. It claims this money to be a "carry-over balance" but that is impossible since it is a new committee. (See communication from city clerk regarding prior violation). It is also logical to assume that most of these donations are in the amount of \$20 or more and some of these donations are likely in the amount of at least \$100 and lack the required disclosure for a donation over \$100. Because there is no way to view and track where this large amount of money came from, it also amounts to an anonymous contribution since donations must be tied to a real person and not a group.

Evidence of violation:

REALTOR Candidate Political Action Committee is a political committee according to the City of Lakewood. It is also a Political Organization. On November 7, 2025, city clerk Jay Robb acknowledged that no such committee existed.

"Upon the City Clerk's receipt of the Committee's amended report amending the contributor to Metro Housing Coalition Political Action Committee, the City Clerk recognized that while the Metro Housing Coalition Political Action Committee has registered with the Secretary of State as a Political Committee (and has reported its contribution to the Committee to the Secretary of State), it has failed to register as a Political Committee with the City Clerk as is required by Code section 2.54.030(H). Pursuant to the City Clerk's obligation under Code section 2.54.050(A)(6), on November 7, 2025, the City Clerk notified the Metro Housing Coalition Political Action Committee of its obligation to register as a political committee.

LMC 2.54.020 Definitions.

Political committee means any person and/or group, other than a natural person, or any group of two or more persons, including natural persons that have accepted or made contributions or expenditures in excess of \$200.00 to support or oppose the nomination or election of one or more candidates. "Political committee" does not include political parties, issue committees or candidate committees.

Political organization means a political organization defined in Section 527(e)(1) of the federal "Internal Revenue Code of 1986", as amended, that is engaged in influencing or attempting to influence the selection, nomination, election, or appointment of any individual to any state or local public office in the state and that is exempt, or intends to seek any exemption, from taxation pursuant to Section 527 of the Internal Revenue Code. "Political organization" shall not be construed to have the same meaning as "political organization" as defined in § 1-1-104(24), C.R.S. for purposes of the "Uniform Election Code of 1992", Articles 1 to 13 of this Title.

LMC 2.54.030

D. All Committees—Disclosures; Prohibited Contributions.

(1) Disclosures.

(b) *Contributions over \$100.00.* In the case of the aggregate contributions made to a political committee or issue committee during an election cycle, the disclosure required by this section shall also include the occupation and employer of each person and/or group who has made a contribution of \$100.00 or more to such committee.

E. Political Organizations.

- (1) Any political organization shall report to the City Clerk in accordance with the requirements of this code:

(a) Any contributions it receives, including the name and address of each person and/or group who has contributed more than \$20.00 or more to the political organization in the reporting period, and the occupation and employer of each natural person who has made a contribution of \$100.00 or more to the political organization; and

(b) Any spending by the political organization in any one reporting period.

- (2) During an election cycle, no political organization shall accept a contribution in currency or coin of more than \$100.00 from any contributor or fail to report the receipt of contributors of currency or coin.

Because of the failure of the committee to state when contributions were made, it is impossible to determine if they have followed the requirements in LMC 2.54.030 (H)

Political committees.

- (1) *Registration.* Except as otherwise provided in this section, all political committees shall register with the City Clerk within ten days after accepting any contribution or making any expenditure. Registration shall include a statement listing:

- (a) The organization's full name, spelling out any acronyms used therein;
- (b) A natural person authorized to act as a registered agent or representative;
- (c) A street address and telephone number for the principal place of operations;
- (d) All affiliated candidates and committees;
- (e) The purpose or nature of interest of the committee or party.

- (2) *Contribution limits.* During an election cycle, a political committee may not accept contributions in excess of the limits imposed by Article XXVIII of the Constitution of Colorado

under Section 3, Contribution Limits, subsection (1)(b), and as adjusted pursuant to subsection (13) of that same section.

/s/ Catherine Kentner

Nov. 23, 2025

Complainant's Signature

Date