

City of Lakewood

Office of the City Clerk

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December 1, 2025

Catherine Kentner
9475 W. Cedar Ave.,
Lakewood, CO 80226

Re: City Clerk's Dismissal of Complaint Filed Against REALTOR Candidate Political Action Committee

Ms. Kentner,

On Monday, November 24, 2025, this office received your campaign finance complaint dated November 23, 2025 (the "Complaint"), alleging that the registered political committee, REALTOR Candidate Political Action Committee (the "Committee"), failed to provide sufficient detail for contributions listed in its report filed on April 17, 2025. The Complaint provides that the Committee "reports a balance of over \$100,000 but fails to list any donations." The Complaint also alleges that while the Committee's report indicates that its balance is a "carry-over balance," this "is impossible since it is a new committee." The Complaint then references language the City Clerk included in the "City Clerk's Determination of Validity of Complaint Filed Against Candidate Committee Jeslin Shahrezaei for Lakewood, and the Subsequent Cure of Such Violation," dated November 7, 2025, as support for the contention that the Committee is a "new committee." Specifically, the Complaint alleges that the Committee has violated the following sections of the Lakewood Municipal Code (the "Code"):

1. Code section 2.54.030(D)(1)(b) for allegedly failing to disclose the occupation and employer of each person and/or group who has made a contribution of \$100.00 or more to the Committee.
2. Code section 2.54.030(E)(1)(a) for allegedly failing to disclose the name and address of each person and/or group who has contributed more than \$20.00 to the Committee.
3. Code section 2.54.030(D)(2)(d) for allegedly accepting anonymous contributions.

In addition to the three specific code sections listed above, the Complaint alleges that "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).

As the City Clerk, per Code section 2.54.050(B)(1), after a complaint is filed it is my responsibility to determine whether the complaint is valid. In this case, the determination of validity depends, pursuant to Code section 2.54.050(B)(1)(a-c) on whether the Complaint you filed: (a) was timely filed under this code; (b) specifically identifies one or more violations of this Code; and (c) alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged. I have determined that the Complaint fails to satisfy Code section 2.54.050(B)(1)(a), because it was not timely filed under the Code. As described in greater detail below, because the Complaint does not satisfy Code section 2.54.050(B)(1)(a), the City Clerk is required to dismiss the Complaint.

I. Determination of Validity Relating to All Alleged Violations.

Analysis of Code section 2.54.050(B)(1)(a): This section of Code provides: “A complaint is valid if it: (a) Was timely filed under this code;”. Per Code section 2.54.050(B)(1), “Any person and/or group who believes that a violation of this Code has occurred may file a written complaint with the City Clerk no later than 120 days after the date of filing of the report containing the alleged violation.” Thus, to satisfy Code section 2.54.050(B)(1)(a), a “timely filed” complaint, must be submitted to the City Clerk within 120 days of the date the report containing the alleged violation is filed.

The Complaint alleges violations against a report filed with the City Clerk on April 17, 2025 (the “Report”). Under the heading of “Monetary Contributions,” the Report lists contributions in the amount of \$107,878.18, and under the heading of “Contributor Name” the Report lists “Carryover Balance.” Because the Report was filed on April 17, 2025, Code sections 2.54.050(B)(1) and 2.54.050(B)(1)(a) require a Complaint alleging a violation related to the Report to have been filed within 120 days of April 17, 2025, meaning that to be timely, the Complaint needed to be filed on or before August 15, 2025. However, as noted above, the Complaint was filed on November 23, 2025, and received by the City Clerk on November 24, 2025. As such, the Complaint was not timely filed. Pursuant to Code section 2.54.050(B)(2), “The City Clerk shall dismiss a complaint that doesn’t meet the stated requirements of this this section.” Therefore, the Complaint is hereby **DISMISSED** because it was not timely filed.

Sincerely,



Jay Robb
City Clerk