

# City of Lakewood

## Office of the City Clerk

480 South Allison Parkway  
Lakewood, Colorado 80226-3127  
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February 13, 2026

Kiplund Kolkmeier  
3933 Inca St.  
Denver, CO 80211

### **Re: City Clerk's Determination of Validity of Complaint Filed Against Lakewood for All Issue Committee and Catherine Kentner as the registered agent of Lakewood for All**

Mr. Kolkmeier,

This office received your campaign finance complaint dated February 10, 2026 (the "Complaint"), alleging that the registered issue committee, "Lakewood for All" (the "Committee") and Catherine Kentner ("Kentner") as the registered agent of the Committee violated Lakewood Municipal Code ("Code") sections 2.54.030(B)(2)(a)<sup>1</sup> and 2.54.040(A)(4)

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 sections 2.54.050(B)(1)(a-c) on whether the Complaint: (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 does not satisfy L.M.C. 2.54.050(B)(1)(c) and is therefore **DISMISSED**.

**I. 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;" Code section 2.54.050(B)(1) provides that a written complaint must be filed "no later than 120 days after the date of filing of the report containing the alleged violation."

The Complaint was filed on February 10, 2026, alleging a violation relating to a report filed on February 6, 2026, and was thus **timely filed**.

**II. Analysis of Code section 2.54.050(B)(1)(b):** This section of Code provides: "A complaint is valid if it: (b) Specifically identifies one or more violations of this code;"

The Complaint alleges a violation of Code sections 2.54.030(B)(2)(a) and 2.54.040(A)(4). Code section 2.54.030(B)(2)(a), when read in conjunction with Code section 2.54.030(B)(1), is capable of being violated. Additionally, Code section 2.54.040(A)(4) provides a general requirement to report, which is capable of being violated and therefore, the Complaint satisfies Code section 2.54.050(B)(1)(b).

**III. Analysis of Code section 2.54.050(B)(1)(c):** This section of Code provides: "A complaint is valid if it: (c) Alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged."

The Complaint alleges two violations: 1) failure to disclose the source of the funds received for the Committee's website; and 2) failure to disclose the expenditures made for the Committee's website.

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<sup>1</sup> Under number 2 of Complaint section entitled "The Complaint Meets all the Requirements of the Code to be Determined Valid," the Complaint alleges a violation of Code section 2.54.030(2), which does not exist, but the Complaint provides a recitation of Code section 2.54.030(B)(2)(a), under the "Governing Law" section, and therefore this Determination of Validity shall refer to and analyze Code section 2.54.030(B)(2)(a), including subsections (I) and (II).

As to the first allegation, the Complaint references Code sections 2.54.030(B)(2)(a), which describes when a ballot question or ballot issue has been determined to trigger reporting requirements in other sections of the Code. The Complaint then references Code section 2.54.040(A)(4), which generally requires an issue committee “supporting or opposing a municipal ballot issue” to file reports with the City Clerk. Neither Code section cited in the Complaint imposes specific contribution disclosure requirements. While not cited in the Complaint, Code section 2.54.040(A)(1)(e)(II) requires the Committee to report the “total of contributions received during the reporting period,” which the Committee complied with by listing \$14.00 in “Total Non-Monetary Contributions” in its Campaign Finance Report filed on February 6, 2026.

Therefore, the Complaint does not allege sufficient facts to support a factual and legal basis to support the Committee’s alleged failure to disclose the source of funds received for its website violation of Code section 2.54.030(B)(2)(a) or 2.54.040(A)(4) and this portion of the Complaint is **DISMISSED**.

As to the second allegation, the Code references the same two Code sections discussed above, and while neither specifically requires disclosure of the expenditures made for the Committee’s website, the City Clerk notes that Code section 2.54.040(A)(1)(e)(III) requires reporting “the total of expenditures made during the reporting period.” The City Clerk further notes that the Committee’s Campaign Finance Report filed on February 6, 2026, lists “\$0.00” for its total expenditures, which on its face does not comport with the Committee’s website providing a disclaimer that the website is “Paid for by Lakewood for All.” However, as described in the attached communications with Kentner, the Committee did not make an expenditure on the website, and instead, Kentner paid the \$14.00 for the web domain personally, and then donated it to the Committee, which is accurately identified as a \$14.00 non-monetary contribution in the Committee’s Campaign Finance Report filed on February 6, 2026. Ultimately, the Committee did not make an expenditure on the website. This section of the Complaint is therefore **DISMISSED**.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Robb", is written over a light blue rectangular background.

Jay Robb  
City Clerk

**From:** [Cathy Kentner](#)  
**To:** [Jay Robb](#)  
**Subject:** Re: Campaign Finance Complaint  
**Date:** Wednesday, February 11, 2026 9:09:52 AM  
**Attachments:** [image001.png](#)

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**# EXTERNAL – USE CAUTION #**

No it's not monetary because it wasn't paid for by the campaign. I paid for it personally and donated it to the campaign. Prior to this on line system there was a place on "in-kind" or "non-monetary" contributions for "purpose" but that has disappeared from the form causing this unnecessary confusion and unwarranted complaint. I wondered about this with other reports that have non-monetary contributions listed. What were those for?

On Wed, Feb 11, 2026 at 9:05 AM Jay Robb wrote:

Ah, I might be able to add that note, but isn't that a monetary contribution; instead of non-monetary? Thanks for the reply.

Sincerely,

**Jay Robb, CMC**

City Clerk

Office: 303-987-7081  
480 S. Allison Parkway

Lakewood, CO 80226

[Lakewood.org](http://Lakewood.org)



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**From:** Cathy Kentner  
**Sent:** Wednesday, February 11, 2026 6:18 AM  
**To:** Jay Robb  
**Subject:** Re: Campaign Finance Complaint

**# EXTERNAL – USE CAUTION #**

Hi Jay

I wrote in the “notes” that the \$14 was for the web domain but the public can’t see that. Is there another way to show what non monetary contributions are for?

Sent from my iPhone

On Feb 10, 2026, at 4:48 PM, Jay Robb wrote:

Hello Cathy we received the attached campaign finance complaints against you this morning and are required to notify you within 24-hours of submittal.

Sincerely,

**Jay Robb, CMC**

City Clerk

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480 S. Allison Parkway

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<image002.png>

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