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OFFICE OF THE
CITY CLERK



Lakewood

City Clerk's Office
Lakewood Civic Center 480
S. Allison Parkway
Lakewood, CO 80226-3127
Email: Jay Robb
Jayrob@lakewood.org
Phone: 303-987-7080
Fax: 303-987-7088
TDD: 303-987-7057

CAMPAIGN FINANCE COMPLAINT FORM

Your Information – Information about the person filing the complaint (complainant)

Full Name: Kiplund Kalkmeier
Address: 3933 Inca St. City: Denver State: CO Zip: 80211
Telephone number: 720-800-5145 Email address: Kip.Kalkmeier@gmail.com

Information of the person alleged to have committed a violation:

Full Name: Lakewood for All, Catherine Kentner Registered Agent
Address: 9475 W. Cedar Ave City: Lakewood State: CO Zip: 80226

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

Failure to disclose source and expenditure
information pursuant to 2.54.030(2) and
2.54.04(A)(4) as further detailed in attached
complaint.

[Handwritten Signature]

Complainant's Signature

2/10/26
Date

Campaign and Political Finance in Municipal Elections Complaint

Submitted By:
Kiplund Kolkmeier
3933 Inca St.
Denver, CO 80211
Attorney Registration #47206

Date Filed: February 10, 2026

Governing Law

Lakewood Municipal Code 2.54.050 - Duties of the City Clerk, Recordkeeping, Enforcement, Sanctions.

B. *Enforcement.*

(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. The City Clerk shall, within 24 hours, notify the person or group who/which is the subject of the allegation that a complaint alleging a violation of this section has been filed. The City Clerk shall also determine within three business days of the filing of the complaint whether or not the complaint is valid. A complaint is valid if it:

- (a) Was timely filed under this code;
- (b) Specifically identifies one or more violations of this code; an
- (c) Alleges/contains sufficient facts to support a factual and legal basis for the finding of violations of law as alleged.

(2) Within the same three business day period the City Clerk shall notify the parties of the Clerk's determination and post a copy of the City Clerk's decision on the City Clerk's website.

2.54.030

(2) *Ballot Issue or Ballot Question Determined.*

(a) Notwithstanding any other provision of law, and subject to the provisions of this section, a matter shall be considered to be a ballot issue or ballot question for the purpose of determining whether an issue committee has been formally established, thereby necessitating compliance with any disclosure, disclaimer, and reporting requirements of this Code:

2.54.040 - Reporting Requirements—Where and When Filed.

(A)(1) Except as otherwise provided in this Code, all reports that are required to be submitted shall be filed with the City Clerk pursuant to the following schedule:

(i) After a proposed ballot question or proposed ballot issue becomes an "issue" under Section [2.54.030](#)(B)(2)(a), issue committees shall file reports on the 90th, 60th, 30th, and 7th days before such election, as well as 30 days after such election.

(4) For the purpose of meeting the filing and reporting requirements of this Code, candidates in municipal elections, their candidate committees, any political committee in support of or in opposition to such candidate, an issue committee supporting or opposing a municipal ballot issue, and small donor committees making contributions to such candidates, as well as any independent expenditure committees that expressly advocate and any person and/or groups making electioneering communications that unambiguously refer to such candidates, shall file with the City Clerk.

2.54.050

C. Sanctions.

(b)(2.3) For all other violations of this code where a penalty is not specified, the penalty **shall** be \$250.00 per violation.

Complaint

Lakewood for All is in violation of the Lakewood Campaign Finance in Municipal Elections code.

Facts and Allegations

1. Lakewood for All is a registered issue committee.
2. Catherine Kentner is the registered agent for Lakewood for All.
3. Lakewood for All filed a 60 day pre-election report on February 6, 2026.
4. That report failed to disclose known expenditures. Lakewood for All has a website that can be found here <https://www.lakewoodforall.com>. The website states that it is paid for by Lakewood for All.
5. Lakewood for All lists a mere \$14 in contributions from a single person, Catherine Kentner, and does not list any expenditures.

The Complaint Meets all the Requirements of the Code to be Determined Valid

1. The complaint must be filed within 120 days after the date of filing of the report containing the alleged violation. The date Lakewood For All filed its 60 day pre-election report is February 6, 2026 and is therefore within 120 days of the filing of this complaint.
2. The complaint alleges specific violations. The allegations are:
Lakewood for All violated 2.54.030(2) and 2.54.040(A)(4) by failing to disclose the source of funds they received and the expenditures they made for its website.
3. The complaint contains sufficient facts supporting the factual and legal basis for the alleged violations. The facts are simple. Lakewood for All has a website and that expenditure is not listed by the committee. Whether purchased directly or received in-kind, expenditures must be disclosed. This complaint contains evidence of expenditures and the committee's report is evidence of the failure to disclose.

Conclusion

It is important to note that Ms. Kentner is a former candidate for City Council and Mayor, as well as a paid consultant for a City Council candidate. Even though ignorance of the law is no defense, based on her political experience she should know her legal requirements to disclose. Will Ms. Kentner be held to the same standards as everyone else, or will she be given more lenient treatment under the code?

Kiplund Kolkmeier
February 10, 2026