



## City of Lakewood

Office of the City Clerk  
Michele Millard

480 South Allison Parkway  
Lakewood, Colorado 80226-3127  
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March 23, 2020

Francis Milhollin  
868 S. Alkire St.  
Lakewood CO 80228

**Re: *Dismissal of campaign finance complaint  
Business & Labor Together Independent Expenditure Committee***

Dear Mr. Milhollin:

This office received your Campaign Finance Complaint dated February 27, 2020, alleging that the Business & Labor Together Independent Expenditure Committee violated Sections 2.54.030, 2.54.071(1), 2.54.070 and 2.54.060 of the Lakewood Municipal Code.

Your complaint indicated that the reports filed by the Business & Labor Together Independent Expenditure Committee on October 31, 2019 for the period covering 10-04-2019 thru 10-26-2019 and December 3, 2019 for the period covering 10-27-2019 thru 12-02-2019 listed contributions from RMDC5 LM Coop Fund Issues Committee. Your complaint alleged that RMDC5 LM was an acronym and was in violation of Section 2.54.030(F)(b)(1) of the Lakewood Municipal Code.

Upon receipt of your complaint, this office forwarded the complaint to the Business & Labor Together Independent Expenditure Committee registered agent, John Zakhem on March 3, 2020. The same day, March 3, 2020, I received amended reports of the October 31, 2019 report for the period covering 10-04-2019 thru 10-26-2019 and the December 3, 2019 report for the period covering 10-27-2019 thru 12-02-2019.

Pursuant to Section 2.54.050(B)(1.1) a person can cure its non-compliance due to an inadequate report or a failure to file a required report or item thereon. The City Clerk shall then accept an amended report or reports within seventy-two (72) hours of notifying the parties that the complaint is neither frivolous or groundless.

Pursuant to Section 2.54.050(B)(1), upon receipt of a complaint of an alleged campaign finance violation, this office must make a determination as to whether the complaint is groundless and/or frivolous. If the answer is no, a hearing is scheduled on the alleged

violation. If the answer is yes, the Clerk must dismiss the complaint and notify the parties of the decision.

The Business & Labor Together Independent Expenditure Committee cured both of the reports; therefore, the City Clerk of the City of Lakewood hereby accepts the amended reports and determines the complaint to be groundless pursuant to Section 2.54.050(B)(1). This matter is hereby dismissed.

Sincerely,

A handwritten signature in blue ink that reads "Michele Millard" followed by a large, stylized circular flourish.

Michele Millard  
City Clerk

CC: John S. Zakhem