

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

THE PRIMACY GROUP

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

May 19 4 14 PM '98
3609 4th Ave., San Diego, CA 92103
619/295-6923 FAX: 619/295-0487

May 19 1 56 PM '98

Wednesday, May 13, 1998

Federal Election Commission
999 E St. NW
Washington, DC 20463

RE: MUR 4742

Dear Sir or Madam:

This is a response to your letter of May 12, 1998 from:

- Juan Vargas, Candidate and Current San Diego City Councilman
- Larry Remer, Owner of **The Primacy Group**
- Deanna Liebergot, Treasurer, Vargas for Congress 1996, #C00307256 and Committee to Re-Elect Juan Vargas, #972238

In the first place, we categorically deny each and every specific or implied allegation of misconduct, campaign violations, and/or other wrongdoing set forth in Mr. Derrick Roach's May 4, 1998 letter to the FEC.

Specifically, we wish to state that:

1. The \$24,506.07 debt to **The Primacy Group** by Vargas for Congress 1996 has been duly reported on Schedule D of all FEC required disclosure. There has been absolutely no repayment of said debt as of this date. Any repayment of this debt will be made by the Vargas for Congress 1996 committee in full accordance with federal, state and local laws. There has not been - nor will there be - any attempt to repay this debt utilizing city council campaign funds or any funds other than those appropriately raised and expended by the Vargas for Congress 1996 committee.
2. **The Primacy Group** is currently assisting Mr. Vargas in his campaign for re-election to the City Council. There will be a primary election on June 2, 1998 and, if required, a run-off on November 3, 1998. Mr. Vargas has opposition in this race and has engaged **The Primacy Group** to provide political consulting services in connection with this race. Mr. Vargas is paying **The Primacy Group** a monthly retainer and reimbursement for expenses.

In his letter, Mr. Roach asserts "no visible campaigning or activity has been taking place." **He is completely wrong.** The Committee to Re-Elect Juan Vargas has engaged in a wide array of election activities, with the assistance of **The Primacy Group**, including: fundraising, writing a ballot statement, endorsement meetings, policy research, creation of brochures and mailers, precinct walking, etc. In addition, the campaign treasurer, Deanna Liebergot, is an employee of **The Primacy Group**, and monies paid include her fees; and the campaign fundraiser, Mr. James Taylor, is utilizing office space, phones, etc. at **The Primacy Group** and fees paid are also intended to pay those costs.

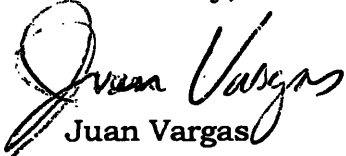
21-04-403-1385

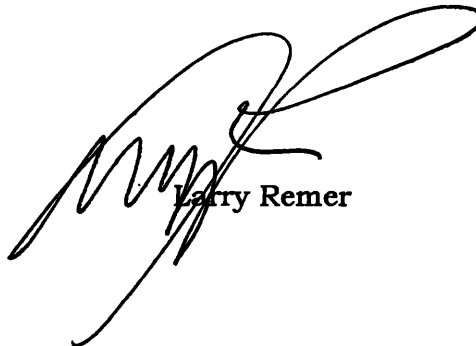
Every single invoice from *The Primacy Group* to the Committee to Re-Elect Juan Vargas has been a legitimate invoice for services rendered in connection with the re-election campaign - and Mr. Roach has presented absolutely no evidence to the contrary.

3. In a hand written "PS" to his letter to the FEC, Mr. Roach has noted that Political Computer Solutions and PG Printing & Graphics have also received payments from the Committee to Re-Elect Juan Vargas. Let it be noted that:
- Political Computer Solutions is a vendor that has provided the Committee to Re-Elect Juan Vargas with computerized voter lists to assist the committee with voter contact (mailings, precinct walking, etc.). All payments have been duly disclosed as required by law. Every invoice has been a legitimate invoice for services rendered. **And Mr. Roach has presented absolutely no evidence to the contrary.**
 - PG Printing and Graphics is a vendor that has provided the Committee to Re-Elect Juan Vargas with brochures, literature, and assistance with personalized mailings to assist the committee with voter contact and fundraising. All payments have been duly disclosed as required by law. Every invoice has been a legitimate invoice for services rendered. **And Mr. Roach has presented absolutely no evidence to the contrary.**

In closing, we emphatically state that we categorically deny every single specific or implied assertion by Mr. Roach that that any funds raised for the 1998 City Council campaign have been used for other than legitimate purposes. We further deny that any repayment of the Vargas for Congress 1996 debt to *The Primacy Group* has come or will come from any source other than the Vargas for Congress Committee. **Mr. Roach has presented no evidence whatsoever to the contrary.**

Yours truly,


Juan Vargas


Larry Remer


Deanna Liebergot

Officeholder, Candidate,
and Controlled Committee
Campaign Statement — Long Form
(Government Code Sections 84200-84216.5)

Type or print in ink.

COVER PAGE - LONG FORM

SEE INSTRUCTIONS ON REVERSE

Check one of the following boxes to indicate the type of statement being filed:

- ☒ Pre-election Statement
- ☐ Supplemental Pre-election Statement (Attach a completed Form 495 to this statement.)
- ☐ Special Odd-Year Campaign Report
- ☐ Semi-annual Statement
- ☐ Termination Statement (Attach a completed Form 415 to this statement.)

Officeholder, Candidate, and Controlled Committee
Included in this Statement

NAME OF OFFICEHOLDER OR CANDIDATE
David Gomez

OFFICE SOUGHT OR HELD (INCLUDE LOCATION AND DISTRICT NUMBER IF APPLICABLE)
SAN Diego City Council, Dist. # 8

RESIDENTIAL OR BUSINESS ADDRESS (NO. AND STREET)
1865 Cabrena Street

CITY SAN Diego STATE CA ZIP CODE 92154 AREA CODE/DAYTIME PHONE 619.423.7201

COMMITTEE NAME David Gomez For City Council I.D. NUMBER 980196

COMMITTEE ADDRESS (NO. AND STREET)
1865 Cabrena Street

CITY SAN Diego STATE CA ZIP CODE 92154 AREA CODE/DAYTIME PHONE 619.423.8137

NAME OF TREASURER Derrick Roach

PERMANENT ADDRESS OF TREASURER (NO. AND STREET)
1640 Maple Drive #42

CITY Chula Vista STATE CA ZIP CODE 91911 AREA CODE/DAYTIME PHONE 619.691.7887

Verification

I have used all reasonable diligence in preparing this statement. I have reviewed the statement and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 3/18/98 At SAN Diego CITY AND STATE CA

By Derrick Roach SIGNATURE OF TREASURER

An officeholder or candidate who controls a committee must also verify the campaign statement. I have used all reasonable diligence and to the best of my knowledge the information contained herein and in the attached schedules is true and complete. I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on MAR. 18, 1998 At SAN Diego CITY AND STATE CA

By David Gomez SIGNATURE OF OFFICEHOLDER

Executed on _____ At _____ CITY AND STATE _____

By _____ SIGNATURE OF CANDIDATE/OFFICEHOLDER

FOR INFORMATION REQUIRED TO BE PROVIDED TO YOU PURSUANT TO THE INFORMATION PRACTICES ACT OF 1977, SEE INFORMATION MANUAL ON CAMPAIGN DISCLOSURE PROVISIONS OF THE POLITICAL REFORM ACT.

Statement covers period from <u>JANUARY 1, 1998</u> through <u>MARCH 17, 1998</u>	Date Stamp <u>RECEIVED</u> CITY CLERK'S OFFICE <u>98 MAR 23 PM 4: 20</u> <u>SAN DIEGO, CALIF.</u> <u>gr</u>	Page <u>1</u> of <u>7</u> For Official Use Only
Date of election if applicable: (Month, Day, Year) <u>JUNE 2, 1998</u>		

Other Committees Not Included in this Statement: List any other committees not included in this consolidated statement that are controlled by you and any committees of which you have knowledge that are primarily formed to receive contributions or to make expenditures on behalf of your candidacy.

COMMITTEE NAME _____ I.D. NUMBER _____

NAME OF TREASURER _____ CONTROLLED COMMITTEE ☐ YES ☐ NO

COMMITTEE ADDRESS (NO. AND STREET) _____

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/DAYTIME PHONE _____

COMMITTEE NAME _____ I.D. NUMBER _____

NAME OF TREASURER _____ CONTROLLED COMMITTEE ☐ YES ☐ NO

COMMITTEE ADDRESS (NO. AND STREET) _____

CITY _____ STATE _____ ZIP CODE _____ AREA CODE/DAYTIME PHONE _____

Attach additional information on appropriately labeled continuation sheets.

2025 "EOT" 40" 12

Schedule E Payments and Contributions (Other Than Loans) Made

Type or print in ink.
 Amounts may be rounded
 to whole dollars.

SCHEDULE E

SEE INSTRUCTIONS ON REVERSE

NAME OF OFFICEHOLDER OR CANDIDATE AND CONTROLLED COMMITTEE

David Gomez, David Gomez For City Council

Statement covers period
 from January 1, 1998
 through March 17, 1998

Page 5 of 7

I.D. NUMBER

980196

CODES FOR CLASSIFYING EXPENDITURES

If one of the following codes accurately describes the expenditure, you may enter the code and leave the "Description of Payment" column blank. Refer to the back of Schedule E-Continuation Sheet for detailed explanations of each category.

- | | | |
|--|--|--|
| "C" - MONETARY AND IN-KIND (NON-MONETARY) CONTRIBUTIONS TO OTHER CANDIDATES AND COMMITTEES | "B" - BROADCAST ADVERTISING | "G" - GENERAL OPERATIONS AND OVERHEAD |
| "I" - INDEPENDENT EXPENDITURES | "N" - NEWSPAPER AND PERIODICAL ADVERTISING | "T" - TRAVEL, ACCOMMODATIONS AND MEALS (MUST BE DESCRIBED) |
| "L" - LITERATURE | "O" - OUTSIDE ADVERTISING | "P" - PROFESSIONAL MANAGEMENT AND CONSULTING SERVICES |
| | "S" - SURVEYS, SIGNATURE GATHERING, DOOR-TO-DOOR SOLICITATIONS | |
| | "F" - FUNDRAISING EVENTS | |

NAME AND ADDRESS OF PAYEE, CREDITOR, OR RECIPIENT OF CONTRIBUTION
 (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER ON, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER TREASURER'S NAME AND ADDRESS)

IMPORTANT: DO NOT ITEMIZE THE PAYMENT OF ACCRUED EXPENSES ON SCHEDULE E.
 REPORT ONLY THE LUMP SUM OF SUCH PAYMENTS ON LINE 4 OF THE SUMMARY SECTION BELOW.

NAME AND ADDRESS OF PAYEE, CREDITOR, OR RECIPIENT OF CONTRIBUTION (IF COMMITTEE, IN ADDITION TO COMMITTEE'S NAME AND ADDRESS, ENTER I.D. NUMBER ON, IF NO I.D. NUMBER HAS BEEN ASSIGNED, ENTER TREASURER'S NAME AND ADDRESS)	CODE	OR	DESCRIPTION OF PAYMENT	AMOUNT PAID
Western Graphics 7614 Lemon Ave Lemon Grove CA	S			579. ¹⁵
SAN Diego City Clerk 202 C Street SAN Diego, CA			Election Filing Fee	200. ⁰⁰
DeRick Raach #42 1640 Maple Dr Chula Vista CA 91911			Campaign Reimbursements	558. ⁹²
SUBTOTAL				\$ 1,338. ⁰⁷

Important: Contributions and expenditures made out of campaign funds to or on behalf of other officeholders, candidates, committees, or ballot measures must also be entered on the Allocation Page, Part I.

Payments and Contributions Made Summary

- | | |
|---|-----------------------------|
| 1. Payments made this period of \$100 or more. (Include all Schedule E subtotals.) | \$ 1,338. ⁰⁷ |
| 2. Payments made this period of under \$100. (Do not itemize.) | \$ 143. ²¹ |
| 3. Total interest paid this period on outstanding loans. (Enter amount from Schedule B, Part II, Column (d).) | \$ 0 ⁻ |
| 4. Total accrued expenses paid this period. (Do not itemize. Enter amount from Schedule F, Line 4.) | \$ (557. ²⁸) |
| 5. Total payments made this period. (Add Lines 1, 2, 3, and 4. Enter here and on the Summary Page, Column A, Line 8.) | TOTAL \$ 924. ⁰⁰ |

SECRET "EOT" 40 "12"

THE PRIMACY GROUP
3609 FOURTH AVENUE
SAN DIEGO, CA 92103

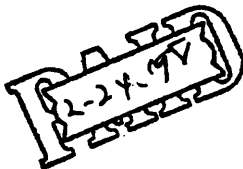
Invoice

DATE	INVOICE #
2/3/98	1454

BILL TO:

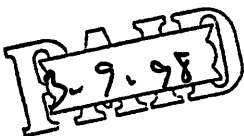
Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

21 04 403 1389

DESCRIPTION	AMOUNT
CONSULTING	3,000.00
LUNCH W/STEERING COMMITTEE 1/26/98	53.25
TELEPHONE CHARGES	54.65
FED EX	14.00
	
TOTAL	\$3,121.90

Invoice

BILL TO:

DESCRIPTION	AMOUNT
CONSULTING	3,000.00
TELEPHONE CHARGES	2.78
DELIVERY	13.00
<div style="text-align: center;">  </div>	
<div style="display: flex; justify-content: space-between;"> <div></div> <div> TOTAL \$3,015.78 </div> </div>	

THE PRIMACY GROUP
3609 FOURTH AVENUE
SAN DIEGO, CA 92103

Invoice

DATE	INVOICE #
12/2/97	1434

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

DESCRIPTION	AMOUNT
CONSULTING -- December 1997	3,000.00
Copies	73.44
TELEPHONE CHARGES	2.22
Lunch w/Juan Vargas 4/30/97	56.77
Strategy Lunch 6/3/97	70.39
Lunch w/Rick D'Ascoli and John Chilson 6/20/97	24.70
Staff meeting lunch 7/8/97	67.48
Lunch w/Juan, Ralph, Collin and John 8/19/97	55.45
Staff lunch 9/24/97	5.11
""	31.02
Lunch w/Steering Committee 10/9/97	50.41
Staff Lunch 9/10/97	99.49
Planning lunch 11/6/97	5.11
""	62.40
<p><i>pd \$1,000 = 1/6/98</i></p> <p><i>2603.99</i></p> <p>PAID 1-15-98</p>	
TOTAL	
	\$3,603.99

PG PRINTING & GRAPHICS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103
(619) 295-6640

Invoice

DATE	INVOICE #
11/24/97	1453

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

SHIP TO:

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT	
			11/24/97				
QUANTITY	ITEM CODE	DESCRIPTION				PRICE EACH	AMOUNT
		Letterhead, Envelopes, Remits 5,000 each					
	DESIGN	ART				250.00	250.00T
	PRINT	PRINTING				1,255.20	1,255.20T
		SALES TAX				7.75%	116.65

PAID
1-7-98

PG PRINTING & GRAPHICS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103
(619) 295-6640

Invoice

DATE	INVOICE #
1/22/98	1462

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

SHIP TO:

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
			1/22/98			
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
	DESIGN	Kick-Off Flyer ART SALES TAX			100.00 7.75%	100.00T 7.75
					TOTAL	\$107.75

PAID
1-29-98

4610031394

PG PRINTING & GRAPHICS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103
(619) 295-6640

Invoice

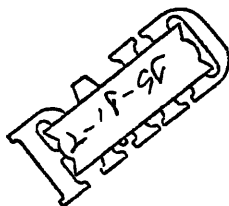
DATE	INVOICE #
2/17/98	1467

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

SHIP TO:

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
			2/17/98			
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
	List	VOTER LIST SALES TAX			258.36 7.75%	258.36 0.00
					TOTAL	\$258.36



PG PRINTING & GRAPHICS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103
(619) 295-6640

Invoice

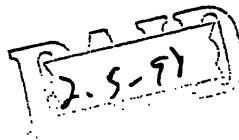
DATE	INVOICE #
1/11/98	1458

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

SHIP TO:

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
			1/11/98			
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
	MISC	Laser letters			120.00	120.00
	MISC	Copies			3.20	3.20
		SALES TAX			7.75%	0.00
					TOTAL	\$123.20



PG PRINTING & GRAPHICS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103
(619) 295-6640

Invoice

DATE	INVOICE #
1/22/98	1463

BILL TO:

Committee to Re-Elect Juan Vargas
3609 Fourth Avenue
San Diego, CA 92103

SHIP TO:

3609 Fourth Ave
San Diego, CA 92103

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
			1/22/98			
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
	DESIGN CAM PRINT	Hueso Invitation ART CAMERA PRINTING -- 500 SALES TAX			100.00 30.00 550.80 7.75%	100.00T 30.00T 550.80T 52.76
					TOTAL	\$733.56

PAID
1-29-98

POLITICAL COMPUTER SOLUTIONS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103

Invoice

DATE	INVOICE #
7/22/97	1094

(619) 295-6640

BILL TO:

JUAN VARGAS
3609 FOURTH AVENUE
SAN DIEGO, CA 92103

SHIP TO:

SAME

861 01 403 1398

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
	Due on recpt		7/22/97			
QUANTITY	ITEM CODE	DESCRIPTION			PRICE EACH	AMOUNT
	List	VOTER LIST SALES TAX			500.00 7.75%	500.00 0.00
					TOTAL	\$500.00

PAID
7-25-97