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Collins

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February 5, 2015

Federal Election Commission  
Office of Complaints Examination & Legal Administration  
Attn: Kim Collins, Paralegal  
999 E Street, NW  
Washington, D.C. 20463

Re: MUR 6865

Dear Ms. Collins:

I am writing on behalf of Congressman Juan Vargas, the Vargas for Congress Committee (the "Committee"), and Nancy Haley, the Committee's Treasurer, in response to the additional information received by the Commission from Complainant Stephen Meade relating to the above-referenced MUR 6865, which information was forwarded to Congressman Vargas and my office and was received by each of us on January 21, 2015. I previously responded to Mr. Meade's complaint on behalf of Ms. Haley and the Committee, believing them to be the only Respondents in this matter. Having subsequently learned that Congressman Vargas was also a Respondent, I am hereby enclosing a copy of the Statement of Designation of Counsel authorizing my representation of him, as well, in this matter. Congressman Vargas wishes to adopt and to join in the response previously submitted by this office on September 24, 2014, on behalf of Ms. Haley and the Committee.

The additional material submitted by Mr. Meade adds nothing of consequence to his initial, meritless complaint. Again, Mr. Meade's supplemental information does not allege any violation of the Federal Election Campaign Act ("FECA" or the "Act") by either Congressman Vargas, the Vargas for Congress Committee, or Ms. Haley. Indeed, the additional information is not even addressed to the Commission, but is merely a copy of a document apparently sent by Mr. Meade to the California Secretary of State requesting an investigation into whether Congressman Vargas violated his "OATH ON FILING FOR 2014 CANDIDACY" — an allegation that is plainly not within the Commission's purview.

To the extent that any material allegations can be discerned from Mr. Meade's rambling, stream-of-unconsciousness document, it appears that he is complaining that Congressman Vargas received "laundered" campaign contributions from San Diego Police Officer Ernesto Encinas during the 2012 election cycle that were actually funded by a foreign national named Jose Azano.

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As indicated in Mr. Meade's initial complaint and in his supplemental document, this matter has been thoroughly investigated by the U.S. Attorney's Office in San Diego, which has indicted both Mr. Encinas and Mr. Azano for their actions, and Mr. Encinas has in fact pleaded guilty to his role in this scheme. As Mr. Meade's document also indicates, however, after a complete investigation, the U.S. Attorney's Office has not accused Congressman Vargas of any wrongdoing and has not come forward with any evidence that he was aware of the true source of Mr. Encinas' contribution to the Vargas Committee. Nevertheless, out of an abundance of caution, in January 2014, the Committee voluntarily refunded the contributions it had received from Mr. Encinas for the 2012 primary and general elections, totaling \$3,500, as well as a \$1,000 contribution the Committee had received from another person being investigated by the U.S. Attorney's Office in connection with this scandal, Marco Polo Cortes. These sums represent the entirety of any campaign contributions received by the Vargas Committee from any individuals mentioned in any indictments or other press reports relating to the alleged money laundering efforts of Mr. Azano. (We do not know what Mr. Meade is referring to with his most recent allegation that Congressman Vargas has "[t]aken as cash \$7000 to \$7500," nor is there any factual basis for such an allegation.) These refunds were duly reported in the Committee's April 2014 Quarterly FEC Report of Receipts and Disbursements.

In sum, the additional information submitted by Mr. Meade does not add anything of significance to his initial complaint, which remains utterly without merit. Respondents respectfully request that the Complaint be summarily dismissed without further action.

Sincerely,



Fredric D. Woocher