



INTRODUCTION & PARTICIPATION INVITATION

Dear Candidate,

On behalf of the Lee County Republican Executive Committee (LCREC), we formally invite you to participate in the **Ethical Campaign and Accountability Initiative (ECAI)** and to be included in the official Republican Candidate Voter Guide for this election cycle.

As candidates representing the Republican Party, we seek to project the highest standard of public service—one that is free from even the appearance of impropriety in governance and campaigning. Ethical campaigns and ethical governance must extend beyond what is merely legal to what is principled, honorable, and right. It is in this spirit that the Ethical Campaign and Accountability Initiative was established.

We respectfully request that you complete the enclosed candidate packet, which

includes:

- Ethical Conduct Commitment

- Financial Integrity Commitment

- Biographical Questionnaire

- Office-Specific Questionnaire

Your responses will be published on LeeGOP.org and other appropriate public platforms to inform voters, share your message, and provide a comprehensive voter information resource for Republican voters.

LCREC will also host candidate forums where you will have the opportunity to present your vision and respond to questions on a broad range of issues. You will be contacted as event details are finalized.



ECAI PARTICIPATION BADGE

Candidates who fully complete the ECAI process will be designated as **ECAI Participating Candidates** and granted a limited, revocable license to use the official **ECAI Participating Candidate Badge** in campaign communications.

Use of the badge signifies participation in a voluntary ethics and transparency initiative and may be displayed on campaign websites, printed materials, and digital communications, provided it is accompanied by the following disclaimer:

“Participation in the Ethical Campaign and Accountability Initiative (ECAI) is voluntary and does not constitute or imply endorsement or support by the Lee County Republican Executive Committee (LCREC).”

Failure to include this disclaimer or misuse of the badge may result in revocation of usage rights.

DISCLOSURE & NON-ENDORSEMENT

Participation in ECAI, including completion of materials, publication in voter guides, forum participation, or badge usage, is voluntary and provided solely for voter education and transparency purposes.

Participation reflects a candidate’s **stated commitment** to the principles outlined in the ECAI materials; however, it **does not constitute verification, certification, or ongoing monitoring of compliance**, and should not be interpreted as confirmation that a candidate is or will remain in full adherence to such commitments.

Accordingly, participation **does not constitute or imply endorsement, recommendation, rating, certification, or formal support** of any candidate by the Lee County Republican Executive Committee, its officers, members, or affiliates, nor does it create any contractual or endorsement rights except as expressly provided in writing pursuant to applicable party rules and Florida law.

We look forward to your participation and to providing Republican voters with meaningful, transparent insight into your candidacy, values, and record.

No Property or Endorsement Rights

The ECAI Participating Candidate Badge:

- *Remains the intellectual property of the Lee County Republican Executive Committee*
- *Is licensed for limited, revocable use only*
- *Does not confer any ownership rights*
- *Does not create any endorsement, certification, or official party designation*

No Contractual Guarantee

Participation in ECAI and use of the badge:

- *Is voluntary*
- *Does not create contractual rights or guarantees*
- *Does not entitle the candidate to endorsement, funding, or party support*
- *May be modified, suspended, or discontinued by LCREC at any time*

Sincerely,

[Your Name]

[Your Title]

Lee County Republican Executive Committee

Section I:

Candidate Information & Biographical Questionnaire

Lee County Republican Executive Committee (LCREC)

PURPOSE & LEGAL DISCLOSURE

This questionnaire is intended solely for **voter education and informational transparency**.

Participation in the Ethical Campaign & Accountability Initiative (ECAI):

- **Does NOT constitute an endorsement, recommendation, certification, rating, or official approval** by LCREC.
- Is voluntary.
- Does not create contractual rights or obligations beyond those required by law.
- May be published in whole or in part for voter education purposes.

All campaign finance compliance remains governed by applicable law, including but not limited to:

- **Chapter 106, Florida Statutes** (Campaign Financing)
- **Chapter 104, Florida Statutes** (Violations of Election Code)

- **Chapter 112, Part III, Florida Statutes** (Code of Ethics for Public Officers and Employees)
- Federal Election Campaign Act (52 U.S.C. § 30101 et seq.), if

applicable **Candidate Information**

1. **Full Name:** James Vargas
2. **Office Sought:** Cape Coral City Council District 4
3. **Election Cycle:** 2026 Municipal Election
4. **Current Residence (City / County / State):**
Cape Coral, Lee County, Florida
5. **Contact Information:**
 - Email: JamesVargasForCapeCoral@gmail.com
 - Phone: 720-335-2030
6. **Education**
(Degrees earned, institutions attended, years completed) Metro State University
2 years completed
7. **Professional Background**
(Current and past employment, positions held, relevant experience)
Current Owner of BeastRx and AlphaStar Vapes,
Formerly Assistant Vice President Of US Operation for Imarketing Solutions
8. **Political & Community Experience**
(Previous offices, boards, committees, volunteer service)
Volunteered at the Denver Rescue Mission
9. **Family & Personal Background (Optional):** NA

10. Length of Residency in Voting District: 3 Years

11. Community Organization Memberships (Active): NA

12. Reason for Seeking Office: To restore fiscal conservatism, accountability transparency and community faith in local government.

13. Other Relevant Information:

Section II:

Candidate Ethical Conduct Commitment

I, the undersigned candidate for public office, voluntarily pledge to uphold ethical, transparent, and principled conduct throughout my campaign and, if elected, while serving in public office.

I acknowledge that compliance with Florida election and ethics laws—including but not limited to **Chapter 106 and Chapter 112, Florida Statutes**—represents the minimum legal requirement for candidates and public officials.

By signing this commitment, I affirm that I will hold myself to a higher ethical standard than mere legal compliance and agree to the following principles and obligations.

Foundational Commitments

1. Voluntary Participation

I voluntarily agree to participate in the **Ethical Campaign & Accountability Initiative (ECAI)** of the **Lee County Republican Executive Committee (LCREC)**.

2. Compliance With Law – Minimum Standard

I understand that compliance with Florida election and ethics laws, including but not limited to **Chapter 106 and Chapter 112, Florida Statutes**, represents the minimum legal requirement for candidates and public officials.

3. Commitment to a Higher Ethical Standard

I further affirm that I will hold myself to a higher ethical standard than mere legal compliance. I will conduct my campaign and, if elected, my public service in a

manner that:

- Promotes transparency beyond technical reporting requirements
- Avoids conflicts of interest, whether actual, potential, or perceived
- Prevents even the appearance of impropriety or preferential treatment
- Protects public trust in the integrity of the electoral and governing process

4. Ethical Campaigning

I commit to conducting my campaign in a manner that promotes integrity, fairness, and respect for the democratic process.

Accordingly:

- I will refrain from knowingly disseminating false or misleading information, engaging in smear tactics, or making personal attacks—whether verbal, written, implied, or otherwise—against my opponents, their families, campaign staff, or employers.
- I will not engage in or encourage threats, intimidation, harassment, or actions intended to harm the personal safety, professional standing, or livelihoods of my opponents or their surrogates.
- I will focus my campaign on policy positions, leadership qualifications, and factual representations of my record and platform.

5. Responsibility for Campaign Representatives and Affiliates

I acknowledge that ethical responsibility extends beyond my personal conduct. Therefore:

- I will require my campaign staff, consultants, volunteers, vendors, advisors, surrogates, and any individual acting with my knowledge, authorization, or on my behalf to adhere to the ethical standards reflected in this commitment.
- I will not knowingly permit, direct, encourage, or ratify conduct by any campaign representative that would violate applicable law or undermine the spirit of this Initiative.
- I will take reasonable corrective action if I become aware of conduct by campaign agents or affiliated persons that creates an actual or apparent ethical violation.

6. Third-Party and Independent Activity

I recognize that third-party political organizations may engage in campaign-related communications.

Accordingly:

- If any third-party entity—including but not limited to political action committees (PACs), advocacy organizations, or individuals—disseminates false, defamatory, or malicious information regarding an opponent, whether coordinated with my campaign or not, I will publicly disavow such falsehoods and clarify that such conduct does not reflect my campaign's values or standards.

Part III CONFLICT OF INTEREST & FINANCIAL INTEGRITY

DISCLOSURES *(Voluntary Transparency and Legal Compliance Commitment)*

I. Conflict of Interest Disclosure Addendum *(Voluntary Transparency Statement)*

In furtherance of transparency and public confidence, I voluntarily disclose the following known or reasonably foreseeable circumstances that could create an actual or apparent conflict of interest if elected to the office sought:

X Financial Interests

Any ownership interest, beneficial interest, investment, or financial relationship in any business, partnership, corporation, real property, nonprofit entity, or other organization that may be regulated by, receive funding from, contract with, or otherwise be affected by decisions of the office sought.

X Employment / Professional Relationships

Any current or prospective employment, consulting arrangement, contractual relationship, board membership, fiduciary role, or compensated advisory position that could reasonably be perceived as influencing official decision-making.

X Family / Household Interests

Any professional, financial, contractual, or ownership interest held by an immediate family member or member of my household that could be affected by actions, votes, or influence of the office sought.

X Contractual or Governmental Relationships

Any existing or anticipated contract, subcontract, grant, procurement relationship, or lobbying relationship involving a governmental entity that may intersect with the duties of the office sought.

X Other Circumstances Affecting Impartiality

Any other circumstance that a reasonable person would conclude could impair, or appear to impair, my independence of judgment.

I understand that voluntary disclosure promotes transparency and does not automatically disqualify service. Where required by law, I will comply with applicable recusal requirements under Chapter 112, Florida Statutes.

II. Donor Influence & Campaign Finance Transparency

I understand that public confidence in representative government requires transparency in campaign financing and independence from improper influence. Therefore, I affirm the following:

X Campaign Finance Transparency

I will timely file and publicly disclose all campaign contributions, expenditures, and financial reports as required by Chapter 106, Florida Statutes, including but not limited to § 106.07, Fla. Stat.

x Contribution Limit Compliance

I will not accept contributions prohibited under § 106.08, Fla. Stat., or any other applicable provision of Florida law.

X No Quid Pro Quo Contributions / Bribery Prohibition

I will not solicit, accept, or agree to accept any contribution, gift, or thing of value in exchange for official action, influence, or vote, consistent with §§ 838.015–838.016, Fla. Stat., and other applicable bribery provisions.

X Independent Expenditure & Coordination Compliance

I acknowledge that coordination between a candidate and an independent expenditure may violate Florida law as defined in § 106.011(5), Fla. Stat. I will not engage in unlawful coordination and will ensure compliance with Chapter 106, Florida Statutes.

X Refusal of Improper Influence

I will decline or return any contribution that is conditioned upon, or reasonably appears to seek, improper influence, special access, or preferential governmental action.

X Ongoing Disclosure Obligation

If circumstances arise that materially affect compliance with these commitments, I will promptly update required public disclosures and take corrective action consistent with Florida law.

III. Financial Integrity and Conflicts of Interest

I understand that financial integrity and the avoidance of conflicts of interest are essential to maintaining public trust. Accordingly:

X Compliance with Campaign Finance Law

I will comply with all applicable provisions of Chapter 106, Florida Statutes, including reporting requirements, contribution limitations, expenditure restrictions, disclaimer requirements, and lawful use of campaign funds.

X Segregation and Proper Use of Campaign Funds

I will maintain a clear separation between campaign funds and any personal or business accounts, consistent with § 106.11, Fla. Stat., ensuring campaign funds are deposited, maintained, and expended strictly in accordance with Florida law.

X Misuse of Public Position Prohibited

I will not corruptly use or attempt to use any official position or public resource to secure a special privilege, benefit, or exemption for myself or others, in violation of § 112.313(6), Fla. Stat.

X Adherence to the Florida Code of Ethics

I acknowledge and agree to conduct myself consistent with Chapter 112, Part III, Florida Statutes (Code of Ethics for Public Officers and Employees).

CANDIDATE ETHICAL COMMITMENT & CERTIFICATION *(Execution and Signature Page)*

I, James Vargas, being a candidate for the office of Cape Coral City Council District 4, affirm that I have carefully read and understand the foregoing **Conflict of Interest Disclosure Addendum, Donor Influence & Campaign Finance Transparency Commitment, and Financial Integrity and Conflicts of Interest Provisions.**

By signing below, I certify and acknowledge the following:

1. I voluntarily make the disclosures indicated herein to promote transparency and public confidence.
2. I affirm my commitment to comply with all applicable provisions of Florida law, including but not limited to:
 - Chapter 104, Florida Statutes
 - Chapter 106, Florida Statutes
 - Chapter 112, Part III, Florida Statutes
 - Chapter 838, Florida Statutes

3. I understand that this document is a voluntary ethical commitment in furtherance of accountability and party integrity.
4. I acknowledge that failure to comply with applicable law may subject me to investigation, penalties, or other consequences under Florida law, independent of this voluntary commitment.
5. I understand that material misrepresentation within this document may be considered a breach of ethical standards established under the Ethical Campaign & Accountability Initiative (ECAI).

I certify under penalty of perjury, pursuant to § 92.525, Florida Statutes, that the foregoing statements are true and correct to the best of my knowledge and belief.

Candidate Signature

Signature: *James Vargas*

Printed Name: James Vargas

Date 06/24/2026 County: LEE Office Sought: Cape Coral City Council District

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SECTION IV – Donor Influence & Campaign Transparency

Disclosure Legal Framework

This disclosure section aligns with the following Florida statutes:

- **F.S. § 106.011** – Definitions
- **F.S. § 106.021** – Campaign Treasurer; Appointment
- **F.S. § 106.07** – Reports; Certification and Filing
- **F.S. § 106.08** – Contributions; Limitations
- **F.S. § 106.19** – Violations; Penalties
- **F.S. § 112.313** – Standards of Conduct for Public Officers and Employees
- **F.S. § 112.3143** – Voting Conflicts

1. Transparency in Contributions

I affirm that:

- I will comply with all reporting requirements under **Chapter 106, Florida Statutes**, including timely filing of campaign treasurer reports pursuant to **F.S. § 106.07**.
- I will not accept contributions in excess of legal limits under **F.S. § 106.08**.
- I will ensure all contributions are processed through a properly appointed campaign treasurer pursuant to **F.S. § 106.021**.
- I will certify reports as true and correct to the best of my knowledge as required by law.

2. Refusal of Improper Influence

I affirm that:

- I will not solicit or accept contributions in exchange for official action, in violation of **F.S. § 106.19**.
- I will avoid conduct that would violate public trust standards under **F.S. § 112.313**.
- I will not participate in any “pay-to-play” arrangement or quid pro quo activity prohibited under state or federal law.

3. Third-Party & Affiliated Contributions

I affirm that:

- Any political committee, electioneering communication organization, or affiliated entity connected with my campaign will operate in compliance with **Chapter 106, Florida Statutes**.
- I will not coordinate or authorize actions designed to evade contribution limits or reporting requirements.
- I will cooperate with lawful oversight by the Florida Division of Elections or Florida Elections Commission.

4. Conflict of Interest Awareness

If elected, I acknowledge my obligation to:

- Abstain from voting where a voting conflict exists pursuant to **F.S. § 112.3143**.
- Comply with ethical disclosure requirements under **Chapter 112, Part III, Florida Statutes**.

Candidate Signature: *James Vargas*

Printed Name: James Vargas

Office Sought: Cape Coral City Council District 4

Date: 06/24/2026

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Candidate Acknowledgment

By signing below, I acknowledge that I have read, understand, and agree to comply with the ECAI Participating Candidate Badge & Usage Rules. I understand that misuse of the badge may result in revocation of usage rights and public clarification by LCREC.

Candidate Signature: *James Vargas*

Printed Name: James Vargas

Office Sought: Cape Coral City Council District 4

Date: 06/24/2026

Submission Instructions & Public Disclosure

Please return this completed and signed commitment no later than **June 18th, 2026** to by email to vicechair@leegop.org and CC susanallen5@aol.com, or you can drop off or mail your submission to:

LCREC C/O Susan Allen

12995 S Cleveland Ave #239 Fort Myers, FL 33907

Information submitted pursuant to this commitment **may be published, in whole or in part**, in connection with the Ethical Campaign & Accountability Initiative (ECAI), including but not limited to voter guides, public reports, and other voter education materials.

Candidates who **fail to submit, decline participation, or do not respond by the stated deadline** may be publicly identified as **“Declined to Participate.”**

Use of the **ECAI Participation Badge** constitutes the candidate’s **acknowledgment and acceptance** of these disclosure terms and all applicable program standards. Any **misuse, misrepresentation, or use inconsistent with ECAI standards** shall result in **immediate revocation of badge usage rights**, including removal from all campaign materials, advertising, and public representations.

The ECAI reserves the right to **publicly disclose any revocation**, including a summary of the basis for such determination, through voter education materials and other public facing platforms.

The Ethical Campaign & Accountability Initiative represents a renewed commitment to restoring **trust, integrity, and accountability** among Republican elected officials in Lee County. While compliance with applicable law is the minimum standard, this initiative calls upon candidates to adhere to a **higher level of ethical conduct**—grounded in honesty, transparency, and principled leadership in service to the citizens of Lee County.

To review the ECAI Non-Compliance Policy go to Leegop.org

Sincerely,

Susan Allen

**The Ethical Campaign & Accountability Initiative Committee
Lee County Republican Executive Committee (LCREC)**