



Supplement to

AOR 2006-35

January 16, 2007

J. Duane Pugh, Esq.  
Acting Assistant General Counsel  
Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: Advisory Opinion Request 2006-35

Dear Mr. Pugh:

This letter is a supplement to my letters of October 27, 2006, November 8, 2006, and November 27, 2006, on behalf of Kolbe for Congress, concerning the application of the Federal Election Act of 1971, as amended (the "Act"), and Commission regulation to the use of campaign funds for legal expense.

Per your oral request for supplemental information, I have attached a document indicating that the 1996 rafting trip was led by and supported by the National Park Service and the Office of Public Affairs, Grand Canyon National Park. Obviously, the trip occurred more than ten years ago and thus available documentation is limited. Available information suggests the purpose of the trip was twofold—to conduct a fire reconnaissance tour and to increase the Congressman's awareness and understanding of conservation issues associated with rafting policies for the Colorado River. In response to your specific question, I understand that government funds were used to pay for Congressman Kolbe's travel to and from the Grand Canyon and to support the rafting portion of the trip. As mentioned in our earlier correspondence, absent Congressman Kolbe's position as a Federal officeholder, this official trip and the participants' involvement in it would not have occurred.

Please feel free to contact me, or counsel, with any further questions.

Sincerely,

William H. Kelley  
Treasurer  
Kolbe for Congress  
P.O. Box 31568  
Tucson, Arizona 85751

P.O. Box 31568 \* Tucson, AZ 85751

Bid for by Kolbe 2002

Contributions are not deductible as charitable contributions for federal income tax purposes.

AND CANYON



NATIONAL PARK

OFFICE OF PUBLIC AFFAIRS  
GRAND CANYON NATIONAL PARK  
P. O. Box 129  
GRAND CANYON, AZ 86023

[Redacted]

[Redacted]

[Redacted]

FAX

TO: [Redacted]

AGENCY: \_\_\_\_\_

*and staff*

FAX #: \_\_\_\_\_

DATE: 5/27/96

# OF PAGES TOTAL: \_\_\_\_\_

REGARDING:

*This is the latest as I know it.*

COMMENTS:

[Redacted]

Multiple horizontal lines for additional comments or information.

Visit of Congressman Jim Kolbe and Staff  
June 29 - July 2, 1996  
Grand Canyon National Park

Itinerary

Friday, June 28

evening Congressman Kolbe and staff arrive in Flagstaff, Arizona

Overnight at [redacted], Flagstaff, [redacted]

Saturday, June 29

6:45 am [redacted], River Subdistrict staff and drivers [redacted] and [redacted] arrive NPS Boat Shop

7:00 am [redacted] and other NPS staff depart South Rim Village to Lees Ferry

7:00 am Kolbe and group depart Flagstaff for Lees Ferry

9:30 am [redacted] and other NPS staff arrive Lees Ferry

9:30 am Kolbe and group arrive Lees Ferry for orientation, loading of gear and departure on boats

10:30 am [redacted] and [redacted] depart Lees Ferry to South Rim via Congressional staff vehicles

Saturday, June 29 through Tuesday, July 2, raft the Colorado River within Grand Canyon National Park (Mile 0 to 88). Camp at Cremation Beach night of July 1.

Tuesday, July 2

6:00 am Congressional staff depart Phantom Ranch for South Rim via Bright Angel Trail

7:30 am [redacted] and Congressman Kolbe tour Phantom Ranch and NPS operation

9:30 am Congressman Kolbe and NPS Fire staff depart Phantom Ranch by NPS helicopter for fire reconnaissance and return flight to South Rim

10:30 am Congressman Kolbe arrives South Rim helibase Pick up by Ranger staff

12 noon +/- Congressional staff group arrive South Rim Congressional staff vehicle and/or park ranger

will be waiting at Bright Angel Trailhead on South Rim

2:00 pm

Congressman Kolbe and staff depart for Tucson via staff vehicles

Notes:

Rover Subdistrict ranger will coordinate July 2 pickup of Congressman Kolbe and staff as they arrive at South Rim.

Gear left with river trip will be shipped back to Congressional staff the week of July 8.

6/27/96