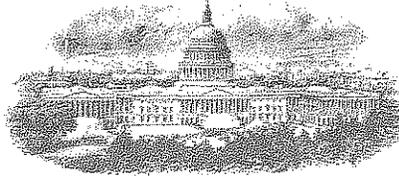


**DON YOUNG**  
CONGRESSMAN FOR ALL ALASKA  
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COMMITTEE ON  
NATURAL RESOURCES  
CHAIRMAN, SUBCOMMITTEE ON  
INDIAN AND ALASKA NATIVE AFFAIRS  
COMMITTEE ON  
TRANSPORTATION & INFRASTRUCTURE  
REPUBLICAN  
POLICY COMMITTEE

Congress of the United States  
House of Representatives  
Washington, DC 20515

September 23, 2011

Office of Congressional Ethics  
425 3<sup>rd</sup> Street, SW  
Suite 1110  
Washington, DC 20024

Dear Members of the Board,

Due to previous commitments in Alaska I am unable to address the Board in person. I appreciate the opportunity to provide a written statement with regards to the review that was initiated on June 22, 2011 and extended on July 25, 2011.

The nature of this review has to do with twelve contributions made to the Congressman Don Young Legal Expense Fund earlier this year. It is my understanding that the Board is reviewing these contributions to determine whether they exceeded the contribution limit which would be a violation of House rules.

The Congressman Don Young Legal Expense Fund was established in January 2008 and since then has raised a little more than \$200,000. It is my understanding that there is roughly \$90,000 left in this account. Some legal funds are very sophisticated in their operations and fundraising activities but that is not the case with mine. There were some months where the fund raised money and then several months could pass without any activity. During the four years the fund has been in existence there has been only one formal fundraising event which raised roughly \$20,000. All of the other contributions were unsolicited donations from individuals and companies that wanted to help with my legal bills.

This January I traveled to Texas for a campaign fundraiser and it was during this trip that I also received contributions for my legal expense fund. Upon my return from Texas the checks for the legal expense fund were mailed to the fund's Trustee for deposit. That is the extent of my involvement with these contributions. Like my campaign, I do not get involved with the dollars and cents. I trust that those who are tasked with overseeing both my campaign and legal fund operate within the rules and I believe in this case they did.

According to Page 4 of the Congressman Don Young Legal Expense Fund agreement, contributions are limited by the following:

6. *Prohibited Contributions: The Trustee may not knowingly accept any gift or donation that is prohibited by or is in excess of the limits established by the Legal Expense Fund regulations issued by the House Committee on Standards of Official Conduct, or that is prohibited by any other laws, rules or regulations governing such contributions as interpreted by the House Committee on Standards of Official Conduct. In particular:*

a. *The Trust shall not knowingly accept more than \$5000 in a calendar year from any individual or organization.*

b. *The Trust shall not knowingly accept any contribution from a registered lobbyist or an agent of a foreign principal.*

c. *The Trust shall not knowingly accept any pro bono legal service of a value of more than \$5000 from any single source in any calendar year.*

*If any prohibited contribution is inadvertently accepted, the Trustee shall as soon as practical after becoming aware of the prohibited nature of the contribution, return it in its entirety to the donor (if from a prohibited source) or return the excess of \$5000 to the donor (if prohibited because of the amount).*

The Trustee was asked to interpret the rules as to whether multiple companies owned by the same individual could legally donate to the Trust. Since the rules above do not specifically speak to this particular question, the Trustee's opinion was that if the twelve companies in question were separate legal entities and operated under separate financial records that they could each make a legal donation to the Trust. I believe the Trustee used her best legal judgment in this situation and believe that as the rules are written, these contributions are allowable. Moreover, these donations were publicly reported, as required by the rules, to the Ethics Committee and the Legislative Resource Center and every donation that has been made to my legal fund has been reported on my annual Financial Disclosure Report. I have never tried to hide any contribution and have not knowingly violated House rules.

In order to make sure that the legal fund did not violate House rules I asked for a formal opinion from the House Ethics Committee. To date, they are still reviewing this request and I am waiting for their decision. As the above rules indicate, the Trustee is prepared to return any funds that the House Ethics Committee determines to be in violation of the contribution limit.

Thank you for your time and consideration.

Sincerely,



DON YOUNG  
Congressman for All Alaska