



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2010 OCT 13 A 11: 23

**SENSITIVE**

**MEMORANDUM**

October 13, 2010

TO: The Commission

THROUGH: Alec Palmer *AP*  
Acting Staff Director

FROM: Patricia Carmona *PC*  
Chief Compliance Officer

Lynn M. Fraser *LMF*  
Director, ADR Office

Krista J. Roche *KJR*  
Assistant Director, ADR Office

SUBJECT: ADR 547 Great River Energy Action Team and Robert P. Ambrose, Treasurer  
Recommendation to Dismiss<sup>1</sup>

The Office of General Counsel (OGC) referred P-MUR 508, and the ADR Office designated the matter as ADR 547. We have included a summary and discussion of the matter for your information. A copy of the *sua sponte* submission is in the voting ballots folder.

**Summary and Analysis of Case:** The Great River Energy Action Team (GREAT) filed a *sua sponte* submission admitting that excessive contributions totaling \$4,500 were made during the 2006 and 2008 election cycles. GREAT contends that it was unaware of its affiliation with the Action Committee for Rural Electrification (ACRE), a multi-candidate political committee sponsored by the National Rural Electric Cooperative Association (NRECA), and therefore did not cross-reference its contributions with those of the affiliated PAC. In late 2008, GREAT became aware that it was affiliated with ACRE during a conversation between GREAT officials and the General Manager of the Minnesota Rural Electric Association. Upon the discovery of the affiliation issue, GREAT initiated a comprehensive review of all contributions made during the 2006 and 2008 election cycles and correlated those contributions with ACRE's contributions. At GREAT's request, all excessive contributions have been refunded.

<sup>1</sup> The Office of General Counsel concurs in the description of this matter.

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2006 and 2008 election cycles and correlated those contributions with ACRE's contributions. At GREAT's request, all excessive contributions have been refunded.

GREAT states that it has undertaken remedial actions to ensure this type of error does not occur in the future. GREAT's remedial actions include implementing procedures to utilize ACRE's website to examine contributions by ACRE and other affiliated PACs, following the written policy issued annually by the NRECA for approval of contributions by ACRE, GREAT, and other affiliated PACs, and requiring each contribution check to bear the signature of at least two individuals at the committee. Additionally, GREAT indicates that its representatives will meet with NRECA officials in the coming months and will send its Treasurer to an FEC-sponsored conference within twelve months.

**RECOMMENDATION:**

- 1. Dismiss ADR 547 (P-MUR 508), and close the file.**
- 2. Approve the appropriate letters.**

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