



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 28, 2010

Jan Witold Baran
Wiley Rein, LLP
1776 K Street, NW
Washington, DC 20006

Re: ADR 547 (P-MUR 508) Great River Energy Action Team

Dear Mr. Witold:

On September 23, 2010, the Federal Election Commission (FEC/Commission) received your *sua sponte* complaint acknowledging certain violations of the Federal Election Campaign Act of 1971, as amended.

After considering the circumstances of this matter, the Commission determined to exercise its prosecutorial discretion and take no action against the Respondents, Great River Energy Action Team and Robert P. Ambrose, Treasurer. In its memorandum to the Commission, dated October 13, 2010, this office stated:

Summary: 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.

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

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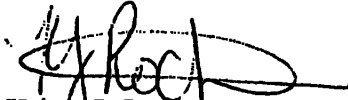
its representatives will meet with NRECA officials in the coming months and will send its Treasurer to an FEC-sponsored conference within twelve months.

Accordingly, the Commission closed its file in this matter on October 27, 2010.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20(b). In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondents and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Krista J. Roche
Assistant Director
Alternative Dispute Resolution Office

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