



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

MAR 4 1998

Peter E. Brereton, Treasurer  
Keycorp Political Action Committee  
127 Public Square, 7th Floor  
Cleveland, OH 44114

Identification Number: C00073155

Reference: Year End Report (10/1/97-12/31/97)

Dear Mr. Brereton:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

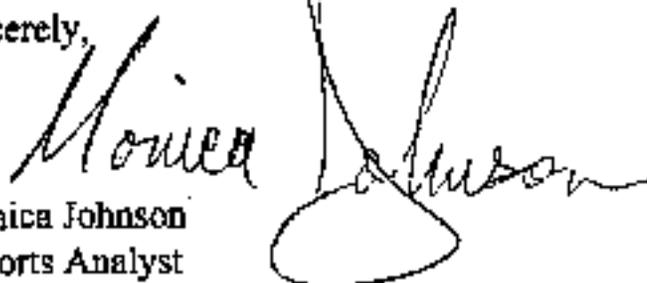
-The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. When an individual's aggregate exceeds the \$200 threshold, the amount should not be deducted from the Column B figure for Line 11(a)(ii). Please amend your report and any subsequent reports that may be affected by this correction.

-Line 23 of the Detailed Summary Page of your report discloses a total of \$23,250 in contributions to federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$24,250. Please amend your report to clarify the discrepancy.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Contributions to federal political action committees should be properly disclosed on a separate Schedule B, supporting Line 23 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script that reads "Monica Johnson". The signature is written in black ink and is positioned to the right of the typed name.

Monica Johnson  
Reports Analyst  
Reports Analysis Division

