



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

May 13, 1999

Peter E. Brereton, Treasurer  
Keycorp Political Action Committee  
(FKA: Society Corporation PAC)  
127 Public Square 7<sup>th</sup> Floor  
Cleveland, OH 44114

Identification Number: C00073155

Reference: Amended October Quarterly Report (7/1/98-9/30/98), received 3/22/99

Dear Mr. Brereton:

This letter is to inform you that as of May 12, 1999, the Commission has not received your response to our request for additional information, dated April 21, 1999. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Peter E. Brereton, Treasurer  
Keycorp Political Action Committee  
(FKA: Society Corporation PAC)  
127 Public Square 7<sup>th</sup> Floor  
Cleveland, OH 44114

APR 21 1999

Identification Number: C00073155

Reference: Amended October Quarterly Report (7/1/98-9/30/98), received 3/22/99

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:

In your letter dated March 18, 1999 referencing the Amended October Quarterly Report, you state the redesignation of Baker for Congress on this amended filing was a clerical error and that "the original entry on Page 1 of 4 for line number 23 is the proper designation of General 1998" (pertinent portion attached). In addition, you state "an excessive contribution was not made."

However, since the state of Louisiana did not hold a runoff or general election in 1998, you should notify the recipient and request a refund of the full amount of the contribution and/or notify the recipient in writing of your redesignation of the contribution for a future election. In the best interests of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution.

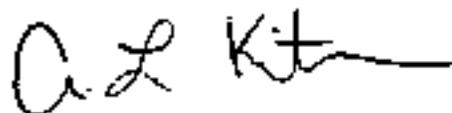
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund and/or redesignation request sent to the recipient committee. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be

disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this contribution, prompt action in obtaining a refund and/or requesting a redesignation will be taken into consideration.

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 "A. L. Kitchen".

Antoinette Kitchen  
Reports Analyst  
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 4 FOR LINE NUMBER 23

Contributions to Federal Candidates/Committees

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (IF FNU) KeyCorp Political Action Committee

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Baker for Congress Committee Post Office Box 1694 Baton Rouge, LA 70821	Contribution: Richard H. Baker (LA-6-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	5/14/98	\$2,000.00
Evan Bayh Committee 427 Palm Tree Drive Gaithersburg, MD 20878	Contribution: Evan Bayh for Congress Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	5/9/98	\$1,000.00
Den Benton for Congress Mike Sanders, Treasurer P.O. Box 5876 Vancouver, WA 98668	Contribution: Den Benton for Congress (WA-3-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	5/1/98	\$1,000.00
People for Barryman 101 E. Maumee Adrian, MI 49321	Contribution to federal candidate for Congress (MI-7-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	3/7/98	\$500.00
Susan Gustafson, Treasurer 1533 NE Tillamoor Portland, OR 97212	Contribution: Earl Blumenauer (OR-3-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	9/9/98	\$1,000.00
Molly Bordonaro for Congress c/o Senator Gordon Smith 835 Southwest Canyon, Suite 235 Portland, OR 97225	Contribution: Molly Bordonaro (OR-1-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	7/15/98	\$1,000.00
John Breaux Senate Committee Post Office Box 3536 Lafayette, LA 70502	Contribution: John R. Breaux (LA-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	9/9/98	\$1,000.00
Friends of Sherrod Brown Dan Harris, Treasurer 111 Edgefield Drive Elyria, OH 44035	Contribution: Sherrod Brown (OH-13-D) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	7/17/98	\$500.00
Chabot for Congress Don Bush, Treasurer 3333 Glenmore Avenue Cincinnati, OH 45211	Contribution: Steve Chabot (OH-1-R) Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	9/9/98	\$250.00

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SUBTOTAL of Disbursements This Page (optional) TOTAL This Period (last page this line number only) \$8,250.00

