



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Peter E. Brereton, Treasurer
Keycorp Political Action Committee
(FKA: Society Corporation PAC)
127 Public Square 7th 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.

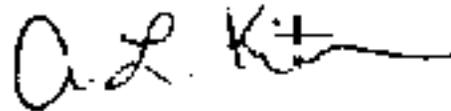
Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund and/or redesignation request sent to the recipient committee. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which 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 black ink, appearing to read "A.L. Kitchen". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

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 FUR) KeyCorp Political Action Committee			
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution: Richard H. Baker (LA-6-R)	Date (month, day, year)	Amount of Each Disbursement this Period
Baker for Congress Committee Post Office Box 1694 Baton Rouge, LA 70821	Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other: 1998	9/14/98	\$2,000.00
Full Name, Mailing Address and ZIP Code Evan Bayh Committee 427 Palm Tree Drive Gathersburg, MD 20878	Purpose of Disbursement Contribution: Evan Bayh for Congress	Date (month, day, year) 5/9/98	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Don Benton for Congress Mike Sanders, Treasurer P.O. Box 5076 Vancouver, WA 98668	Purpose of Disbursement Contribution: Don Benton for Congress (WA-3-R)	Date (month, day, year) 5/1/98	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code People for Berryman 101 E. Maumee Adrian, MI 49221	Purpose of Disbursement Contribution to federal candidate for Congress (MI-7-D)	Date (month, day, year) 1/7/98	Amount of Each Disbursement this Period \$500.00
Full Name, Mailing Address and ZIP Code Blumensauer for Congress Susan Gustafson, Treasurer 1533 NE Tillamook Portland, OR 97213	Purpose of Disbursement Contribution: Earl Blumensauer (OR-3-D)	Date (month, day, year) 5/9/98	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Molly Bordonaro for Congress c/o Senator Gordon Smith 835 Southwest Canyon, Suite 235 Portland, OR 97225	Purpose of Disbursement Contribution: Molly Bordonaro (OR-1-R)	Date (month, day, year) 7/15/98	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code John Breaux Senate Committee Post Office Box 3526 Lafayette, LA 70502	Purpose of Disbursement Contribution: John B. Breaux (LA-D)	Date (month, day, year) 5/9/98	Amount of Each Disbursement this Period \$1,000.00
Full Name, Mailing Address and ZIP Code Friends of Sherrad Brown Dan Harris, Treasurer 111 Edgfield Drive Elyria, OH 44035	Purpose of Disbursement Contribution: Sherrad Brown (OH-13-D)	Date (month, day, year) 7/17/98	Amount of Each Disbursement this Period \$500.00
Full Name, Mailing Address and ZIP Code Chabot for Congress Don Bush, Treasurer 5333 Glenmore Avenue Cincinnati, OH 45211	Purpose of Disbursement Contribution: Steve Chabot (OH-1-R)	Date (month, day, year) 9/9/98	Amount of Each Disbursement this Period \$250.00
SUBTOTAL of Disbursements This Page (optional)			\$8,250.00
TOTAL This Period (last page this line number only)			

AK

