FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Erskine Cade, Treasurer
KeyCorp Political Action Committee
127 Public Square
Cleveland, OH 44114

OCT 09 2002

Identification Number: C00073155

Reference: July Quarterly Report (4/1/02-6/30/02)

Dear Mr. Cade:

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:

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the 2002 Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR § 110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in

writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). 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 impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-The total listed on Line 22, Column B of the Detailed Summary Page appears 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 total. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for line 21(c), Column B appear to be incorrect. Please provide the corrected total on the Detailed Summary Page.

A 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. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Christopher Morse
Campaign Finance Analyst
Reports Analysis Division

22037753705

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS

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

FOR LINE NUMBER: (check only one)
☐ 21b ☐ 22 ☒ 23 ☐ 24 ☐ 25
☐ 26 ☐ 27 ☐ 28a ☐ 28b ☐ 28c ☐ 29

Any 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 (In Full)
KeyCorp Political Action Committee

A.
Full Name (Last, First, Middle Initial): Craig for U S Senate
Mailing Address: PO Box 2601
City: Boise State: ID Zip Code: 83701
Purpose of Disbursement: Contribution: Larry E. Craig (ID-R)
Candidate Name: Larry E. Craig (ID-R)
Office Sought: House / X Senate / President
State: ID District: 0
Disbursement For: 2002 Primary X General Other (specify)
Date of Disbursement: 06 / 19 / 2002
Amount of Each Disbursement this Period: 1000.00
Category/Type: Contribution: Larry E. Craig (ID-R)
Transaction ID: D2883

B.
Full Name (Last, First, Middle Initial): Chris Chocola for Congress
Mailing Address: P.O. Box 6728
City: South Bend State: IN Zip Code: 46660-6728
Purpose of Disbursement: Contribution: Chris Chocola (IN-3-R)
Candidate Name: Chris Chocola (IN-3-R)
Office Sought: X House / Senate / President
State: IN District: 3
Disbursement For: 2002 X Primary General Other (specify)
Date of Disbursement: 06 / 19 / 2002
Amount of Each Disbursement this Period: 1500.00
Category/Type: Contribution: Chris Chocola (IN-3-R)
Transaction ID: D2884

Primary Date 5/1/02

C.
Full Name (Last, First, Middle Initial): Gordon Smith Oregon Victory Committee
Mailing Address: 5005 S.W. Meadows Road, Suite 310
City: Lake Oswego State: OR Zip Code: 97035
Purpose of Disbursement: Contribution: Gordon H. Smith (OR-R)
Candidate Name: Gordon H. Smith (OR-R)
Office Sought: House / X Senate / President
State: OR District: 0
Disbursement For: 2002 Primary X General Other (specify)
Date of Disbursement: 06 / 24 / 2002
Amount of Each Disbursement this Period: 500.00
Category/Type: Contribution: Gordon H. Smith (OR-R)
Transaction ID: D2887

SUBTOTAL of Disbursements This Page (optional) 3000.00

TOTAL This Period (last page this line number only) .....