

RQ-3



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

October 31, 2002

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

Identification Number: C00073155

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

Dear Mr. Cade:

This letter is to inform you that as of October 30, 2002, the Commission has not received your response to our request for additional information, dated October 9, 2002. 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).

An adequate response must be received at the Commission by November 20, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

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 should have any questions regarding this matter, please contact Christopher Morse on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) 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

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)

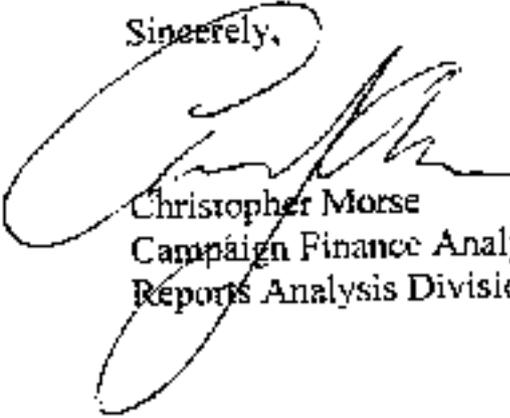
Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-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

**SCHEDULE B (FEC Form 3X)  
ITEMIZED DISBURSEMENTS**

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

FOR LINE NUMBER:  
(check only one)

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
<input type="checkbox"/> 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

Full Name (Last, First, Middle Initial) A. Craig for U S Senate		Date of Disbursement 06 / 19 / 2002
Mailing Address PO Box 2601 City: Boise State ID: Zip Code: 83701		Amount of Each Disbursement this Period 1000.00
Purpose of Disbursement Contribution: Larry E. Craig (ID-R) Candidate Name: Larry E. Craig (ID-R) Office Sought: House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President <input type="checkbox"/> Disbursement For: 2002 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <input type="checkbox"/>		Contribution: Larry E. Craig (ID-R) Transaction ID: D2863
State: ID	District: 0	

Full Name (Last, First, Middle Initial) B. Chris Chocola for Congress		Date of Disbursement 08 / 19 / 2002
Mailing Address P.O. Box 6728 City: South Bend State IN: Zip Code: 46680-6728		Amount of Each Disbursement this Period 1500.00
Purpose of Disbursement Contribution: Chris Chocola (IN-3-R) Candidate Name: Chris Chocola (IN-3-R) Office Sought: House <input checked="" type="checkbox"/> Senate <input type="checkbox"/> President <input type="checkbox"/> Disbursement For: 2002 Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) <input type="checkbox"/>		Contribution: Chris Chocola (IN-3-R) Transaction ID: D2864
State: IN	District: 3	<i>Primary Date 5/17/02</i>

Full Name (Last, First, Middle Initial) C. Gordon Smith Oregon Victory Committee		Date of Disbursement 06 / 24 / 2002
Mailing Address 5005 S.W. Meadows Road, Suite 310 City: Lake Oswego State OR: Zip Code: 97035		Amount of Each Disbursement this Period 500.00
Purpose of Disbursement Contribution: Gordon H. Smith (OR-R) Candidate Name: Gordon H. Smith (OR-R) Office Sought: House <input type="checkbox"/> Senate <input checked="" type="checkbox"/> President <input type="checkbox"/> Disbursement For: 2002 Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) <input type="checkbox"/>		Contribution: Gordon H. Smith (OR-R) Transaction ID: D2867
State: OR	District: 6	

SUBTOTAL of Disbursements This Page (optional) ..... 3000.00  
TOTAL This Period (last page this line number only) .....

