

Peter E. Brereton
SVP and Director
Government Relations



SECRETARY OF THE SENATE

00 MAY -1 AM 10:54
KeyCorp
127 Public Square
Cleveland, OH 44114-1306

HAND DELIVERED

Tel: 216 689-4486

April 25, 2000

Secretary of the Senate
U.S. Senate
Washington, D.C. 20510

To Whom It May Concern:

I am in receipt of a "First Notice of Non-Receipt" of my 1999 final report that was due on February 14, 2000. My I.D. number is 30396000.

Due to a mix-up on my end, that report was not filed on time. I am enclosing the report with this letter along with my apology for the delay.

Sincerely,

Peter E. Brereton

Clerk of the House of Representatives
 Legislative Resource Center
 N-106 Cannon Building
 Washington, DC 20515

Secretary of the Senate
 Office of Public Records
 332 Hart Building
 Washington, DC 20510

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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page

3. Registrant Name KEYCORP			
2. Address <input type="checkbox"/> Check if different than previously reported 127 PUBLIC SQUARE			
4. Principal Place of Business (if different from line 2) City: CLEVELAND State/Cap for Country: OHIO 44114-1306			
1. Contact Name PETER E. BRERETON	Telephone 216/689-4486	E-mail (optional)	5. Senate ID # 21530-12
7. Client Name <input type="checkbox"/> Self			6. House ID # 30396000

TYPE OF REPORT Year 1999 Midyear (January 1-June 30) OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report
 10. Check if this is a Termination Report Termination Date _____ 11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13	
<p>12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more: <input type="checkbox"/> ⇒ \$ _____ <small>Income (nearest \$20,000)</small></p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p>13. Organizations</p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input checked="" type="checkbox"/></p> <p>\$10,000 or more: <input type="checkbox"/> ⇒ \$ _____ <small>Expenses (nearest \$20,000)</small></p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input checked="" type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6053(b)(8) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature: Peter E. Brereton
 Printed Name and Title: **PETER E. BRERETON, SVP AND DIRECTOR OF GOVERNMENT RELATIONS, KEYCORP**
 LD-2 (REV. 6/98) PAGE 1 of _____

Registrant Name KEYCORP Client Name SELF

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code FIN (one per page)

16. Specific lobbying issues

1) H.R. 10, FINANCIAL MODERNIZATION

17. Houses of Congress and Federal agencies contacted Check if None

- 1.) U.S. SENATE
- 2.) U.S. HOUSE OF REPRESENTATIVES

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New
PETER E. BRERETON		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature: Peter E. Brereton Date: 4-25-00

Printed Name and Title: PETER E. BRERETON, SVP & DIRECTOR OF GOVERNMENT RELATIONS