

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

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

SECRETARY OF THE SENATE
02 MAR 13 AM 11:50

LOBBYING REPORT

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

1. Registrant Name KEYCORP			
2. Address <input type="checkbox"/> Check if different than previously reported 127 PUBLIC SQUARE			
3. Principal Place of Business (if different from line 2) City: CLEVELAND State/Zip (or Country) OHIO 44114-1306			
4. Contact Name PETER E. BRERETON	Telephone 216-689-4486	E-mail (optional) peter_brereton@keybank.com	5. Senate ID # 21530-1
7. Client Name <input type="checkbox"/> Self			6. House ID # 3039600

TYPE OF REPORT 8. Year _____ Midyear (January 1-June 30) OR Year End (July 1-Dec)

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

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000

\$10,000 or more ⇨ \$ _____
Income (nearest \$20,000)

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).

13. Organizations

EXPENSES relating to lobbying activities for this reporting period were:

Less than \$10,000

\$10,000 or more ⇨ \$ 40,000
Expenses (nearest \$20,000)

14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description

Method A. Reporting amounts using LDA definition

Method B. Reporting amounts under section 6011 Internal Revenue Code

Method C. Reporting amounts under section 162 Internal Revenue Code

Signature Peter E. Brereton



Registrant Name KEYCORP

Client Name _____

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

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

16. Specific lobbying issues

BANKRUPTCY REFORM
FINANCIAL PRIVACY

17. House(s) of Congress and Federal agencies contacted

U.S. SENATE
U.S. HOUSE OF REPRESENTATIVES

Check if None

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

Name	Covered Official Position (if applicable)
PETER E. BRERETON	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature

Peter E. Brereton

Date

02-14-02

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



Registrant Name KEYCORP

Client Name _____

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different from line 20)

City

State/Zip (or Country)

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the client

ISSUE UPDATE

24. General lobbying issues previously reported that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Bu (city and state or cc

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities

28. Name of each previously reported foreign entity that **no longer** owns, or controls, or is affiliated with the registrant or affiliated organization

Signature

Peter E. Bereton

Date

02-14-02

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

Form 1 D.2 (Rev. 6/98)

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