

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
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SECRETAR
02 MAY 2

LOBBYING REGISTRATION

Lobbying Disclosure Act of 1995 (Section 4)

Check if this is an Amended Registration 1. Effective Date of Registration 5/9/2002
2. House Identification Number _____ Senate Identification Number _____

REGISTRANT

3. Registrant Name **Palmetto Group**
Address **801 Pennsylvania Avenue, NW** Suite **730**
City **Washington** State **DC** Zip **20004**
4. Principal place of business (if different from line 3)
City _____ State/Zip (or Country) _____
5. Telephone number and contact name Contact E-Mail (optional)
202-638-7780 **David Rudd**
6. General description of registrant's business or activities
Legislative consulting firm

CLIENT *A lobbying firm is required to file a separate registration for each client. Organizations employing in-house lobbyists should be labeled "Self" and proceed to line 10. Self*

7. Client Name **Alliance Capital Management Corporation**
Address **1345 Avenue of the Americas**
City **New York** State **NY** Zip **10105**
8. Principal place of business (if different from line 7)
City _____ State/Zip (or Country) _____
9. General description of client's business or activities
Investment Company

LOBBYISTS

10. Name of each individual who has acted or is expected to act as a lobbyist for the client identified on line 7. If any person listed in this section has served as a "covered executive branch official" or "covered legislative branch official" within two years of first acting as a lobbyist for this client, state the executive and/or legislative position(s) in which the person served.

Name	Covered Official Position (if applicable)
David Rudd	
John Winburn	

Registrant Name: **Palmetto Group**

Client Name: **Alliance Capital Management Corporation**

LOBBYING ISSUES

11. General lobbying issue areas. Select all applicable codes listed in instructions and on the reverse side of Form LD-1, page 1.

FIN

12. Specific lobbying issues (current and anticipated)

State of Florida pension plan investments.

AFFILIATED ORGANIZATIONS

13. Is there an entity other than the client that contributes more than \$10,000 to the lobbying activities of the registrant in a semiannual period and in whole or major part plans, supervises, or controls the registrant's lobbying activities?

No. Go to line 14.

Yes. Complete the rest of this section for each entity matching criteria above, then proceed to line 14.

Name	Address	Principal Place of Bus (city and state or cour

FOREIGN ENTITIES

14. Is there any foreign entity that:

- a) holds at least 20% equitable ownership in the client or any organization identified on line 13; or
- b) directly or indirectly, in whole or in major part, plans, supervises, controls, directs, finances, or subsidizes activities of the client or any organization identified on line 13; or
- c) is an affiliate of the client or any organization identified on line 13 and has a direct interest in the outcome of the lobbying activity?

No. Sign and date the registration.

Yes. Complete the rest of this section for each entity matching criteria above, the sign and date the registration.

Name	Address	Principal Place of Business (city and state or country)	Amount of contributio for lobbying activities:

Signature  Date 5/10/2002

Printed Name and Title David Rudd - Principal

