

LOBBYING REPORT

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

1. Registrant Name:

SULLIVAN & BALDICK

2. Address:

1455 PENNSYLVANIA AVENUE, SUITE 300, WASHINGTON, DC 20004

3. Principal place of business (if different from line 2):

Country: City: State/Zip(or Country):

4. Contact Name: LAURIE SULLIVAN

Telephone: (202) 347-9848

E-mail (optional): lsullivan@sullivanbaldick.com

Senate ID #: 72111-51

House ID #: 35940003

7. Client Name: Self

CITIGROUP

TYPE OF REPORT

8. Year 2006 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

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): 90,000.00

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: => Expenses (nearest \$20,000): _____

14. Reporting Method.

Check box to indicate expense accounting method. See instructions for description of options.

- Method A.** Reporting amounts using LDA definitions only
 Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code
 Method C. Reporting amounts under section 162(e) of the Internal Revenue Code

Registrant Name: SULLIVAN & BALDICK Client Name: CITIGROUP

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: EDU (one per page)

16. Specific lobbying issues:

HR.609 | College Access and Opportunity Act of 2005 S.1614 | Higher Education Amendments of 2005

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

House of Representatives
Senate

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

Name: SPICER, TRACY

Covered Official Position (if applicable):

Name: SULLIVAN, LAURIE SULLIVAN

Covered Official Position (if applicable):

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

Registrant Name: SULLIVAN & BALDICK Client Name: CITIGROUP

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:

HR.1069 | Notification of Risk to Personal Data Act HR.1080 | Information Protection and Security Act HR.3374 | Consumer Notification and Financial Data Protection Act HR.3375 | Financial Data Security Act of 2005 HR.3426 | Preservation of Federalism in Banking Act HR.3505 | Financial Services Regulatory Relief Act of 2005 HR.3997 | Financial Data Protection Act of 2005 HR.4241 | Deficit Reduction Act of 2005 S.1332 | Personal Data Privacy and Security Act S.1502 | Preservation of Federalism in Banking Act S.1789 | Personal Data Privacy and Security Act of 2005 S.751 | Notification of Risk to Personal Data Act

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

House of Representatives
Senate

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

Name: SPICER, TRACY
Covered Official Position (if applicable):
Name: SULLIVAN, LAURIE
Covered Official Position (if applicable):

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

Registrant Name: SULLIVAN & BALDICK Client Name: CITIGROUP

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: RET (one per page)

16. Specific lobbying issues:

HR.2106 | Employee Pension Preservation and Taxpayer Protection Act of 2005 HR.2830 | Pension Protection Act of 2005 S.1783 | Pension Security and Transparency Act of 2005 S.861 | Employee Preservation Act of 2005

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

House of Representatives
Senate

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

Name: SPICER, TRACY
Covered Official Position (if applicable):
Name: SULLIVAN, LAURIE
Covered Official Position (if applicable):

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

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: TAX (one per page)

16. Specific lobbying issues:

HR.1471 | | A bill to amend the Internal Revenue Code of 1986 to permanently extend the Subpart F exemption to achieve financing income. | HR.1956 | Business Activity Tax Simplification Act of 2005 | HR.2911 | | A bill to amend the Internal Revenue Code of 1986 to modify the active business definition under section 355. | S.1159 | | A bill to amend the Internal Revenue Code of 1986 to permanently extend the Subpart F exemption to achieve financing income. | S.1327 | | A bill to amend the Internal Revenue Code of 1986 to modify the active business definition under section 355. | S.750 | | A bill to amend the Internal Revenue Code of 1986 to allow look-through treatment of payments between related foreign corporations. |

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

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

Name: SPICER, TRACY
Covered Official Position (if applicable):
Name: SULLIVAN, LAURIE
Covered Official Position (if applicable):

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

Signature: ON FILE Date: Jul 24, 2006

Printed Name and Title: Laurie Sullivan, President -