

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

03 FEB 24 PM 3: 28

**LOBBYING REPORT**

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

1. Registrant Name <b>Palmetto Group</b>			
2. Registrant Address <input type="checkbox"/> Check if different than previously reported Address <b>801 Pennsylvania Avenue, N.W.</b> Suite <b>730</b> City <b>Washington</b> State/Zip (or Country) <b>DC 20004</b>			
3. Principal Place of Business (if different from line 2) City _____ State/Zip (or Country) _____			
4. Contact Name <b>John Winburn</b>		Telephone <b>202-638-7780</b>	E-mail (optional) _____
7. Client Name <input type="checkbox"/> Self <b>The Hartford</b>			5. Senate ID # <b>18570-696</b>  6. House ID # <b>30874058</b>

**TYPE OF REPORT** 8. Year 2002 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 12/31/02 11. No Lobbying

**INCOME OR EXPENSES - Complete Either Line 12 OR Line 13**

12. Lobbying Firms	13. Organizations
<b>INCOME</b> relating to lobbying activities for this reporting period was:	<b>EXPENSES</b> relating to lobbying activities for this reporting period were:
Less than \$10,000 <input type="checkbox"/>	Less than \$10,000 <input type="checkbox"/>
\$10,000 or more <input checked="" type="checkbox"/> >> \$ <u>\$75,000.00</u> Income (nearest \$20,000)	\$10,000 or more <input type="checkbox"/> >> \$ _____ Expenses (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).	<b>14. REPORTING METHOD.</b> Check box to indicate accounting method. See instructions for description of
	<input type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definition
	<input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033 the Internal Revenue Code
	<input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(c) Internal Revenue Code

Signature \_\_\_\_\_ Date 1/31/05

Printed Name and Title John Winburn - Principal Page \_\_\_\_\_

Registrant Name: Palmetto Group

Client Name: The Hartford

**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 INS (one per page)

16. Specific Lobbying issues  
**H.R.1755, Reinsurance Tax Equity Act of 2001, tax havens**  
**S.1743, National Terrorism Reinsurance Fund Act,**

17. House(s) of Congress and Federal agencies contacted  Check if None  
**House of Representatives**  
**Senate**

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

Name	Covered Official Position (if applicable)
<b>Glaze, Steve</b>	
<b>Jenkins, Ed</b>	
<b>Prucker, Michael</b>	
<b>Rudd, David</b>	
<b>Winburn, John</b>	

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



Signature \_\_\_\_\_ Date 1/31/05

Printed Name and Title John Winburn - Principal \_\_\_\_\_ Page \_\_\_\_\_

Registrant Name: Palmetto Group

Client Name: The Hartford

**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

**H.R.1755, Reinsurance Tax Equity Act of 2001, tax havens**

**S.1743, National Terrorism Reinsurance Fund Act, tax havens**

**S.2339, Tax Haven and Abusive Tax Shelter Reform Act of 2002, tax havens**

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

Check if None

**House of Representatives**

**Senate**

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

Name	Covered Official Position (if applicable)
<b>Glaze, Steve</b>	
<b>Jenkins, Ed</b>	
<b>Prucker, Michael</b>	
<b>Rudd, David</b>	
<b>Winburn, John</b>	

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

Check if None



Signature \_\_\_\_\_ Date 1/31/05

Printed Name and Title John Winburn - Principal \_\_\_\_\_ Page