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SECRETARY OF THE SENATE
03 FEB 20 PM 12:50

LOBBYING REPORT

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

1. Registrant Name POLICY DIRECTIONS INC.			
2. Address <input type="checkbox"/> Check if different than previously reported 818 CONNECTICUT AVENUE, NW, SUITE 225			
3. Principal Place of Business (if different from line 2) City: WASHINGTON State/Zip (or Country) DC 20006			
4. Contact Name FRANKIE L. TRULL	Telephone (202) 776-0071	E-mail (optional) fltrull@poldir.com	5. Senate ID # 31
7. Client Name <input type="checkbox"/> Self Philip Morris Management Corp./Kraft General Foods Div.			6. House ID # 32

TYPE OF REPORT 8. Year 2002 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

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">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 checked="" type="checkbox"/> ⇔ \$ <u>20,000.00</u> Income (nearest \$20,000)</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 align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇔ \$ _____ Expenses (nearest \$10,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for descriptive information.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA disclosure</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 170(e)(2)(B) Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 170(e)(2)(C) Internal Revenue Code</p>
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Signature Frankie L. Trull

FRANKIE L. TRULL, President

Printed Name and Title _____

I.D-2 (REV. 6/98)

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Registrant Name POLICY DIRECTIONS INC. Client Name Philip Morris Management Corp./Kraft General Fc

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

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

16. Specific lobbying issues

Food safety
FDA regulation
Food security

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

U.S. House of Representatives
U. S. Senate
Department of Health & Human Services
FDA

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

Name	Covered Official Position (if applicable)
FRANKIE L. TRULL	
KATHLEEN (KAY) HOLCOMBE	
STEVEN L. KOPPERUD	

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

Signature Frankie L. Trull Date 02/03/03

Printed Name and Title FRANKIE L. TRULL, PRESIDENT

Registrant Name POLICY DIRECTIONS INC. Client Name Philip Morris Management Corp./Kraft General Fc

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

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

16. Specific lobbying issues

Sugar Program
Coffee Imporation

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

U.S. House of Representatives
U. S. Senate
Department of Health & Human Services
FDA

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

Name	Covered Official Position (if applicable)
FRANKIE L. TRULL	
KATHLEEN (KAY) HOLCOMBE	
STEVEN L. KOPPERUD	

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

Signature Frankie L. Trull Date 02/03/03

Printed Name and Title FRANKIE L. TRULL, PRESIDENT

