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06 FEB 13 PM 1:

LOBBYING REPORT

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

1. Registrant name Sullivan & Baldick			
2. Address <input type="checkbox"/> Check if different than previously reported 1455 Pennsylvania Avenue, Suite 300 Washington DC 20004 USA			
3. Principal place of business (if different than line 2) City _____ State/Zip or Country _____			
4a. Contact Name Ms. Laurie Sullivan	b. Telephone number (202) 347-9848	c. E-mail lsullivan@sullivanbaldick.com	5. Senate ID # 72111-51
7. Client Name <input type="checkbox"/> Self Citigroup	6. House ID # 35940003		

TYPE OF REPORT 8. Year 2005 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

<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>90,000</u></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 reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇨ \$ _____</p> <p>14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of option:</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Revenue Code</p>
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Edit Form >

Signature *Laurie Sullivan* Date 2/10/05

Printed Name and Title Laurie Sullivan, President

0000052082



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 was 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 - Financial Institutions/Investments/Securities (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"
HR3505 "Financial Services Regulatory Relief Act of 2005"

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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

Signature  Date 2/10/09

Printed Name and Title Laurie Sullivan, President

0000052083



Registrant Name Sullivan & Baldick Client Name Citigroup

ADDENDUM for General Lobbying Issue Area FIN

16. Specific lobbying issues (continued from previous page)

HR.3997 "Financial Data Protection Act of 2005".
HR.4241 "Deficit Reduction Act of 2005"
S.751 "Notification of Risk to Personal Data Act"
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"

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Add page to continue specific issues description for this iss

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 BUD - Budget/Appropriations (one per page)

16. Specific lobbying issues

HR.4241 "Deficit Reduction Act of 2005"
S.1932 "Deficit Reduction Omnibus Reconciliation Act of 2005"

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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

0000052085

Printed Name and Title Laurie Sullivan, President



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 was 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 - Education (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 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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

0000052086

Printed Name and Title Laurie Sullivan, President



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 was 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 - Insurance (one per page)

16. Specific lobbying issues

HR.1153 "Terrorism Insurance Backstop Extension Act of 2005"
HR.4314 "Terrorism Risk Insurance Revision Act of 2005"
S.467 "Terrorism Risk Insurance Extension Act of 2005"

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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

0000052087

Printed Name and Title Laurie Sullivan, President

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 POS - Postal (one per page)

16. Specific lobbying issues

HR.22 "Postal Accountability and Enhancement Act"
S.662 "Postal Accountability and Enhancement 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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

3000052088

Printed Name and Title Laurie Sullivan, President

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 is 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 - Retirement (one per page)

16. Specific lobbying issues

S.861 "Employee Preservation Act of 2005"
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

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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

0000052089

Printed Name and Title Laurie Sullivan, President



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 is 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 - Taxation/Internal Revenue Code (one per page)

16. Specific lobbying issues

HR.1471 "To amend the Internal Revenue Code of 1986 to permanently extend the subpart F exemption for active financing income
HR.1956 "Business Activity Tax Simplification Act of 2005"
HR.2911 "To amend the Internal Revenue Code of 1986 to modify the active business definition under section 355"

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)
Laurie	Sullivan	Ms.	
Tracy	Spicer	Ms.	

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

0000052090

Printed Name and Title Laurie Sullivan, President



Registrant Name Sullivan & Baldick Client Name Citigroup

ADDENDUM for General Lobbying Issue Area TAX

16. Specific lobbying issues (continued from previous page)

S.1159 "A bill to amend the Internal Revenue Code of 1986 to permanently extend the subpart F exemption for active financing"
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"

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