

THE POLICY GROUP, SECRETARY OF THE SENATE

THE WATERGATE 00 APR 20 PM 1:26
2600 VIRGINIA AVE NW
SUITE 408 H.D.
WASHINGTON, DC 20037
TELE: (202) 968-8190
FAX: (202) 968-4037

April 18, 2000

Office of Public Records
U.S. Senate
232 Hart Office Building
Washington, DC 20510

RE: END OF YEAR REPORT (1999) FOR "THE POLICY GROUP"
SENATE IDENTIFICATION NUMBER 52424-12

Dear Sir or Madam:

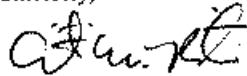
Please find enclosed a copy of my Year-End Lobbying Report for 1999. Due to a clerical error, this report was inadvertently not submitted by the prescribed deadline, and I apologize for my failure to file this report in a timely manner.

It was neither my intention nor my desire to avoid filing this report by its due date. We are a relatively new business, having originally filed our Lobbying Registration in November 1999, and the amount of paperwork requirements for both the District of Columbia and the Federal government has been somewhat daunting. As a result, several items, including this important filing, were temporary misplaced.

Please let me know if you have any questions or need additional information.

Thanking you for your understanding, I am

Sincerely,



Christian M. Richter
President

Enclosure

00 APR 20 PM 1:26

H.D.

LOBBYING REPORT

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

1. Registrant Name <u>The Policy Group</u>			
2. Address ☐ Check if different than previously reported <u>Suite #408, 2600 Virginia Avenue, N.W., Washington, DC 20037</u>			
3. Principal Place of Business (if different from line 2) City: <u>(SAME)</u> State/Zip (or Country):			
4. Contact Name <u>Christian M. Richter</u>		Telephone <u>(202) 965-5790</u>	E-mail (optional) <u>richter.pgroup@aol.com</u>
5. Senate ID # <u>52424-12</u>		6. House ID # <u>34878000</u>	
7. Client Name ☐ Self <u>Surface Finishing Industry Council</u>			

TYPE OF REPORT 8. Year 1999 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	13. Organizations
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for this reporting period were:
Less than \$10,000 ☐	Less than \$10,000 ☐
\$10,000 or more ☒ ⇒ <u>\$60,000</u> Income (nearest \$20,000)	\$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	

Signature

Christian M. Richter

Printed Name and Title Christian M. Richter, President

LD-2 (REV. 6/98)

PAGE 1 of 11

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 ENV (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESHA (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

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

Name	Covered Official Position (if applicable)	New
Christian M. Richter	- NA -	☐
William A. Collins	- NA -	☐
		☐
		☐
		☐
		☐
		☐

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

☒ Check if None

Signature

Christian M. Richter

Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 MAN (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. House + SENATE

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

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Christian M. Richter	- NA -	☐
William A. Collins	- NA -	☐
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		☐
		☐
		☐
		☐

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

☒ Check if None

Signature

Christian M. Richter

Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Form LD-2 (Rev. 8/95)

Page 3 of 11

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 WAS (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

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Environmental Protection Agency
Occupational Safety and Health Administration
U.S. House + SENATE

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William A. Collins	- N/A -	☐
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19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

Signature



Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome WESHAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

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

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Christian M. Richter	- NA -	☐
William A. Collins	- NA -	☐
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19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

Signature

Christian M. Richter

Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 CAW (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

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

Name	Covered Official Position (if applicable)	New
Christian M. Richter	- N/A -	☐
William A. Collins	- N/A -	☐
		☐
		☐
		☐
		☐
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19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

Signature

Christian M. Richter

Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 CHM (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

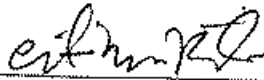
18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New
Christian M. Richter	- NA -	☐
William A. Collins	- NA -	☐
		☐
		☐
		☐
		☐
		☐

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

☒ Check if None

Signature



Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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 AER (one per page)

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

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

Name	Covered Official Position (if applicable)	New
Christian M. Richter	- N/A -	☐
William A. Collins	- N/A -	☐
		☐
		☐
		☐
		☐
		☐

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☒ Check if None

Signature

Christian M. Richter

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April 17, 2000

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Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESNAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

☐ Check if None

Environmental Protection Agency
Occupational Safety and Health Administration
U.S. HOUSE + SENATE

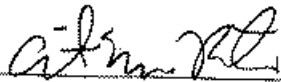
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Christian M. Richter	- NA -	☐
William A. Collins	- NA -	☐
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19. Interest of each foreign entity in the specific issues listed on line 16 above

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Signature



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Registrant Name The Policy Group Client Name Surface Finishing Industry Council

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

16. Specific lobbying issues

- ① Metal Products and Machinery Rulemaking (EPA)
- ② Pretreatment Streamlining Rulemaking (EPA)
- ③ Chrome NESHAAP (EPA)
- ④ Urban Air Toxics Strategy (EPA)
- ⑤ Ergonomics Rulemaking (OSHA)

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

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Occupational Safety and Health Administration
U.S. House + SENATE

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☒ Check if None

Signature

Christian M. Richter

Date

April 17, 2000

Printed Name and Title

Christian M. Richter, President

Registrant Name The Policy Group Client Name Surface Finishing Industry Council

Information Update Page - Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different from line 20)

City

State/Zip (or Country)

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is no longer expected to act as a lobbyist for the client

William A. Collins

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Business (city and state or country)

26. Name of each previously reported organization that is no longer affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the registrant, client or affiliated organization

Signature Christian M. Richter Date April 17, 2000

Printed Name and Title Christian M. Richter, President