

## LOBBYING REPORT

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

1. Registrant Name:

**VENN STRATEGIES LLC**

2. Address:

1101 CONNECTICUT AVENUE NW, STE. 550, WASHINGTON, DC 20036

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

4. Contact Name: SANDRA SWIRSKI

Telephone: 202496-4968

E-mail (optional): sswirski@vennstrategies.com

Senate ID #: 65191-125

House ID #:

7. Client Name:  Self

**CITIGROUP**

### 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 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): 20,000.00

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: VENN STRATEGIES LLC 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: TAX (one per page)

16. Specific lobbying issues:

Proposed regulations imposing payroll withholding on ESPPs and ISOs. S. 1971, National Employee Savings and Trust Equity Act of 2002, exclusion of ISOs and ESPPs from FICA and FUTA wages. H.R. 3762, the Pension Security Act of 2002, exclusion of ISOs and ESPPs from FICA and FUTA wages.

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

Council of Economic Advisers  
HOUSE OF REPRESENTATIVES  
Natl Economic Council (NEC)  
Office of the Vice President of the United States  
SENATE  
Treasury, Dept of  
White House Office

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

Name: HAWLEY, NOELLE  
Covered Official Position (if applicable): N/A  
Name: SILVERMAN, STEPHANIE  
Covered Official Position (if applicable): N/A  
Name: SWIRSKI, SANDRA  
Covered Official Position (if applicable): N/A  
Name: URBAN, ANNE  
Covered Official Position (if applicable): N/A

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

Signature: ON FILE Date: Feb 10, 2003

Printed Name and Title: NOELLE HAWLEY - VICE PRESIDENT