

THE POLICY GROUP, LLC

1120 CONNECTICUT AVENUE NW

SUITE 490

WASHINGTON, DC 20036

TELE: (202) 965-5190

FAX: (202) 965-4037

SECRETARY OF THE SENATE

00 NOV -2 PM 12:19

October 15, 2000

Secretary of the Senate  
Office of Public Records  
232 Hart Senate Office Building  
Washington, DC 20510

To the Senate Office of Public Records:

This letter accompanies my firm's late filing of our January 2000 - June 2000 lobbying report, which is enclosed, in response to your notice of non-receipt.

Our small firm, which is now completing its first year of operation, has been through several staff changes and an office move in recent months, and we had fallen behind in our administration of paperwork and official filings. We expect to address our staffing issues shortly, and do not expect to be late in filing lobbying reports in the future.

We appreciate your notice and your acceptance of this filing.

Sincerely,



Christian M. Richter, President  
The Policy Group, LLC

00 NOV -2 PM 12:18

**LOBBYING REPORT**

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

1. Registrant Name <b>THE POLICY GROUP, LLC</b>			
2. Address <input checked="" type="checkbox"/> Check if different than previously reported <b>1120 CONNECTICUT AVE. NW, SUITE 490</b>			
3. Principal Place of Business (if different from line 2) City: <b>WASHINGTON</b> State/Zip (or Country) <b>DC 20036</b>			
4. Contact Name <b>CHRISTIAN RICHTER</b>		Telephone <b>202-297-0250</b>	E-mail (optional) 5. Senate ID # <b>52424-12</b>
7. Client Name <input type="checkbox"/> Self <b>SURFACE FINISHING INDUSTRY COUNCIL</b>		6. House ID # <b>34878000</b>	

TYPE OF REPORT 8. Year 2000 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><b>12. Lobbying Firms</b></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>30,000</u>  <small>Income (nearest \$20,000)</small></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><b>13. Organizations</b></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"/> ⇒ \$ _____  <small>Expenses (nearest \$20,000)</small></p> <p><b>14. REPORTING METHOD.</b> Check box to indicate expense accounting method. See instructions for description of options.</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 the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature: *Christian Richter*

Printed Name and Title: **President, The Policy Group, LLC**

Registrant Name THE POLICY GROUP, LLC 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 C400 (one per page)

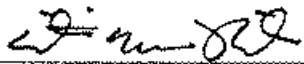
16. Specific lobbying issues  
Section 313 - Emergency Planning and Community Right-to-know Act - TOXIC Release Inventory  
Issues included:   
① EPA's enforcement actions regarding nitrates  
② EPA's interpretations of Section 313 regarding agency guidance

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

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

Name	Covered Official Position (if applicable)	New
<u>Christian Richter</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date 10-15-00  
Printed Name and Title Christian M. Richter, President

Registrant Name THE POLICY GROUP, LLC 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 C4W (one per page)

16. Specific lobbying issues  
Clean Water Act - EPA Effluent Guidelines Rulemaking  
re: Metal Products & Machinery  
Issues include EPA's development of the Metal Products & Machinery rule & associated sampling & surveying of affected industries

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

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

Name	Covered Official Position (if applicable)	New
<u>Christian Richter</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature *Christian Richter* Date 10-15-00  
Printed Name and Title Christian M. Richter, President

Registrant Name THE POLING GROUP, LLC 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 EAY (one per page)

16. Specific lobbying issues

S. 1537 Superfund Amendments & Reauthorization Act, Section 3, relating to Small Business liability

Issues included provisions of Section 3 delineating thresholds below which companies are exempted from liability

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

Senate

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

Name	Covered Official Position (if applicable)	New
<u>Christian Riccetta</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature *Christian Riccetta* Date 10-15-00  
Printed Name and Title Christian M. Riccetta, President

Registrant Name THE PAINT GROUP, LLC Client Name SURFACE FINISHING INDUSTRY

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  
EPA's Strategy on Persistent, Bioaccumulative & Toxic Chemicals (PBTs)  
Issues related specifically to technology used by EPA to label metals as PBT chemicals

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

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

Name	Covered Official Position (if applicable)	New
<u>Christian Riante</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature *Christian Riante* Date 10-15-00  
Printed Name and Title Christian M. Riante, President

Registrant Name THE POLICY GROUP, LLC 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 LBR (one per page)

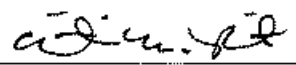
16. Specific lobbying issues  
S. 1070 - Sensible Ergonomics Needs Scientific Evidence (SENSE) Act - Section 3 relating to delaying OSHA standard  
H.R. 987 - Workplace Preservation Act - Section 3 relating to delaying OSHA standard

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

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

Name	Covered Official Position (if applicable)	New
<u>Christian Richter</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature  Date 10-15-00  
Printed Name and Title Christian M. Richter, President

Registrant Name THE POLICY GROUP, LLC 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  
RCRA - EPA project (study of existing far-ion exchange technology from Subtitle C of RCRA)  
(Resource Conservation & Recovery Act)

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

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

Name	Covered Official Position (if applicable)	New
<u>Christian Richter</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

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

Signature [Signature] Date 10-15-00  
Printed Name and Title Christian M. Richter, President

Registrant Name The Policy Group, LLC Client Name SURFACE FINISHING INDUSTRY COUNCIL

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

20. Client new address

NA

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 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

*C Richter*

Date

10-15-00

Printed Name and Title

Christian M. Richter, President

Form LD-2 (Rev. 6-98)

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