

Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510
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LOBBYING REPORT

SECRETARY OF THE SENATE

05 FEB 11 PM 5:21

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

1. Registrant Name

Covington & Burling2. Address ☐ Check if different than previously reported.**1201 Pennsylvania Avenue, NW**

3. Principal Place of Business (if different from line 2)

City: **Washington**State/Zip (or Country) **DC 20**

4. Contact Name Telephone Email (optional)

John C. Dugan (202)662-54155. Senate ID #
11195-10537. Client Name ☐ Self**Forethought Financial Services, Inc.**6. House ID #
31827086TYPE OF REPORT 8. Year 2004 Midyear (January 1-June 30) ☐ OR Year End (July 1-December)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 Act

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 ☒ ⇒ \$ 20,000
Income (nearest \$20,000)

Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income for 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 reporting period were:

Less than \$10,000 ☐\$10,000 or more ☐ ⇒ \$ _____
Expenses (nearest \$20,000)

14. REPORTING METHOD. Check box expense accounting method. See instruction description of options.

☐ Method A. Reporting amounts using LI definitions only☐ Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code☐ Method C. Reporting amounts under 16 Internal Revenue Code

Signature _____

Printed Name and Title

John C. Dugan

Registrant Name Covington & BurlingClient Name Forethought Financial Services

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

15. General issue area code FIN, TAX (one per page)

16. Specific lobbying issues

Regulatory burden relief legislation, tax treatment of funeral trusts

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

☐ Check if None

Senate, House

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

Name

Covered Official Position (if applicable)

John C. Dugan

Roderick C. DeArment

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

☒ Check if None

Signature



Date

February 11, 2005

Signature _____
Printed Name and Title _____

John C. Dugan