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LOBBYING REGISTRATION

Lobbying Disclosure Act of 1995 (Section 4)

Check if this is an Amended Registration ☒

1. Effective Date of
Registration

January 12, 2005

2. House Identification

Senate Identification

Number

31827017

Number

11195330

REGISTRANT

3. Registrant Name **Covington & Burling**

Address **1201 Pennsylvania Avenue, N.W.**

City **Washington**

State **DC**

Zip **20004**

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

City

State/Zip (or Country)

5. Telephone number and contact name

(202) 662-5656

Contact **Mark E. Plotkin**

Email (optional) **mplotkin@co**

6. General description of registrant's business or activities **law firm**

CLIENT

A Lobbying firm is required to file a separate registration for each client. Organizations employing in-house should check the box labeled "Self" and proceed to line 10. ☐ Self

7. Client Name **International Business Machines**

Address **New Orchard Road**

City **Armonk**

State **NY**

Zip **10504**

8. Principal place of business (if different from line 7) **N/A**

City

State/Zip (or Country)

9. General description of client's business or activities **Information Technology and Services**

LOBBYISTS

10. Name of each individual who has acted or is expected to act as a lobbyist for the client identified line 7. If any person listed in this section has served as a "covered executive branch official" or "covered legislative branch official" within two years of first acting as a lobbyist for the client, *state the executive and/or legislative position(s) in which the person served*

Name	Covered Official Position (if applicable)
Mark E. Plotkin	
David M. Marchick	
Martin B. Gold	
Roderick A. DeArment	

Registrant Name Covington & Burling Client Name International Business Machines

LOBBYING ISSUES

11. General lobbying issue areas. Select all applicable codes listed in instructions and on the reverse of Form LD-1, page 1.

TRD

12. Specific lobbying issues (current and anticipated) **Foreign investment**

AFFILIATED ORGANIZATIONS

13. Is there an entity other than the client that contributes more than \$10,000 to the lobbying activities of the registrant in a semiannual period **and** in the whole or major part plans, supervises or controls the registrant's lobbying activities?

☐ No ⇒ Go to line 14.

☐ Yes ↓ Complete the rest of this section for each entity matching the criteria above, then proceed to line 14.

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

FOREIGN ENTITIES

14. Is there any foreign entity that:

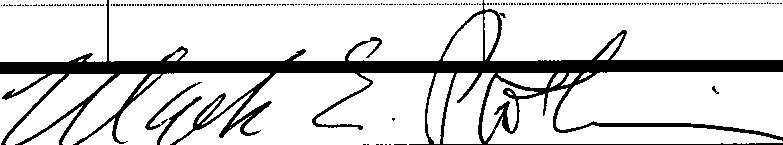
- a) holds at least 20% equitable ownership in the client or any organization identified on line 13;
- b) directly or indirectly, in whole or in major part, plans, supervises, controls, directs, finances or subsidizes activities of the client or any organization identified on line 13; **or**
- c) is an affiliate of the client or any organization identified on line 13 and has a direct interest in the outcome of the lobbying activity?

☐ No ⇒ Sign and date the registration.

☐ Yes ↓ Complete the rest of this section for each entity matching the criteria above, then sign and date the registration..

Name	Address	Principal place of Business (city and state or country)	Amount of contribution for lobbying activities	Ownership percent of client

Signature



Date **January 12, 2005**

