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05 FEB 15 PM 11:00

## LOBBYING REPORT

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

|   |                                  |                   |                                   |
|---|----------------------------------|-------------------|-----------------------------------|
| 1. Registrant Name<br><b>Davis &amp; Harman LLP</b>   |                                  |                   |                                   |
| 2. Address <input type="checkbox"/> Check if different than previously reported<br><b>1455 Pennsylvania Avenue NW; Suite 1200, Washington, DC 20004</b> |                                  |                   |                                   |
| 3. Principal Place of Business (if different from line 2)<br>City: _____ State/Zip (or Country) _____   |                                  |                   |                                   |
| 4. Contact Name<br><b>Janis McClintock</b>  | Telephone<br><b>202/347-2230</b> | E-mail (optional) | 5. Senate ID<br><b>11674-1038</b> |
| 5. Client Name <input type="checkbox"/> Self<br><b>Variable Annuity Life Ins. Co. (VALIC)</b>   |                                  |                   | 6. House ID<br><b>31318082</b>    |

### TYPE OF REPORT

8. Year 2004 Midyear (January 1-June 30)  OR Year End (July 1-December)

9. Check if filing amends a previously filed versions of this report

10. Check if this is a Termination Report  \ Termination Date \_\_\_\_\_

11. No Lobbying Acti

### 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 period were:                                  |
| Less than \$10,000 <input type="checkbox"/>  | Less than \$10,000 <input type="checkbox"/>   |
| \$10,000 or more <input checked="" type="checkbox"/> \ \$ 20,000<br>Income (nearest \$20,000)  | \$10,000 or more <input type="checkbox"/> \ \$<br>Income (nearest \$20,000)                     |
| 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). | 14. REPORTING METHOD. Check box to indicate accounting method. See instructions for descriptive |
|  | <input type="checkbox"/> Method A. Reporting amounts using LDA defin                            |
|  | <input type="checkbox"/> Method B. Reporting amounts under section 602 Internal Revenue Code    |
|  | <input type="checkbox"/> Method C. Reporting amounts under section 162 Revenue Code             |

Signature \_\_\_\_\_

Printed Name and Title \_\_\_\_\_



Registrant Name **Davis & Harman LLP**

Client Name **VALIC**

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach add needed.

15. General issue area code **RET** (one per page)

16. Specific lobbying issues

**Savings proposals in the President's FY 2005 Budget, particularly Employer Retirement Savings Accounts; H.R. 1776, Preservation and Savings Expansion and possible revisions thereto.**

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

**House of Representatives**  
**Senate**

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

| Name                    | Covered Official Position (if applicable) |
|-------------------------|---|
| James M. Delaplane, Jr. |   |
| Kent A Mason            |   |
|                         |   |
|                         |   |
|                         |   |
|                         |   |
|                         |   |

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

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name and Title \_\_\_\_\_



Registrant Name Davis & Harman LLP

Client Name VALIC

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach add: needed.

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

16. Specific lobbying issues

**IRS/Treasury Guidance on non-qualified deferred compensation and commissions.**

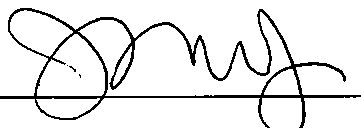
17. House(s) of Congress and Federal agencies contacted  Check if None

**Treasury**

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

| Name                    | Covered Official Position (if applicable) |
|-------------------------|---|
| James M. Delaplane, Jr. |   |
|                         |   |
|                         |   |
|                         |   |
|                         |   |
|                         |   |
|                         |   |

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

Signature 

Date 2/11/05

Printed Name and Title James M. Delaplane, Jr., Partner

