

of the House of Representatives Secretary of the Senate  
 Legislative Resource Center Office of Public Records  
 3-106 Cannon Building 232 Hart Building  
 Washington, DC 20515 Washington, DC 20510

SECRETARY OF THE SENATE

05 JUL 27 PM 3:

# LOBBYING REPORT

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

1. Registrant Name

Covington &amp; Burling

2. 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)

Mark E. Plotkin, Partner

(202) 662-5656

mplotkin@cov.com

5. Senate ID #

11195330

7. Client Name ☐ Self

International Business Machines Corporation

6. House ID #

31827017

**TYPE OF REPORT** 8. Year 2005 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 4/30/05 11. No Lobbying Activities ☐

## 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 ☒ ⇒ \$ 260,000  
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 this reporting period were:

Less than \$10,000 ☐

\$10,000 or more ☐ ⇒ \$ \_\_\_\_\_  
Expenses (nearest \$20,000)

**14. REPORTING METHOD.** Check box to indicate reporting 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 162(e) of the Internal Revenue Code

Signature \_\_\_\_\_ Date July 27, 2005  
Printed Name and Title Mark E. Plotkin, Partner

Registrant Name

**Covington & Burling**

Client Name

**International Business Machines Corporation**

**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 code, provide information as requested. Attach additional page(s) as needed.**

15. General issue area code TRD (one per page)

16. Specific lobbying issues

**Trade and investment issues.**

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

☐ Check if None

**United States Senate; House of Representatives; Executive Office of the President; Department of Commerce; Department of Justice; Department of State; Department of the Treasury; Office of the Trade Representative.**

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

Name

Covered Official Position (if applicable)

**Mark E. Plotkin**

**David M. Marchick**

**Martin B. Gold**

**Floor Assistant and Advisor to the Senate  
Majority Leader**


**Roderick A. DeArment**

**Peter L. Flanagan**

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

☒ Check if No

Signature



Date

**July 27 2005**

Signature \_\_\_\_\_ Date July 27, 2005  
Printed Name and Title Mark E. Plotkin, Partner