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LOBBYING REPORT

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

1. Registrant Name

Covington & Burling

2. Address ☐ Check if different than previously reported.

**1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004**

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

City: **Washington**

State/Zip (or Country) **D.C. 20004**

4. Contact Name

Stuart C. Stock

Telephone

(202) 662-5384

Email (optional)

5. Senate ID #

11195-606

7. Client Name ☐ Self

Sun Life Assurance Company of Canada (U.S.)

6. House ID #

31827054

TYPE OF REPORT 8. Year **1999** 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

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000 ☒

\$10,000 or more ☐ ⇒ \$ _____
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 expense accounting 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(c) of the Internal Revenue Code

Signature

David N. Brown

Date **July 28, 1999**

Printed Name and Title

David N. Brown

Registrant Name Covington & Burling

Client Name Sun Life Assurance Company of
Canada (U.S.)

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 RAN (one per page)

16. Specific lobbying issues

H.R. 10. Proposed termination of thrift charter and required conversion of thrifts to banks; treatment of thrift holding companies in connection with conversions.

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

☐ Check if None

House of Representatives

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

Name	Covered Official Position (if applicable)	New
Stuart C. Stock		<input type="checkbox"/>
Gerard J. Waldron		<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

David N. Brown

Date

July 28, 1999

Printed Name and Title

David N. Brown

Registrant Name **Covington & Burling**

Client Name **Sun Life Assurance Company of
Canada (U.S.)**

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

20. Client new address

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

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
Sun Life Assurance Company of Canada	150 King Street West Toronto, Ontario CANADA M5H1J9	150 King Street West Toronto, Ontario CANADA M5H1J9	- 0 -	100%

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

David N. Brown

Date

July 28, 1999

Printed Name and Title

David N. Brown