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SECRETARY OF THE SENATE

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

- | | | |
|--|---------------------------------------|---|
| 1. Registrant Name
Covington & Burling | | 4. |
| 2. Address <input type="checkbox"/> Check if different than previously reported.
1201 Pennsylvania Avenue, N.W. | | 5. |
| 3. Principal Place of Business (if different from line 2) | | |
| City: Washington | State/Zip (or Country) DC/2000 | |
| 4. Contact Name
Roderick A. DeArment | Telephone
202-662-5900 | Email (optional)
rdearment@cov.com |
| 7. Client Name <input type="checkbox"/> Self
American Council on Education | | 5. Senate ID # |
| | | 6. House ID # |
| TYPE OF REPORT 8. Year <u>2003</u> Midyear (January 1-June 30) <input type="checkbox"/> OR Year End (July 1-December 31) <input type="checkbox"/> | | |
| 9. Check if this filing amends a previously filed version of this report <input type="checkbox"/> | | |
| 10. Check if this is a Termination Report <input type="checkbox"/> ⇒ Termination Date _____ | | 11. No Lobbying Activities <input type="checkbox"/> |

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 the reporting period were:

Less than \$10,000 ☐

\$10,000 or more ☐ ⇒ \$_____

- 14. REPORTING METHOD.** Check box to expense accounting method. See instruction 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 February 17, 2004
Printed Name and Title **Roderick A. DeArment**

DC: 1232676-1

Registrant Name Covington & Burling Client Name American Council on Education

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which 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 TAX (one per page)

16. Specific lobbying issues

The deduction of donations of patents and other intellectual property

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

House of Representatives
United States Senate
Department of Treasury

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

Name	Covered Official Position (if applicable)
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Roderick A. DeArment

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

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Signature 
Printed Name and Title **Roderick A. DeArment, Partner**

Date February 17, 2004