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# LOBBYING REPORT

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

1. Registrant Name

**Covington & 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 201**

4. Contact Name

**John C. Dugan**

Telephone

**(202)662-5415**

Email (optional)

5. Senate ID #

**11195-1053**

7. Client Name ☐ Self

**Forethought Financial Services, Inc.**

6. House ID #

**31827086**

**TYPE OF REPORT** 8. Year 2003 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 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 ☐ ⇒ \$ \_\_\_\_\_  
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 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 instruction for description of options.

☐ **Method A.** Reporting amounts using LD definitions only

☐ **Method B.** Reporting amounts under section 6033(b)(8) of the Internal Revenue Code

☐ **Method C.** Reporting amounts under 162 Internal Revenue Code

Signature \_\_\_\_\_

Date August 11, 2003

Printed Name and Title

**John C. Dugan**

Registrant Name Covington & BurlingClient Name Forethought Financial Services

**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 FIN (one per page)

16. Specific lobbying issues

**Regulatory burden relief legislation**

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

☐ Check if None

**Senate, House**

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

Name

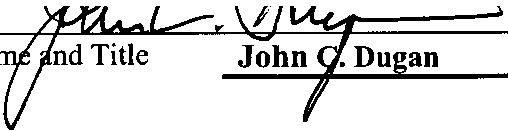
Covered Official Position (if applicable)

**John C. Dugan**

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

☒ Check if None



Signature  Date August 11, 2003  
Printed Name and Title John C. Dugan