

COVINGTON & BURLING

SECRETARY OF THE SENATE

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SAN FRANCISCO

00 APR 17 AM 8:45

H.O.

DAVID N. BROWN
TEL 202.662.6236
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DBROWN@COV.COM

April 11, 2000

Secretary of the Senate
Senate Office of Public Records
232 Hart Senate Office Building
Washington, D.C. 20510

Re: Sun Life Assurance Company of
Canada (U.S.) -- ID: 318270054
Notice of Non-Receipt, April 4, 2000

Ladies and Gentlemen:

Enclosed is a Termination Report to terminate Covington & Burling's registration
with respect to this client.

Very truly yours,



David N. Brown

DNB/ja
Enclosure

00 APR 17 AM 8:45

H.D.

LOBBYING REPORT

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

1. Registrant Name Covington & Burling	
2. Address <input type="checkbox"/> 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 <input type="checkbox"/> Self Sun Life Assurance Company of Canada (U.S.)	6. House ID # 31827054
TYPE OF REPORT 8. Year 2000 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 checked="" type="checkbox"/> ⇨ Termination Date 04/10/00 11. No Lobbying Activity <input checked="" type="checkbox"/>	

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: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇨ \$ _____ 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.)	EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇨ \$ _____ Expenses (nearest \$20,000) 14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> Method A. Reporting amounts using LDA definitions only <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under 162(e) of the Internal Revenue Code

Signature David N. Brown Date April 11, 2000
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 BAN (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

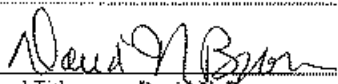
18. Name of each individual who acted as a lobbyist in this issue area

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



Date April 11, 2000

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

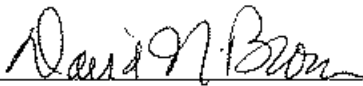
Date **April 11, 2000**

Printed Name and Title

David N. Brown

Registrant Name Covington & Burling

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

Signature  Date April 11, 2000
Printed Name and Title David N. Brown