Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515

Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510

Secretary of the Senate Received: Jul 26, 2006

LOBBYING REGISTRATION Lobbying Disclosure Act of 1995 (Section 4)	
Check if this is an Amended Registration	1. Effective Date of Registration Jun 05, 2006
2. House Identification Number	Senate Identification Number 11195-2765
REGISTRANT 3. Registrant Name: COVINGTON & BURLING, LLP Address: 1201 Pennsylvania Avenue, NW City: Washington State: DC Zip: 20004-	
Principal place of business (if different from line 3): City: State/Zip(or Country):	
 Telephone number and contact name: 202-662-5396 Contact: WILLIAM WICHTERMAN E-mail(optional): bwichterman@cov.com 	
General description of registrant's business or activities: law firm	
CLIENT A Lobbying firm is required to file a separate registration for each client. labeled "Self" and proceed to line 10.	Organizations employing in-house lobbyists should check the box
Self	
 Client name: CLUB FOR GROWTH STATE ACTION Address: 2001 L STREET, NW, ST. 600 City: WASHINGTON State: DC Zip: 20036 	
Principal place of business (if different from line 7): City: State/Zip(or Country): USA	
General description of client's business or activities: to enact pro-growth economic policies by state governments	
LOBBYISTS	

10. Name of each individual who has acted or is expected to act as a lobbyist for the client identified on line 7. If any person listed in this section has served as a "covered executive branch official" or "covered legislative branch official" within two years of first acting as a lobbyist for the client, state the executive and/or legislative position(s) in which the person served.

Name: GOLD, MARTIN

Covered Official Position (if applicable): COUNSEL, SENATE MAJORITY LEADER BILL FRIST Name: LETCHWORTH, ELIZABETH

Covered Official Position (if applicable):

Name: WICHTERMAN, WILLIAM

Covered Official Position (if applicable): POLICY ADVISOR, SENATE MAJORITY LEADER BILL FRIST

LOBBYING ISSUES

11. General lobbying issue areas. Select all applicable codes listed in instructions and on the reverse side of Form LD-1, page 1:

LAW

12. Specific lobbying issues (current and anticipated):

oppose legislation to regulate 527 groups

AFFILIATED ORGANIZATIONS

Page 1

Registrant Name: COVINGTON & BURLING, LLP Client Name: CLUB FOR GROWTH STATE ACTION

13. Is there an entity other than the client that contributes more than \$10,000 to the lobbying activities of the registrant in a semi-annual period and 13. Is there an entity other than the client that contributes more than \$10,000 to the lobbying activities of the registrant in a semi-annual periodin whole or in major part plans, supervises or controls the registrant's lobbying activities?
X No, then go to line 14.
Yes, then complete the rest of this section for each entity matching the criteria above, then proceed to line 14.
FOREIGN ENTITIES 14. Is there any foreign entity that: a) holds at least 20% equitable ownership in the client or any organization identified on line 13; OR b) directly or indirectly, in whole or in major part, plans, supervises, controls, directs, finances or subsidizes activities of the client or any organization identified on line 13; OR c) is an affiliate of the client or any organization identified on line 13 and has a direct interest in the outcome of the lobbying activity?
No, then sign and date the registration. Yes, then complete the rest of this section for each entity matching the criteria above, then sign and date the registration.
Signature: ON FILE Date: Jul 26, 2006
Printed Name and Title: WILLIAM WICHTERMAN, SR. LEGISLATIVE ADVISOR

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