

COVINGTON & BURLING

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WASHINGTON
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SECRETARY
03 FEB 25

February 12, 2003

BY HAND DELIVERY

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

Dear Sir or Madame:

✓ I enclose an original and a copy of Covington & Burling's year-end lobbying report for the following clients: Brown & Williamson Tobacco Corporation; Lorillard Tobacco Company; Philip Morris Management Corporation, and R.J. Reynolds Tobacco Company. Please return the originals, and date-stamp and return the copies.

Please contact me if you have any questions or require additional information.

Sincerely,


Keith A. Teel

Enclosures
KT/hs

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
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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 <input type="checkbox"/> Check if different than previously reported 1201 Pennsylvania Avenue, N.W.			
3. Principal Place of Business (if different from line 2) City: Washington State/Zip (or Country) D.C. 20004			
4. Contact Name Keith A. Teel	Telephone 202-662-5501	E-mail (optional)	5. Senate ID # 11195-
7. Client Name <input type="checkbox"/> Self Brown & Williamson Tobacco Corp.			6. House ID # 318270

TYPE OF REPORT 8. Year 2002 Midyear (January 1-June 30) ☐ OR Year End (July 1-D

9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☒ ⇒ Termination Date 12/31/02

11. No Lobby

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input checked="" type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p align="center">13. Organizations</p> <p>EXPENSES relating to lobbying activities for this period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA de</p> <p><input type="checkbox"/> Method B. Reporting amounts under section Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section Internal Revenue Code</p>
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Signature

Keith Teel

Printed Name and Title Keith A. Teel, Partner

LD-2 (REV. 6/98)

Registrant Name Covington & Burling Client Name Brown & Williamson Tobacco Co. ^{SEC 03}

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant was engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code and attach additional page(s) as needed.

15. General issue area code N/A (one per page)

16. Specific lobbying issues

N/A

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

☒ Check if None

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

Name	Covered Official Position (if applicable)
N/A	

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

☒ Check if None

Signature

Keith Tool

Date

Feb 12

Printed Name and Title Keith A. Teel, Partner

Form LD-2 (Rev. 6/98)

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Registrant Name Covington & Burling Client Name Brown & Williamson Tobacco Cor

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

Keith A. Teel

ISSUE UPDATE

24. General lobbying issues previously reported that no longer pertain

All

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of E (city and state or c

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

28. Name of each previously reported foreign entity that no longer owns, or controls, or is affiliated with the registered affiliated organization

Signature Keith A Teel Date Feb 12,
Printed Name and Title Keith A. Teel