

COVINGTON & BURLING

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SECRETARY OF
JOHN C. DUGAN
04 FEB 11
TEL 202.662.5415
FAX 202.778.5415
JDUGAN@COV.COM

00000462304

February 11, 2004

BY HAND

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

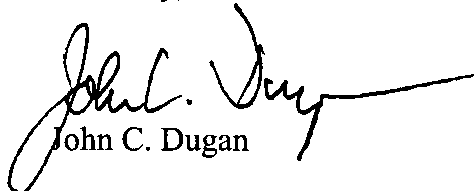
Re: Forethought Financial Services, Inc. - ID: 11195-1053
Response to Notice of Non-Receipt of Lobbying Disclosure
Act Filing, January 9, 2004

To Whom It May Concern:

Please find enclosed a copy of our letter to the Office of the Clerk of the House of Representatives, with attachments, regarding the semiannual report for January 2002 through June 30, 2002 for Forethought Financial Services, Inc. As discussed there are now filing a report covering that period.

Please let me know if you have questions.

Sincerely,


John C. Dugan

Enclosures

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00000462305

February 11, 2004

BY HAND

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

Re: Forethought Financial Services, Inc. - ID: 31827086
Response to Notice of Non-Receipt of Lobbying Disclosure
Act Filing, January 9, 2004

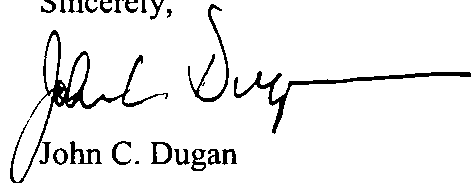
Dear Mr. Trandahl:

By letter dated January 9, 2004, the Office of the Clerk of the U.S. House of Representatives notified Covington & Burling that the Clerk had not received a semiannual report or termination for Forethought Financial Services Inc. ("Forethought") for the period January 1, 2002 through June 30, 2002. (See attached letter). This was an oversight, and we did register for Forethought during that period (on February 1, 2002), but engaged in little lobbying activity during that initial semiannual period (less than \$20,000). Covington & Burling has filed regular and timely semiannual reports for Forethought for each semiannual period since that initial period.

Accordingly, enclosed is our semiannual report for Forethought for the period January 1, 2002 through June 30, 2002. We are simultaneously sending a copy of this report and an identical semiannual report to the Secretary of the Senate.

Please let me know if you have any questions.

Sincerely,


John C. Dugan

Enclosures

JEFF TRANDAHL
CLERK

GERASIMOS C. VANS
DEPUTY CLERK

Office of the Clerk
U.S. House of Representatives
Washington, DC 20515-6601

00000462306

January

COVINGTON & BURLING
1201 PENNSYLVANIA AVENUE, NW
WASHINGTON, DC 20004

Re: FORETHOUGHT FINANCIAL SERVICES, INC - ID: 31827086

FIRST NOTICE OF NON-RECEIPT

The Lobbying Disclosure Act of 1995, 2 USC 1601-1612, empowers the Clerk of the House of Representatives to verify and inquire to ensure the timeliness of registrations and reports.

A review of Reports on file with the Legislative Resource Center indicates that you neither terminated your registration nor submitted a report for the period January 1, 2002 to March 30, 2002, which was due by August 14, 2002.

Please provide us (within 30 days) with an appropriate filing and written explanation of any delinquency.

For further information, please contact the Legislative Resource Center, B106 Cannon House Office Building, Washington, DC, (202) 226-5200.

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|---|--|
| 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 |
|---|--|

LOBBYING REPORT

SECRETARY OF

04 FEB 11

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

1. Registrant Name

Covington & Burling2. 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 200**

4. Contact Name

John C. Dugan

Telephone

(202)662-5415

Email (optional)

5. Senate ID #

11195-10537. Client Name ☐ Self**Forethought Financial Services, Inc.**

6. House ID #

31827086TYPE OF REPORT 8. Year **2002** 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 Act ☐

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.)

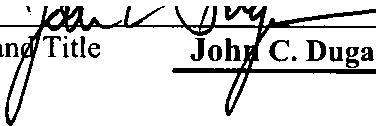
13. Organizations

EXPENSES relating to lobbying activities for reporting period were:

Less than \$10,000 ☐\$10,000 or more ☐ ⇒ \$ _____
Expenses (nearest \$20,000)

14. REPORTING METHOD. Check box to indicate reporting method. See instructions 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 February 11, 2004
Printed Name and Title John C. Dugan

Registrant Name Covington & BurlingClient Name Forethought Financial Ser

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue area registrant engaged in lobbying on behalf of the client during the reporting period. **Using a separate 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

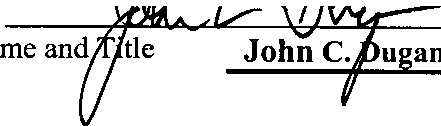
Name

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 No

Signature  Date February 11, 2004
Printed Name and Title John C. Dugan