

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

SECRETAR
04 APR -

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 Ave, NW, Washington DC 20004			
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name Richard C. Shea	Telephone (202) 662-5599	E-mail (optional)	5. Senate ID #
7. Client Name <input type="checkbox"/> Self International Business Machines Corporation			6. House ID #

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

<p>12. Lobbying Firms</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>220,000</u> 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>13. Organizations</p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description of methods.</p> <p><input type="checkbox"/> Method A: Reporting amounts using LDA definition</p> <p><input type="checkbox"/> Method B: Reporting amounts under section 60 Internal Revenue Code</p> <p><input type="checkbox"/> Method C: Reporting amounts under section 16 Internal Revenue Code</p>
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Signature _____

Printed Name and Title _____

LD-2 (REV. 6/98)

Registrant Name Covington & Burling Client Name International Business Machines Corporati

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

15. General issue area code RET (one per page)

16. Specific lobbying issues

Administrative guidance and legislation relating to hybrid defined benefit plans

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

☐ Check if None

United States Senate
United States House of Representatives
Department of the Treasury

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

Name	Covered Official Position (if applicable)
Richard C. Shea	
Robert S. Newman	

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

☒ Check if None

Signature

Richard C. Shea

Date

February 17, 2004

Signature _____ Date _____

Printed Name and Title Richard C. Shea, Partner

Form LD-2 (Rev.6/98)

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