

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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SECRETARY OF THE SENATE

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LOBBYING REPORT

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

1. Registrant Name Caplin & Drysdale, Chartered			
2. Registrant Address <input type="checkbox"/> Check if different than previously reported Address One Thomas Circle NW, Ste 1100 City Washington State/Zip (or Country) DC 20005			
3. Principal Place of Business (if different from line 2) City _____ State/Zip (or Country) _____			
4. Contact Name Terri Ballard	Telephone 202/862-5095	E-mail (optional) tb@capdale.com	5. Senate ID # 8203-90
7. Client Name <input type="checkbox"/> Self Variable Annuity Life Insurance Company			6. House ID # 31112009

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

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

10. Check if this is a Termination Report >> Termination Date 8/7/2002 11. No Lobbying

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms	13. Organizations
<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>\$20,000.00</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>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 reporting accounting method. See instructions for description of method.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definition</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(e) of the Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>

Signature *Terri Ballard* Date 2/4/2004

Printed Name and Title Terri Ballard - Firm Administrator Page

Registrant Name: Caplin & Drysdale, Chartered

Client Name: Variable Annuity Life Insurance Company

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 TAX (one per page)
- 16. Specific Lobbying issues
See attached.

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- 17. House(s) of Congress and Federal agencies contacted Check if None
House of Representatives
Joint Committee on Taxation

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

Name	Covered Official Position (if applicable)
Mason, Kent	

- 19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature Terri Ballard Date 2/4/2004

Printed Name and Title Terri Ballard - Firm Administrator Page

Variable Annuity Life Insurance Company

Applicability of the following bills to plans not covered by ERISA:

H.R. 3669

Employee Retirement Savings Bill of Rights

S. 1971

National Employee Savings and Trust Equity Guarantee Act

Finance Committee bill being developed with respect to retirement plan investment issues.



Caplin & Drysdale, Chartered
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www.caplindrysdale.com

Sharon P. Light
202-862-5099 Direct
spl@capdale.com

February 6, 2004

VIA HAND DELIVERY

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

Re: Variable Annuity Life Insurance Company, 8203-90

Dear Secretary of the Senate:

I enclose the termination report for the registrant referenced above. The termination was effective August 7, 2002. Because of the departure from our firm of Kent Mason on August 7, 2002, and a miscommunication with the person at our firm who handled filings in compliance with the Lobbying Disclosure Act, we were unaware that termination report had not been filed until we received a letter from your office notifying us that the mid-year 2002 report for Edward Jones Investments, another client of Kent Mason's, had not been filed.

Should you have further questions, please contact me at 202-862-5099.

Sincerely,

Sharon P. Light

Enclosures

DOC# 211489 v2 - 02/06/2004