

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

SECRETARY OF THE SENATE

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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 #

11195-517. Client Name Self**American Bankers Association**

6. House ID #

31827002TYPE OF REPORT 8. Year 2002 Midyear (January 1-June 30) OR Year End (July 1-December)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 ⇨ \$ _____
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 1 expense accounting method. See instruction description of options.

 Method A. Reporting amounts using LE definitions only Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code Method C. Reporting amounts under section 16 Internal Revenue Code

Signature _____

Date February 15, 2005

Printed Name and Title

John C. Dugan

Registrant Name Covington & Burling

Client Name American Bankers Association

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

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

16. Specific lobbying issues

Financial privacy legislation

17. House(s) of Congress and Federal agencies contacted Check if None

Senate, House

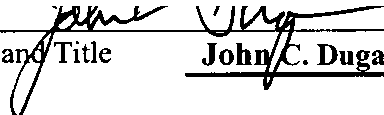
18. Name of each individual who acted as a lobbyist in this issue area

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 N



Signature  Date February 13, 2003
Printed Name and Title John C. Dugan