

COVINGTON & BURLING

SECRETARY OF

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GERARD J. WALDRON
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05 APR 12

April 12, 2005

Hand Delivered

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

Re: American Automobile Association ("AAA") - ID #11195-1115

Dear Sir or Madam:

Enclosed are our reports for American Automobile Association ("AAA") for the time period January 1-June 30, 2004 and for the time period July 1-December 31, 2004. It has come to my attention that these reports were not filed, evidently because we had no lobbying activity during those timeframes. In addition, enclosed is our Termination Report since we continue to have no lobbying activity for this client. Please accept these filings and if you have any questions or want to discuss this matter, please contact the undersigned.

Sincerely,



Gerard J. Waldron

GJW/csg

Enclosures

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

LOBBYING REPORT

05 APR 12 PM 3:00

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, N.W.**

3. Principal Place of Business (if different from line 2)

City: **Washington**

State/Zip (or Country)

D.C. 200

4. Contact Name

Telephone

Email (optional)

5. Senate ID #

Gerard J. Waldron**(202) 662-5360****gwaldron@cov.com****11195-1115**7. Client Name ☐ Self

6. House ID #

American Automobile Association**31827080****TYPE OF REPORT** 8. Year **2004** 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 Activity ☐**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.)

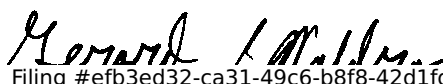
13. Organizations

EXPENSES relating to lobbying activities for the reporting period were:

Less than \$10,000 ☐\$10,000 or more ☐ ⇒ \$ _____
Expenses (nearest \$20,000)**14. REPORTING METHOD.** Check box to indicate expense accounting method. See instructions for description of options.


- ☐ **Method A.** Reporting amounts using LDA definitions only
- ☐ **Method B.** Reporting amounts under section 6033(b)(8) of the Internal Revenue Code
- ☐ **Method C.** Reporting amounts under 162(e) Internal Revenue Code

Signature



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April 12, 2005

Signature  Date April 12, 2005
Printed Name and Title Gerard J. Waldron

DC: 1555978-1

Registrant Name Covington & Burling Client Name American Automobile Association

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 AUT TRA (one per page)

16. Specific lobbying issues

Highway safety and consumer safety - Oversight of highway safety and consumer access to safety devices and no specific legislative proposals.

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

☐ Check if None

U.S. House of Representatives

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

Name


Covered Official Position (if applicable)

Geard J. Waldron

Partner

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

☒ Check if None

Signature  Date April 12, 2005
Printed Name and Title Gerard J. Waldron

Registrant Name Covington & Burling Client Name American Automobile Association

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

ISSUE UPDATE

24. General lobbying issues previously reported that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Business (city and state or country)

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	Ownership percentage client

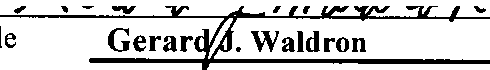
28. Name of each previously reported foreign entity that **no longer** owns, **or** controls, **or** is affiliated with registrant, client or affiliated organization

Signature

Kenneth J. Muldrew
Filing #efb3ed32-ca31-49c6-b8f8-42d1fddd9b5c - Page 7 of 8

Date

April 12, 2005

Signature  Date April 14, 2003
Printed Name and Title Gerard J. Waldron