

# LOBBYING REPORT

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

<b>1. Registrant Name</b> <input checked="" type="checkbox"/> Organization/Lobbying Firm <input type="checkbox"/> Self Employed Individual <b>Covington &amp; Burling LLP</b>			
<b>2. Address</b> <input type="checkbox"/> Check if different than previously reported Address1 <b>1201 Pennsylvania Avenue, NW</b> Address2 _____ City <b>Washington</b> State <b>DC</b> Zip Code <b>20004</b> - Country <b>USA</b>			
<b>3. Principal place of business (if different than line 2)</b> City _____ State _____ Zip Code _____ - Country _____			
<b>4a. Contact Name</b> <b>RICHARD C. SHEA</b>	<b>b. Telephone Number</b> <input type="checkbox"/> International Number <b>(202) 662-5599</b>	<b>c. E-mail</b> <b>rshea@cov.com</b>	<b>5. Senate ID#</b> <b>11195-137</b>
<b>7. Client Name</b> <input type="checkbox"/> Self <input type="checkbox"/> Check if client is a state or local government or instrumentality <b>BANK OF AMERICA</b>			<b>6. House ID#</b> <b>318270029</b>

**TYPE OF REPORT** 8. Year 2008 Q1 (1/1 - 3/31)  Q2 (4/1 - 6/30)  Q3 (7/1-9/30)  Q4 (10/1 - 12/31)

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

10. Check if this is a Termination Report  Termination Date 09/30/2008 11. No Lobbying Issue Activity

## INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13

12. Lobbying	13. Organizations
<b>INCOME</b> relating to lobbying activities for this reporting period was: <u>Less than \$5,000</u> <input checked="" type="checkbox"/> <u>\$5,000 or more</u> <input type="checkbox"/> \$ _____ Provide a good faith estimate, rounded to the nearest \$10,000, 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).	<b>EXPENSE</b> relating to lobbying activities for this reporting period were: <u>Less than \$5,000</u> <input type="checkbox"/> <u>\$5,000 or more</u> <input type="checkbox"/> \$ _____ <b>14. REPORTING</b> Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definitions only <input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(e) of the Internal Revenue Code

Signature Filed Electronically Date 10/31/2008

Printed Name and Title Richard C. Shea, Partner

**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. Add additional page(s) as needed.

15. General issue area code   (one per page)

16. Specific lobbying issues

None

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

[Empty box for listing House(s) of Congress and Federal agencies]

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

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Richard	Shea			<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>
				<input type="checkbox"/>

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

[Empty box for listing interest of each foreign entity]

Printed Name and Title Richard C. Shea, Partner