

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For Six Month Period Ending Aug. 31, 2015

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

(b) Registration No.

Covington & Burling LLP

5852

(c) Business Address(es) of Registrant

850 Tenth Street, N.W.
Washington, D.C. 20001

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes No (2) Citizenship Yes No (3) Occupation Yes No

(b) If an organization:

(1) Name Yes No (2) Ownership or control Yes No (3) Branch offices Yes No

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

From time to time, partners not associated with the foreign principals join or leave the partnership.

In March 2015, the firm opened an office in Los Angeles at 2029 Century Park East, Ste. 3100, Los Angeles, CA 90067.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.Yes No If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

N/A: Waiver granted February 5, 2008.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position	Date Connection Ended
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From time to time, partners not associated with the foreign principals join or leave the partnership.

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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From time to time, partners not associated with the foreign principals join or leave the partnership.

5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes No

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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Maria Paula Uribe	Policy Advisor	June 19, 2015
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No
- If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
- If yes, furnish the following information:

Name and Address of Foreign Principal(s)

Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

Corporación Colombia Internacional
Government of Spain

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No

Exhibit B⁴ Yes No

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, identify each foreign principal and describe in full detail your activities and services:

See attachment.

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12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See attachment.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS-MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If no, explain why.

Covington received no payments from Corporación Colombia Internacional or the Government of Spain in this period.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom	Purpose	Amount
			Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, have you filed an Exhibit D⁸ to your registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

(c) RECEIPTS-THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No
- (2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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See attachment.

Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes No

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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See attachment.

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- Radio or TV broadcasts
- Magazine or newspaper
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Other (specify) _____

Electronic Communications

- Email
- Website URL(s): _____
- Social media websites URL(s): _____
- Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- Public officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (specify) _____

21. What language was used in the informational materials:

- English
- Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes No

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

September 30, 2015

/s/ Peter L. Flanagan

eSigned

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Supplemental Statement
Covington & Burling LLP
March 1, 2015 – August 31, 2015
Question 11

Government of Spain

Covington assists the Government of Spain with U.S. legislative and related policy matters potentially affecting the interests of Spain with respect to sunken vessels and their remains including potential amendments to the Sunken Military Craft Act. As detailed in the registration filed on June 3, 2011, Covington also serves as counsel to Spain in litigation related to sunken vessels and their remains. On March 26 and 27, 2015, James Goold delivered remarks concerning litigation related to sunken vessels and their remains to the Lawyers' Committee for Cultural Heritage Preservation at an event at the University of Pennsylvania.

Corporación Colombia Internacional

Covington & Burling LLP will review documentation provided by the foreign principal and the Colombian Ministry of Agriculture and consult with relevant United States government agencies, and other stakeholders, to ascertain the current status of the U.S. Department of Agriculture's approval process for the export of Colombian crops to the United States, in light of the obligations the United States may have under the U.S.-Colombia Free Trade Agreement. The crops include hass avocados, peppers, watermelon, melon, mango and beef. Following this analysis, Covington & Burling LLP will propose specific steps the Covington would take, working with the foreign principal, to achieve the foreign principal's market access objectives.

Supplemental Statement
Covington & Burling LLP
March 1, 2015 – August 31, 2015
Question 12

Corporación Colombia Internacional

M. Paula Uribe

Date	Name	Position	Type	Subject Matter
3/6/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	M	Agricultural exports from Colombia.
3/9/15	Elvis Cordova	Deputy Under Secretary, Marketing and Regulatory Programs, USDA	E	Agricultural exports from Colombia.

Key: E = E-mail, M = Meeting, T = Telephone Call

Supplemental Statement
 Covington & Burling LLP
 March 1, 2015 – August 31, 2015
 Question 15(a)

Corporación Colombia Internacional

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
4/7/15	Employee reimbursement	FARA filing fee	305.00
Various	Various	Telecommunications	21.06
		Total	<u>326.06</u>

Government of Spain

<u>Date</u>	<u>To Whom</u>	<u>Purpose</u>	<u>Amount</u>
4/7/15	Employee reimbursement	FARA filing fee	305.00
5/21/15	Employee reimbursement	J. Goold Travel/Philadelphia	670.27
		Total	<u>975.27</u>

On March 26 and 27, 2015, James Goold delivered remarks concerning litigation related to sunken vessels and their remains to the Lawyers' Committee for Cultural Heritage Preservation at an event at the University of Pennsylvania.

Covington & Burling LLP disbursed expenses for legal and related services for the Government of Spain that would not require registration under the Foreign Agents Registration Act, including expenses for legal research, travel, telecommunications, court filing fees, duplicating, printing, and postal and delivery services.

Supplemental Statement
 Covington & Burling LLP
 March 1, 2015 – August 31, 2015
 Question 15(c)

Covington & Burling LLP PAC

3/4/2015	Leahy for U.S. Senator	\$3,000
3/4/2015	Leahy for U.S. Senator	\$2,000
3/12/2015	Whitehouse for Senate	\$1,000
3/12/2015	True North PAC	\$2,500
3/16/2015	Friends of Kelly Ayotte	\$1,500
3/18/2015	Richmond for Congress	\$1,000
3/19/2015	David Vitter for Senate	\$2,000
3/23/2015	Jim Jordan for Congress	\$5,000
3/25/2015	Friends of Mike Lee	\$1,000
3/25/2015	Louise Slaughter Re-Election Committee	\$2,500
3/25/2015	Jeff Fortenberry for U.S. Congress	\$1,000
4/9/2015	Thomas Massie for Congress	\$2,500
4/9/2015	Blaine for Congress	\$1,000
4/15/2015	Steve Chabot for Congress	\$1,000
4/15/2015	Comstock for Congress	\$1,000
4/16/2015	Blumenthal for Connecticut	\$5,000
4/16/2015	Friends of John McCain	\$5,000
4/24/2015	BAM-PAC	\$1,500
4/29/2015	Scott Garrett for Congress	\$1,000
5/6/2015	Friends of Roy Blunt	\$2,500
5/6/2015	JEB Fund	\$2,500
5/7/2015	Kurt Schrader for Congress	\$1,000
5/7/2015	Elizabeth Esty for Congress	\$2,500
5/7/2015	Visclosky for Congress	\$1,000
5/7/2015	Rodney Davis for Congress	\$1,000
5/8/2015	Blue Hen PAC	\$5,000
5/12/2015	Thom Tillis Committee	\$1,000
5/12/2015	Feinstein for Senate 2018	\$5,000
5/15/2015	Yarmuth for Congress	\$1,000
5/28/2015	Friends of Pat Toomey	\$5,000
5/29/2015	Cathy McMorris Rodgers for Congress	\$2,000
5/29/2015	Lowey for Congress	\$2,500
5/29/2015	Democratic Senatorial Campaign Comm.	\$15,000
6/3/2015	Friends of Kelly Ayotte	\$1,500
6/3/2015	The Richard Burr Committee	\$1,000
6/3/2015	Ron Johnson for Senate	\$3,000
6/3/2015	Moran for Kansas	\$1,000
6/3/2015	Lisa Murkowski for U.S. Senate	\$2,000
6/5/2015	Lofgren for Congress	\$1,000

6/11/2015	Friends of Schumer	\$1,000
6/11/2015	Hatch Election Committee	\$1,000
6/11/2015	Collins for Congress	\$2,500
6/11/2015	Leadership for Today and Tomorrow	\$1,000
6/11/2015	Friends of Jim Clyburn	\$1,500
6/12/2015	Murphy for Congress	\$1,500
6/12/2015	Friends of Heck	\$1,000
6/12/2015	Issa for Congress	\$2,500
6/12/2015	Texans for Lamar Smith	\$2,500
6/12/2015	Montanans for Tester	\$1,000
6/12/2015	Gohmert for Congress	\$1,000
6/18/2015	David Vitter for Senate	\$3,000
6/18/2015	Hultgren for Congress	\$1,000
6/26/2015	Democrats Win Seats PAC	\$2,500
7/8/2015	Crowley for Congress	\$1,000
7/9/2015	Vicky Hartzler for Congress	\$1,000
7/9/2015	Meehan for Congress	\$2,500
7/10/2015	Re-Elect McGovern Committee	\$2,500
7/13/2015	Karen Bass for Congress	\$2,500
7/13/2015	Orrin PAC	\$1,000
7/15/2015	Thornberry for Congress Committee	\$5,000
7/16/2015	Jeffries for Congress	\$1,000
7/21/2015	Tony Cardenas for Congress	\$2,500
7/21/2015	Bucshon for Congress	\$1,000
7/23/2015	Friends of Bill Posey	\$1,000
7/29/2015	Collins for Senator	\$1,000
7/30/2015	Kinzinger for Congress	\$2,500
8/13/2015	Jeff Flake for U.S. Senate	\$5,000
8/13/2015	Welch for Congress	\$2,500
8/13/2015	Bonamici For Congress	\$2,500
8/13/2015	Ted Deutch for Congress	\$2,500
8/13/2015	Scott Peters for Congress	\$2,500
8/13/2015	Bob Goodlatte for Congress	\$5,000
8/20/2015	Comstock for Congress	\$1,000
8/26/2015	DeFazio for Congress	\$2,500

Muftiah McCartin

3/1/2015	Covington & Burling PAC	\$125
4/1/2015	Covington & Burling PAC	\$125
5/1/2015	Covington & Burling PAC	\$125
6/1/2015	Covington & Burling PAC	\$125
6/29/2015	Van Hollen for Senate	\$500
6/16/2015	Graham for Congress	\$250
6/22/2015	Louise Slaughter Re-Election Comm.	\$1,000
5/12/2015	Matsui for Congress	\$500

4/30/2015	Julia Brownley for Congress	\$250
6/29/2015	Democratic Congressional Campaign Comm.	\$100
7/1/2015	Covington & Burling PAC	\$125
7/8/2015	Karen Bass for Congress	\$223.82 (in-kind)
8/3/2015	Covington & Burling PAC	\$125

Miriam Guggenheim

3/2/2015	Covington & Burling PAC	\$125
4/1/2015	Covington & Burling PAC	\$125
5/1/2015	Covington & Burling PAC	\$125
6/1/2015	Covington & Burling PAC	\$125
7/1/2015	Covington & Burling PAC	\$125
8/3/2015	Covington & Burling PAC	\$125

Arturo Valenzuela

3/12/2015	Leahy for U.S. Senator Committee	\$500
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