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OMB No. 1124-0001; Expires July 31, 2023

U.S. Department of Justice
Washington, DC 20530

Registration Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

I--REGISTRANT

1. Name of Registrant

Covington & Burling LLP

2. Registration Number (To be assigned by the FARA Unit)

6876

3. Primary Business Address

800 10th Street, Washington, DC 20001

4. If the registrant is an individual, furnish the following information:

(a) Residence address(es)

(b) Nationality

(c) Year of birth

(d) Present citizenship

(e) If present citizenship not acquired by birth, state when, where and how acquired

(f) Occupation

5. If the registrant is not an individual, furnish the following information:

(a) Type of organization: Committee ☐ Association ☐ Partnership ☒ Voluntary group ☐
Corporation ☐ Other *(specify)* _____

(b) Date and place of organization 01/01/1919, Washington D.C.

(c) Name of responsible individual (e.g., officer, director or partner) Douglas Gibson

(d) Other business address(es), if any, including locations of branch or local offices See Appendix for Response

(e) If a membership organization, provide number of members

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

(f) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
See Appendix for Response			

(g) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

Name	Foreign Principal(s)	Services

(h) Describe the nature of the registrant's regular business or activity.

Covington & Burling LLP is a law firm.

(i) Give a complete description of the ownership and control structure of the registrant.

Covington & Burling LLP is a limited liability partnership organized under the laws of the District of Columbia and owned and controlled by its partners.

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6. List all individuals, other than those listed in Item 5(g), who render services or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address	Foreign Principal(s)	Services
Bruce Wilson		OCP S.A.	Development of legislative and executive department messaging and communication strategies, and, where appropriate, assist OCP's other advisors in developing communications and policy strategies related to OCP's role in the U.S. fertilizer sector and the potential impact of tariffs on the U.S. agricultural community.

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

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II--FOREIGN PRINCIPAL

7. List every foreign principal[1] for whom the registrant is acting or has agreed to act.

Foreign Principal	Foreign Principal Address
OCP S.A.	2 Rue Al abtal, Hay Erraha Casablanca MOROCCO 20200

III--ACTIVITIES

8. In addition to the activities described in any Exhibit B to this statement, will the registrant engage or is the registrant engaging now in activity or rendering services on its own behalf which benefits any or all of its foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

IV--FINANCIAL INFORMATION

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of the registrant's obligation to register[2] under FARA, has the registrant received from any foreign principal named in Item 7 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 for disbursement or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.[3]

Foreign Principal	Date Received	From Whom	Purpose	Amount
OCP S.A.	09/01/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	$ 81,974.92
OCP S.A.	10/02/2020	OCP S.A.	Legal fees in connection with non-registerable legal services.	$ 304,819.53
				$ 386,794.45

1 The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual 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.

2 An agent must register within 10 days of becoming an agent, and before acting as such.

3 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, monies, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

(b) **RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register[4] under FARA, has the registrant received anything of value[5] other than money, from any foreign principal named in Item 7 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	From Whom	Purpose	Thing of Value

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

During the period beginning 60 days prior to the date of the registrant's obligation to register[6] under FARA, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Item 7 of this statement or transmitted monies to any such foreign principal?

Yes ☐ No ☒

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

Foreign Principal	Date	Recipient	Purpose	Amount

(b) **DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of the registrant's obligation to register[7] under FARA, has the registrant disposed of any thing of value[8] other than money in furtherance of or in connection with its activities on behalf of any foreign principal named in Item 7 of this statement? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value

(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of the registrant's obligation to register[9] under FARA, has the registrant (or any short form registrant) made any contribution of money or other thing of value from its own funds and on its own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
09/01/2020	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	$ 250.00
10/01/2020	Bruce Wilson	Covington & Burling LLP PAC	Payroll deduction	$ 250.00

4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 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.

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

V--INFORMATIONAL MATERIALS[10]

11. Prior to the time of filing this statement,[11] has the registrant prepared, disseminated, or caused to be disseminated, any informational materials on behalf of any foreign principal listed in Item 7 of this statement?

Yes ☐ No ☒

If yes, identify each foreign principal and attach the informational materials.

Foreign Principal	Informational Materials Attached	Type

12. (a) Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials?

Yes ☐ No ☒

(b) If yes, identify each foreign principal and respond to the remaining items in this section.

13. Has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☐

If yes, identify each foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount

14. Will any individuals or organizations, including public relations firms or publicity agents, participate in the preparation or dissemination of such informational materials?

Yes ☐ No ☐

If yes, furnish the names and addresses of such individuals or organizations.

Name	Address	Foreign Principal(s)

15. Activities in preparing or disseminating informational materials will include the use of the following:

☐ Magazine or newspaper ☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications
☐ Lectures or speeches ☐ Radio or TV broadcasts ☐ Motion picture films ☐ Letters or telegrams
☐ Email
☐ Website URL(s): _____
☐ Social Media website URL(s): _____
☐ Other *(specify)* _____

10 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, electronic communications, 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.

11 See Footnote 2, on page 3.

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

16. Informational materials will be disseminated among the following groups:

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

17. Indicate the language to be used in the informational materials:

- ☐ English
- ☐ Other *(specify)* _____

VI--EXHIBITS AND ATTACHMENTS

18. (a) The following described exhibits shall be filed with a Registration Statement:

Exhibit A- This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 6.

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

(b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).

(c) An Exhibit D shall be filed when applicable. This exhibit, 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. (See Rule 201 (e)).

VII--EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature [12]
10/13/2020	Bruce Wilson	/s/Bruce Wilson

12 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.

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

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EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
13 October 2020	Bruce S. Wilson	

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Appendix
Response to Item 5(d)

Item 5(d): If the registrant is not an individual, furnish the following information: Other business address(es), if any, including locations of branch or local offices.

Office No. 703, Level 7, Gate Precinct Bldg. 3, Dubai Int'l Finance Centre, P.O. Box 507082, Dubai, UNITED ARAB EMIRATES

Bolwerklaan 21 Avenue du Boulevard, Brussels, BELGIUM B-1210

2301 Tower C Yintai Centre, 2 Jianguomenwai Avenue, Chaoyang Dist., Beijing, CHINA 100022

Marienturm, Taunusanlage 9-10, Frankfurt am Main, GERMANY 60329

173 Oxford Road, 7th Floor, Rosebank, Johannesburg, SOUTH AFRICA 2169

265 Strand, London, UNITED KINGDOM WC2R 1BH

1999 Avenue of the Stars, Los Angeles, CA 90067

The New York Times Building, 620 Eighth Avenue, New York, NY 10018

3000 El Camino Real, 5 Palo Alto Square, Palo Alto, CA 94306

Salesforce Tower, 415 Mission Street, Suite 5400, San Francisco, CA 94105

Foreign Legal Consultant Office 22nd Floor, Meritz Tower, 382, Gangnam-daero, Gangnam-gu, Seoul, KOREA, SOUTH

2701 Two ifc, Shanghai ifc, No. 8 Century Avenue, Pudong New District, CHINA

Received by NSD/FARA Registration Unit 10/13/2020 3:58:20 PM

Appendix
Response to Item 5(f)

Item 5(f): If the registrant is not an individual, furnish the following information: List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address	Citizenship	Position
Douglas Gibson		UNITED STATES	Chairman of the Management Committee
Catherine Dargan		UNITED STATES	Member of the Management Committee
Yaron Dori		UNITED STATES	Member of the Management Committee
James Garland		UNITED STATES	Member of the Management Committee
Emily Henn		UNITED STATES	Member of the Management Committee
Michael Labson		UNITED STATES	Member of the Management Committee
Louise Nash		UNITED KINGDOM	Member of the Management Committee
David Pinsky		UNITED STATES	Member of the Management Committee