

CAPELLA EDUCATION COMPANY

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 SECRETARY OF THE SENATE
 OFFICE OF PUBLIC RECORDS

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March 8, 2005

Secretary of the Senate
 Office of Public Records
 232 Hart Building
 Washington, DC 20510

Clerk of the House of Representatives
 Legislative Resource Center
 B-106 Cannon House Office Building
 Washington, DC 20515

Dear Sirs or Mesdames,

Enclosed is my semi-annual lobbying report of mid-year 2004. I have submitted this report twice before, but I continue to receive threatening letters saying that I have not submitted the report. If for some reason I am doing something wrong, please call me at 612-977-5470 so that I can correct.

Thank you.

Sincerely,



Gregory W. Thom
 Vice President, Governmental Affairs
 General Counsel and Secretary

SECRETARY OF THE SENATE
PUBLIC RECORDS DIVISION

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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

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

1. Registrant Name <u>GREGORY W. THOM / CAPELLA UNIVERSITY</u>			
2. Address <input checked="" type="checkbox"/> Check if different than previously reported <u>225 South Sixth Street Minneapolis MN 55448</u>			
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name <u>GREG THOM</u>	Telephone <u>612-977-5470</u>	E-mail (optional) <u>greg.thom@capella.edu</u>	5. Senate ID # <u>288214-12</u>
7. Client Name <input type="checkbox"/> Self <u>CAPELLA UNIVERSITY / CAPELLE EDUCATION COMPANY</u>	6. House ID # <u>37079000</u>		

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 from 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 this reporting period were:

Less than \$10,000

\$10,000 or more ⇨ \$ _____
Expense (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 section 162(e) of the Internal Revenue Code

Signature _____

Printed Name and Title

Gregory W. ThomVice President, Government Counsel, Sec'y
Vice President, Government
Affairs

00000100634

Registrant Name GREGORY W. TRAM Client Name CAPELLA UNIVERSITY

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 EDU (one per page)

16. Specific lobbying issues

we are lobbying for repeal of the 50% Rule as part of Higher Education Act Reauthorization, and for replacement of the 50% Rule with stringent accreditation standards

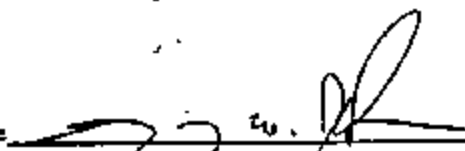
17. House(s) of Congress and Federal agencies contacted Check if None

House, Senate, Department of Education

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

Name	Covered Official Position (if applicable)	New
<i>Gregory W. Tram</i>	<i>Vice President, General Counsel; Secy Vice President, Government Affairs</i>	<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

Signature  Date 3/7/05
 Printed Name and Title Gregory W. Tram *Vice President, General Counsel; Secy
Vice President, Government Affairs*