

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

02 AUG 21

LOBBYING REPORT

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

1. Registrant Name French & Company			
2. Address <input type="checkbox"/> Check if different than previously reported 601 Thirteenth Street, N.W., Suite 370 South			
3. Principal Place of Business (if different from line 2) City: Washington State/Zip (or Country) D.C. 20005			
4. Contact Name Verrick O. French	Telephone (202) 783-7272	E-mail (optional)	5. Senate ID # 15452
7. Client Name <input type="checkbox"/> Self J.C. Penney Company, Inc.			6. House ID # 308751

TYPE OF REPORT 8. Year 2002 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 _____

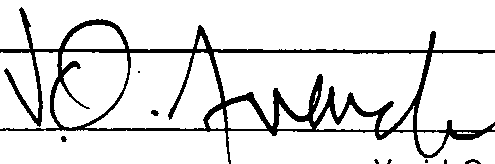
11. No Lobbying /

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 <input type="checkbox"/>
\$10,000 or more <input checked="" type="checkbox"/> ⇒ \$ <u>100,000.00</u> 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 <input type="checkbox"/>
\$10,000 or more <input type="checkbox"/> ⇒ \$ _____ Expenses (nearest \$20,000)
14. REPORTING METHOD. Check box to indicate reporting accounting method. See instructions for description of method.
<input type="checkbox"/> Method A. Reporting amounts using LDA definition
<input type="checkbox"/> Method B. Reporting amounts under section 6033 Internal Revenue Code
<input type="checkbox"/> Method C. Reporting amounts under section 162 Internal Revenue Code

Signature



Printed Name and Title

Verrick O. French, President

Registrant Name French & Company Client Name J.C. Penney Company, Inc.

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, information as requested. Attach additional page(s) as needed.

15. General issue area code TRD (one per page)

16. Specific lobbying issues

International trade issues, including renewal of Andean Trade Preferences Act.

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

House
Senate
Department of Commerce
United States Trade Representative

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

Name	Covered Official Position (if applicable)
Verrick O. French	President
Richard R. Gill	Executive Vice President
Rebecca Dornbusch	Vice President
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.....
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19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature V.O. French Date 8/14/2002

Printed Name and Title Verrick O. French, President

Registrant Name French & Company Client Name J.C. Penney Company, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant is engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, information as requested. Attach additional page(s) as needed.

15. General issue area code HCR (one per page)

16. Specific lobbying issues

Patients' bill of rights legislation.

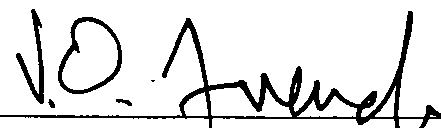
17. House(s) of Congress and Federal agencies contacted Check if None

House
Senate

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

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

Signature  Date 8/14/2002

Printed Name and Title Verrick O. French, President



Registrant Name French & Company Client Name J.C. Penney Company, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant is engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code RET (one per page)

16. Specific lobbying issues

Pension reform.

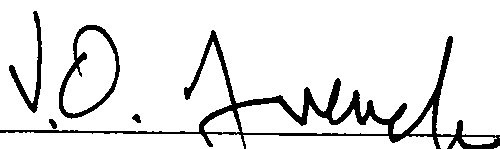
17. House(s) of Congress and Federal agencies contacted Check if None

House
Senate

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

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Signature  Date 8/14/2002

Printed Name and Title Verrick O. French, President

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Registrant Name French & Company Client Name J.C. Penney Company, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant is engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code LBR (one per page)

16. Specific lobbying issues

West Coast port labor issues.

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

House
Department of Transportation
Department of Commerce
Department of Labor

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

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Signature *N.O. French* Date 8/14/2002
Printed Name and Title Verrick O. French, President

