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SECRETARY OF THE SENATE  
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## LOBBYING REPORT

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

1. Registrant Name <b>French &amp; Company</b>			
2. Address <input type="checkbox"/> Check if different than previously reported <b>601 Thirteenth Street NW., Suite 370 South</b>			
3. Principal Place of Business (if different from line 2) <b>Washington</b> <b>D.C. 20005</b> City: State/zip (or Country)			
4. Contact Name <b>Richard R. Gill</b>	Telephone <b>(202) 783-7272</b>	E-mail (optional)	5. Senate ID # <b>15452-90</b>
7. Client Name <input type="checkbox"/> Self <b>J.C. Penney Company, Inc.</b>			6. House ID # <b>30875007</b>

**TYPE OF REPORT** 8. Year 2004 Midyear (January 1-June 30)  OR Year End (July 1-Dec

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

10. Check if this is a Termination Report  ⇔ Termination Date 02/01/04 11. No Lobbying

### INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center"><b>12. Lobbying Firms</b></p> <p><b>INCOME</b> relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input checked="" type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇔ \$ _____ Income (nearest \$20,000)</p> <p>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).</p>	<p align="center"><b>13. Organizations</b></p> <p><b>EXPENSES</b> relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇔ \$ _____ Expenses (nearest \$20,000)</p> <p><b>14. REPORTING METHOD.</b> Check box to indicate reporting method. See instructions for description of each method.</p> <p><input type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definition</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033 Internal Revenue Code</p> <p><input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(e) Internal Revenue Code</p>
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Signature

*Richard R. Gill*

Date

11/17/04

Printed Name and Title

Richard R. Gill, Executive Vice President

LD-2 (REV. 4/03)

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