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J. C. PENNEY CORPORATION, INC.

February 12, 2003

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7002 2410 0003 8722 3638

Secretary of the Senate
Office of Public Records
232 Hart Building
Washington, D.C. 20510

Gentlemen:

On December 17, 2002, Ginny Grundei of this office and I spoke to John Jensen, who identified himself as an Information Specialist in your office. We stated that we filed Lobby Reports with your office for the January through June 2001 period, the July through Decemnt 2001 period and the January through June 2002 period. We also stated that no one in our company met the more than one legislative contact and twenty percent or more of their time within the stated six-month period standard (which requires lobbying report filing) as of and since that date. When John confirmed that, if the standard is not met, no report need be filed asked how to terminate back to January 1, 2001.

John instructed us as follows:

Submit a photocopy of our January through June 2002 report on which we have checked box No. 9 and box No. 10 as well as inserted the termination date of January 1, 2001.

There is no need to resign our January through June 2002 report or amend our subsequent reports already filed with your office.

Write a letter explaining what we are doing and why.

We understand that this letter and the attached photocopy of our January through June 2002 report will serve as proper notice of termination of our Lobbying Report obligations – January 1, 2001 – as no one in our company met the more than one legislative contact and twenty percent or more of their time standard (which would require lobbying report forms) and since that date.

Respectfully,



Norman J. Westlow
Senior Government Relations Counsel

Piano, LA 750.

T - (972) 43

F - (972) 43

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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 J. C. Penney Corporation, Inc.		3. Senate ID # 209	
2. Address <input type="checkbox"/> Check if different than previously reported 6501 Legacy Drive, Plano, TX 75024-1119		6. House ID # 309	
3. Principal Place of Business (if different from line 2) City: _____ State/Zip (or Country) _____			
4. Contact Name Norman J. Weslow	Telephone (972) 431-1252	E-mail (optional)	
7. Client Name <input checked="" type="checkbox"/> Self			

TYPE OF REPORT B. Year 2002 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 January 1, 2001

11. No Lobbying

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

<p align="center">12. Lobbying Firm</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input 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">13. Organizations</p> <p>EXPENSES 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 checked="" type="checkbox"/> ⇒ \$ <u>8840,000.00</u> Expenses (nearest \$20,000)</p> <p>14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description:</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA default</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 66 (Internal Revenue Code)</p> <p><input checked="" type="checkbox"/> Method C. Reporting amounts under section 162 (Internal Revenue Code)</p>
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Signature *Norman J. Weslow* 08/20/02

Printed Name and Title Norman J. Weslow, Senior Government Relations Counsel

http://sopr.senate.gov/cgi-win/opr_gifviewer.exe?/2002/P/P/020/341/077/0020341077|1