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PUBLIC RECORDS
8/23/04
DATE

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

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 2/01/04

11. No Lobbyin

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

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

Signature

Richard R. Gill

Date

8/13/04

Printed Name and Title

Richard R. Gill, Executive Vice President

LD-2 (REV. 4/03)

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