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SECRETARY OF THE SENATE

03 FEB 24 PM 3:47

# 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) City: Washington State/Zip (or Country) DC 20005			
4. Contact Name	Telephone	E-mail (optional)	5. Senate ID #
Verrick O. French	(202) 783-7272		1545
7. Client Name <input type="checkbox"/> Self J.C. Penney Company, Inc.			6. House ID #
			3087

**TYPE OF REPORT** 8. 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

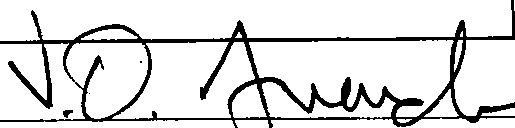
10. Check if this is a Termination Report  ⇨ Termination Date \_\_\_\_\_

11. No Lobbying

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

<p align="center"><b>12. Lobbying Firms</b></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 checked="" type="checkbox"/> ⇨ \$ <u>20,000.00</u> 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>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 type="checkbox"/> ⇨ \$ _____ Expenses (nearest \$20,000)</p> <p><b>14. REPORTING METHOD.</b> Check box to indicate accounting method. See instructions for description of</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definition</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6011 Internal Revenue Code</p> <p><input type="checkbox"/> Method C. Reporting amounts under section 6013 Internal Revenue Code</p>
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Signature



Printed Name and Title \_\_\_\_\_ Verrick O. French, President

LD-2 (REV. 6/98)

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 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

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature *V.O. French* Date 2/14/03



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

Name	Covered Official Position (if applicable)
Verrick O. French	President
Richard R. Gill	Executive Vice President

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature V.O. French Date 2/14/03



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 issue

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

Name	Covered Official Position (if applicable)
Verrick O. French	President
Richard R. Gill	Executive Vice President
Rebecca Dornbusch	Vice President

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

Signature V.O. French Date 2/14/03

