



2008
**Political Activities
and Contributions
Report**



Prudential



The decisions made by government have a tremendous impact on how Prudential operates as a public company and competes in the global marketplace. Accordingly, it's important that the company have the opportunity to maintain an active role in the public policy arena and express its views to legislators and regulators who have a strong interest in issues of significance to the company, our shareholders, our customers and our employees.

The company supports programs to help maintain an active profile in the process. Such activities include direct lobbying, working with state and federal trade associations and coalitions, sponsoring of political action committees (PACs) and to a lesser extent contributing corporate funds to political organizations. Company policy prohibits contributing corporate funds to candidate committees.

The attached report summarizes Prudential's policies and procedures for political activity, and details the disbursement activity of the company-sponsored PACs as well as the annual dues, assessments and contributions of \$50,000 or more paid by the Company to trade associations and tax exempt groups such as 527 organizations.

Inquiries about Prudential's political activities or its PACs may be addressed to prudential.pac@prudential.com.

A handwritten signature in black ink, appearing to read "Peter Sayre".

Peter Sayre
PAC Treasurer
Senior Vice President and Controller



Summary of Prudential Policies and Procedures for Political Activity

Prudential recognizes the importance of participation in the American democratic process, both by individuals and the Company. Prudential also values transparency in this process and appreciates the need for disclosure of its political activity in order to promote ethical corporate governance and participation in political processes and confidence in the American democratic process. Prudential's United States political contributions and those of its political action committees ("PACs" or "Prudential PACs") are made in accordance with federal and state campaign finance laws. Additionally, internal policies and standards adopted by the Company also govern political activity.

All employees are permitted to engage in political activities to the extent permitted by law, provided that they do so as individuals and not as representatives of the Company. Certain personal political contributions of employees and family members are prohibited or restricted under Company policy in order to comply with state and local "pay-to-play" laws pertaining to contributions by vendors to the public sector. Prudential prohibits individual political contributions for the purpose of influencing or attempting to influence the award of business to Prudential businesses.

Prudential sponsors PACs to which eligible employees working in the United States may make contributions. Such contributions are strictly voluntary, and the Company and its management will not reward anyone for making such contributions nor penalize anyone for electing not to participate. Prudential also makes U.S. political contributions from corporate funds in certain states where permitted by applicable law. Company policy prohibits corporate political contributions outside of the United States.

Political contributions made by Prudential PACs serve the purpose of providing a voice for Prudential employees so that they may participate in the American democratic process. Prudential PACs support candidates from both major political parties who share Prudential's vision and values of protecting retirement, savings, investment and insurance needs of all Americans. Political contribution determinations are made by the Prudential Financial, Inc. Political Action Committee Board of Directors in consultation with Prudential's External Affairs Department and are executed by the Manager and Treasurer of the Prudential PACs.

A complete membership listing of the Prudential PAC Board is included on page 4]. The board meets once per year at a minimum. The PAC Administrator, Treasurer and Board of Directors are responsible for managing and administering all Prudential PACs U.S. political contribution activities, including making final decisions as to political contributions made by the PACs. Additionally, the External Affairs Department, in consultation with Law Departments is responsible for maintaining Prudential's internal rules and procedures relating to U.S. political activities. Prudential and Prudential's PACs properly report political contributions and lobbying expenditures to the public through the means prescribed by state and federal governmental authorities.

Prudential employees that are registered as lobbyists on behalf of the Company also comply with Company procedures for tracking and reporting activities and related expenses involving dealings with public officials and employees, including special provisions in the Company's Gift and Entertainment policy that address prohibited expenses. Prudential lobbyists also are required to carry out professional conduct that meets and exceeds generally accepted standards of conduct of the profession.



Prudential PAC Board of Directors

Maureen E. Adolf

Vice President, External Affairs

Matthew J. Chanin

Senior Managing Director, Prudential Capital Group

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Vice President, Individual Life

Robert DeFillippo

Vice President, Global Communications

Barbara Koster

Senior Vice President, Corporate Technology Management

Jeanette Pollock

Vice President, Enterprise Discontinued Business Solutions

Scott Sleyster

Senior Vice President, Domestic Chief Investment Officer

Sharon Taylor

Senior Vice President, Human Resources

Rex B. Wackerle

Vice President, External Affairs

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Vice Chairman, Office of the Chairman

Brian W. Clymer

PAC Vice Chairman

Vice President, External Affairs

Peter Sayre

PAC Treasurer

Senior Vice President & Controller, CFO Department

John Feeney

Assistant PAC Treasurer

Vice President, External Affairs

Administration

Roman Gabriel

PAC Administrator

Director, External Affairs



Prudential PAC Federal Contributions
January 1, 2008 – December 31, 2008

U.S. House Candidates

<u>Recipient</u>	<u>Amount (\$)</u>
John Adler (D-NJ)	2000
Jason Altmire (D-PA)	2000
Robert Andrews (D-NJ)	1500
Melissa Bean (D-IL)	3000
Xavier Becerra (D-CA)	2000
Shelley Berkley (D-NV)	1000
Judy Biggert (R-IL)	1000
John Boehner (R-OH)	2500
Charles Boustany (R-LA)	1000
Steve Buyer (R-IN)	1000
Christopher Carney (D-PA)	1000
Andre Carson (D-IN)	1000
Michael Castle (R-DE)	2000
William Clay (D-MO)	2000
Joseph Courtney (D-CT)	1000
Joseph Crowley (D-NY)	2500
Artur Davis (D-AL)	2000
Geoffrey Davis (R-KY)	1000
Rahm Emanuel (D-IL)	1000
Barney Frank (D-MA)	2000
Rodney Frelinghuysen (R-NJ)	1000
Scott Garrett (R-NJ)	3000
Deborah Halvorson (D-IL)	1000
Wally Herger (R-CA)	1000
Paul Hodes (D-NH)	1500
Rush D. Holt (D-NJ)	3000
Samuel Johnson (R-TX)	3000
Paul Kanjorski (D-PA)	10000
Ron Kind (D-WI)	1000
Ronald Klein (D-FL)	2500
Frank Kratovil (D-MD)	1000
Leonard Lance (R-NJ)	3000
Thomas Latham (R-IA)	2000
Steven LaTourette (R-OH)	1000



Stephen Lynch (D-MA)	1000
Carolyn McCarthy (D-NY)	3000
Kevin McCarthy (R-CA)	1000
Patrick McHenry (R-NC)	2000
Howard McKeon (R-CA)	1000
Kendrick Meek (D-FL)	2000
Gregory Meeks (D-NY)	2500
Dennis Moore (D-KS)	2000
Chris Murphy (D-CT)	1500
Robert Neugebauer (R-TX)	1000
Devin Nunes (R-CA)	1000
Frank Pallone (D-NJ)	1500
William Pascrell (D-NJ)	5000
Donald Payne (D-NJ)	4000
Earl Pomeroy (D-ND)	5000
Adam Putnam (R-FL)	2000
Steven Rothman (D-NJ)	2000
Edward Royce (R-CA)	5000
Allyson Schwartz (D-PA)	1500
Christopher Shays (R-CT)	1000
Steve Stivers (R-OH)	1000
John Tanner (D-TN)	5000
Michael Thompson (D-CA)	1500
Edolphus Towns (D-NY)	1000
Chris Van Hollen (D-MD)	2000
Nydia Velazquez (D-NY)	1500
G. William Foster (D-IL)	1000
David Wu (D-OR)	1000
John Yarmuth (D-KY)	1000



Prudential PAC Federal Contributions
January 1, 2008 – December 31, 2008

U.S. Senate Candidates

<u>Recipient</u>	<u>Amount (\$)</u>
Bob Casey (D-PA)	2000
Saxby Chambliss (R-GA)	5000
Norm Coleman (R-MN)	1000
Robert Corker (R-TN)	2500
Michael Crapo (R-ID)	5000
James DeMint (R-SC)	1000
Christopher Dodd (D-CT)	5000
Elizabeth Dole (R-NC)	2500
Orrin Hatch (R-UT)	2500
Tim Johnson (D-SD)	2500
Jack Reed (D-RI)	6500
Gordon Smith (R-OR)	5000
John Sununu (R-NH)	3000
John Thune (R-SD)	2500
Mark Warner (D-VA)	1000



Prudential PAC Federal Contributions to Leadership PACs
January 1, 2008 – December 31, 2008

<u>Leadership Committee</u>	<u>Legislator</u>	<u>Amount (\$)</u>
21st Century PAC	Rep. Howard McKeon (R-CA)	4000
All America PAC	Sen. Evan Bayh (D-IN)	2500
AMERIPAC	Rep. Steny Hoyer (D-MD)	5000
Battle Born Political Action Committee	Sen. John Ensign (R-NV)	5000
Bridge PAC	Rep. James Clyburn (D-SC)	5000
Building Empowerment and Accountability Now PAC	Rep. Melissa Bean (D-IL)	5000
Chris PAC	Sen. Christopher Dodd (D-CT)	5000
Citizens for Action	Rep. Paul Kanjorski (D-PA)	5000
Committee for the Preservation of Capitalism	Rep. Jim McCrery (R-LA)	5000
Continuing a Majority Party Action Committee	Rep. David Camp (R-MI)	5000
DAK PAC	Sen. Kent Conrad (D-ND)	5000
Every Republican Is Crucial (ERIC PAC)	Rep. Eric Cantor (R-VA)	5000
First State PAC	Sen. Thomas Carper (D-DE)	5000
Freedom and Democracy Fund	Sen. Mel Martinez (R-FL)	3000
Freedom and Security PAC	Rep. John Kline (R-MN)	2500
Freedom Project	Rep. John Boehner (R-OH)	5000
Glacier PAC	Sen. Max Baucus (D-MT)	5000
Growth and Prosperity PAC	Rep. Spencer Bachus (R-AL)	5000
Hawkeye PAC	Sen. Charles Grassley (R-IA)	3000
Leadership in the New Century (LINC PAC)	Sen. Blanche Lincoln (D-LA)	5000
LEGPAC	Sen. Benjamin Cardin (D-MD)	5000
The Madison PAC	Rep. Richard Neal (D-MA)	5000
National Leadership PAC	Rep. Charles Rangel (D-NY)	5000
NEW MILLENNIUM PAC	Sen. Robert Menendez (D-NJ)	5000
Next Century Fund	Sen. Richard Burr (R-NC)	5000
NODAK Political Action Committee	Rep. Earl Pomeroy (D-ND)	1000
PAC to the Future	Rep. Nancy Pelosi (D-CA)	3000
Prairie Political Action Committee	Sen. Richard Durbin (D-IL)	5000
Prosperity PAC	Rep. Paul Ryan (D-WI)	2500
Republican Majority Fund	Sen. Saxby Chambliss (R-GA)	5000
ROYB Fund	Rep. Roy Blunt (R-MO)	5000
Senate Majority Fund	Sen. Jon Kyl (R-AZ)	2500
SNOW PAC	Sen. Robert Bennett (D-UT)	2500
Solidarity PAC	Rep. George Miller (D-CA)	5000
South Dakota First PAC	Sen. Tim Johnson (D-SD)	2500
Synergy PAC	Rep. John Larson (D-CT)	5000
TOMPAC	Rep. Patrick Tiberi (R-OH)	1500
WIN VIRGINIA 2008	Sen. Mark Warner (D-VA)	1500



Prudential PAC Federal Contributions to Trade Association and Other PACs

January 1, 2008 – December 31, 2008

<u>Committee</u>	<u>Amount (\$)</u>
Blue Dog PAC	5000
Investment Company Institute PAC	2500
Moderate Democrats PAC	5000
New Democrat Coalition Political Action Committee	5000

Prudential PAC State Contributions

January 1, 2008 – December 31, 2008

<u>State</u>	<u>Amount (\$)</u>
California	
Sen. David Cogdill (R)	1000
Sen. Jeffrey Denham (R)	1000
Sen. Alex Padilla (D)	1000
Sen. Leland Yee (D)	1000
Rep. Karen Bass (D)	1000
Rep. John Benoit (R)	1000
Rep. Joe Coto (D)	1000
Rep. Felipe Fuentes (D)	1000
Rep. Lloyd Levine (D)	1000
Rep. Jose Solorio (D)	1000
Rep. Michael Villines (R)	1000
Illinois	
Sen. Emil Jones (D)	1000
Indiana	
Gov. Mitch Daniels (R)	1000
Sen. David Long (R)	300
Pennsylvania	
Atty. Gen. Thomas Corbett (R)	500
Sen. Jeff Piccola (R)	1000
Sen. Michael Stack (D)	1000
Sen. Donald White (R)	1000



Rep. Nick Micozzie (R)	500
Keystone Leaders PAC	1500
Pennsylvania Senate Republican Campaign	3500

Texas

Lt. Gov. David Dewhurst (R)	1000
Atty. Gen. Greg Abbott (R)	1000
Sen. Kip Averitt (R)	500
Sen. Kim Brimer (R)	500
Sen. Robert Duncan (R)	500
Sen. Rodney Ellis (D)	500
Sen. Troy Fraser (R)	500
Sen. Juan Hinojosa (D)	500
Sen. Michael Jackson (R)	500
Sen. Eduardo Lucio (D)	500
Sen. Florence Shapiro (R)	500
Sen. Leticia Van de Putte (D)	500
Sen. Kirk Watson (D)	500
Sen. Jeff Wentworth (R)	500
Sen. Judith Zaffirini (D)	500
Rep. Valinda Bolton (D)	250
Rep. Tom Craddick (R)	1000
Rep. Craig Eiland (D)	400
Rep. Dan Flynn (R)	250
Rep. Helen Giddings (D)	250
Rep. Kelly Hancock (R)	400
Rep. Linda Harper-Brown (R)	250
Rep. Charles Howard (R)	250
Rep. Carl Isett (R)	300
Rep. Armando Martinez (D)	400
Rep. Ruth McClendon (D)	250
Rep. Mark Shelton (R)	250
Rep. Todd Smith (R)	400
Rep. Mark Strama (D)	250
Rep. Larry Taylor (R)	400
Rep. Senfronia Thompson (D)	400
Rep. Sylvester Turner (D)	250
Rep. Harold V. Dutton (D)	250
Rep. Hubert Vo (D)	400
Rep. Beverly Woolley (R)	400
Texas Republican Legislative Caucus	1500



Prudential New York PAC State Contributions
January 1, 2008 – December 31, 2008

<u>New York</u>	<u>Amount (\$)</u>
Sen. Will Barclay (D)	350
Sen. Neil Breslin (D)	400
Sen. Joseph Bruno (R)	2000
Sen. Martin Golden (D)	500
Sen. James Seward (R)	1500
Rep. Joseph Morelle (D)	2000
Rep. Sheldon Silver (D)	2500
Sen. Dean Skelos (R)	1000
Rep. Mark Weprin (D)	1500
NY Democratic Assembly Campaign Committee	8000
NY Senate Republican Campaign Committee	1000

Prudential New Jersey PAC State Contributions
January 1, 2008 – December 31, 2008

<u>New Jersey</u>	<u>Amount (\$)</u>
Federal	
Prudential Financial, Inc Political Action Committee - Transfer	11,200
Georgia	
Sen. Robert Brown (D)	200
Sen. Ed Harbison (D)	200
Sen. Ralph Hudgens (R)	275
Sen. Jack Murphy (R)	275
Sen. Tommie Williams (R)	350
Rep. Carl Epps (D)	200
Rep. Lester Jackson (D)	200
Rep. Jerry Keen (R)	350
Rep. Tom Knox (R)	275
Rep. Howard Maxwell (R)	275
Rep. Glenn Richardson (R)	400
Iowa	
Rep. Kevin McCarthy (D)	500



Annual dues, assessments and contributions of \$50,000 or more to trade associations and tax-exempt groups
January 1, 2008 – December 31, 2008

<u>Association</u>	<u>Lobbying (\$)</u>	<u>Total Dues (\$)</u>
American Council of Life Insurers	\$1,041,865	2,270,365
U.S. Chamber of Commerce	629,000	1,650,000
Corporate Executive Board	0	663,636
The Financial Services Forum	100,000	400,000
Business Roundtable	108,358	235,560
Insurance Marketplace Standards Association	0	182,000
Worldwide ERC	30,000	100,225
Association of California Life and Health Companies	3,220	80,500
National Association of Variable Annuities	1,333	116,666
Life Insurance Council of New York	11,400	60,000
The Insurance Federation of Pennsylvania	11,523	58,671
New Jersey Chamber of Commerce	5,250	52,500
American Savings Education Council	0	50,000
National Structured Settlement Trade Association	4,500	50,000

<u>Organization</u>	<u>Amount</u>
Republican Governors Association	\$50,000