



2009
**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 legislative and regulatory processes. 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 support candidate committees.

The attached report summarizes Prudential's policies and procedures for political activity as well as the direct disbursement activity of the Company-sponsored PACs. In addition, the attached report includes 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, as well as the portion of these dues and assessments attributable to the lobbying activities of those 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 federal, 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. In rare cases, in an effort to assist the political process and for administrative purposes only, Prudential also makes political contributions from corporate funds where permitted by law.

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 Administrator 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 conjunction with the Compliance Department, is responsible for maintaining Prudential's internal policies 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 who are registered as lobbyists on behalf of the Company must also comply with Company procedures for tracking and reporting activities and related expenses involving dealings with public officials and employees. Prudential lobbyists also are required to behave in a manner that meets and exceeds generally accepted standards of conduct of the profession. In their dealings with public officials and employees, all Prudential employees are required to comply with the Company's policies on political activities, lobbying and gifts and entertainment.

Prudential PAC Board of Directors

Maureen E. Adolf

Vice President, External Affairs

Matthew J. Chanin

Senior Managing Director, Prudential Capital Group

Joan Cleveland

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

Officers

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PAC Chairman

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, 2009 – December 31, 2009

U.S. House Candidates	
Recipient	Amount (\$)
Jason Altmire (D-PA)	1,000
Joseph Baca (D-CA)	500
Melissa Bean (D-IL)	4,000
Xavier Becerra (D-CA)	2,000
Shelley Berkley (D-NV)	1,500
Judy Biggert (R-IL)	2,000
Mary Bono Mack (R-CA)	1,000
Charles Boustany (R-LA)	1,000
Kevin Brady (R-TX)	1,000
Virginia Brown-Waite (R-FL)	1,000
Steve Buyer (R-IN)	2,000
David Camp (R-MI)	4,000
Eric Cantor (R-VA)	1,500
Dennis Cardoza (D-CA)	1,000
Michael Castle (R-DE)	1,000
Travis Childers (D-MS)	1,000
Joseph Courtney (D-CT)	1,000
Danny Davis (R-IL)	1,000
Lloyd Doggett (D-TX)	1,000
David Dreier (R-CA)	1,000
Bob Etheridge (D-NC)	1,000
Barney Frank (D-MA)	2,000
Scott Garrett (R-NJ)	4,000
Luis Gutierrez (D-IL)	1,000
Dean Heller (R-NV)	1,000
Jeb Hensarling (R-TX)	3,500
Wally Herger (R-CA)	1,000
Stephanie Herseth Sandlin (D-SD)	2,500
Brian Higgins (D-NY)	1,000
James Himes (D-CT)	2,500
Rush D. Holt (D-NJ)	5,500
Samuel Johnson (R-TX)	2,500
Paul Kanjorski (D-PA)	3,000
Ron Kind (D-WI)	5,000
Leonard Lance (R-NJ)	2,000
Sander Levin (D-MI)	1,000
John Lewis (D-GA)	1,000
Carolyn McCarthy (D-NY)	3,750
Kevin McCarthy (R-CA)	2,500
Howard McKeon (R-CA)	2,000



Prudential PAC Federal Contributions (cont.)

January 1, 2009 – December 31, 2009

U.S. House Candidates	
Recipient	Amount (\$)
Michael McMahon (D-NY)	1,000
Gregory Meeks (D-NY)	2,000
Walt Minnick (D-ID)	1,000
Gwendolynne Moore (D-WI)	1,000
Christopher Murphy (D-CT)	1,000
Richard Neal (D-MA)	2,500
Robert Neugebauer (R-TX)	1,000
Frank Pallone (D-NJ)	1,000
Erik Paulsen (R-MN)	1,000
William Pascrell (D-NJ)	5,000
Donald Payne (D-NJ)	3,000
Earl Pomeroy (D-ND)	6,000
Bill Posey (R-FL)	1,000
Charles Rangel (D-NY)	5,000
David Reichert (R-WA)	1,000
Edward Royce (R-CA)	5,000
Linda Sanchez (D-CA)	1,000
Allyson Schwartz (D-PA)	2,000
Louise Slaughter (D-NY)	1,000
Fortney Stark (D-CA)	1,000
John Tanner (D-TN)	5,000
Michael Thompson (D-CA)	2,000
Patrick Tiberi (R-OH)	2,000
Chris Van Hollen (D-MD)	2,000
Charles Wilson (D-OH)	1,000
John Yarmuth (D-KY)	1,000



Prudential PAC Federal Contributions (cont.)

January 1, 2009 – December 31, 2009

U.S. Senate Candidates	
Recipient	Amount (\$)
Evan Bayh (D-IN)	2,000
Michael Bennet (D-CO)	1,000
Robert Bennett (R-UT)	5,000
Sherrod Brown (D-OH)	1,000
Jim Bunning (R-KY)	1,000
Richard Burr (R-NC)	2,500
Michael Capuano (D-MA)	1,000
Kent Conrad (D-ND)	2,500
Robert Corker (R-TN)	2,500
Charles Grassley (R-IA)	2,500
Kay Hagan (D-NC)	1,000
Orrin Hatch (R-UT)	2,500
Tim Johnson (D-SD)	5,000
Blanche Lincoln (D-AR)	5,000
Ben Nelson (D-NE)	2,000
Charles E. Schumer (D-NY)	2,000
Richard Shelby (R-AL)	2,500
David Vitter (R-LA)	2,500



Prudential PAC Federal Contributions to Leadership PACs

January 1, 2009 – December 31, 2009

Leadership Committee	Legislator	Amount (\$)
21st Century PAC	Rep. Howard McKeon (R-CA)	3,000
Alamo PAC	Sen. John Cornyn (R-TX)	2,000
AMERIPAC	Rep. Steny Hoyer (D-MD)	5,000
Battle Born Political Action Committee	Sen. John Ensign (R-NV)	2,500
Bluegrass Committee	Sen. Mitch McConnell (R-KY)	2,500
Bridge PAC	Rep. James Clyburn (D-SC)	5,000
CAP PAC	Rep. Carolyn McCarthy (D-NY)	1,250
DAK PAC	Sen. Kent Conrad (D-ND)	5,000
Democrats Win Seats PAC	Rep. Debbie Wasserman-Schultz (D-FL)	500
Every Republican Is Crucial	Rep. Eric Cantor (R-VA)	2,500
First State PAC	Sen. Thomas Carper (D-DE)	5,000
Forward Together PAC	Sen. Mark Warner (D-VA)	2,500
Freedom and Security PAC	Rep. John Kline (R-MN)	1,000
The Freedom Fund	Sen. Mike Crapo (R-ID)	3,000
The Freedom Project	Rep. John Boehner (R-OH)	5,000
Glacier PAC	Sen. Max Baucus (D-MT)	5,000
Growth and Prosperity PAC	Rep. Spencer Bachus (R-AL)	5,000
Heartland Values PAC	Sen. John Thune (R-SD)	2,500
Jobs, Opportunities and Education PAC	Rep. Joseph Crowley (D-NY)	3,500
Leadership 21	Rep. John Tanner (D-TN)	5,000
LEGPAC	Sen. Benjamin Cardin (D-MD)	2,500
The Madison PAC	Rep. Richard Neal (D-MA)	3,500
MINT Political Action Committee	Sen. James DeMint (R-SC)	2,000
Narragansett Bay PAC	Sen. Jack Reed (D-RI)	5,000
New Millennium PAC	Sen. Robert Menendez (D-NJ)	5,000
Next Century Fund	Sen. Richard Burr (R-NC)	2,500
Priority PAC	Sen. Mark Pryor (D-AR)	2,500
Prosperity PAC	Rep. Paul Ryan (R-WI)	1,000
Republican Majority Fund	Sen. Saxby Chambliss (R-GA)	5,000
Senate Majority Fund	Sen. Jon Kyl (R-AZ)	2,500
Silk PAC	Rep. William Pascrell (D-NJ)	2,500
Solidarity PAC	Rep. George Miller (D-CA)	3,000
Synergy PAC	Rep. John Larson (D-CT)	5,000
Tenn PAC	Sen. Lamar Alexander (R-TN)	2,500



Prudential PAC Federal Contributions to Trade Associations and Other PACs

January 1, 2009 – December 31, 2009

Committee	Amount (\$)
Blue Dog PAC	5,000
Investment Company Institute PAC	2,500
Moderate Democrats PAC	5,000
New Democrat Coalition Political Action Committee	5,000

Prudential PAC State Contributions

January 1, 2009 – December 31, 2009

California	Amount (\$)
Sen. Ronald Calderon (D)	1,000
Sen. Gloria McLeod (D)	1,000
Sen. Anthony Strickland (R)	1,000
Rep. Sam Blakeslee (R)	1,000
Rep. Charles Calderon (D)	1,000
Rep. Nathan Fletcher (R)	1,000
Rep. Martin Garrick (R)	1,000
Rep. Joe Coto (D)	1,000
Rep. Norma Torres (D)	1,000
Democratic State Central Committee of California	1,000
Michigan	
Sen. Alan Sanborn (R)	300
Pennsylvania	
Gov. Tom Corbett (R)	500
Sen. Dominic Pileggi (R)	500
Sen. Donald White (R)	500
Rep. Anthony DeLuca (D)	500
Texas	
Gov. Rick Perry (R)	7,500
Atty. Gen. Greg Abbott (R)	1,000
Sen. Robert Duncan (R)	1,000
Sen. Glenn Hegar (R)	1,000
Rep. Craig Eiland (D)	500
Rep. Joseph Deshotel (D)	500
Rep. Trey Martinez Fischer (D)	500
Rep. Kelly Hancock (R)	500
Rep. Todd Hunter (R)	500
Rep. Carl Isett (R)	500
Rep. Larry Taylor (R)	500
Rep. Senfronia Thompson (D)	500
Rep. Mark Strama (D)	500



Prudential New York PAC State Contributions

January 1, 2009 – December 31, 2009

New York	Amount (\$)
Gov. David Paterson (D)	5,000
Sen. Neil Breslin (D)	1,000
Sen. James Seward (R)	500
Sen. Malcolm Smith (D)	2,000
Rep. Herman Farrell (D)	1,000
Rep. Sheldon Silver (D)	1,000
NY Democratic Assembly Campaign Committee	7,000

Prudential New Jersey PAC State Contributions

January 1, 2009 – December 31, 2009

Florida	Amount (\$)
Bill McCollum for Governor (R)	500
Georgia	
Sen. Timothy Golden (D)	200
Sen. Ed Harbison (D)	250
Sen. Jack Murphy (R)	275
Sen. Tommie Williams (R)	325
Rep. Ellis Black (D)	200
Rep. Michael Coan (R)	275
Rep. Carl Epps (D)	200
Rep. Jerry Keen (R)	325
Rep. Howard Maxwell (R)	275
Rep. David Shafer (R)	275



Annual dues, assessments and contributions of \$50,000 or more to trade associations and tax-exempt groups

January 1, 2009 – December 31, 2009

Organization	Lobbying (\$)	Total Dues (\$)
U.S. Chamber of Commerce	1,471,500	2,000,000
American Council of Life Insurers	352,800	1,575,000
Investment Company Institute	0	534,967
Corporate Executive Board	0	517,987
Business Roundtable	124,847	235,560
The Financial Services Roundtable	85,822	207,600
The Financial Services Forum	120,000	200,000
Insurance Marketplace Standards Association	0	182,000
Life Insurance Council of New York	25,200	120,000
Association of California Life and Health Companies	4,890	81,500
Worldwide ERC	22,500	75,225
National Structures Settlement Trade Association	4,950	55,000
New Jersey Chamber of Commerce	5,407	54,075
The Insurance Federation of Pennsylvania	10,710	53,337