

# **Prudential Financial, Inc. 2010 Political Activities and Contributions Report**



**Prudential**

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# A Note from the PAC Treasurer

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 is 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](mailto:prudential.pac@prudential.com).

Roman M Gabriel  
PAC Treasurer  
Vice President, External Affairs

# 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

## BOARD

**Maureen E. Adolf**

Vice President  
External Affairs

**Joan Cleveland**

Vice President  
Business Development

**Barbara Koster**

Senior Vice President  
Corporate Technology Management

**Scott Sleyster**

Senior Vice President  
Domestic Chief Investment Officer

**Rex B. Wackerle**

Vice President  
External Affairs

**Matthew J. Chanin**

Senior Managing Director  
Prudential Capital Group

**Robert DeFillippo**

Vice President  
Global Communications

**Jeanette Pollock**

Vice President  
Enterprise Discontinued Business Solutions

**Sharon Taylor**

Senior Vice President  
Human Resources

## OFFICERS

**Mark Grier**

PAC Chairman  
Vice Chairman, Office of the Chairman

**Brian W. Clymer**

PAC Vice Chairman  
Vice President, External Affairs

**Roman Gabriel**

PAC Treasurer  
Vice President, External Affairs

**John Feeney**

Assistant PAC Treasurer  
Vice President, External Affairs

## ADMINISTRATION

**Kelly Eaton**

PAC Administrator  
Manager, External Affairs

# Prudential PAC Federal Contributions

January 1, 2010 – December 31, 2010

## U.S. HOUSE OF REPRESENTATIVES

STATE	CANDIDATE	PARTY	CONTRIBUTION
<b>CALIFORNIA</b>			
Rep.	Howard	McKeon	R \$ 2,500
Rep.	Edward	Royce	R \$ 2,000
Rep.	Michael	Thompson	D \$ 1,500
Rep.	George	Miller	D \$ 3,000
Rep.	Wally	Herger	R \$ 2,000
Rep.	George	Miller	D \$ 5,000
Rep.	David	Dreier	R \$ 2,000
<b>COLORADO</b>			
Rep.	Edwin	Perlmutter	D \$ 1,000
<b>CONNECTICUT</b>			
Rep.	Joseph	Courtney	D \$ 1,000
Rep.	James	Himes	D \$ 2,500
Rep.	John	Larson	D \$ 2,500
Rep.	Christopher	Murphy	D \$ 1,000
<b>FLORIDA</b>			
Rep.	Allen	Boyd	D \$ 1,000
Rep.	Bill	Posey	R \$ 1,000
<b>GEORGIA</b>			
Rep.	Thomas	Price	R \$ 2,000
<b>IDAHO</b>			
Rep.	Walter	Minnick	D \$ 3,000
<b>ILLINOIS</b>			
Rep.	Judy	Biggert	R \$ 1,500
Rep.	Melissa	Bean	D \$ 3,000
Rep.	Donald	Manzullo	R \$ 1,000
Rep.	Luis	Gutierrez	D \$ 1,000
Rep.	Melissa	Bean	D \$ 2,000
Rep.	Daniel	Seals	D \$ 1,000
<b>INDIANA</b>			
Rep.	Joseph	Donnelly	D \$ 500
<b>KANSAS</b>			
Rep.	Lynn	Jenkins	R \$ 1,000
<b>MASSACHUSETTS</b>			
Rep.	Richard	Neal	D \$ 5,000
Rep.	Barney	Frank	D \$ 2,500

# Prudential PAC Federal Contributions

January 1, 2010 – December 31, 2010

## U.S. HOUSE OF REPRESENTATIVES

STATE	CANDIDATE		PARTY	CONTRIBUTION	
MARYLAND					
Rep.	Frank	Kratovil	D	\$	1,000
MICHIGAN					
Rep.	Sander	Levin	D	\$	5,230
Rep.	David	Camp	R	\$	5,000
MINNESOTA					
Rep.	Erik	Paulsen	R	\$	1,500
Rep.	John	Kline	R	\$	2,500
NORTH CAROLINA					
Rep.	Brad	Miller	D	\$	1,000
NORTH DAKOTA					
Rep.	Earl	Pomeroy	D	\$	4,000
NEW JERSEY					
Rep.	John	Adler	D	\$	3,500
Rep.	Robert	Andrews	D	\$	6,000
Rep.	Rodney	Frelinghuysen	R	\$	2,500
Rep.	Scott	Garrett	R	\$	5,000
Rep.	Rush	Holt	D	\$	4,000
Rep.	Leonard	Lance	R	\$	2,500
Rep.	Frank	Pallone	D	\$	1,000
Rep.	Donald	Payne	D	\$	2,500
Rep.	Steven	Rothman	D	\$	4,000
NEW YORK					
Rep.	Joseph	Crowley	D	\$	5,000
Rep.	Christopher	Lee	R	\$	1,000
Rep.	Daniel	Maffei	D	\$	1,000
Rep.	Carolyn	Maloney	D	\$	2,000
Rep.	Carolyn	McCarthy	D	\$	4,750
Rep.	Michael	McMahon	D	\$	1,000
Rep.	Gregory	Meeks	D	\$	2,000
Rep.	Scott	Murphy	D	\$	2,000
NEVADA					
Rep.	Shelley	Berkley	D	\$	1,500



# Prudential PAC Federal Contributions

January 1, 2010 – December 31, 2010

## U.S. HOUSE OF REPRESENTATIVES

STATE		CANDIDATE		PARTY	CONTRIBUTION	
OHIO						
Rep.	John	Boehner		R	\$	5,000
Rep.	Marcia	Fudge		D	\$	1,000
PENNSYLVANIA						
Rep.	Paul	Kanjorski		D	\$	7,500
SOUTH DAKOTA						
Rep.	Stephanie	Herseith Sandlin		D	\$	1,000
TENNESSEE						
Rep.	John	Tanner		D	\$	5,000
TEXAS						
Rep.	Kevin	Brady		R	\$	2,000
Rep.	Jeb	Hensarling		R	\$	7,500
Rep.	Eddie	Johnson		D	\$	1,000
Rep.	Samuel	Johnson		R	\$	1,000
Rep.	Randy	Neugebauer		R	\$	1,500
WASHINGTON						
Rep.	David	Reichert		R	\$	1,000
Rep.	Jim	McDermott		D	\$	1,000
Rep.	David	Reichert		R	\$	1,500
WISCONSIN						
Rep.	Ron	Kind		D	\$	4,000

# Prudential PAC Federal Contributions

January 1, 2010 – December 31, 2010

## U.S. SENATE

STATE	CANDIDATE		PARTY	CONTRIBUTION	
DELAWARE					
Sen.	Thomas	Carper	D	\$	5,000
IDAHO					
Sen.	Michael	Crapo	R	\$	3,000
KENTUCKY					
Sen.	Mitch	McConnell	R	\$	5,000
LOUISIANA					
Sen.	David	Vitter	R	\$	2,000
NORTH CAROLINA					
Sen.	Kay	Hagan	D	\$	1,000
Sen.	Richard	Burr	R	\$	5,000
NEW JERSEY					
Sen.	Robert	Menendez	D	\$	2,000
NEW MEXICO					
Sen.	Jeff	Bingaman	D	\$	2,500
VIRGINIA					
Sen.	Mark	Warner	D	\$	2,500

# Prudential PAC Contributions to PACs

January 1, 2010 – December 31, 2010

## U.S. SENATE LEADERSHIP PACs

COMMITTEE		CANDIDATE		PARTY	STATE	CONTRIBUTION	
Battle Born PAC	Sen.	John	Ensign	R	NV	\$	2,500
DAK PAC	Sen.	Kent	Conrad	D	ND	\$	5,000
Forward Together PAC	Sen.	Mark	Warner	D	VA	\$	2,500
LEGPAC	Sen.	Benjamin	Cardin	D	MD	\$	2,500
Long Leaf Pine PAC	Sen.	Kay	Hagan	D	NC	\$	2,500
Republican Majority Fund	Sen.	Saxby	Chambliss	R	GA	\$	2,500
Rock City PAC	Sen.	Robert	Corker	R	TN	\$	2,500
South Dakota First PAC	Sen.	Tim	Johnson	D	SD	\$	5,000

## U.S. HOUSE LEADERSHIP PACs

COMMITTEE		CANDIDATE		PARTY	STATE	CONTRIBUTION	
AMERIPAC	Rep.	Steny	Hoyer	D	DC	\$	5,000
Bridge PAC	Rep.	James	Clyburn	D	SC	\$	5,000
Every Republican Is Crucial (ERIC PAC)	Rep.	Eric	Cantor	R	VA	\$	2,000
Growth and Prosperity PAC	Rep.	Spencer	Bachus	R	VA	\$	5,000
Jobs, Economy & Budget Fund (JEB Fund)	Rep.	Jeb	Hensarling	D	MD	\$	2,500
Majority Committee PAC	Rep.	Kevin	McCarthy	R	CA	\$	2,500
Pioneer PAC	Rep.	Patrick	Tiberi	R	OH	\$	2,000
Prosperity PAC	Rep.	Paul	Ryan	R	VA	\$	3,000
Road to Freedom	Rep.	Edward	Royce	R	VA	\$	3,000
Silk PAC	Rep.	William	Pascrell	D	NJ	\$	5,000

## OTHER COMMITTEES

COMMITTEE		PARTY	STATE	CONTRIBUTION	
Blue Dog PAC		D	N/A	\$	5,000
Democratic Party of Wisconsin - Federal Account		D	WI	\$	1,000
Investment Company Institute PAC		D	N/A	\$	2,500
Moderate Democrats PAC		D	N/A	\$	5,000
New Democrat Coalition Political Action Committee		D	N/A	\$	5,000
Republican Party of Wisconsin - Federal Account		R	WI	\$	1,000

# Prudential PAC State Contributions

January 1, 2010 – December 31, 2010

## STATE CONTRIBUTIONS

STATE		CANDIDATE	PARTY	CONTRIBUTION	
CALIFORNIA					
St. Rep.	Jose	Solorio	D	\$	1,000
St. Rep.	Martin	Garrick	R	\$	1,000
St. Rep.	Nathan	Fletcher	R	\$	1,000
St. Rep.	John	Perez	D	\$	1,000
St. Rep.	Bill	Monning	D	\$	1,000
St. Rep.	Kevin	de Leon	D	\$	1,000
St. Sen.	Ronald	Calderon	D	\$	1,000
St. Sen.	Darrell	Steinberg	D	\$	1,000
St. Sen.	Robert	Dutton	R	\$	1,000
ILLINOIS					
St. Rep.	Tom	Cross	R	\$	1,000
St. Rep.	Michael	Madigan	D	\$	1,000
St. Sen.	Christine	Radogno	R	\$	1,000
St. Sen.	John	Cullerton	D	\$	1,000
PENNSYLVANIA					
St. Sen.	Donald	White	R	\$	1,000
St. Sen.	Jake	Corman	R	\$	1,000
St. Sen.	Dominic	Pileggi	R	\$	1,000
St. Sen.	Joseph	Scarnati	R	\$	1,000

# Prudential PAC State Contributions

January 1, 2010 – December 31, 2010

## STATE CONTRIBUTIONS

STATE	CANDIDATE		PARTY	CONTRIBUTION	
TEXAS					
Atty Gen.	Greg	Abbott	R	\$	2,500
Gov.	Rick	Perry	R	\$	2,500
St. Rep.	Joseph	Deshotel	D	\$	500
St. Rep.	Craig	Eiland	D	\$	500
St. Rep.	Rene	Oliveira	D	\$	500
St. Rep.	Burt	Solomons	R	\$	500
St. Rep.	Senfronia	Thompson	D	\$	500
St. Rep.	Larry	Taylor	R	\$	500
St. Rep.	Kelly	Hancock	R	\$	500
St. Rep.	Mark	Strama	D	\$	500
St. Rep.	Todd	Hunter	R	\$	500
St. Rep.	Joseph	Deshotel	D	\$	500
St. Rep.	Trey	Martinez Fischer	D	\$	500
St. Rep.	Joseph	Straus	R	\$	1,000
St. Sen.	Robert	Duncan	R	\$	1,000
St. Sen.	Leticia	Van de Putte	D	\$	1,000
St. Sen.	Kirk	Watson	D	\$	1,000
St. Sen.	Glenn	Hegar	R	\$	1,000

# Prudential New Jersey PAC Contributions

January 1, 2010 – December 31, 2010

## NEW JERSEY PAC CONTRIBUTIONS

STATE	CANDIDATE		PARTY	CONTRIBUTION
GEORGIA				
Gov.	Nathan	Deal	R	\$ 1,000
Lt. Gov	Casey	Cagle	R	\$ 750
St. Rep.	Stacey	Abrams	D	\$ 350
St. Rep.	Carl	Epps	D	\$ 225
St. Rep.	Howard	Maxwell	R	\$ 275
St. Rep.	John	Meadows	R	\$ 500
St. Rep.	Lawrence	O'Neal	R	\$ 400
St. Rep.	David	Ralston	R	\$ 750
St. Rep.	Richard	Smith	R	\$ 650
St. Rep.	Calvin	Smyre	D	\$ 400
St. Rep.	Tom	Weldon	R	\$ 300
St. Sen.	Bill	Cowsert	R	\$ 750
St. Sen.	Ed	Harbison	D	\$ 250
St. Sen.	Jack	Murphy	R	\$ 275
St. Sen.	Chip	Rogers	R	\$ 325
St. Sen.	David	Shafer	R	\$ 275
St. Sen.	Cecil	Staton	R	\$ 350
St. Sen.	Tommie	Williams	R	\$ 325

# Prudential New York PAC Contributions

January 1, 2010 – December 31, 2010

## NEW YORK PAC CONTRIBUTIONS

STATE		CANDIDATE	PARTY	CONTRIBUTION	
St. Rep.	Herman	Farrell	D	\$	1,000
St. Rep.	Joseph	Morelle	D	\$	2,800
St. Rep.	Sheldon	Silver	D	\$	1,000
St. Sen.	Neil	Breslin	D	\$	2,000
St. Sen.	John	Sampson	D	\$	1,000
St. Sen.	James	Seward	R	\$	1,500

### OTHER NEW YORK COMMITTEES

NY Democratic Assembly Campaign Committee	D	\$	7,000
NY Senate Republican Campaign Committee	R	\$	3,000

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

January 1, 2010 – December 31, 2010

ORGANIZATION*	LOBBYING (\$) **	TOTAL DUES
American Council of Life Insurers	\$ 349,650.00	\$ 1,575,000.00
United States Chamber of Commerce	\$ 528,650.00	\$ 1,057,300.00
US Chamber Institute for Legal Reform	\$ 850,000.00	\$ 1,000,000.00
Corporate Executive Board	\$ -	\$ 539,173.00
Investment Company Institute	\$ -	\$ 508,635.52
The Financial Services Roundtable	\$ 171,395.00	\$ 456,000.00
Business Roundtable	\$ 179,025.60	\$ 235,560.00
Association for Advanced Life Underwriting	\$ 5,916.00	\$ 206,800.00
The Financial Services Forum	\$ 100,000.00	\$ 200,000.00
Insurance Marketplace Standards Association	\$ -	\$ 182,000.00
Metro Hartford Alliance	\$ 1,230.00	\$ 123,000.00
Insured Retirement Institute	\$ -	\$ 100,000.00
Association of California Life & Health	\$ 4,896.00	\$ 81,600.00
Mortgage Bankers Association	\$ 19,265.49	\$ 62,277.00
The Institute of International Finance, Inc.	\$ -	\$ 61,500.00
Securities Industry and Financial Markets Association	\$ 9,000.00	\$ 60,000.00
The Insurance Federation of Pennsylvania	\$ 12,480.00	\$ 60,000.00
New Jersey Chamber of Commerce	\$ 8,355.75	\$ 55,705.00
Worldwide ERC	\$ 15,232.50	\$ 50,775.00

\*Prudential belongs to various trade organizations that maintain a relevant focus on matters concerning our business interests.

\*\* Non-deductible portion of dues computed pursuant to I.R.C. § 162 (e) and Treas. Reg. § 1.162.29.





**Prudential**