2012 Political Activities and Contributions Report





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A Note from the PAC Treasurer



I am pleased to announce the release of our 2012 Political Activities and Contributions report. At Prudential we are committed to operating openly and believe the best way to inform and educate how we do business is to communicate and provide transparency to our shareholders, customers, employees and other important stakeholders.

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 maintain a presence in the public policy arena to express viewpoints to legislators and regulators on key matters that impact how we operate as a business.

The Company sponsors a number of initiatives to help support an active profile in the legislative and regulatory processes. Such sponsored activities include direct engagements with state and federal lawmakers and regulators, establishing partnerships with trade organizations, operation of political action committees and, to a lesser extent, the use of corporate funds to support political organizations.

Our annual report provides detailed information on the Company sponsored political contributions and annual association dues, assessments and contributions to trade associations exceeding \$50,000. The Company sponsored political action committees operate in accordance with all relevant state and federal laws. Further information about our political action committees are available on the Federal Election Commission website at fec.gov.

Prudential does not provide direct independent expenditures intended to support communications that expressly advocate the election or defeat of a candidate. In 2012, the Company did not contribute corporate funds to support any state or local ballot initiatives. Company policy prohibits contributing corporate funds to support candidate committees.

If you have any questions related to Prudential's political activities or contributions please submit an email to prudential.pac@prudential.com.

Sincerely,

Roman Gabriel
PAC Treasurer

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 does not directly contribute financial or other assistance to candidates for public office. In accordance with federal, state, and local campaign finance laws, Prudential may provide corporate political contributions to state political party committees or other committees. Prudential will not contribute financial or other support to U.S. political parties, committees, or candidates for public office or support other organizations except where approved by External Affairs in consultation with the Law Department. All corporate contributions, if made, will be included in the annual report.

Likewise, Prudential may also contribute to 527 groups or super PACs in accordance with all federal, state, and local campaign finance laws. Such contributions will be approved by External Affairs in consultation with the Law Department and, if made, will be disclosed in the annual report.

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 penalize anyone for electing not to participate.

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 6. 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.

Summary of Prudential Policies and Procedures for Political Activity



Prudential's United States political contributions and those of its political action committees are made in accordance with federal, state, and local campaign finance laws in an effort to promote the interests and public policy positions of Prudential Financial Inc. Additionally, internal policies and standards adopted by the company also govern Prudential's political activity.

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.

PAC Board of Directors



BOARD

Susan Blount

Senior Vice President & General Counsel Law, Compliance, Business Ethics &

External Affairs

Barbara Koster

Senior Vice President

Corporate Technology Management

Scott Sleyster

Senior Vice President

Domestic Chief Investment Officer

Michael Lillard

Chief Investment Officer

Prudential Fixed Income

Rex B. Wackerle

Vice President

External Affairs

Robert DeFillippo

Chief Communications Officer

Global Communications

Jeanette Pollock

Vice President

Enterprise Discontinued Business Solutions

Sharon Taylor

Senior Vice President

Human Resources

Rob Tyndall

Vice President, Risk Management

Prudential Retirement

OFFICERS

Mark Grier

PAC Chairman

Roman Gabriel

PAC Treasurer

Vice Chairman, Office of the Chairman

Ann M. Kappler

PAC Vice Chairman

Vice President, Chief Legal Officer,

Litigation and Regulation

Head of External Affairs

John Feeney

Assistant PAC Treasurer

Vice President, External Affairs

ADMINISTRATION

Brandy Stacks

PAC Administrator

Manager, External Affairs

Vice President, External Affairs



LLS House of Representatives

U.S. House of Representatives								
STATE		CANDIDA	ΓE	PARTY	CONTRIBUTION			
Alabama								
	Rep.	Spencer	Bachus	R	\$5,000.00			
	Rep.	Terri	Sewell	D	\$1,500.00			
California								
	Rep.	Joe	Baca	D	\$2,000.00			
	Rep.	Howard	McKeon	R	\$1,000.00			
	Rep.	Juan	Vargas	D	\$1,500.00			
	Rep.	Darrell	Issa	R	\$1,000.00			
	Rep.	Henry	Waxman	D	\$1,000.00			
	Rep.	Susan	Davis	D	\$1,000.00			
	Rep.	Mike	Thompson	D	\$2,500.00			
	Rep.	Maxine	Waters	D	\$2,500.00			
	Rep.	Devin	Nunes	R	\$2,500.00			
	Rep.	Ed	Royce	R	\$5,000.00			
	Rep.	Kevin	McCarthy	R	\$5,000.00			
	Rep.	Linda	Sanchez	D	\$1,000.00			
Colorado								
	Rep.	Edwin	Perlmutter	D	\$3,500.00			
Connectic	ut							
	Rep.	John	Larson	D	\$5,000.00			
	Rep.	James	Himes	D	\$5,000.00			



U.S. House of Representatives

STATE		CANDI	DATE	PARTY	CONTRIBUTION
Delaware					
	Rep.	John	Carney	D	\$3,500.00
Florida					
	Rep.	Jeff	Miller	R	\$2,500.00
Georgia					
	Rep.	John	Barrow	D	\$1,500.00
Illinois					
	Rep.	Aaron	Schock	R	\$2,500.00
	Rep.	Peter	Roskam	R	\$5,000.00
	Rep.	Robert	Dold	R	\$2,500.00
	Rep.	Judy	Biggert	R	\$1,500.00
Louisiana					
	Rep.	Charles	Boustany	R	\$8,500.00
Maine					
	Rep.	Chellie	Pingree	D	\$1,000.00
Maryland					
	Rep.	John	Conyers	D	\$500.00
	Rep.	Steny	Hoyer	D	\$5,000.00
Massachus	etts				
	Rep.	Richard	Neal	D	\$5,000.00
	Rep.	Michael	Capuano	D	\$1,000.00



U.S. House of Representatives

STATE		CANDIDATE			CONTRIBUTION
Michigan					
Ū	Rep.	Sander	Levin	D	\$5,000.00
	Rep.	David	Camp	R	\$5,000.00
	Rep.	Gary	Peters	D	\$3,000.00
Minnesota					
	Rep.	Erik	Paulsen	R	\$5,000.00
	Rep.	John	Kline	R	\$2,500.00
New Jersey					
	Rep.	Frank	LoBiondo	R	\$1,000.00
	Rep.	William	Pascrell	D	\$6,000.00
	Rep.	Rush	Holt	D	\$7,000.00
	Rep.	Robert	Andrews	D	\$2,500.00
	Rep.	Donald	Payne	D	\$3,000.00
	Rep.	Donald	Payne Jr.	D	\$1,000.00
	Rep.	Lance	Leonard	R	\$2,000.00
	Rep.	Frank	Pallone	D	\$1,000.00
	Rep.	Scott	Garrett	R	\$5,000.00
North Caroli	ina				
	Rep.	Patrick	McHenry	R	\$2,500.00



U.S. House of Representatives

STATE		CANDIDAT	TE .	PARTY	CONTRIBUTION
New York					
	Rep.	Joseph	Crowley	D	\$1,000.00
	Rep.	Tom	Reed	R	\$2,500.00
	Rep.	Steve	Israel	D	\$1,000.00
	Rep.	Louise	Slaughter	D	\$2,000.00
	Rep.	Timothy	Bishop	D	\$1,000.00
	Rep.	Carolyn	McCarthy	D	\$5,000.00
	Rep.	Michael	Grimm	D	\$2,500.00
	Rep.	Carolyn	Maloney	D	\$2,500.00
Ohio					
	Rep.	Joyce	Beatty	D	\$1,000.00
	Rep.	John	Boehner	R	\$5,000.00
	Rep.	Timothy	Ryan	D	\$1,000.00
	Rep.	Marcia	Fudge	D	\$1,000.00
	Rep.	Patrick	Tiberi	R	\$5,000.00
	Rep.	Steve	Stivers	R	\$2,500.00
	Rep.	James	Renacci	R	\$1,500.00
Oregon					
	Rep.	Kurt	Schrader	D	\$2,500.00



U.S. House of Representatives

		U.S. HU	use of Represer	itatives	
STATE		CANDIDAT	E	PARTY	CONTRIBUTION
Pennsylvar	nia				
•	Rep.	Allyson	Schwartz	D	\$2,500.00
	Rep.	Jason	Altmire	D	\$2,500.00
	Rep.	James	Gerlach	R	\$2,500.00
	Rep.	Michael	Fitzpatrick	R	\$3,000.00
Tennessee					
	Rep.	David	Roe	R	\$2,500.00
Texas					
	Rep.	Samuel	Johnson	R	\$3,000.00
	Rep.	Jeb	Hensarling	R	\$5,000.00
	Rep.	Kenny	Marchant	R	\$2,500.00
	Rep.	Francisco	Canseco	R	\$2,500.00
Utah					
	Rep.	James	Matheson	D	\$2,500.00
Virginia					
J	Rep.	Paul	Hirschbiel	D	\$3,000.00
	Rep.	Eric	Cantor	R	\$5,500.00
	Rep.	James	Moran	D	\$1,000.00
Washingto	n				
_	Rep.	Rick	Larsen	D	\$1,000.00
	Rep.	David	Reichert	R	\$2,500.00
	Rep.	Cathy	McMorris Rodgers	R	\$3,000.00



U.S. House of Representatives

STATE Wisconsin		CANDIDAT	E	PARTY	CONTRIBUTION
Wisconsin	Rep.	Ron	Kind	D	\$5,000.00
	Rep.	Gwendolynne	Moore	D	\$2,000.00
	Rep.	Sean	Duffy	R	\$5,500.00
West Virginia				•	
	Rep.	Shelley	Capito	R	\$2,500.00



U.S. Senate

STATE		CANDIE	DATE	PARTY	CONTRIBUTION
Alaska					
7 Haona	Sen.	Mark	Begich	D	\$1,500.00
Colorado					
	Sen.	Mark	Udall	D	\$1,500.00
	Sen.	Michael	Bennet	D	\$2,500.00
Connecticut					
	Sen.	Richard	Blumenthal	D	\$2,500.00
	Sen.	Christopher	Murphy	D	\$2,500.00
Delaware					
	Sen.	Thomas	Carper	D	\$2,500.00
Florida					
	Sen.	Bill	Nelson	D	\$1,000.00
lowa					
	Sen.	Tom	Harkin	D	\$2,500.00
	Sen.	Charles	Grassley	R	\$5,000.00



U.S. Senate

STATE		CAND	IDATE	PARTY	CONTRIBUTION
Kansas					
	Sen.	Pat	Roberts	R	\$2,500.00
	Sen.	Jerry	Moran	R	\$2,000.00
Kentucky					
	Sen.	Mitch	McConnell	R	\$5,000.00
Louisiana					
	Sen.	David	Vitter	R	\$2,000.00
Maryland					
	Sen.	Benjamin	Cardin	D	\$2,500.00
Massachuset					
	Sen.	Scott	Brown	R	\$1,000.00
	Sen.	John	Kerry	D	\$2,500.00
Michigan					
	Sen.	Debbie	Stabenow	D	\$2,500.00
Missouri					
	Sen.	Roy	Blunt	R	\$2,500.00
	Sen.	Claire	McCaskill	D	\$2,500.00
Mississippi					
	Sen.	Roger	Wicker	R	\$1,000.00
Montana					
	Sen.	Max	Baucus	D	\$2,500.00
	Sen.	Jon	Tester	D	\$5,000.00



U.S. Senate

STATE		CANDIDA	ATE	PARTY	CONTRIBUTION
Nebraska					
	Sen.	Dean	Heller	R	\$1,000.00
	Sen.	Mike	Johanns	R	\$4,000.00
New York					
	Sen.	Charles	Schumer	D	\$3,000.00
	Sen.	Kirsten	Gillibrand	D	\$1,000.00
Ohio					
	Sen.	Sherrod	Brown	D	\$2,500.00
Oregon					
	Sen.	Jeff	Merkley	D	\$2,500.00
Pennsylvania					
	Sen.	Patrick	Toomey	R	\$4,000.00
South Dakota					
	Sen.	Tim	Johnson	D	\$5,000.00
Tennessee				_	
	Sen.	Robert	Corker	R	\$5,000.00
Texas					
	Sen.	John	Cornyn	R	\$5,000.00
Utah					
	Sen.	Orrin	Hatch	R	\$5,000.00
Virginia					
	Sen.	Mark	Warner	D	\$7,500.00
	Sen.	Lamar	Alexander	R	\$2,500.00



U.S. Senate

STATE		CANDIDA	ATE	PARTY	CONTRIBUTION
Washington					
ŭ	Sen.	Patty	Murray	D	\$1,500.00
West Virginia					
	Sen.	Joe	Manchin	D	\$1,500.00
Wisconsin					
	Sen.	Ronald	Johnson	R	\$2,500.00
Wyoming					
	Sen.	Michael	Enzi	R	\$2,500.00
	Sen.	John	Barrasso	R	\$5,000.00

Prudential PAC State Contributions



State Contributions

STATE		CANDIDA	ATE	PARTY	CONTRIBUTION
GA	Sen.	Ronald	Ramsey	D	\$250.00
GA	Rep.	Richard	Smith	R	\$450.00
GA	Lt. Gov.	Casey	Cagle	R	\$750.00
GA	Rep.	David	Ralston	R	\$500.00
GA	Rep.	Calvin	Smyre	D	\$250.00
GA	Rep.	Howard	Maxwell	R	\$250.00
GA	Sen.	David	Shafer	R	\$250.00
GA	Rep.	Stacey	Abrams	R	\$300.00
IL	Rep.	Tom	Cross	R	\$1,000.00
IL	Sen.	Christine	Radogno	R	\$1,000.00
IL	Rep.	Frank	Mautino	D	\$500.00
IL	Sen.	William	Haine	D	\$500.00
PA	Sen.	Donald	White	R	\$1,000.00
PA	Rep.	Michael	Turzai	R	\$1,000.00
PA	Rep.	Nick	Micozzie	R	\$1,000.00
PA	Rep.	Anthony	DeLuca	D	\$1,000.00
PA	Sen.	Michael	Stack	D	\$1,000.00
PA	Rep.	Joseph	Hackett	R	\$1,000.00
TX	Rep.	Kenneth	Sheets	R	\$500.00
TX	Sen.	Kelly	Hancock	R	\$1,000.00
TX	Sen.	Larry	Taylor	R	\$1,000.00
TX	Sen.	Tommy	Williams	R	\$1,000.00

Prudential PAC State Contributions



State Contributions

STATE	CANDIDATE			PARTY	CONTRIBUTION
TX	Sen.	Robert	Duncan	R	\$1,000.00
TX	Rep.	Craig	Eiland	D	\$500.00
TX	Rep.	Armando	Walle	D	\$500.00
TX	Rep.	Hubert	Vo	D	\$500.00
TX	Rep.	Senfronia	Thompson	D	\$500.00
TX	Rep.	Joseph	Straus	R	\$1,000.00
TX	Sen.	Kevin	Eltife	R	\$1,000.00
TX	Sen.	Kirk	Watson	D	\$1,000.00
TX	Sen.	Royce	West	D	\$1,000.00
TX	Sen.	Troy	Fraser	R	\$1,000.00
TX	Rep.	Matt	Schaefer	R	\$500.00
TX	Rep.	Jim	Pitts	R	\$500.00
TX	Rep.	Paul	Workman	R	\$500.00
TX	Rep.	Dee	Margo	R	\$500.00
TX	Sen.	Eduardo	Lucio	D	\$500.00

Prudential PACs Contributions to PACs Prudential



U.S. Senate – Leadership PACs

COMMITTEE		CANDIDA	\TE	PARTY	STATE	CONTRIBUTION
Bluegrass Committee	Sen.	Mitch	McConnell	R	KY	\$5,000.00
Forward Together PAC	Sen.	Mark	Warner	D	VA	\$5,000.00
Heartland Values PAC	Sen.	John	Thune	R	SD	\$5,000.00
LEGPAC	Sen.	Benjamin	Cardin	D	MD	\$2,500.00
NEW MILLENNIUM PAC	Sen.	Robert	Menendez	D	NJ	\$5,000.00
Next Century Fund	Sen.	Richard	Burr	R	VA	\$5,000.00
Republican Majority Fund	Sen.	Saxby	Chambliss	R	GA	\$5,000.00
ROYB FUND	Sen.	Roy	Blunt	R	MO	\$2,500.00
Truth Accountability and Courage Political Action	Sen.	Thomas	Coburn	R	VA	\$2,500.00
The Freedom Project	Sen.	Michael	Crapo	R	ID	\$5,000.00

U.S. House – Leadership PACs

COMMITTEE		CANDIDA	ATE .	PARTY	STATE	CONTRIBUTION
Every Republican is Crucial (ERIC PAC)	Rep.	Eric	Cantor	R	VA	\$5,000.00
AMERIPAC	Rep.	Steny	Hoyer	D	MD	\$5,000.00
Jobs, Opportunities and Education PAC (JOE-PAC)	Rep.	Joseph	Crowley	D	NY	\$5,000.00
BADGERPAC	Rep.	Ron	Kind	D	WI	\$5,000.00
BRIDGEPAC	Rep.	James	Clyburn	D	SC	\$5,000.00
Grassroots Organizing & Leading PAC	Rep.	Sander	Levin	D	MD	\$5,000.00
Supporting Conservatives of Today and Tomorrow	Rep.	Scott	Garrett	R	NJ	\$5,000.00
Synergy PAC	Rep.	John	Larson	D	VA	\$5,000.00

Prudential PACs Contributions to PACs Prudential



U.S. House – Leadership PACs

COMMITTEE		CANDIDATE			STATE	CONTRIBUTION
Silk PAC	Rep.	William	Pascrell	D	NJ	\$2,500.00
CAP PAC	Rep.	Carolyn	McCarthy	D	NY	\$2,500.00
The Freedom Project	Rep.	John	Boehner	R	ОН	\$5,000.00
The Madison PAC	Rep.	Richard	Neal	D	MD	\$5,000.00

Other Committees

COMMITTEE	PARTY	CONTRIBUTION
Investment Company Institute PAC	N/A	\$2,500.00
Blue Dog PAC	D	\$5,000.00
New Democrat Coalition Political Action Committee	D	\$5,000.00

Prudential New York PAC Contributions Prudential Bring Your Challenges

New York

STATE	CANDIDATE / COMMITTEE			PARTY	CONTRIBUTION
NY	St. Sen.	Neil	Breslin	D	\$1,750.00
NY	St. Rep.	Joseph	Morelle	D	\$2,000.00
NY	St. Sen.	Dean	Skelos	R	\$1,000.00
NY	St. Sen.	James	Seward	R	\$1,000.00
NY	St. Rep.	Keith	Wright	D	\$500.00
NY	St. Sen.	Timothy	Kennedy	D	\$500.00
NY	NY Dem	ocratic Assembly	Campaign Committee	D	\$9,500.00

Industry Groups and Trade Association Dues Prudential



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

ORGANIZATION*	LOBBYING (\$) **	TOTAL DUES
Trade Association	Lobbying	Total Dues
American Council of Life Insurers	\$482,955.50	\$2,382,777.90
U.S. Chamber Institute for Legal Reform	\$600,000.00	\$800,000.00
LIMRA	_	\$435,039.00
Association For Advanced Life Underwriting	\$21,566.00	\$271,566.00
Business Roundtable	\$84,801.60	\$235,560.00
The Financial Services Roundtable	\$91,200.00	\$228,000.00
Insured Retirement Institute	\$7,650.00	\$185,000.00
Metro Hartford Alliance	\$1,350.00	\$135,000.00
U.S. Chamber of Commerce	\$68,750.00	\$125,000.00
Securities Industry and Financial Markets Association	\$17,257.80	\$115,052.00
Association of California Life & Health	\$9,460.00	\$94,600.00
Association of Institutional Investors	_	\$76,000.00
Florida Insurance Council Inc	\$30,474.15	\$71,064.10
The Insurance Federation of Pennsylvania	\$13,000.00	\$65,000.00
Life Insurance Council of New York Inc	\$15,000.00	\$60,000.00
National Multi Housing Council	\$24,805.00	\$55,000.00

^{*}Prudential belongs to various organizations that maintain a relevant focus on matters concerning our business interests including membership organizations, trade groups, and social welfare organizations.

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