2013 Political Activities and Contributions Report





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A Note from the PAC Treasurer



I am pleased to announce the release of our 2013 Political Activities and Contributions Report ("annual report"). At Prudential we are committed to operating openly and believe the best way to demonstrate 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 our viewpoints to legislators and regulators on key matters that impact how we operate as a business.

Prudential sponsors a number of initiatives to help support an active profile in legislative and regulatory processes. Such sponsored activities include direct engagements with state and federal lawmakers and regulators, 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 Prudential's 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 is available on the Federal Election Commission's website at fec.gov. This report also provides a summary of Prudential's policies and procedures for political activities.

Prudential does not provide direct independent expenditures intended to support communications that expressly advocate the election or defeat of a candidate. In 2013, Prudential did not contribute corporate funds to support any state or local ballot initiative nor did it contribute financial or other support to candidates for public office.

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

March 2014

Summary of Prudential Policies and Procedures for Political Activity



Prudential Financial, Inc. ("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 to disclose its political activity in an effort to promote ethical corporate governance, participation in political processes and confidence in the American democratic systems. 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 and other applicable laws without regard for the private political preferences of Prudential executives. Internal policies and standards adopted by the Company also govern political activity. The Corporate Governance and Business Ethics Committee of Prudential's Board of Directors provides guidance and approves the political contributions strategy and policy of the company.

All employees are permitted to engage in political activities to the extent permitted by law, provided 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 the company.

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 political committees excluding candidate 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 direct corporate contributions will be included in this annual report.

Prudential may also contribute to 527 groups or super PACs in accordance with all federal, state, and local campaign finance laws. Such contributions of \$50,000 or more will be approved by External Affairs in consultation with the Law Department and will be disclosed in this annual report.

Prudential sponsors PACs to which eligible employees working in the United States may contribute. 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 provide 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 the retirement, savings, investment and insurance needs of all Americans. Political contribution determinations are made by the Prudential Financial, Inc. Federal Political Action Committee and Prudential Financial Inc. State and Federal Political Action Committee Boards of Directors in consultation with Prudential's External Affairs Department and are executed by the Administrator and Treasurer of the Prudential PACs. In addition, an audit of the Prudential PACs is conducted every five years by an independent function.

A complete membership listing of the Prudential PACs Boards is included on pages 6 and 7. Each board meets once per year at a minimum. The PAC Administrator, Treasurer and Boards of Directors are responsible for, respectively, managing and administering all Prudential PACs, including making final decisions as to political contributions and related activities of the PACs.

Procedures for Political Activity



The External Affairs Department, in conjunction with the Legal and Compliance Departments, are responsible for maintaining Prudential's internal policies and procedures and ensuring compliance with internal policies relating to U.S. political activities. Prudential and Prudential's PACs file reports and disclose political contributions and lobbying expenditures to the public through the means prescribed by state and federal governmental authorities.

In their dealings with public officials and government employees, all Prudential employees are required to comply with Prudential's policies on political activities, lobbying and gifts and entertainment, including 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 generally accepted standards of conduct of the profession.

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Federal PAC Board of Directors



BOARD

Susan Blount

Executive 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

Vice Chairman, Office of the Chairman

Ann Kappler

PAC Vice Chairman

Vice President, Chief Legal Officer,

Litigation and Regulation

Head of External Affairs

ADMINISTRATION

Roman Gabriel

PAC Treasurer

Vice President, External Affairs

John Feeney

Assistant PAC Treasurer

Vice President, External Affairs

Brandy Stacks

PAC Administrator

Manager, External Affairs

State & Federal PAC Board of Directors 슚 Prudential



BOARD

Robert DeFillippo

Chief Communications Officer **Global Communications**

Joseph Emanuel

Vice President **Corporate Counsel**

Rex B. Wackerle

Vice President **External Affairs**

Jeanette Pollock

Vice President

Enterprise Discontinued Business Solutions

Dylan Tyson

Vice President

Pension Risk Management

Retirement

OFFICERS

Ann Kappler

PAC Chairman Vice President, Chief Legal Officer, Litigation and Regulation Head of External Affairs

Michael McCann

PAC Vice Chairman

Vice President, External Affairs

ADMINISTRATION

Roman Gabriel

PAC Treasurer Vice President, External Affairs

John Feeney

Assistant PAC Treasurer Vice President, External Affairs

Brandy Stacks

PAC Administrator Manager, External Affairs

March 2014



STATE		CANDID	ATE	PARTY	CONTRIBUTION
Alabama					
	Rep.	Martha	Roby	R	\$1,000.00
Alaska					
	Sen.	Mark	Begich	D	\$1,500.00
Arizona					
	Rep.	Krysten	Sinema	D	\$2,000.00
	Rep.	Matt	Salmon	R	\$1,000.00
California					
California	Rep.	Xavier	Becerra	D	\$3,000.00
	Rep.	Howard	McKeon	R	\$1,000.00
	Rep.	Gary	Miller	R	\$1,000.00
	Rep.	Devin	Nunes	R	\$5,000.00
	Rep.	Edward	Royce	R	\$3,000.00
	Rep.	Linda	Sanchez	D	\$5,000.00
	Rep.	Mike	Thompson	D	\$3,500.00
	Rep.	Juan	Vargas	D	\$1,500.00
	Rep.	Maxine	Waters	D	\$3,500.00
Colorado					
00101440	Sen.	Michael	Bennet	D	\$1,000.00
	Rep.	Edwin	Perlmutter	D	\$5,000.00
Connectic	ut				
	Sen.	Richard	Blumenthal	D	\$2,500.00
	Rep.	Joseph	Courtney	D	\$4,500.00
	Rep.	James	Himes	D	\$3,500.00
	Rep.	John	Larson	D	\$5,000.00



STATE		CANDII	DATE	PARTY	CONTRIBUTION
Delaware					
	Rep.	John	Carney	D	\$3,500.00
Florida					
	Rep.	Patrick	Murphy	D	\$2,000.00
	Rep.	Dennis	Ross	R	\$1,000.00
	Rep.	Debbie	Wasserman Schultz	D	\$1,000.00
Georgia					
	Rep.	John	Barrow	D	\$1,000.00
Illinois					
	Sen.	Mark	Kirk	R	\$2,500.00
	Rep.	Cheri	Bustos	D	\$1,000.00
	Rep.	Bill	Foster	D	\$2,000.00
	Rep.	Robin	Kelly	D	\$1,000.00
	Rep.	Mike	Quigley	D	\$1,500.00
	Rep.	Peter	Roskam	R	\$5,000.00
	Rep.	Aaron	Schock	R	\$2,500.00
Indiana					
	Rep.	Joseph	Donnelly	D	\$1,000.00
	Rep.	Luke	Messer	R	\$1,000.00
Kansas					
	Sen.	Pat	Roberts	R	\$2,500.00
Kentucky					
	Rep.	Brett	Gutherie	R	\$1,000.00
Louisiana					
	Rep.	Charles	Boustany	R	\$3,000.00
Maine	Rep.	Michael	Michaud	D	\$1,000.00



STATE		CANDID	ATE	PARTY	CONTRIBUTION
Maryland					
	Sen.	Ben	Cardin	D	\$1,000.00
Massachus	setts				
	Rep.	Joseph	Kennedy	D	\$1,500.00
	Rep.	Richard	Neal	D	\$5,000.00
	Rep.	John	Tierney	D	\$2,000.00
Michigan					
_	Rep.	Daniel	Kildee	D	\$1,000.00
	Rep.	Sander	Levin	D	\$5,000.00
	Rep.	Gary	Peters	D	\$5,000.00
	Rep.	Timothy	Walberg	R	\$1,000.00
Minnesota					
	Rep.	John	Kline	R	\$5,000.00
	Rep.	Erik	Paulsen	R	\$5,000.00
Mississipp	i				
	Rep.	Patrick	Nunnelee	R	\$1,000.00
Montana					
	Sen.	Jon	Tester	D	\$5,000.00
New Hamp	shire				
	Sen.	Kelly	Ayotte	R	\$2,500.00
	Sen.	Jeanne	Shaheen	D	\$1,500.00
New Jersey	/				
	Sen.	Cory	Booker	D	\$2,500.00
	Rep.	Robert	Andrews	D	\$2,500.00
	Rep.	Rodney	Frelinghuysen	R	\$2,500.00
	Rep.	Scott	Garrett	R	\$5,000.00
	Rep.	Rush	Holt	D	\$5,000.00



STATE		CANDIDAT	E	PARTY	CONTRIBUTION
New Jersey	,				
	Rep.	Leonard	Lance	R	\$2,500.00
	Rep.	Frank	LoBiondo	R	\$1,000.00
	Rep.	Frank	Pallone	D	\$2,500.00
	Rep.	William	Pascrell	D	\$2,500.00
	Rep.	Donald	Payne, Jr.	D	\$3,500.00
New York					
	Rep.	Joseph	Crowley	D	\$5,000.00
	Rep.	Steve	Israel	D	\$2,000.00
	Rep.	Carolyn	Maloney	D	\$2,500.00
	Rep.	Carolyn	McCarthy	D	\$5,000.00
	Rep.	Gregory	Meeks	D	\$1,000.00
	Rep.	Thomas	Reed	R	\$2,000.00
North Carolina					
	Sen.	Kay	Hagan	D	\$5,000.00
	Rep.	Richard	Hudson	R	\$1,000.00
	Rep.	Patrick	McHenry	R	\$3,000.00
North Dakota					
	Sen.	Heidi	Heitkamp	D	\$1,000.00
Ohio					
	Sen.	Sherrod	Brown	D	\$2,500.00
	Sen.	Rob	Portman	R	\$2,500.00
	Rep.	Joyce	Beatty	D	\$3,500.00
	Rep.	John	Boehner	R	\$5,000.00



STATE		CANDIDATE		PARTY	CONTRIBUTION
Ohio					
	Rep.	Marcia	Fudge	D	\$3,000.00
	Rep.	James	Renacci	R	\$2,500.00
	Rep.	Steve	Stivers	R	\$2,500.00
	Rep.	Pat	Tiberi	R	\$5,000.00
Oregon					
	Sen.	Ron	Wyden	D	\$1,000.00
	Rep.	Earl	Blumenauer	D	\$1,000.00
	Rep.	Kurt	Schrader	D	\$2,500.00
Pennsylvani	Ponnsylvania				
	Sen.	Patrick	Toomey	R	\$4,000.00
	Rep.	Lou	Barletta	R	\$1,000.00
	Rep.	Mike	Kelly	R	\$1,000.00
	Rep.	Allyson	Schwartz	D	\$2,500.00
Rhode Islan	d				
	Sen.	Jack	Reed	D	\$1,000.00
South Carolina					
	Sen.	Timothy	Scott	R	\$4,500.00
Tennessee					
	Sen.	Lamar	Alexander	R	\$5,000.00



STATE		CANDIDAT	ΓE	PARTY	CONTRIBUTION
Texas					
	Rep.	Kevin	Brady	R	\$3,000.00
	Rep.	Jeb	Hensarling	R	\$5,000.00
	Rep.	Ruben	Hinojosa	D	\$2,500.00
	Rep.	Samuel	Johnson	R	\$3,000.00
	Rep.	Robert	Neugebauer	R	\$3,000.00
Vermont					
	Rep.	Peter	Welch	D	\$1,000.00
Virginia					
	Rep.	Eric	Cantor	R	\$5,000.00
	Rep.	Robert	Goodlatte	R	\$2,500.00
	Rep.	Robert	Scott	D	\$1,000.00
Washington					
_	Sen.	Patty	Murray	D	\$2,500.00
	Rep.	Dennis	Heck	D	\$1,000.00
West Virginia				_	
	Rep.	Shelley	Moore Capito	R	\$5,000.00
Wisconsin					
	Rep.	Sean	Duffy	R	\$5,000.00
	Rep.	Ron	Kind	D	\$5,000.00
	Rep.	Thomas	Petri	R	\$2,500.00
	Rep.	Mark	Pocan	D	\$1,000.00
	Rep.	Paul	Ryan	R	\$2,500.00
Wyoming					
	Sen.	Michael	Enzi	R	\$2,500.00



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STATE		CANDIDA	ALE	PARTY	CONTRIBUTION
Vermont					
	Rep.	Peter	Welch	D	\$1,000.00
Washington					
	Sen.	Patty	Murray	D	\$2,500.00
	Rep.	Dennis	Heck	D	\$1,000.00
West Virginia					
J	Rep.	Shelley	Moore Capito	R	\$5,000.00
Wisconsin					
	Rep.	Sean	Duffy	R	\$5,000.00
	Rep.	Ron	Kind	D	\$5,000.00
	Rep.	Thomas	Petri	R	\$2,500.00
	Rep.	Mark	Pocan	D	\$1,000.00
	Rep.	Paul	Ryan	R	\$2,500.00
Wyoming					
	Sen.	Michael	Enzi	R	\$2,500.00

Prudential PAC State Contributions



STATE		CANDIDATE		PARTY	CONTRIBUTION
GA	Gov.	Nathan	Deal	R	\$750.00
GA	Sen.	Ronald	Ramsey	D	\$250.00
GA	Sen.	David	Shafer	R	\$500.00
GA	Rep.	Stacey	Abrams	R	\$300.00
GA	Rep.	David	Ralston	R	\$500.00
GA	Rep.	Richard	Smith	R	\$450.00
GA	Rep.	Calvin	Smyre	D	\$250.00
IL	Sen.	John	Cullerton	D	\$500.00
IL	Sen.	William	Haine	D	\$500.00
IL	Sen.	Christine	Radogno	R	\$1,000.00
IL	Rep.	Anthony	DeLuca	D	\$500.00
IL	Rep.	Jim	Durkin	R	\$1,000.00
IL	Rep.	Frank	Mautino	D	\$500.00
PA	Gov.	Tom	Corbett	R	\$2,000.00
PA	Sen.	Joseph	Scarnati	R	\$1,000.00
PA	Sen.	Michael	Stack	D	\$1,000.00
TX	Lt. Gov.	David	Dewhurst	R	\$1,500.00
TX	AG	Greg	Abbott	R	\$5,000.00
TX	Sen.	Troy	Fraser	R	\$1,000.00
TX	Sen.	Kelly	Hancock	R	\$1,000.00
TX	Sen.	Larry	Taylor	R	\$1,000.00
TX	Sen.	Kirk	Watson	D	\$1,000.00
TX	Rep.	Greg	Bonnen	R	\$500.00
TX	Rep.	Todd	Hunter	R	\$500.00

Prudential PAC State Contributions



STATE		CANE	DIDATE	PARTY	CONTRIBUTION
TX	Rep.	Geanie	Morrison	R	\$500.00
TX	Rep.	Rene	Oliveira	D	\$500.00
TX	Rep.	Kenneth	Sheets	R	\$500.00
TX	Rep.	Joseph	Straus	R	\$1,000.00
TX	Rep.	Paul	Workman	R	\$500.00

Prudential PACs Contributions to PACs Prudential



U.S. Senate – Leadership PACs

COMMITTEE		CANDIDA	TE	PARTY	STATE	CONTRIBUTION
21 st Century Majority Fund	Sen.	Johnny	Isakson	R	GA	\$5,000.00
Bluegrass Committee	Sen.	Mitch	McConnell	R	KY	\$5,000.00
Defend America PAC	Sen.	Richard	Shelby	R	AL	\$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
Hawkeye PAC	Sen.	Charles	Grassley	R	IA	\$1,000.00
HELLERHIGHWATER PAC	Sen.	Dean	Heller	R	NV	\$2,500.00
MurphPAC	Sen.	Christopher	Murphy	D	CT	\$5,000.00
NEW MILLENNIUM PAC	Sen.	Robert	Menendez	D	NJ	\$5,000.00
Next Century Fund	Sen.	Richard	Burr	R	NC	\$5,000.00
ORRINPAC	Sen.	Orrin	Hatch	R	UT	\$5,000.00
People's Voice PAC	Sen.	Tammy	Baldwin	D	WI	\$1,500.00
Rocket City PAC	Sen.	Bob	Corker	R	TN	\$5,000.00
ROYB Fund	Sen.	Roy	Blunt	R	MO	\$5,000.00
The Freedom Fund	Sen.	Michael	Crapo	R	ID	\$5,000.00

U.S. House – Leadership PACs

COMMITTEE		CANDIDATE			STATE	CONTRIBUTION
America Forward PAC	Rep.	John	Conyers	D	MI	\$2,500.00
AMERIPAC	Rep.	Steny	Hoyer	D	MD	\$5,000.00
BADGERPAC	Rep.	Ron	Kind	D	WI	\$5,000.00
BRIDGEPAC	Rep.	James	Clyburn	D	SC	\$5,000.00
Democrats Win Seats PAC	Rep.	Debbie	Wasserman Schultz	D	FL	\$1,500.00
Dream PAC	Rep.	Linda	Sanchez	D	CA	\$2,500.00
Every Republican is Crucial (ERIC PAC)	Rep.	Eric	Cantor	R	VA	\$5,000.00

Prudential PACs Contributions to PACs Prudential



U.S. House - Leadership PACs

COMMITTEE		CANDIDA	ATE	PARTY	STATE	CONTRIBUTION
Jobs, Opportunities and Education PAC (JOE-PAC)	Rep.	Joseph	Crowley	D	NY	\$2,500.00
Jobs & Innovation Matter PAC (JIM PAC)	Rep.	Jim	Himes	D	СТ	\$2,500.00
Jobs, Economy & Budget Fund (JEB PAC)	Rep.	Jeb	Hensarling	R	TX	\$5,000.00
Grassroots Organizing & Leading PAC (GOAL PAC)	Rep.	Sander	Levin	D	MI	\$2,500.00
Majority Committee PAC	Rep.	Kevin	McCarthy	R	TX	\$5,000.00
Rocket PAC	Rep.	Rush	Holt	D	NJ	\$2,500.00
Safeguarding American Liberties Morals & Opportunities Now PAC	Rep.	Matt	Salmon	R	AZ	\$2,500.00
Silk PAC	Rep.	William	Pascrell	D	NJ	\$5,000.00
Synergy PAC	Rep.	John	Larson	D	CT	\$2,500.00
The Freedom Project	Rep.	John	Boehner	R	ОН	\$5,000.00

Other Committees

COMMITTEE	PARTY	CONTRIBUTION
Blue Dog PAC	D	\$5,000.00
Investment Company Institute PAC		\$2,500.00
Moderate Democrats PAC	D	\$5,000.00
New Democrats Coalition PAC	D	\$5,000.00

Prudential New York PAC Contributions Prudential Bring Your Challenges

STATE		CANDIDATE / COMMITTE	E	PARTY	CONTRIBUTION
NY	St. Rep.	Kevin	Cahill	D	\$2,000.00
NY	St. Rep.	Joseph	Morelle	D	\$1,000.00
NY	St. Rep.	James	Seward	R	\$1,000.00
NY	St. Rep.	Sheldon	Silver	D	\$1,000.00
NY	St. Rep.	Aravella	Simotas	D	\$1,000.00
NY		NYS Democratic Assembly Campaign Committee		D	\$4,000.00
NY		NYS Republican Campaign Committee		R	\$2,500.00
NY		Life Insurance Council of New York PAC (LICONY PAC)			\$5,000.00

Trade Association, Industry Groups & Other Disbursements



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

ORGANIZATION*	LOBBYING (\$)**	TOTAL DUES
American Council of Life Insurers	\$339,824.99	\$1,725,000.00
Life Insurance and Market Research Assn.	-	\$450,266.00
Financial Services Forum	\$180,000.00	\$400,000.00
Association for Advanced Life Underwriting	\$26,741.00	\$276,741.00
United States Chamber of Commerce	\$115,000.00	\$225,000.00
Business Roundtable	\$103,646.40	\$235,560.00
Center for Capital Markets Competiveness	\$100,000.00	\$200,000.00
Insured Retirement Institute	\$28,050.00	\$187,000.00
Financial Services Roundtable	\$94,620.00	\$154,380.00
Metro Hartford Alliance	\$4,050.00	\$135,000.00
Securities Industry & Financial Markets Association	\$17,991.60	\$120,739.00
Association of Institutional Investors	-	\$100,000.00
United States Institute for Legal Reform	\$65,000.00	\$100,000.00
Association of California Life & Health Insurance Companies	\$15,000.00	\$100,000.00
The Conference Board Inc.	-	\$79,500.00
Florida Insurance Council, Inc.	\$28,231.09	\$70,625.74
The Insurance Federation of Pennsylvania	\$13,000.00	\$65,000.00
Life Insurance Council of New York, Inc	\$14,400.00	\$60,000.00
National Multi Housing Council	\$13,020.00	\$60,000.00
New Jersey State Chamber of Commerce	\$8,865.00	\$59,100.00

^{*}Prudential belongs and contributes to various organizations that maintain a relevant focus on matters concerning our business interests including membership organizations, trade groups, social welfare organizations and 527 organizations.

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