



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 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).

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. 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 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. Prudential lobbyists also are required to carry out professional conduct 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

**Mark B. Grier**

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, 2008 – December 31, 2008

### U.S. House Candidates

Recipient	Amount (\$)
John Adler (D-NJ)	2,000
Jason Altmire (D-PA)	2,000
Robert Andrews (D-NJ)	1,500
Melissa Bean (D-IL)	3,000
Xavier Becerra (D-CA)	2,000
Shelley Berkley (D-NV)	1,000
Judy Biggert (R-IL)	1,000
John Boehner (R-OH)	2,500
Charles Boustany (R-LA)	1,000
Steve Buyer (R-IN)	1,000
Christopher Carney (D-PA)	1,000
Andre Carson (D-IN)	1,000
Michael Castle (R-DE)	2,000
William Clay (D-MO)	2,000
Joseph Courtney (D-CT)	1,000
Joseph Crowley (D-NY)	2,500
Artur Davis (D-AL)	2,000
Geoffrey Davis (R-KY)	1,000
Rahm Emanuel (D-IL)	1,000
G. William Foster (D-IL)	1,000
Barney Frank (D-MA)	2,000
Rodney Frelinghuysen (R-NJ)	1,000
Scott Garrett (R-NJ)	3,000
Deborah Halvorson (D-IL)	1,000
Wally Herger (R-CA)	1,000
Paul Hodes (D-NH)	1,500
Rush D. Holt (D-NJ)	3,000
Samuel Johnson (R-TX)	3,000
Paul Kanjorski (D-PA)	10,000
Ron Kind (D-WI)	1,000
Ronald Klein (D-FL)	2,500
Frank Kratovil (D-MD)	1,000
Leonard Lance (R-NJ)	3,000
Thomas Latham (R-IA)	2,000
Steven LaTourette (R-OH)	1,000
Stephen Lynch (D-MA)	1,000
Carolyn McCarthy (D-NY)	3,000
Kevin McCarthy (R-CA)	1,000
Patrick McHenry (R-NC)	2,000
Howard McKeon (R-CA)	1,000
Kendrick Meek (D-FL)	2,000
Gregory Meeks (D-NY)	2,500



## Prudential PAC Federal Contributions (cont.)

January 1, 2008 – December 31, 2008

### U.S. House Candidates

<b>Recipient</b>	<b>Amount (\$)</b>
Dennis Moore (D-KS)	2,000
Chris Murphy (D-CT)	1,500
Robert Neugebauer (R-TX)	1,000
Devin Nunes (R-CA)	1,000
Frank Pallone (D-NJ)	1,500
William Pascrell (D-NJ)	5,000
Donald Payne (D-NJ)	4,000
Earl Pomeroy (D-ND)	5,000
Adam Putnam (R-FL)	2,000
Steven Rothman (D-NJ)	2,000
Edward Royce (R-CA)	5,000
Allyson Schwartz (D-PA)	1,500
Christopher Shays (R-CT)	1,000
Steve Stivers (R-OH)	1,000
John Tanner (D-TN)	5,000
Michael Thompson (D-CA)	1,500
Edolphus Towns (D-NY)	1,000
Chris Van Hollen (D-MD)	2,000
Nydia Velazquez (D-NY)	1,500
David Wu (D-OR)	1,000
John Yarmuth (D-KY)	1,000

### U.S. Senate Candidates

<b>Recipient</b>	<b>Amount (\$)</b>
Bob Casey (D-PA)	2,000
Saxby Chambliss (R-GA)	5,000
Norm Coleman (R-MN)	1,000
Robert Corker (R-TN)	2,500
Michael Crapo (R-ID)	5,000
James DeMint (R-SC)	1,000
Christopher Dodd (D-CT)	5,000
Elizabeth Dole (R-NC)	2,500
Orrin Hatch (R-UT)	2,500
Tim Johnson (D-SD)	2,500
Jack Reed (D-RI)	6,500
Gordon Smith (R-OR)	5,000
John Sununu (R-NH)	3,000
John Thune (R-SD)	2,500
Mark Warner (D-VA)	1,000



## Prudential PAC Federal Contributions to Leadership PACs

January 1, 2008 – December 31, 2008

<b>Leadership Committee</b>	<b>Legislator</b>	<b>Amount (\$)</b>
21st Century PAC	Rep. Howard McKeon (R-CA)	4,000
All America PAC	Sen. Evan Bayh (D-IN)	2,500
AMERIPAC	Rep. Steny Hoyer (D-MD)	5,000
Battle Born Political Action Committee	Sen. John Ensign (R-NV)	5,000
Bridge PAC	Rep. James Clyburn (D-SC)	5,000
Building Empowerment and Accountability Now PAC	Rep. Melissa Bean (D-IL)	5,000
Chris PAC	Sen. Christopher Dodd (D-CT)	5,000
Citizens for Action	Rep. Paul Kanjorski (D-PA)	5,000
Committee for the Preservation of Capitalism	Rep. Jim McCrery (R-LA)	5,000
Continuing a Majority Party Action Committee	Rep. David Camp (R-MI)	5,000
DAK PAC	Sen. Kent Conrad (D-ND)	5,000
Every Republican Is Crucial (ERIC PAC)	Rep. Eric Cantor (R-VA)	5,000
First State PAC	Sen. Thomas Carper (D-DE)	5,000
Freedom and Democracy Fund	Sen. Mel Martinez (R-FL)	3,000
Freedom and Security PAC	Rep. John Kline (R-MN)	2,500
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
Hawkeye PAC	Sen. Charles Grassley (R-IA)	3,000
Leadership in the New Century (LINC PAC)	Sen. Blanche Lincoln (D-LA)	5,000
LEGPAC	Sen. Benjamin Cardin (D-MD)	5,000
Madison PAC	Rep. Richard Neal (D-MA)	5,000
National Leadership PAC	Rep. Charles Rangel (D-NY)	5,000
NEW MILLENNIUM PAC	Sen. Robert Menendez (D-NJ)	5,000
Next Century Fund	Sen. Richard Burr (R-NC)	5,000
NODAK Political Action Committee	Rep. Earl Pomeroy (D-ND)	1,000
PAC to the Future	Rep. Nancy Pelosi (D-CA)	3,000
Prairie Political Action Committee	Sen. Richard Durbin (D-IL)	5,000
Prosperity PAC	Rep. Paul Ryan (D-WI)	2,500
Republican Majority Fund	Sen. Saxby Chambliss (R-GA)	5,000
ROYB Fund	Rep. Roy Blunt (R-MO)	5,000
Senate Majority Fund	Sen. Jon Kyl (R-AZ)	2,500
SNOW PAC	Sen. Robert Bennett (D-UT)	2,500
Solidarity PAC	Rep. George Miller (D-CA)	5,000
South Dakota First PAC	Sen. Tim Johnson (D-SD)	2,500
Synergy PAC	Rep. John Larson (D-CT)	5,000
TOMPAC	Rep. Patrick Tiberi (R-OH)	1,500
WIN VIRGINIA 2008	Sen. Mark Warner (D-VA)	1,500



## Prudential PAC Federal Contributions to Trade Associations and Other PACs

January 1, 2008 – December 31, 2008

<b>Committee</b>	<b>Amount (\$)</b>
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, 2008 – December 31, 2008

<b>California</b>	<b>Amount (\$)</b>
Sen. David Cogdill (R)	1,000
Sen. Jeffrey Denham (R)	1,000
Sen. Alex Padilla (D)	1,000
Sen. Leland Yee (D)	1,000
Rep. Karen Bass (D)	1,000
Rep. John Benoit (R)	1,000
Rep. Joe Coto (D)	1,000
Rep. Felipe Fuentes (D)	1,000
Rep. Lloyd Levine (D)	1,000
Rep. Jose Solorio (D)	1,000
Rep. Michael Villines (R)	1,000
<b>Illinois</b>	
Sen. Emil Jones (D)	1,000
<b>Indiana</b>	
Gov. Mitch Daniels (R)	1,000
Sen. David Long (R)	300
<b>Pennsylvania</b>	
Atty. Gen. Thomas Corbett (R)	500
Sen. Jeff Piccola (R)	1,000
Sen. Michael Stack (D)	1,000
Sen. Donald White (R)	1,000
Rep. Nick Micozzie (R)	500
Keystone Leaders PAC	1,500
Pennsylvania Senate Republican Campaign	3,500



## Prudential PAC State Contributions (cont.)

January 1, 2008 – December 31, 2008

<b>Texas</b>	<b>Amount (\$)</b>
Lt. Gov. David Dewhurst (R)	1,000
Atty. Gen. Greg Abbott (R)	1,000
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)	1,000
Rep. Harold V. Dutton (D)	250
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. Hubert Vo (D)	400
Rep. Beverly Woolley (R)	400
Texas Republican Legislative Caucus	1,500



## Prudential New York PAC State Contributions

January 1, 2008 – December 31, 2008

<b>New York</b>	<b>Amount (\$)</b>
Sen. Will Barclay (D)	350
Sen. Neil Breslin (D)	400
Sen. Joseph Bruno (R)	2,000
Sen. Martin Golden (D)	500
Sen. James Seward (R)	1,500
Sen. Dean Skelos (R)	1,000
Rep. Joseph Morelle (D)	2,000
Rep. Sheldon Silver (D)	2,500
Rep. Mark Weprin (D)	1,500
NY Democratic Assembly Campaign Committee	8,000
NY Senate Republican Campaign Committee	1,000

## Prudential New Jersey PAC State and Federal Contributions

January 1, 2008 – December 31, 2008

<b>Federal</b>	<b>Amount (\$)</b>
Prudential Financial, Inc. Political Action Committee – Transfer	11,200

  

<b>Georgia</b>	
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

  

<b>Iowa</b>	
Rep. Kevin McCarthy (D)	500



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

January 1, 2008 – December 31, 2008

<b>Association</b>	<b>Lobbying (\$)</b>	<b>Total Dues (\$)</b>
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
<b>Organization</b>		<b>Amount (\$)</b>
Republican Governors Association		50,000