

# 2011 Political Activities and Contributions Report



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# A Note from the PAC Treasurer



I am pleased to announce the release of our 2011 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](http://fec.gov).

Prudential does not provide direct independent expenditures intended to support communications that expressly advocate the election or defeat of a candidate. In 2011, 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 submitted an email to [prudential.pac@prudential.com](mailto:prudential.pac@prudential.com).

Sincerely,

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 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 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



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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.

## BOARD

**Joan Cleveland**

Vice President  
Individual Life Insurance

**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  
Retirement Services

## 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

**Roman Gabriel**

PAC Administrator (Temporary Acting)

## U.S. House of Representatives

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>Arizona</b>					
	Rep.	Matt	Salmon	R	\$2,000.00
	Rep.	David	Schweikert	R	\$1,000.00
<b>California</b>					
	Rep.	Joe	Baca	D	\$1,000.00
	Rep.	Bob	Filner	D	\$1,000.00
	Rep.	Kevin	McCarthy	R	\$5,000.00
	Rep.	Nancy	Pelosi	D	\$1,000.00
	Rep.	Edward	Royce	R	\$5,000.00
	Rep.	Mike	Thompson	D	\$3,000.00
<b>Colorado</b>					
	Rep.	Edwin	Perlmutter	D	\$3,000.00
<b>Connecticut</b>					
	Rep.	James	Himes	D	\$5,000.00
	Rep.	John	Larson	D	\$4,000.00
<b>Delaware</b>					
	Rep.	John	Carney	D	\$1,000.00
<b>Florida</b>					
	Rep.	Jeff	Miller	R	\$2,000.00
	Rep.	Bill	Posey	R	\$1,000.00

## U.S. House of Representatives

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>Georgia</b>					
	Rep.	Sanford	Bishop	D	\$1,000.00
	Rep.	Henry	Johnson	D	\$1,500.00
	Rep.	John	Lewis	D	\$1,500.00
<b>Illinois</b>					
	Rep.	Judy	Biggert	R	\$3,500.00
	Rep.	Robert	Dold	R	\$1,000.00
	Rep.	Michael	Quigley	D	\$1,000.00
	Rep.	Peter	Roskam	R	\$3,000.00
<b>Indiana</b>					
	Rep.	Andre	Carson	D	\$1,000.00
<b>Kentucky</b>					
	Rep.	John	Yarmuth	D	\$1,000.00
<b>Louisiana</b>					
	Rep.	Charles	Boustany	R	\$2,000.00
<b>Massachusetts</b>					
	Rep.	Barney	Frank	D	\$2,500.00
	Rep.	Stephen	Lynch	D	\$1,000.00
	Rep.	Richard	Neal	D	\$1,500.00
<b>Maryland</b>					
	Rep.	Steny	Hoyer	D	\$5,000.00



## U.S. House of Representatives

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>Michigan</b>					
	Rep.	David	Camp	R	\$5,000.00
	Rep.	John	Conyers	D	\$1,000.00
	Rep.	Sander	Levin	D	\$5,000.00
	Rep.	Gary	Peters	D	\$1,000.00
<b>Minnesota</b>					
	Rep.	John	Kline	R	\$2,500.00
	Rep.	Erik	Paulsen	R	\$2,500.00
<b>Missouri</b>					
	Rep.	Emanuel	Cleaver	D	\$2,500.00
	Rep.	Blaine	Luetkemeyer	R	\$1,000.00
<b>New Jersey</b>					
	Rep.	Robert	Andrews	D	\$3,000.00
	Rep.	Rodney	Frelinghuysen	R	\$1,000.00
	Rep.	Scott	Garrett	R	\$5,000.00
	Rep.	Rush	Holt	D	\$3,000.00
	Rep.	Leonard	Lance	R	\$3,000.00
	Rep.	Frank	LoBiondo	R	\$1,500.00
	Rep.	Frank	Pallone	D	\$2,500.00
	Rep.	William	Pascrell	D	\$4,000.00
	Rep.	Donald	Payne	D	\$3,000.00
	Rep.	Steve	Rothman	D	\$3,000.00
	Rep.	Jon	Runyan	R	\$1,500.00

## U.S. House of Representatives

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>New York</b>					
	Rep.	Joseph	Crowley	D	\$4,000.00
	Rep.	Michael	Grimm	R	\$1,500.00
	Rep.	Nan	Hayworth	R	\$1,000.00
	Rep.	Carolyn	Maloney	D	\$1,000.00
	Rep.	Carolyn	McCarthy	D	\$5,000.00
	Rep.	Gregory	Meeks	D	\$2,500.00
	Rep.	Tom	Reed	R	\$1,000.00
<b>North Carolina</b>					
	Rep.	Patrick	McHenry	R	\$3,000.00
<b>Ohio</b>					
	Rep.	John	Boehner	R	\$5,000.00
	Rep.	Steve	Stivers	R	\$1,000.00
<b>Oregon</b>					
	Rep.	Kurt	Schrader	D	\$1,000.00
<b>Pennsylvania</b>					
	Rep.	Jason	Altmire	D	\$2,500.00
	Rep.	Michael	Fitzpatrick	R	\$2,000.00
	Rep.	James	Gerlach	R	\$2,000.00
	Rep.	Allyson	Schwartz	D	\$1,000.00
<b>Tennessee</b>					
	Rep.	Diane	Black	R	\$1,000.00

## U.S. House of Representatives

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>Texas</b>					
	Rep.	Kevin	Brady	R	\$2,000.00
	Rep.	Samuel	Johnson	R	\$2,000.00
	Rep.	Randy	Neugebauer	R	\$1,000.00
	Rep.	Lamar	Smith	R	\$1,000.00
<b>Utah</b>					
	Rep.	James	Matheson	D	\$1,000.00
<b>Virginia</b>					
	Rep.	Eric	Cantor	R	\$1,000.00
	Rep.	Robert	Hurt	R	\$1,000.00
<b>Washington</b>					
	Rep.	David	Reichert	R	\$3,000.00
<b>Wisconsin</b>					
	Rep.	Ron	Kind	D	\$5,000.00
	Rep.	Gwendolynne	Moore	D	\$2,000.00
	Rep.	Paul	Ryan	R	\$2,000.00

## U.S. Senate

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>Colorado</b>					
	Sen.	Mark	Udall	D	\$1,000.00
<b>Georgia</b>					
	Sen.	Saxby	Chambliss	R	\$5,000.00
<b>Idaho</b>					
	Sen.	Michael	Crapo	R	\$5,000.00
<b>Indiana</b>					
	Sen.	Richard	Lugar	R	\$1,000.00
<b>Maryland</b>					
	Sen.	Benjamin	Cardin	D	\$5,000.00
<b>Maine</b>					
	Sen.	Olympia	Snowe	R	\$2,500.00
<b>Missouri</b>					
	Sen.	Claire	McCaskill	D	\$1,000.00
	Sen.	Roy	Blunt	R	\$2,500.00
<b>Mississippi</b>					
	Sen.	Roger	Wicker	R	\$1,000.00
<b>Montana</b>					
	Sen.	Jon	Tester	D	\$1,000.00
<b>Nevada</b>					
	Sen.	Dean	Heller	R	\$2,000.00

## U.S. Senate

STATE	CANDIDATE			PARTY	CONTRIBUTION
<b>New Jersey</b>					
	Sen.	Robert	Menendez	D	\$8,000.00
<b>North Carolina</b>					
	Sen.	Kay	Hagan	D	\$2,500.00
<b>Pennsylvania</b>					
	Sen.	Robert	Casey	D	\$2,000.00
<b>South Dakota</b>					
	Sen.	John	Thune	R	\$5,000.00
<b>Tennessee</b>					
	Sen.	Robert	Corker	R	\$4,000.00
<b>Utah</b>					
	Sen.	Orrin	Hatch	R	\$5,000.00
<b>Virginia</b>					
	Sen.	Mark	Warner	D	\$5,000.00

# Prudential PAC State Contributions



January 1, 2011 – December 31, 2011

STATE	CANDIDATE / COMMITTEE			PARTY	CONTRIBUTION
IL	St. Rep.	JoAnn	Osmond	R	\$500.00
IL	St. Rep.	Tom	Cross	R	\$1,000.00
IL	St. Sen.	Christine	Radogno	R	\$1,000.00
KS	Senate Republican Leadership Committee			R	\$500.00
PA	Pennsylvania Senate Republican Campaign Committee			R	\$1,000.00
PA	St. Sen.	Jake	Corman	R	\$1,000.00
PA	St. Sen.	Joseph	Scarnati	R	\$1,000.00
TX	Atty Gen.	Greg	Abbott	R	\$3,000.00
TX	St. Rep.	Armando	Walle	D	\$500.00
TX	St. Rep.	Barbara	Nash	R	\$500.00
TX	St. Rep.	Larry	Taylor	R	\$1,000.00
TX	St. Rep.	Craig	Eiland	D	\$500.00
TX	St. Rep.	Hubert	Vo	D	\$500.00
TX	St. Rep.	Kelly	Hancock	R	\$1,000.00
TX	St. Rep.	Kenneth	Sheets	R	\$500.00
TX	St. Rep.	Raul	Torres	R	\$500.00
TX	St. Rep.	Senfronia	Thompson	D	\$500.00
TX	St. Rep.	Joseph	Straus	R	\$1,500.00
TX	St. Sen.	Leticia	Van de Putte	D	\$1,000.00
TX	St. Sen.	Robert	Duncan	R	\$1,000.00
TX	St. Sen.	Tommy	Williams	R	\$1,000.00

# Prudential PAC Contributions to PACs



## U.S. Senate – Leadership PACs

COMMITTEE	CANDIDATE			PARTY	STATE	CONTRIBUTION
Bluegrass Committee	Sen.	Mitch	McConnell	R	KY	\$5,000.00
Forward Together PAC	Sen.	Mark	Warner	D	VA	\$5,000.00
Freedom Fund, The	Sen.	Mike	Crapo	R	ID	\$2,500.00
Narragansett Bay PAC	Sen.	Jack	Reed	D	RI	\$2,000.00
NEW MILLENNIUM PAC	Sen.	Robert	Menendez	D	NJ	\$5,000.00
Next Century Fund	Sen.	Richard	Burr	R	NC	\$5,000.00
South Dakota First PAC	Sen.	Tim	Johnson	D	SD	\$5,000.00

## U.S. House – Leadership PACs

COMMITTEE	CANDIDATE			PARTY	STATE	CONTRIBUTION
21st Century PAC	Rep.	Howard	McKeon	R	CA	\$1,500.00
AMERIPAC	Rep.	Steny	Hoyer	D	MD	\$5,000.00
Bridge PAC	Rep.	James	Clyburn	D	SC	\$5,000.00
Every Republican Is Crucial (ERIC PAC)	Rep.	Eric	Cantor	R	VA	\$4,000.00
Freedom and Security PAC	Rep.	John	Kline	R	MN	\$2,500.00
Freedom Project, The	Rep.	John	Boehner	R	OH	\$5,000.00
Growth and Prosperity PAC	Rep.	Spencer	Bachus	R	AL	\$5,000.00
Madison PAC, The	Rep.	Richard	Neal	D	MA	\$5,000.00
Majority Committee PAC	Rep.	Kevin	McCarthy	R	CA	\$2,500.00
Pioneer Political Action Committee	Rep.	Patrick	Tiberi	R	OH	\$5,000.00

## U.S. House – Leadership PACs

COMMITTEE	CANDIDATE			PARTY	STATE	CONTRIBUTION
Prosperity PAC	Rep.	Paul	Ryan	R	WI	\$2,000.00
Supporting Conservatives of Today and Tomorrow	Rep.	Scott	Garrett	R	NJ	\$5,000.00
Southwest Leadership Fund	Rep.	Tom	Udall	D	NM	\$1,000.00
Synergy PAC	Rep.	John	Larson	D	CT	\$1,000.00

## Other Committees

COMMITTEE	PARTY	CONTRIBUTION
Republican Mainstreet Partnership PAC	R	\$3,000.00
Investment Company Institute PAC	N	\$2,500.00
Blue Dog PAC	D	\$5,000.00
New Democrat Coalition Political Action Committee	D	\$5,000.00



# Prudential NJ PAC Contributions



January 1, 2011 – December 31, 2011

STATE	CANDIDATE / COMMITTEE			PARTY	CONTRIBUTION
GA	St. Sen.	Greg	Goggans	R	\$300.00
GA	St. Rep.	Howard	Maxwell	R	\$300.00
GA	St. Rep.	Richard	Smith	R	\$300.00
NJ*	Prudential Foundation			N	\$11.93

\*The Prudential New Jersey PAC was terminated in 2011

# Prudential NY PAC Contributions



January 1, 2011 – December 31, 2011

STATE	CANDIDATE / COMMITTEE			PARTY	CONTRIBUTION
NY	Gov.	Andrew	Cuomo	D	\$5,000.00
NY	St. Rep.	Ronald	Canestrari	D	\$500.00
NY	St. Rep.	Herman	Farrell	D	\$2,000.00
NY	St. Rep.	Joseph	Morelle	D	\$1,000.00
NY	St. Rep.	Sheldon	Silver	D	\$2,000.00
NY	St. Sen.	Neil	Breslin	D	\$1,000.00
NY	St. Sen.	Jeffrey	Klein	D	\$500.00
NY	St. Sen.	Thomas	Libous	R	\$750.00
NY	St. Sen.	James	Seward	R	\$1,500.00
NY	St. Sen.	Dean	Skelos	R	\$2,000.00
<b>OTHER NEW YORK COMMITTEES</b>					
NY	NY Democratic Assembly Campaign Committee			D	\$8,000.00

# Trade Association Dues



## 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	\$325,000.00	\$1,625,000.00
United States Institute for Legal Reform	\$750,000.00	\$1,000,000.00
United States Chamber of Commerce	\$287,500.00	\$570,000.00
Corporate Executive Board	-	\$531,148.00
Life Insurance and Market Research Assc.	-	\$420,328.00
APARK, Inc.	-	\$250,000.00
Business Roundtable	\$106,002.00	\$235,560.00
Association for Advanced Life Underwriting	\$25,489.50	\$226,500.00
Financial Services Forum	\$94,000.00	\$200,000.00
Securities Industry & Financial Markets Assc.	\$21,000.00	\$140,000.00
National Structured Settlements Trade Association	\$11,700.00	\$130,000.00
Metro Hartford Alliance	\$1,230.00	\$123,000.00
Association of California Life & Health Insurance Companies	\$9,140.00	\$91,400.00
The Geneva Association	-	\$76,000.00
Institute of International Finance	-	\$62,500.00
Massachusetts Institute of Technology	-	\$60,000.00
Life Insurance Council of New York, Inc	\$13,800.00	\$60,000.00
The Insurance Federation of Pennsylvania	\$12,000.00	\$60,000.00
New Jersey State Chamber of Commerce	\$8,606.25	\$57,375.00

\*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**  
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