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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant name
Clark and Associates

2. Address Check if different than previously reported
101 Constitution Avenue, NW, Suite 800
Washington DC 20001 US

3. Principal place of business (if different than line 2)
City _____ State/Zip or Country _____

4a. Contact Name Mr. Steve Clark	b. Telephone number 202-246-1600	c. E-mail sbc@sbcclark.com	5. Senate ID # 76992-3
7. Client Name <input type="checkbox"/> Self Prudential Insurance Company of America			6. House ID # 361180

TYPE OF REPORT 8. Year 2005 Midyear (January 1-June 30) OR Year End (July 1-December)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report ⇒ Termination Date _____ 11. No Lobbying Act

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000

\$10,000 or more ⇒ \$ 40,000

Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).

13. Organizations

EXPENSES relating to lobbying activities for this report were:

Less than \$10,000

\$10,000 or more ⇒ \$ _____

14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description of c

Method A. Reporting amounts using LDA definition

Method B. Reporting amounts under section 6033(c) Internal Revenue Code

Method C. Reporting amounts under section 162(c) Revenue Code

Signature _____ Date _____

Printed Name and Title **Steve Clark - President**

Registrant Name Clark and Associates

Client Name Prudential Insurance Company of Am

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the r engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code INS - Insurance (one per page)

16. Specific lobbying issues

General business issues before the U.S. Congress and federal government.

17. House(s) of Congress and Federal agencies contacted Check if None

House of Representatives
Senate

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Steve Clark	

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature Steve Clark Date 7-26-05

Printed Name and Title Steve Clark - President

