



SECRETARY OF THE SENATE

Debra L. Bouyer  
Legal Assistant

05 FEB 15 PM 4:35  
The Prudential Insurance Company of America  
100 Mulberry Street, 3 Gateway Center, 15<sup>th</sup> Floor  
Newark, NJ 07102-4077  
Tel 973 367-3135 Fax 973 367-8179

February 10, 2005

**VIA OVERNIGHT COURIER**

Clerk of the House of Representatives  
Legislative Resource Center  
B-106 Cannon Building  
Washington, D.C. 20515

Secretary of the Senate  
Office of Public Records  
232 Hart Building  
Washington, D.C. 20510

**Re: Prudential Financial Inc.  
Lobbying Report on Form LD-2**

Dear Sir or Madam:

Enclosed for filing is Prudential Financial's Lobbying Report on Form LD-2 covering the year end period July 1, 2004 to December 31, 2004 which is required to be filed by each of your offices pursuant to the Lobbying Disclosure Act of 1995, as amended.

Please do not hesitate to contact the undersigned at (973) 367-3135 if you have any questions regarding the foregoing.

Sincerely,

Debra L. Bouyer  
Legal Assistant

Enclosures

cc: John L. Bronson, Esq.



Clerk of the House of Representatives Legislative Resource Center B-106 Cannon Building Washington, DC 20515	Secretary of the Senate Office of Public Records 232 Hart Building Washington, DC 20510
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# LOBBYING REPORT

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

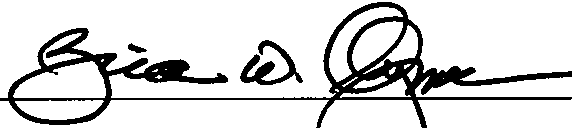
1. Registrant name <p style="text-align: center;">Prudential Financial, Inc.</p>				
2. Address <input type="checkbox"/> Check if different than previously reported <p style="text-align: center;">751 Broad Street Newark NJ 07102 US</p>				
3. Principal place of business (if different than line 2) <p style="text-align: center;">City State/Zip or Country</p>				
4a. Contact Name		b. Telephone number	c. E-mail	5. Senate ID #
Mr. John L. Bronson		(973) 367-3949	john.bronson@prudential.com	32338-1
7. Client Name <input checked="" type="checkbox"/> Self				6. House ID #
Prudential Financial, Inc.				3170400

**TYPE OF REPORT** 8. Year 2004 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	
<p style="text-align: center;"><b>12. Lobbying Firms</b></p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> ⇨ \$ _____</p> <p>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).</p>	<p style="text-align: center;"><b>13. Organizations</b></p> <p>EXPENSES relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> ⇨ \$ <u>1,820,500</u></p> <p><b>14. REPORTING METHOD.</b> Check box to indicate exp accounting method. See instructions for description of opt</p> <p><input checked="" type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definitions</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(1) Internal Revenue Code</p> <p><input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(e) of Revenue Code</p>

Signature  Date 2/9/2005 Edit >

Printed Name and Title Brian W. Clymer, Vice President



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the 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 FIN - Financial Institutions/Investments/Securiti (one per page)

16. Specific lobbying issues

H.R. 2420, Mutual Funds Integrity and Fee Transparency Act of 2003, All provisions  
H.R. 4849, The Retirement Security for Life Act of 2004, All provisions  
H.R. 2622, The Fair and Accurate Credit Transactions Act of 2003 (committee print showing subcommittee amendments), All provisions  
H.R. 1375, The Financial Services Regulatory Relief Act of 2003, All provisions  
H.R. 957, The Broker Accountability through Enhanced Transparency Act

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Rex	Wackerle	Mr.	
Christopher	Payne	Mr.	
Lynn	Jacobs	Ms.	

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

Signature \_\_\_\_\_ Date \_\_\_\_\_



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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15. General issue area code FIN - Financial Institutions/Investments/Securiti (one per page)

16. Specific lobbying issues

H.R. 1766, To make permanent the provisions of the Fair Credit Reporting Act and amend the Gramm-Leach Bliley Act to establish a national uniform privacy standard for financial institutions, All provisions  
 H.R. 1636, Consumer Privacy Protection Act of 2003, All provisions  
 H.R. 2971, Social Security Number Privacy and Identity Theft Prevention Act of 2003, All provisions  
 H.R. 1000, Pension Security Act of 2003, All provisions

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Rex	Wackerle	Mr.	
Christopher	Payne	Mr.	
Lynn	Jacobs	Ms.	
Bryan	Pickel	Mr.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the 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 FIN - Financial Institutions/Investments/Securities (one per page)

16. Specific lobbying issues

S. 877, CAN-SPAM Act of 2003, All provisions

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

Senate

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

Name	Covered Official Position (if applicable)
Rex Wackerle Mr.	
Alan Brubaker Mr.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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

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

16. Specific lobbying issues

H.R. 2096, Long-Term Care Retirement Security Act of 2003, All provisions  
 S. 992, Life Insurance Tax Simplification Act of 2003, All provisions  
 S. 13, Death Tax Fairness Act of 2003, All provisions  
 S.1335, Long-Term Care and Retirement Security Act of 2003, All provisions  
 S. 100, Access to Affordable Health Care Act, All provisions related to Long Term Care

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)
Rex	Wackerle	Mr.	
Alan	Brubaker	Mr.	
Christopher	Payne	Mr.	
Lynn	Jacobs	Ms.	
Bryan	Pickel	Mr.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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

15. General issue area code TOR - Torts (one per page)

16. Specific lobbying issues

H.R. 1115, Class Action Fairness Act of 2003, All provisions  
 S. 274, Class Action Fairness Act of 2003, All provisions  
 S. 1751, Class Action Fairness Act of 2003, All provisions  
 S. 2062, Class Action Fairness Act of 2003, All provisions  
 S. 2290, Fairness in Asbestos Injury Resolution Act of 2004 (FAIR Act)

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)
Rex	Wackerle	Mr.	
Alan	Brubaker	Mr.	
Christopher	Payne	Mr.	
Lynn	Jacobs	Ms.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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15. General issue area code CPT - Copyright/Patent/Trademark (one per page)

16. Specific lobbying issues

H.R. 1561, United States Patent and Trademark Fee Modernization Act of 2003; All provisions

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Rex	Wackerle	Mr.	
Christopher	Payne	Mr.	
Lynn	Jacobs	Ms.	
Bryan	Pickel	Mr.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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15. General issue area code TRD - Trade (Domestic & Foreign) (one per page)

16. Specific lobbying issues

H.R. 2739, The United States-Singapore Free Trade Implementation Act, All provisions  
 H.R. 2738, United States-Chile Free Trade Implementation Act, All provisions  
 H.R. 2896, American Jobs Creation Act of 2003, All provisions  
 H.R. 1769, Jobs Protection Act of 2003, All provisions

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Bryan	Pickel	Mr.	
Lynn	Jacobs	Ms.	

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



Registrant Name Prudential Financial, Inc. Client Name Prudential Financial, Inc.

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15. General issue area code TAX - Taxation/Internal Revenue Code (one per page)

16. Specific lobbying issues

H.R. 1776, The Pension Preservation and Savings Expansion Act of 2003, All provisions  
 H.R. 2, The Jobs and Growth Reconciliation Tax Act of 2003, All provisions  
 H.R. 4520, American Jobs Creation Act of 2004, All provisions  
 H.R. 4849, The Retirement Security for Life Act of 2004, All provisions  
 H.R. 5395, Tax Technical Corrections Act of 2004, All provisions

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Christopher	Payne	Mr.	
Bryan	Pickel	Mr.	
Lynn	Jacobs	Ms.	

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







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15. General issue area code TRA - Transportation (one per page)

16. Specific lobbying issues

H.R. 2989, Transportation, Treasury and Independent Agencies Appropriations Act of 2004, All provisions  
H.R. 5025, Transportation, Treasury and Independent Agencies Appropriations Act of 2005, All provisions

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

House of Representatives

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

Name			Covered Official Position (if applicable)
Bryan	Pickel	Mr.	
Lynn	Jacobs	Ms.	

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



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15. General issue area code RET - Retirement (one per page)

16. Specific lobbying issues

H.R. 518, Retirement Account Portability Act, All provisions  
H.R. 3108, Pension Stability Act, All provisions  
H.R. 1779, Guardsmen and Reservists Financial Relief Act of 2004, All provisions  
S. 2424, The National Employee Savings and Trust Equity Guarantee Act (NESTEG), All provisions

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)
Lynn	Jacobs	Ms.	
Alan	Brubaker	Mr.	

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



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15. General issue area code BUD - Budget/Appropriations (one per page)

16. Specific lobbying issues

S. Con Res 95 – FY '05 Budget Resolution, All provisions

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

Senate

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

Name	Covered Official Position (if applicable)
Alan Brubaker Mr.	

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

