

## LOBBYING REPORT

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

1. Registrant Name:

**WASHINGTON COUNCIL ERNST & YOUNG**

2. Address:

1150 17TH STREET, NW SUITE 601, WASHINGTON, DC 20036

3. Principal place of business (if different from line 2):

Country: City: State/Zip(or Country):

4. Contact Name: NICK GIORDANO

Telephone: (202) 293-7474

E-mail (optional): lee.moe@wc.ey.com

Senate ID #: 57475-3173

House ID #: 35185157

7. Client Name:  Self

**PRUDENTIAL INSURANCE COMPANY OF AMERICA**

### TYPE OF REPORT

8. Year 2005 Midyear (January 1 - June 30):  **OR** Year End (July 1 - December 31):

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 Activity:

### 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:  => Income (nearest \$20,000): 100,000.00

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 reporting period were:

Less than \$10,000:

\$10,000 or more:  => Expenses (nearest \$20,000): \_\_\_\_\_

#### 14. Reporting Method.

Check box to indicate expense accounting method. See instructions for description of options.

**Method A.** Reporting amounts using LDA definitions only

**Method B.** Reporting amounts under section 6033(b)(8) of the Internal Revenue Code

**Method C.** Reporting amounts under section 162(e) of the Internal Revenue Code

Registrant Name: WASHINGTON COUNCIL ERNST & YOUNG Client Name: PRUDENTIAL INSURANCE COMPANY OF AMERICA

**LOBBYING ACTIVITY**

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

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

16. Specific lobbying issues:

Miscellaneous pension, retirement and savings issues

17. House(s) of Congress and Federal agencies contacted:

Department of Labor  
Department of Treasury  
EOP  
House of Representatives  
Senate

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

Name: BAZEL, LAUREN  
Covered Official Position (if applicable):  
Name: DONEY, JOHN  
Covered Official Position (if applicable):  
Name: GARRETT-NELSON, LABRENDA  
Covered Official Position (if applicable):  
Name: GASPER, GARY  
Covered Official Position (if applicable):  
Name: GATES, BRUCE  
Covered Official Position (if applicable):  
Name: GIORDANO, NICK  
Covered Official Position (if applicable):  
Name: GRAB, FRANCIS  
Covered Official Position (if applicable):  
Name: KOSHGARIAN, DAVE  
Covered Official Position (if applicable):  
Name: MCGUINNESS, MARTY  
Covered Official Position (if applicable):  
Name: MELTZER, RICHARD  
Covered Official Position (if applicable):  
Name: PHELPS, ANNE  
Covered Official Position (if applicable):  
Name: PORTER, JOHN  
Covered Official Position (if applicable):  
Name: ROZEN, ROBERT  
Covered Official Position (if applicable):  
Name: STEELE FLYNN, DONNA  
Covered Official Position (if applicable):  
Name: URBAN, TIM  
Covered Official Position (if applicable):

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

Registrant Name: WASHINGTON COUNCIL ERNST & YOUNG Client Name: PRUDENTIAL INSURANCE COMPANY OF AMERICA

**LOBBYING ACTIVITY**

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

15. General issue area code: TAX (one per page)

16. Specific lobbying issues:

Miscellaneous corporate and international tax issues

17. House(s) of Congress and Federal agencies contacted:

Department of Treasury  
House of Representatives  
Senate  
Internal Revenue Service

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

Name: BAZEL, LAUREN  
Covered Official Position (if applicable):  
Name: DONEY, JOHN  
Covered Official Position (if applicable):  
Name: GARRETT-NELSON, LABRENDA  
Covered Official Position (if applicable):  
Name: GASPER, GARY  
Covered Official Position (if applicable):  
Name: GATES, BRUCE  
Covered Official Position (if applicable):  
Name: GIORDANO, NICK  
Covered Official Position (if applicable):  
Name: GRAB, FRANCIS  
Covered Official Position (if applicable):  
Name: KOSHGARIAN, DAVE  
Covered Official Position (if applicable):  
Name: MCGUINNESS, MARTY  
Covered Official Position (if applicable):  
Name: MELTZER, RICHARD  
Covered Official Position (if applicable):  
Name: PHELPS, ANNE  
Covered Official Position (if applicable):  
Name: PORTER, JOHN  
Covered Official Position (if applicable):  
Name: ROZEN, ROBERT  
Covered Official Position (if applicable):  
Name: STEELE FLYNN, DONNA  
Covered Official Position (if applicable):  
Name: URBAN, TIM  
Covered Official Position (if applicable):

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

Signature: ON FILE Date: Feb 14, 2006

Printed Name and Title: Nick Giordano, Partner -

**Information Update Page:**

**Complete ONLY where registration information has changed.**

**LOBBYIST UPDATE**

**23. Name of each previously reported individual who is NO LONGER expected to act as a lobbyist for the client**

Name: Moseley, Phil

**ISSUE UPDATE**

**24. General lobbying issues previously reported that NO LONGER pertain**

**AFFILIATED ORGANIZATIONS**

**25. Add the following organization(s)**

**26. Name of each previously reported organization that is NO LONGER affiliated with the registrant or client**

**FOREIGN ENTITIES**

**27. Add the following foreign entities**

**28. Name of each previously reported foreign entity the NO LONGER owns, OR controls, OR is affiliated with the registrant, client or affiliated organization**

Name:

Name:

Name:

Name:

Name:

Signature: ON FILE      Date: Feb 14, 2006

Printed Name and Title: NICK GIORDANO, PARTNER -