



UNITARIAN UNIVERSALIST
ASSOCIATION OF CONGREGATIONS

BY FAX 650-618-1806 and EMAIL corporatesecretary@google.com

November 12, 2013

Timothy Brennan
*Treasurer and
Chief Financial Officer*

Mr. David C. Drummond
Corporate Secretary
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

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Boston
Massachusetts 02108
USA
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Re: Shareholder proposal

Dear Mr. Drummond:

The Unitarian Universalist Association (“UUA”), a holder of 910 shares in Google Inc., is hereby submitting the enclosed resolution for consideration at the upcoming annual meeting. The resolution requests that the members of the Board authorize the preparation of a report disclosing policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.

We are joining with Walden Asset Management in filing this resolution. Mr. Timothy Smith represents Walden Asset Management which is the primary filer. The UUA delegates to Walden Asset Management the authority to act on behalf of the UUA in all respects with regard to this filing.


The Unitarian Universalist Association (“UUA”) is a faith community of more than 1000 self-governing congregations that brings to the world a vision of religious freedom, tolerance and social justice. With roots in the Jewish and Christian traditions, Unitarianism and Universalism have been forces in American spirituality from the time of the first Pilgrim and Puritan settlers. The UUA is also an investor with an endowment valued at approximately \$157 million, the earnings from which are an important source of revenue supporting our work in the world. The UUA takes its responsibility as an investor and shareowner very seriously. We view the shareholder resolution process as an opportunity to bear witness to our values at the same time that we enhance the long-term value of our investments.

We submit the enclosed resolution for inclusion in the proxy statement in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934 for consideration and action by the shareowners at the upcoming annual meeting. We have held at least \$2,000 in market value of the company’s common stock for more than one year as of the filing date and will continue to hold at least the requisite number of shares for filing proxy resolutions through the stockholders’ meeting

Affirming the Worth and Dignity of All People

Verification that we are beneficial owners of the requisite shares of Google Inc. is enclosed. If you have questions or wish to discuss the proposal, please contact Timothy Smith at (617) 726-7155.

Yours very truly,



Timothy Brennan

CC: Timothy Smith, Walden Asset Management

Enclosure: Shareholder resolution on lobbying disclosure

Lobbying Disclosure

Whereas, we believe it is important that Google's lobbying positions, and processes to influence public policy, are transparent. Public opinion is skeptical of corporate influence on Congress and public policy and controversial lobbying activity may pose risks to our company's reputation.

Google spent approximately \$31.35 million in 2010, 2011 and 2012 on federal lobbying, according to Senate reports. But this figure may not include grassroots lobbying to influence legislation by mobilizing public support or opposition. Also, not all states require disclosure of lobbying expenditures. The reports also do not include contributions to tax-exempt organizations which write and endorse model legislation.

Resolved, the shareholders of Google request the Board authorize the preparation of a report, updated annually, and disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by Google used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. Google's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by management and the Board for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which Google is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant Board oversight committees and posted on the company's website.

Supporting Statement

We encourage transparency about the ways corporate funds influence legislation and regulation, directly and indirectly. We commend Google for updating disclosure on its website on political spending and lobbying but the company still does not disclose details about lobbying through trade associations, maintaining secrecy about its payments used for lobbying by these associations.

For example, the U.S. Chamber of Commerce spent over \$1 billion in lobbying since 1998, yet any Google funding of the Chamber is secret. The Chamber has also sued the EPA for its work on climate regulation.

In addition, Google reportedly sits on a task force of the American Legislative Exchange Council (ALEC) which has launched a “high priority campaign” to repeal renewable energy standards in states.

In contrast, Google’s website publicly affirms its commitment to “protecting the environment.”

It is in Google’s best interests to review its public policy advocacy and oversight and expand its public disclosure about third party lobbying.