

NEW YORK FREEDOM OF INFORMATION LAW REQUEST

VIA EMAIL

July 12, 2022

New York State Department of Financial Services
Office of General Counsel
Attn: Records Access Officer
One State Street, 20th Floor
New York, NY 10004
Recordsaccessofficer@dfs.ny.gov

Re: Prudential of America Group's Annual Statements – 2017 to 2022 (IR#0808E)

Dear Records Access Officer:

This firm represents the Informed Consent Action Network (“ICAN”). On behalf of ICAN, we are requesting records pursuant to the Freedom of Information Law (N. Y. Pub. Off. Law § 84 *et seq.*, as amended) (“FOIL”). Please provide the records in your possession via email to foia@sirillp.com:

All annual statements¹ for the Prudential of America Group² dated from 2017 through the date of the search.

Information helpful to fulfilling the request: We are primarily interested in the company’s “direct claims and benefits paid” for life insurance (i.e. ordinary, group, total, etc.) from each annual statement.

Please note that the FOIL provides that if only portions of a requested file are exempted from release, the remainder must still be released. We therefore request that we be provided with all non-exempt portions which are reasonably segregable. We further request that you describe any deleted or withheld material in detail and specify the statutory basis for denying access to such documents as well as your reasons for believing that the alleged statutory justification applies. Please also separately state your reasons for not invoking your discretionary powers to release the requested documents in the public interest. Such statements may help to avoid unnecessary appeal and litigation. Our clients reserves all rights to appeal the withholding or deletion of any information.

¹ See https://www.dfs.ny.gov/apps_and_licensing/insurance_companies/as_life (last visited 7/8/2022).

² See Exhibit 1 for details.

Access to the requested records should be granted within five (5) business days from the date of your receipt of this letter. Failure to respond in a timely manner shall be viewed as a denial of this request and ICAN may immediately file an administrative appeal.

We preapprove any costs up to fifty (50) dollars relating to search and processing of this request. We further request notification if costs are estimated to exceed fifty (50) dollars.

If you would like to discuss our request or any issues raised in this letter, please feel free to contact us at (212) 532-1091 or foia@sirillp.com during normal business hours. Thank you for your time and attention to this matter.

Very truly yours,

/s/ Aaron Siri

Aaron Siri, Esq.

Colin M. Farnsworth, Esq.

Exhibit 1



(<http://www.dfs.ny.gov>)



Ins. Company Search

Company Detail

[Company Search](#) [Print or Save details](#)

NAIC#: 68241	DOM: New Jersey	Group: PRUDENTIAL OF AMERICA GROUP	Phone: 844-728-7706
CPAF: 783	ORG: LF	Group#: 304	Spl Risk:
DMV#:	Website: WWW.PRUDENTIAL.COM	Admitted Dt: 10/20/1879	FId: 221211670

Prudential Insurance Company of America
751 Broad Street
6th Floor
Newark, NJ 07102

Company Name History:

(No Data Available)

Current Writing Powers:

NYS Insurance Law Section Code	Line of Business	Description
1113(a)	1	Life
1113(a)	2	Annuities
1113(a)	3	Accident And Health

HELP AND INFORMATION



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