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September 18, 2024

CONFIDENTIAL: The enclosures to this letter are filed subject to the request for **CONFIDENTIAL** treatment and the exceptions under the public records law described herein.

Via Online OCI Licensing Application Form

Amy J. Malm, CPA, CFE, PIR
Administrator, Division of Financial Regulation
Office of the Commissioner of Insurance
125 South Webster Street, 2nd Floor
Madison, WI 53702

Re: In the Matter of the Acquisition of Control of Community Care, Inc. and
Community Care Health Plan, Inc. (NAIC #17056) by CareSource

Dear Amy:

In connection with the Form A submitted on behalf of CareSource, an Ohio nonprofit corporation ("CareSource") to your Office today, and as mentioned in the cover letter for that Form A, we are enclosing, for submission on behalf of CareSource, the additional materials listed in Attachment A as a confidential supplement to the Form A. We hereby request that these enclosures be kept confidential as and for the reasons stated in Attachment A, as more fully described below. As noted in Item 5(a) of the Form A, the three-year pro forma financial projections for CCHP are being adjusted for the 2026 Family Care Program rates released by DHS on September 2, 2026, and will be submitted as Confidential Exhibit 4 to this Form A as soon as they are available.

Form A Filing. The enclosures are required to be filed with your Office as part of CareSource's Form A filing to obtain the Commissioner's approval of CareSource's proposed acquisition of control of Community Care, Inc. ("CCI") and Community Care Health Plan, Inc. ("CCHP" and together with CCI, "Community Care"). As a result, your Office may withhold this information from public disclosure under Wis. Stat. § 601.465(1m)(a), and, moreover, because the information is not public, it is presumed under Wis. Stat. § 601.465(1n)(a), notwithstanding the public records law, that it is proprietary and confidential and that the potential for harm and competitive disadvantage if it is made public by your Office outweighs the public interest in the

disclosure of the information.

Trade Secrets. As stated in Attachment A, certain enclosures to this letter include “trade secrets” as defined under Wis. Stat. § 134.90(1)(c) because the information in them “derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use [and] is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.” A trade secret is exempt from the public records law under Wis. Stat. § 19.36(5) and Wis. Admin. Code § Ins 6.13(2).

Personal Information. Finally, the public value of the personal information in biographical affidavits and elsewhere is outweighed by the privacy interests of persons submitting these affidavits, and by the public interest in encouraging qualified people to serve in these capacities, *see* the Wisconsin Attorney General’s June 2025 *Wisconsin Public Records Law Compliance Guide*, pp. 36-40, and, in particular, home information and the social security number of an employee provided by an employer are exempt from the public records law. *Id.* at p. 23, *citing* Wis. Stat. § 19.36(10)(a).

In the event that your Office receives a request for or a subpoena for the production of the exhibits to this letter, we respectfully request that your Office immediately advise us of such request or subpoena so that we may take the appropriate action to protect such documents.

We appreciate your assistance with respect to the Form A. If you require any additional information relating to this request of the Form A, please do not hesitate to contact me at (608) 283-2434 or at William.Toman@Quarles.com, or Dan Risku, CareSource’s Vice President and Deputy General Counsel at (774) 384-3560 or daniel.risku@caresource.com.

Very truly yours,

QUARLES & BRADY LLP



William J. Toman

Enclosures

cc: Karl Albert, CPA, CPCU, CFE
cc(w/enc.): Dan Risku, CareSource
Bruce Arnold, Husch Blackwell LLP

ATTACHMENT A

**REQUEST FOR CONFIDENTIAL TREATMENT OF CERTAIN DOCUMENTS FILED
IN CONNECTION WITH THE FORM A STATEMENT REGARDING THE
PROPOSED ACQUISITION OF CONTROL OF COMMUNITY CARE, INC. AND
COMMUNITY CARE HEALTH PLAN, INC.**

DOCUMENT	REQUEST FOR CONFIDENTIAL TREATMENT	EXEMPTION FROM DISCLOSURE
Affiliation Agreement (Unredacted), Confidential Exhibit 1 to the Form A	Entire document (a public version of the Affiliation Agreement with redactions is attached as Exhibit A to the Form A)	See Form A Filing, Trade Secrets, and Personal Information exceptions to the public records law as described in the letter.
Biographical Affidavits, Confidential Exhibits 2 and 5 to the Form A	Entire document	See Form A Filing and Personal Information exception to the public records law as described in the letter.
Business Plan of Community Care, Confidential Exhibit 3 to the Form A	Entire document	See Form A Filing and Trade Secrets exceptions to the public records law as described in the letter.
Financial Projections of CCHP, Confidential Exhibit 4 to the Form A (<i>to be submitted under separate cover once available, as described in Item 5(a) of the Form A</i>)	Entire document	See Form A Filing and Trade Secrets exceptions to the public records law as described in the letter.