

**PERMANENT GENERAL ASSURANCE CORPORATION
PERMANENT GENERAL ASSURANCE CORPORATION OF OHIO
THE GENERAL AUTOMOBILE INSURANCE COMPANY, INC.**

APPLICATION FOR CHANGE IN DOMESTIC COMPANY STATUS

Item 1 – Transmittal Letter

Please see the attached transmittal letter with regard to the Form A Statement Regarding the Acquisition of Control of Permanent General Assurance Corporation, Permanent General Assurance Corporation of Ohio and The General Automobile Insurance Company, Inc.

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September 25, 2024

VIA EMAIL and ELECTRONIC APPLICATION

Nathan Houdek
Commissioner of Insurance
Office of the Commissioner of Insurance
State of Wisconsin
125 South Webster Street
Madison, Wisconsin 53703-3473

Re: Form A Statement Regarding the Acquisition of Control of Permanent General Assurance Corporation (NAIC # 37648), Permanent General Assurance Corporation of Ohio (NAIC # 22906) and The General Automobile Insurance Company, Inc. (NAIC # 13703)

Dear Commissioner Hudek:

On behalf of Sentry Insurance Company, a Wisconsin insurance company ("SIC"), Sentry Holdings, Inc., a Wisconsin corporation ("SHI") and Sentry Mutual Holding Company, a Wisconsin domestic mutual insurance holding company ("SMHC" and together with SIC and SHI, the "Applicants"), we are pleased to submit the attached Form A Statement Regarding the Acquisition of Control of a Domestic Insurer (the "Form A") seeking approval of the Wisconsin Office of the Commissioner of Insurance (the "OCI"), pursuant to Wis. Stat. § 611.72 and Wis. Admin. Code § Ins 40.02, of the Applicants' proposed acquisition of control of the following Wisconsin domiciled insurance companies: (i) Permanent General Assurance Corporation ("PGAC"); (ii) Permanent General Assurance Corporation of Ohio ("PGAC OH"); and (iii) The General Automobile Insurance Company, Inc., ("General Auto" and together with PGAC and PGAC OH, the "Domestic Insurers"). In accordance with Wis. Admin. Code § Ins 40.02(1)(b)1, a copy of the Form A is being sent to the Domestic Insurers.

As further described in the Form A, the Applicants and their affiliates have a significant presence in the insurance industry and are pleased to leverage that experience with the acquisition of the Domestic Insurers. SIC is a Wisconsin insurance company with its headquarters in Stevens Point, Wisconsin. SIC is a multi-line insurer offering a broad range of products including auto, commercial auto, earthquake, flood, workers' compensation, general liability, and commercial property.

As you will note from the confidential business plan attached as Exhibit CE-3 to the Form A (the “Business Plan”), following the proposed acquisition, the Domestic Insurers plan to continue writing personal automobile coverages under The General® brand in the states in which they are licensed under The General® brand on an admitted basis. Acquiring the Domestic Insurers to service such markets fits well within the Applicants’ strategic vision and long-term plan.

The Form A includes a confidential supplement with exhibits that contain confidential and/or proprietary information, sensitive personal information and strategies that are not otherwise available to the public that, if disclosed, could cause substantial injury to the competitive position and/or personal privacy of the Applicants and certain of the other parties referenced therein (the “Confidential Supplement”). Pursuant to Wis. Admin. Code § Ins 40.05, the Confidential Supplement is required under Wis. Stat. § 601.42. Thus, the OCI may withhold that information from public disclosure under Wis. Stat. § 601.465(1m)(a) and Wis. Admin. Code § Ins 6.13(3). Moreover, because the Confidential Supplement 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 OCI outweighs the public interest in the disclosure of the information.

The Confidential Supplement also includes “trade secrets” as defined under Wis. Stat. § 134.90(1)(c) because it “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 may be withheld by the OCI under Wis. Admin. Code § Ins 6.13(2).

Finally, the public value of the personal information in the Biographical Affidavits, attached as Exhibit CE-1 to the Confidential Supplement to the Form A, is outweighed by the privacy interests of persons submitting those affidavits, and by the public interest in encouraging qualified people to serve in the capacities described therein (see the Wisconsin Attorney General’s May 2024 *Wisconsin Public Records Law Compliance Guide*, pp. 36-39, and, in particular, the portions thereof noting that home address information and the social security numbers of employees provided by an employer are exempt from the public records law). *Id.* at p. 23, *citing* Wis. Stat. § 19.36(10)(a).

Therefore, the Applicants respectfully request that the OCI treat the Confidential Supplement to the Form A and the documents and information referenced in or attached to such Confidential Supplement, as confidential and exempt from disclosure pursuant to all applicable provisions of law, including, but not limited to, those laws referenced above, and afford all relevant protections under those laws to such information. The Applicants also request that they be notified in advance if any person requests access to the Confidential Supplement or any of the exhibits contained therein so that they have the opportunity to prevent or limit such disclosure.

In furtherance of this request, the materials for which we are requesting confidential treatment have not been included among the “Public Documents” uploaded to the OCI’s

Office of the Commissioner of Insurance
September 25, 2024
Page 4

Application Form for Change in Domestic Company Status. The "Confidential Documents" uploaded to the OCI's Application Form for Change in Domestic Company Status include all information and materials for which we are requesting confidential treatment.

We request that you kindly acknowledge receipt of this filing by email.

Should you have any questions or require further information, please do not hesitate to contact me at (312) 853-7184. We look forward to working with you and your staff. Thank you for your attention to this matter.

Best regards,

Sara N. Africano

cc: Sean Carney, Sidley Austin LLP
Raina Zanow, Sentry Insurance Company