



RAINA ZANOW
AVP – Assistant General Counsel
raina.zanow@sentry.com
715-346-6483 PHONE
715-346-7028 FAX

September 3, 2026

VIA EMAIL and ELECTRONIC APPLICATION

Nathan Houdek
Commissioner of Insurance
Office of the Commissioner of Insurance
State of Wisconsin
101 East Wilson Street
Madison, WI 53703

RE: Form A – Statement Regarding the Acquisition of Control of or Merger with a Domestic Insurer - Patriot General Insurance Company (NAIC # 23442); and

Form A – Statement Regarding the Acquisition of Control of or Merger with a Domestic Insurer The General Automobile Insurance Company, Inc. (NAIC # 13703)

Dear Commissioner Houdek:

On behalf of Sentry Insurance Company, a Wisconsin insurance company ("Sentry"), Sentry Holdings, Inc., a Wisconsin corporation ("SHI") and Sentry Mutual Holding Company, a Wisconsin domestic mutual insurance holding company ("SMHC" and together with Sentry and SHI, the "Applicants"), attached please find two separate Form A – Statements Regarding the Acquisition of Control of or Merger with a Domestic Insurer ("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 direct control of the each of the following Wisconsin domiciled insurance companies: Patriot General Insurance Company ("PG") and The General Automobile Insurance Company, Inc. ("GAIC" and together with PG the "Domestic Insurers") as part of the Applicants' internal reorganization involving the Domestic Insurers (the "Proposed Transaction"). For clarity, the purpose of the Proposed Transaction is to move the Domestic Insurers from indirect subsidiaries of Sentry to direct subsidiaries of Sentry for administrative purposes (i.e., the Proposed Transaction is not expected to have any effect on the operations of either of the Domestic Insurers).

Each 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 discourse under Wis. Stat. §601.465(am)(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 is

proprietary and confidential and that the potential for harm and competitive disadvantage if it is made public by the OCI outweighs the public interest in the disclosure of 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 each 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 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 each 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 can 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 “Public Documents” uploaded to the OCI’s 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.

Should you have any questions or require further information, please do not hesitate to contact us. We look forward to working with you and your staff. Thank you for your attention to this matter.

Respectfully Submitted,


Raina M. Zanow