

Evan M. Bonnstetter
Associate
evan.bonnstetter@faegredrinker.com
+1 612 766 7917 direct

Faegre Drinker Biddle & Reath LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
+1 612 766 7000 main
+1 612 766 1600 fax

September 17, 2024

VIA OCI PORTAL

The Honorable Nathan Houdek
Commissioner of Insurance
Wisconsin Office of the
Commissioner of Insurance
125 S. Webster Street
Madison, Wisconsin 53703

Attn: Chris Martin, Division of Financial Regulation

**Re: Form A Statement Regarding the Proposed Acquisition of Control of
Security Health Plan of Wisconsin, Inc.**

Dear Commissioner Houdek:

On behalf of Sanford, a North Dakota nonprofit corporation, ("Sanford" and the "Applicant"), enclosed please find a Form A Statement Regarding the Acquisition of Control of a Domestic Insurer (the "Form A") seeking the approval of the Commissioner of Insurance of the State of Wisconsin (the "Commissioner") pursuant to Wis. Stat. § 617.11(1) and Wis. Admin. Code § Ins 40.02 for the proposed acquisition of control of Security Health Plan of Wisconsin, Inc., a Wisconsin domestic nonstock service insurance corporation organized under Chapter 613 of the Wisconsin Statutes (the "Company").

The acquisition of control of the Company by Sanford will occur pursuant to the Definitive Agreement dated September 13, 2024 (the "Agreement"), by and between Sanford and Marshfield Clinic Health System, Inc., a Wisconsin nonstock, nonprofit corporation ("MCHS"). As described in the Form A, MCHS is the sole corporate member of the Company and therefore controls the Company. Following the Closing, Sanford will become the sole corporate member of MCHS and therefore acquire indirect ultimate control of the Company.

Sanford respectfully requests approval from the Commissioner for the acquisition of control of the Company as described in the Form A.

A copy of the Form A is being provided simultaneously to the Company.

The Honorable Nathan
Houdek

- 2 -

September 17, 2024

Please note, Exhibit CE-1 through Exhibit CE-4 to the Form A will be filed under separate cover as part of a confidential supplement to the Form A.

Thank you for your assistance on this matter. Should you have any questions or require any further information, please do not hesitate to contact me at (612) 766-7917 or evan.bonnstetter@faegredrinker.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan Bonnstetter". The signature is written in a cursive style with a large initial "E".

Evan M. Bonnstetter

Enclosures

cc: Rob Lafrentz, Sanford Health (robert.lafrentz@sanfordhealth.com)
Amy Strati, Faegre Drinker Biddle & Reath LLP (amy.strati@faegredrinker.com)