

October 7, 2022

VIA EMAIL

Mr. Christopher J. Martin
Division of Financial Regulation
Office of the Commissioner of Insurance
125 S. Webster Street, 2nd Floor
Madison, WI 53702

Re: Merger of Farmers Town Mutual Insurance Company
with and into Arlington Mutual Insurance Company

Dear Mr. Martin:

This correspondence is in response to your October 4, 2022, email regarding the authorized territory of Arlington Mutual Insurance Company (“Arlington Mutual”) as the surviving corporation of its merger with Farmers Town Mutual Insurance Company (“Farmers Town Mutual”).

In order to maintain compliance with Wis. Stat. § 612.02(2)(c) and in accordance with the board resolutions approving the merger, Arlington Mutual and Farmers Town Mutual have agreed that the counties of Clark and Richland will not be included in the authorized territory of the surviving corporation post-merger.

Accordingly, we have are submitting the following revised documents for your review:

1. Amended Exhibit A – Proposed Amended and Restated Articles of Incorporation.
2. A revised proposed Summary of the Agreement and Plan of Merger to be sent to Arlington Mutual and Farmers Town Mutual policyholders with the notice of meeting.

Therefore, upon approval of the merger by the Commissioner and the Arlington Mutual and Farmers Town Mutual policyholders, the surviving corporation will be authorized in the counties of Adams, Columbia, Dane, Dodge, Fond du Lac, Grant, Green Lake, Iowa, Jackson, Juneau, Lafayette, La Crosse, Marquette, Monroe, Sauk and Vernon.

Mr. Christopher Martin
Office of the Commissioner of Insurance
October 7, 2022
Page 2

We appreciate your consideration in reviewing the enclosed materials. Please call should you have any questions on the material or need additional information.

Sincerely,

GODFREY & KAHN, S.C.

Zachary Bemis

Enclosures

cc: Ms. Teri Krysa, Manager
Mr. Michael Haight, Manager

28016545.1