



September 9, 2020

Craig Van Dyke
President and Chief Executive Officer
Western Fraternal Life Association
1900 First Avenue NE
Cedar Rapids, Iowa 52402

Daniel Shinnick
President and Chief Executive Officer
National Mutual Benefit
6522 Grand Teton Plaza
Madison, Wisconsin 53719

Re: Proposed Merger of National Mutual Benefit with and into Western Fraternal Life Association, with a Redomestication to Wisconsin and As-Yet-Undetermined Change of Name

Dear Messrs. Van Dyke and Shinnick:

The following items are requested in connection with this Office's review of the proposed merger of National Mutual Benefit with and into Western Fraternal Life Association.

1. Please provide a letter to supplement the Form A that describes the process that is, in fact, being employed for selection of the actual new name for the consolidated society.
2. Please file a new Appendix O, which letter from YesElections should indicate whether the election close of 11:59 p.m. on May 26, 2020 had been observed, that every ballot received before 11:59 p.m. on May 26, 2020, whether on paper or electronically, had been counted, and that there were procedures in place to receive and take note of late-filed ballots, notwithstanding their invalidity.
3. Please have YesElections provide a copy of each paper ballot received.
4. If the date stamp is not evident on the paper ballots, please have YesElections provide a description of how the time of receipt of ballots was tracked and provide such alternative documentation for each ballot received.
5. Please have YesElections provide a list of each electronic ballot received, which includes the Delegate's name and how they voted.
6. Please have YesElections provide a copy of the electronic date stamp for each electronic ballot received.

Messrs. Van Dyke and Shinnick
September 9, 2020
Page 2

If you have questions on this or any other matter in which I might be of some assistance, please call me at (608) 267-4388.

Sincerely,

A handwritten signature in cursive script that reads "Steven J. Junior".

Steven J. Junior, Insurance Program Manager
Division of Financial Regulation

cc: Todd Martin, Stinson, LLP
Noreen Parrett, Parrett Law, LLC