



Whyte Hirschboeck Dudek S.C.

October 22, 2013

**VIA HAND DELIVERY**

Kristen L. Forsberg, CPA, CFE  
Insurance Financial Examiner/Licensing Specialist  
Office of the Commissioner of Insurance  
125 South Webster Street, 2nd Floor  
Madison, WI 53703

2013 OCT 22 PM 4:41  
RECEIVED  
WISCONSIN COMMISSIONER  
OF INSURANCE

**Re: Trilogy Health Insurance, Inc. – Change in Business Plan**

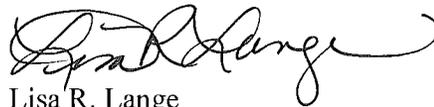
Dear Ms. Forsberg:

On behalf of our client, Trilogy Health Insurance, Inc. (“THI”), enclosed please find THI’s proposed Business Plan, Financial Projections (including major assumptions, membership by month, balance sheet, income statement and three year RBC summary) and a Reinsurance Summary. THI hereby requests approval, pursuant to Wis. Stats. § 611.28, of a change in its business plan from a domestic health insurance company to a domestic health maintenance organization.

THI requests that OCI maintain the confidentiality of the enclosed information and not release this information to the public. The enclosed information could put THI at a competitive disadvantage if released publicly and THI has taken reasonable efforts to maintain the confidentiality of such information. The information constitutes a “trade secret” 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.”

Thank you for your consideration with respect to these matters.

Very truly yours,



Lisa R. Lange

LRL/co  
Enclosure

cc (w/o enc.): William D. Felsing, Trilogy Health Insurance, Inc.

WHD/9875079.1