



Professional Corporation  
500 N. Meridian Street – Suite 400  
Indianapolis, IN 46204-1293  
hallrender.com

**Elizabeth A. Elias**  
eelias@hallrender.com  
Direct Dial: (317) 977-1468

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**VIA UPLOAD TO <https://ociobforms.wi.gov/PortalWeb>**

Nathan Houdek, Commissioner  
Wisconsin Office of the Commissioner of Insurance  
PO Box 7873  
Madison, WI 53707-7873

RE: **SUBMISSION OF FORM A FOR ST. LUKE'S HOSPITAL OF DULUTH**

Dear Commissioner Houdek:

On behalf of St. Luke's of Duluth, we submit this Form A and its Exhibits for the proposed change in control of Aspirus Health Plan due to the planned merger of Aspirus and St. Luke's of Duluth.

St. Luke's is excited to continue with increased investments in its people, facilities, technology and services as part of the Aspirus system. These investments, which are reflected in commitments from Aspirus to St. Luke's in the AGREEMENT will help the combined system (including both St. Luke's and Aspirus) better serve patients and compete more effectively in the healthcare marketplace across Northern Wisconsin, Minnesota and Michigan. A stronger combined Aspirus system will be a better ultimate controlling person of Aspirus Health Plan, Inc. as well. There are no immediate service area expansions contemplated for Aspirus Health Plan, Inc. in conjunction with this transaction.

Thank you for your consideration of this Form A. Please feel free to contact me if you have any questions.

Sincerely,

HALL RENDER KILLIAN HEATH & LYMAN, P.C.

Elizabeth A. Elias