

June 28, 2019

**VIA FEDERAL EXPRESS**

Nathan Houdek, Deputy Commissioner  
Office of the Commissioner of Insurance  
State of Wisconsin  
GEF-III, Second Floor  
125 South Webster Street  
Madison, WI 53703-3473

Attn: Mr. Michael Mancusi-Ungaro

Re: Amended and Restated Form A Statement Regarding the Acquisition of Control of or Merger with a Domestic Insurer – American Family Insurance Mutual Holding Company's Acquisition of Control of IDS Property Casualty Insurance Company and Ameriprise Insurance Company

Dear Deputy Commissioner Houdek:

On behalf of our client, American Family Insurance Mutual Holding Company (“**AFIMHC**”), please find enclosed herein an original Amended and Restated Form A Statement Regarding the Acquisition of Control of or Merger with a Domestic Insurer (the “**Amended Form A**”) filed in connection with the above-referenced Form A application submitted by AFIMHC in connection with its acquisition of control of IDS Property Casualty Insurance Company (“**IDS**”) and Ameriprise Insurance Company (“**AIC**”).

As previously discussed with your professional staff, the purpose of the Amended Form A is to update the Form A application to reflect certain changes within the management structure of AFIMHC and a change in one of the proposed executive officers of IDS following the acquisition of control by AFIMHC. In addition, there are changes to the Future Plans section of the Form A, as well as some corrections relative to the list of intercompany agreements in Item 1(viii) being terminated subject to notice to the Commissioner.

The specific changes within the management structure of AFIMHC are as follows:

1. Ms. Jessica J. Stauffacher is moving from her role as Chief Operating Officer, American Family Agency to President and Chief Executive Officer of IDS following the acquisition of control of IDS. Ms. Stauffacher will replace Mr. Thomas V. Ealy, the current President of



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IDS. Mr. Ealy has advised AFIMHC of his desire to leave IDS following the change of control.

2. Ms. Telisa L. Yancy has moved from her former role as Chief Marketing Officer of AFIMHC to be the Chief Operating Officer, American Family Agency in place of Ms. Stauffacher. The office of Chief Marketing Officer will not be filled or continued at this time.
3. Ms. Asya S. Alexandrovich is now the Chief Legal Officer of AFIMHC. She replaces Mr. David C. Holman in that role, who previously held both the Chief Legal Officer and Chief Strategy Officer positions within AFIMHC. Mr. Holman will continue in his current role as Chief Strategy Officer for AFIMHC going forward.

There are no changes to the Board of Directors of AFIMHC. A revised biographical affidavit for Ms. Yancy, and a new biographical affidavit for Ms. Alexandrovich, are being submitted simultaneously with this filing under confidential seal. Obviously, given the personal information contained within these biographical affidavits, the same are submitted under seal of confidentiality pursuant to sections 601.42 and 601.465 of the Wisconsin Statutes and INS s. 40.05 of the Wisconsin Administrative Code.

The specific changes to the Future Plans for Insurer section is the addition of proposed Joinder Agreements by and between IDS and American Family Mutual Insurance Company, S.I. (“AFMICSI”) and AIC and AFMICSI, in each case joining those entities to the existing Amended and Restated Intercompany Services and Cost Allocation Agreement in place between AFMICSI and various of its affiliates (the “**Services Agreement**”). The Services Agreement provides that AFMICSI can provide services to each of IDS and AIC on a cost basis, and vice versa. Initially, the services to be provided by AFMICSI will supplement those services that will not be provided by Ameriprise to IDS under the Transition Services Agreement which is disclosed in the Stock Purchase Agreement. We ask you to include your approval or other action relative to these Joinder Agreements in the order issued in connection with the above-referenced Form A proceedings. In addition, the Future Plans for Insurer section is changed to reflect that Ms. Stauffacher will become the President and Chief Executive Officer of IDS following the change of control.

The specific changes to Item 1(viii) are just correcting errors in the list of documents contained therein and aligning that list with the intercompany agreements disclosed in the IDS Form B on file with the Commissioner.

For your convenience, also enclosed is a redline that shows the foregoing changes in the Amended Form A as against the original Form A application filed with the Office. Note that the redline suggests changes were made to Mr. William Todd Fancher’s position within AFIMHC, but



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Mr. Fancher remains in the same position as he did previously (Chief People Officer) and the notations on the redline in this regard are simply a function of the redlining software.

As evidence of this filing, kindly file-stamp the copy of this transmittal letter enclosed herein and return the same to our attention in the self-addressed, stamped envelope enclosed for your convenience.

Should you require additional information, or have any questions regarding this filing, please do not hesitate to contact me.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Thomas R. Hrdlick", written over a horizontal line.

Thomas R. Hrdlick

TRH/ms  
Enclosures

Cc: Ann Wenzel  
Anne E. Ross