

August 30, 2018

Hand Delivered

Amy Malm, Director
Bureau of Financial Analysis and Examination
Office of the Commissioner of Insurance
PO Box 7873
Madison, WI 53707-7873

2018 AUG 30 PM 2:11
RECEIVED
OFFICE OF THE COMMISSIONER OF INSURANCE

Re: Request for Approval of Merger of
Little Black Mutual Insurance Company into
Farmington Mutual Insurance Company
Pursuant to Wis. Stat. § 611.73 and Wis. Adm. Code Ins § 40.02

Dear Ms. Malm:

Enclosed with this letter pursuant to Wis. Stat. § 611.73 and Wis. Adm. Code §§ Ins 40.02 is the Form A Statement on the merger of Little Black Mutual Insurance Company ("Little Black") into Farmington Mutual Insurance Company ("Farmington") requesting the approval of the Wisconsin Office of the Commissioner of Insurance (the "OCI"). Included with this filing are two copies of the Form A Statement and required exhibits. We have not included a Form E Pre-Acquisition Notification Form with the filing. Farmington believes that it is exempt from filing a Form E under Wis. Adm. Code Ins § 40.025(2)(d)1 and 3, since in no market would the combined market share of Farmington and Little Black exceed 5% of the total market, and in no market would the combined market share of Farmington and Little Black exceed 12% of the total market nor would Farmington's market share increase by more than 2% of the total market.

We are filing under separate cover the exhibits and information for which Farmington is seeking confidential treatment pursuant to Wis. Stat. §§ 134.90 and 601.465. Farmington is asserting confidentiality for the following information and exhibits as protected from disclosure under provisions of Wisconsin law as containing personally sensitive information or being of a confidential, proprietary and/or trade secret nature, the disclosure of which would cause material harm to the competitive position of Farmington and information that falls within the definition of "trade secret" of Wis. Stat. § 134.90:

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1. Biographical Affidavits for certain proposed directors and officers.
2. Plan of Operations for the combined company.
3. Financial Pro Forma.

The above exhibits and information should be maintained as confidential and not be made available for public inspection or copying. We request that the OCI provide written notification of any request for access to such exhibits and information and advance written notification of release of any exhibit or information due to a determination by the OCI that it should not be accorded confidential treatment. Any communications relating to such a request or determination should be directed to Mike Soldan, General Manager, Farmington Mutual Insurance Company, 264 State Road 35, Osceola, WI 54020, telephone 715-294-3186, email address mike@farmingtonmutual.com.

Thank you for your consideration of this Form A filing. Please contact me should you have any questions or require additional information.

Sincerely,

PARRETT & O'CONNELL, LLP



Noreen J. Parrett

Enclosures

cc: Mike Soldan, Farmington Mutual Insurance Company (w/encls.)
Tony Wilke, Little Black Mutual Insurance Company (w/encls.)