



33 East Main Street
Suite 900
Madison, Wisconsin 53703
608.251.5000
Fax 608.251.9166
www.quarles.com

Attorneys at Law in
Chicago
Indianapolis
Madison
Milwaukee
Naples
Phoenix
Scottsdale
Tampa
Tucson
Washington, D.C.

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Direct dial: 608/283-2434
E-mail: william.toman@quarles.com

April 23, 2018

NOTICE: As described further below, the enclosures with this letter are filed subject to a request for **CONFIDENTIAL** treatment and an exception under the public records law.

VIA HAND DELIVERY

Michael Mancusi-Ungaro
Insurance Financial Examiner - Licensing Specialist
Bureau of Financial Analysis and Examinations
Office of the Commissioner of Insurance
125 S. Webster St.
Madison, WI 53702

**Re: In the Matter of the Acquisition of Control of Health Tradition Health Plan
by WEA Insurance Corporation**

Dear Mike:

Thanks again to you and your colleagues for meeting with us regarding this proposed acquisition. Following up on our discussions, WEA Insurance Corporation (the "Applicant") is planning to file a Form A pursuant to Wis. Stat. § 611.72 and Wis. Admin. Code § Ins 40.02 in connection with its acquisition of control of Health Tradition Health Plan (the "Insurer"). In anticipation of that filing, on behalf of the Applicant, we have enclosed the biographical sketches of the following officers of Applicant: Michael I. Quist, Barbara J. Ruegsegger, Vaughn L. Vance, and Dawn M. Witek. Please hold these sketches to be included as exhibits to the forthcoming Form A filing.

We request that the enclosed biographical sketches (the "Confidential Information") be kept confidential. They are required filed with the Commissioner of Insurance of the State of Wisconsin (the "Commissioner") as part of the Applicant's Form A filing to obtain the Commissioner's approval of the Applicant's proposed acquisition of control of the Insurer. As a result, the Commissioner may withhold the Confidential Information from public disclosure

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under Wis. Stat. § 601.465(1m)(a), and, moreover, because the information is not public, it is presumed under § 601.465(1n)(a), notwithstanding the public records law, that it is proprietary and confidential and that the potential for harm and competitive disadvantage if it is made public by the Commissioner outweighs the public interest in the disclosure of the Confidential Information.

Finally, the public value of the personal information in biographical sketches is outweighed by the privacy interests of persons submitting these sketches, and the public interest in encouraging qualified people to serve in these capacities, *see* the Wisconsin Attorney General's November 2015 *Wisconsin Public Records Law Compliance Guide*, pp. 35-36, and, in particular, home information and the social security number of an employee provided by an employer are exempt from the public records law. *Id.* at p. 22, *citing* § 19.36(10)(a).

In the event your Office receives a request for or a subpoena for the production of the Confidential Information, we respectfully request that the Office immediately advise us of such request or subpoena so that we may take the appropriate action to protect these documents.

We appreciate your Office's assistance as the Applicant prepares to file the Form A. If you need anything further, please do not hesitate to contact me or Vaughn Vance, Vice President & General Counsel of Applicant, at (608) 661-6774 or vvance@weatrust.com.

Very truly yours,

QUARLES & BRADY LLP



William J. Toman

Enclosures

cc: Vaughn Vance