

November 4, 2008

VIA ELECTRONIC AND U.S. MAIL

Office of the Wisconsin Commissioner of Insurance
125 South Webster Street
Madison, Wisconsin 53702

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CLIENT/MATTER NUMBER
070441-0101

RECEIVED
WISCONSIN COMMISSIONER
OF INSURANCE
NOV 12 2008
PH 12-27

Attn: Timothy Vande Hey

Re: Sheboygan Falls Mutual Insurance Company—Plan of
Conversion, Amended and Restated Articles of Incorporation,
and Amended and Restated Bylaws

Dear Mr. Vande Hey:

Attached for filing, in accordance with Section 611.76(5) of the Wisconsin Statutes and our prior communications with the Staff of the Office of the Commissioner of Insurance for the State of Wisconsin ("OCI"), are the following: 1) Resolutions passed by unanimous vote of the Board of Directors of Sheboygan Falls Mutual Insurance Company ("SFMIC") at a meeting held on October 14, 2008; 2) Plan of Conversion as approved by the SFMIC Board of Directors; 3) Amended and Restated Articles of Incorporation for the converted stock company; and 4) Amended and Restated Bylaws for the converted stock company.

Each of the attached documents has been previously submitted for review by the OCI staff in the attached form, and has been approved as to form.

We believe that SFMIC's application for approval of its conversion under Section 611.76(4m) of the Wisconsin statutes is now complete. Please contact the undersigned if you will require any additional documents or information to complete this application for approval of the conversion in advance of the upcoming administrative hearing.

Very truly yours,



Anne E. Ross

Enclosures

cc: Julie E. Walsh
Frederick W. Dreher
Allison J. Levy
Donald H. Nikolaus
Connie L. O'Connell
Lee F. Wilcox

Exh #	18
Date	11/7/08
Case	08-C31480
Ins. Comm.	

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