



Whyte Hirschboeck Dudek S.C.

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November 18, 2013

***VIA HAND DELIVERY***

Kristen L. Forsberg, CPA, CFE  
Insurance Financial Examiner/Licensing Specialist  
Office of the Commissioner of Insurance  
125 South Webster Street, 2nd Floor  
Madison, WI 53703

RECEIVED  
OFFICE OF THE COMMISSIONER  
OF INSURANCE  
MADISON, WI 53703  
NOV 19 2013

**Re: Trilogy Health Insurance, Inc. –Business Plan/Projections/Capital and Surplus  
CONFIDENTIAL**

Dear Ms. Forsberg:

In response to your letter dated November 6, 2013, Trilogy hereby responds and submits the following information with a request that OCI maintain the confidentiality of the enclosed information and not release this information to the public.

1. Item 3 – Business Plan. See attached Business Plan information.
2. Item 4 – Financial Projections. See attached Financial Projection information.
3. Item 5 – Target Level Capital and Surplus (RBC) – THI. See attached Target Level Capital and Surplus information.
4. Item 9 – IPN Administrative Services Agreement. See attached Exhibit B to the IPN Administrative Services Agreement.

The enclosed information could put THI at a competitive disadvantage if released publicly and THI has taken reasonable efforts to maintain the confidentiality of such information. The information constitutes a “trade secret” under Wis. Stat. § 134.90(1)(c) because it “derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use [and] is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.”

WHD/9938430.1

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Thank you for your consideration with respect to these matters.

Very truly yours,



Lisa R. Lange

LRL/co  
Enclosure

cc (w/enc.): William D. Felsing, Trilogy Health Insurance, Inc.