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WISCONSIN COMMISSIONER  
OF INSURANCE

Lisa R. Lange  
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December 4, 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

**Re: Trilogy Health Insurance, Inc. –Updated Financial Projections/Item 9 Exhibit B to  
SMG Administrative Services Agreement -- 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 4 – Financial Projections. See updated Financial Projection information.
2. Item 9 – SMG Administrative Services Agreement. See attached Exhibit B to the SMG 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.”

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.

WHD/9994138.1