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**Sent:** Friday, July 7, 2023 2:47 PM  
**To:** Helder, Randy <[RHelder@naic.org](mailto:RHelder@naic.org)>  
**Cc:** Weyhenmeyer, Erica <[Erica.Weyhenmeyer@illinois.gov](mailto:Erica.Weyhenmeyer@illinois.gov)>  
**Subject:** Market Analysis Procedures (D) Working Group - Fraternal Exemption

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Dear Mr. Helder:

I am writing regarding the fraternal exemption to MCAS reporting, which I understand will be discussed further at the July 17 meeting of the Market Analysis Procedures (D) Working Group. I appreciate the opportunity to provide Modern Woodmen of America's views about the importance of the exemption, which has been in place since MCAS' inception.

Historically, fraternal organizations have been exempted from MCAS requirements because of their unique structure as not-for-profit membership organizations. Throughout our hi