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February 20, 2018

VIA HAND DELIVERY

The Honorable Katharine L. Wade
Connecticut Insurance Department
153 Market Street
Hartford, Connecticut 06103
Attn: Financial Analysis Unit, Financial Regulation Division

**Re: Form A Application to Acquire Control of SPARTA Insurance Company
Under Conn. Gen. Stat. § 38a-130**

Dear Commissioner Wade:

Enclosed please find a Form A application (the "Application") in connection with the proposed acquisition of control of SPARTA Insurance Company (the "Domestic Insurer") by Apollo Global Management, LLC, Leon Black, Joshua Harris and Marc Rowan (collectively, the "Applicants") filed as required by Conn. Gen. Stat. § 38a-130 and Conn. Agencies Regs. § 38a-138-1 *et seq.*

The Applicants respectfully request your approval for the proposed acquisition of control described in the Application. Pursuant to Conn. Agencies Regs. § 38a-138-1, we have enclosed for filing one (1) original and five (5) copies of the Application (excluding certain confidential information contained in the Biographical Affidavits as described below), each in 3-ring binders, and a thumb drive containing an electronic copy of the same. Also enclosed is a completed "State of Connecticut, Form A Checklist".

Under separate cover, we have submitted a request for confidential treatment of Confidential Supplement to Exhibit D to the Application - Biographical Affidavits. Such exhibit, or portions thereof, that are included with the Application contain information that the Applicants consider confidential and sensitive from a personal privacy perspective and are entitled to confidential treatment under Conn. Gen. Stat. § 1-210(b)(2). Due to the nature of such, the Applicants have not publicly released such exhibit or portions thereof.



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Thank you for your time and attention to this matter. We appreciate your cooperation and efforts in reviewing the enclosed Application and look forward to working with, and assisting, you and your staff in order to complete its review.

If you have any comments or questions, please contact me by e-mail at wgoddard@daypitney.com or by telephone at 860-275-0117.

Sincerely,


William D. Goddard

WDG/gb
Enclosures