

REPORT ON EXAMINATION
OF
FLORIDA FARM BUREAU CASUALTY
INSURANCE COMPANY

GAINESVILLE, FLORIDA

AS OF

DECEMBER 31, 2013

BY THE
FLORIDA OFFICE OF INSURANCE REGULATION

TABLE OF CONTENTS

LETTER OF TRANSMITTAL	-
SCOPE OF EXAMINATION	1
SUMMARY OF SIGNIFICANT FINDINGS	2
CURRENT EXAM FINDINGS.....	2
PRIOR EXAM FINDINGS.....	2
HISTORY	2
GENERAL	2
DIVIDENDS TO STOCKHOLDERS.....	3
CAPITAL STOCK AND CAPITAL CONTRIBUTIONS.....	3
SURPLUS NOTES	4
ACQUISITIONS, MERGERS, DISPOSALS, DISSOLUTIONS, AND PURCHASE OR SALES THROUGH REINSURANCE	4
CORPORATE RECORDS	4
CONFLICT OF INTEREST.....	4
MANAGEMENT AND CONTROL	5
MANAGEMENT	5
AFFILIATED COMPANIES	7
SIMPLIFIED ORGANIZATIONAL CHART	8
REINSURANCE AGREEMENT.....	9
TAX ALLOCATION AGREEMENT.....	9
COST SHARING AGREEMENT	9
JOINT EXPENCE ALLOCATION AGREEMENT	10
EXPENSE ALLOCATION AGREEMENT.....	10
FIDELITY BOND AND OTHER INSURANCE	11
PENSION, STOCK OWNERSHIP AND INSURANCE PLANS	11
TERRITORY AND PLAN OF OPERATIONS	11
TREATMENT OF POLICYHOLDERS	12
COMPANY GROWTH	12
PROFITABILITY OF COMPANY	12
LOSS EXPERIENCE	13
REINSURANCE	13
ASSUMED	13
CEDED	13
ACCOUNTS AND RECORDS	15
CUSTODIAL AGREEMENT	16
LICENSING AGREEMENT	16
INDEPENDENT AUDITOR AGREEMENT	16

INFORMATION TECHNOLOGY REPORT	16
STATUTORY DEPOSITS	17
FINANCIAL STATEMENTS PER EXAMINATION.....	17
ASSETS.....	18
LIABILITIES, SURPLUS AND OTHER FUNDS	19
STATEMENT OF INCOME	20
COMPARATIVE ANALYSIS OF CHANGES IN SURPLUS.....	21
COMMENTS ON FINANCIAL STATEMENTS.....	22
LIABILITIES	22
CAPITAL AND SURPLUS	22
SUMMARY OF RECOMMENDATIONS.....	22
CONCLUSION.....	23

March 13, 2015

Kevin M. McCarty
Commissioner
Office of Insurance Regulation
State of Florida
Tallahassee, Florida 32399-0326

Dear Sir:

Pursuant to your instructions, in compliance with Section 624.316, Florida Statutes, Rule 69O-138.005, Florida Administrative Code, and in accordance with the practices and procedures promulgated by the National Association of Insurance Commissioners (NAIC), we have conducted an examination as of December 31, 2013, of the financial condition and corporate affairs of:

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY
5700 S.W. 34th STREET
GAINESVILLE, FLORIDA 32608

Hereinafter referred to as the "Company". Such report of examination is herewith respectfully submitted.

SCOPE OF EXAMINATION

This examination covered the period of January 1, 2009 through December 31, 2013. The Company was last examined by representatives of the Florida Office of Insurance Regulation (Office) as of December 31, 2008. This examination commenced with planning at the Office from October 20, 2014 to October 24, 2014. The fieldwork commenced on November 12, 2014, and concluded as of March 13, 2015.

This financial examination was a statutory financial examination conducted in accordance with the NAIC Financial Condition Examiners Handbook, Accounting Practices and Procedures Manual and Annual Statement Instructions promulgated by the NAIC as adopted by Rules 69O-137.001(4) and 69O-138.001, Florida Administrative Code, with due regard to the statutory requirements of the insurance laws and rules of the State of Florida.

The Financial Condition Examiners Handbook requires that the examination be planned and performed to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. An examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation and management's compliance with Statutory Accounting Principles and Annual Statement Instructions when applicable to domestic state regulations.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process.

This report of examination is confined to significant adverse findings, a material change in the financial statements or other information of regulatory significance or requiring regulatory action. The report comments on matters that involved departures from laws, regulations or rules, or which were deemed to require special explanation or description.

SUMMARY OF SIGNIFICANT FINDINGS

Current Exam Findings

The following is a summary of material adverse findings, significant non-compliance findings, or material changes in the financial statements noted during this examination.

Notification for Change of Officers

The Company did not notify the Office of the departure of the Company Actuary within the required forty-five (45) days, which was not in compliance with Section 628.261, Florida Statutes.

Prior Exam Findings

There were no material adverse findings, significant non-compliance findings, or material changes in the financial statements noted for the examination as of December 31, 2008.

HISTORY

General

The Company was incorporated in Florida on April 16, 1974, and commenced business on July 1, 1974, as Florida Farm Bureau Casualty Insurance Company.

The Company was authorized to transact the following insurance coverages in Florida on various dates beginning in 1974 to 1992 and continued to be authorized as of December 31, 2013:

Homeowners Multi Peril	Glass
Commercial Multi Peril	Burglary and Theft
Private Passenger Auto Physical Damage	Mobile Home Multi Peril
Private Passenger Auto liability	Inland Marine
Commercial Automobile Liability	Other Liability
Commercial Auto Physical Damage	Fidelity
Allied Lines	Fire

Effective February 15, 2010, the Company amended its Articles of Incorporation and Bylaws to reduce the number of directors from eight to six. The Company notified the Office of the change in number of directors.

Dividends to Stockholders

The Company did not declare or pay any dividends during the period of this examination.

Capital Stock and Capital Contributions

As of December 31, 2013, the Company's capitalization was as follows:

Number of authorized common capital shares	3,000,000
Number of shares issued and outstanding	500,000
Total common capital stock	\$500,000
Par value per share	\$1.00

The Company was controlled and wholly owned by Southern Farm Bureau Casualty Insurance Company (Southern Casualty), a Mississippi domiciled corporation, which was owned by 6 Farm Bureau investment/holding companies, which are owned/controlled by the Farm Bureau federations/organizations in Arkansas, Mississippi, Louisiana, South Carolina, Florida and Colorado.

The Company's parent company did not make any capital contributions during the examination period.

Surplus Notes

The Company did not have any surplus notes during the period of this examination.

Acquisitions, Mergers, Disposals, Dissolutions and Purchase or Sales Through Reinsurance

The Company had no acquisitions, mergers, disposals, dissolutions and purchase or sales through reinsurance during the period of this examination.

CORPORATE RECORDS

The recorded minutes of the Shareholders, Board of Directors (Board) and certain internal committees were reviewed for the period under examination. The recorded minutes of the Board adequately documented its meetings and approval of Company transactions and events, in compliance with the NAIC Financial Condition Examiners Handbook adopted by Rule 69O-138.001, Florida Administrative Code, including the authorization of investments as required by Section 625.304, Florida Statutes.

Conflict of Interest

The Company adopted a policy statement requiring periodic disclosure of conflicts of interest in accordance with the NAIC Financial Condition Examiners Handbook adopted by Rule 69O-138.001, Florida Administrative Code.

MANAGEMENT AND CONTROL

Management

The annual shareholders meeting for the election of directors was held in accordance with Section 628.231, Florida Statutes. Directors serving as of December 31, 2013, were:

Directors

Name and Location	Principal Occupation
Ronald Roy Anderson Baton Rouge, Louisiana	President Louisiana Farm Bureau Federation, Inc.
John Lawrence Hoblick Gainesville, Florida	President Florida Farm Bureau Federation
Donald James Shawcroft Denver, Colorado	President Colorado Farm Bureau
Randy Lee Knight (a) Jackson, Mississippi	President Mississippi Farm Bureau Federation
Harry Randal Veach Little Rock, Arkansas	President Arkansas Farm Bureau Federation
David Melton Winkles, Jr. Columbia, South Carolina	President South Carolina Farm Bureau

(a) Replaced by David Michael McCormick as President of Mississippi Farm Bureau Federation on February 16, 2015.

In accordance with the Company's bylaws, the Board appointed the following senior officers:

Senior Officers

Name	Title
Steven Clay Murray	President & CEO
Ronald Roy Anderson	Chairman of the Board
John Lawrence Hoblick	Vice Chairman
Steven Walter Ingram	Secretary
Kimberly Payne Blackburn	VP Products & Agency/Brokerage
Bert Jay Gindy	VP Compliance & Government Relations
Stephen Thomas Grabow	VP Claims
Michael Anthony Hill	VP Finance
Marvin Stanley Smith	VP Information Technology
Stephen Douglas Tanner	VP Human Resources & Administration
Mark Lane Thomas	VP Underwriting & Training

The Company's Board appointed an internal committee. The following is an internal Board committee and members as of December 31, 2013:

Audit Committee

John Lawrence Hoblick¹
Harry Randal Veach
David Melton Winkles, Jr.
Randy Lee Knight (a)
Ronald Roy Anderson
Donald James Shawcroft

¹ Chairman

(a) Replaced by David Michael McCormick as President of Mississippi Farm Bureau Federation on February 16, 2015.

The Company maintained an audit committee, as required by Section 624.424(8) (c), Florida Statutes.

Affiliated Companies

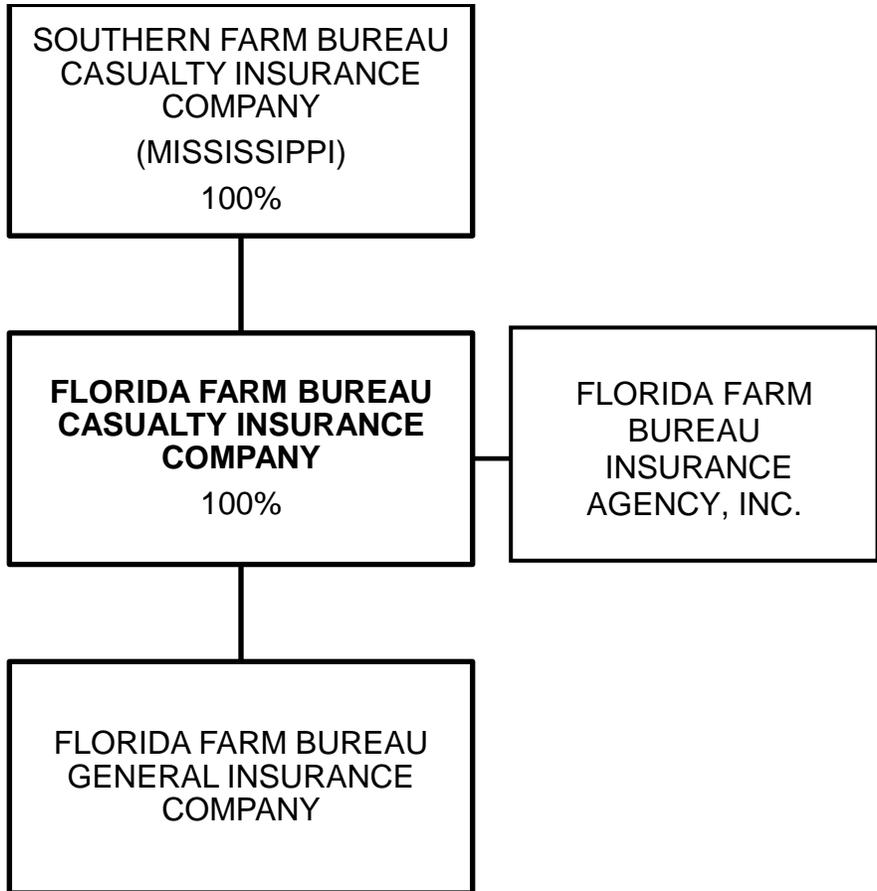
The most recent holding company registration statement was filed with the State of Florida on March 12, 2015, as required by Section 628.801, Florida Statutes, and Rule 69O-143.046, Florida Administrative Code.

A simplified organizational chart as of December 31, 2013, reflecting the holding company system, is shown on the following page. Schedule Y of the Company's 2013 annual statement provided a list of all related companies of the holding company group.

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY

SIMPLIFIED ORGANIZATIONAL CHART

DECEMBER 31, 2013



The following agreements were in effect between the Company and its affiliates:

Reinsurance Agreement

The Company entered into a multi-line Reinsurance Agreement with its affiliate, Florida Farm Bureau General Insurance Company (Florida General), on January 1, 2007. The reinsurance agreement states all risks, less certain business ceded to the Florida Hurricane Catastrophe Fund, were assumed from its wholly owned subsidiary, Florida General. The agreement states all losses, loss adjustment expenses, acquisition expenses, general expenses and all taxes arising out of the premiums assumed should be reimbursed or paid by the Company.

Tax Allocation Agreement

The Company, along with its immediate parent, Southern Casualty, and affiliates, filed a consolidated federal income tax return. On December 31, 2013, the method of allocation between the Company and its parent was on a separate-entity basis. Each member of the group recorded an inter-company income tax receivable or payable with Southern Casualty. Within ninety days of the remittance by Southern Casualty of any income tax payment to the taxing authorities, all inter-company tax receivables and payables were settled.

Cost Sharing Agreement

The Company entered into a Cost Sharing Agreement with Florida Farm Bureau Federation (Federation) and Affiliates, and Florida General on July 1, 2005. The companies agree to provide services shared by Federation and companies including management and operational support. Property taxes are prorated based on occupied space. Costs shared under this agreement during 2013 amounted to \$685,674.

Joint Expense Allocation Agreement

The Company entered into a Joint Expense Allocation Agreement with its subsidiary, Florida General on February 13, 2009. To achieve potential cost efficiencies, the companies share in certain overhead expenses that are mutually beneficial. All joint overhead expenses incurred in operating the Company and Florida General were allocated between the companies pursuant to the formula prescribed in one of the following three categories: Loss Adjustment Expense, Information System Expense and Other Routing/Reoccurring Joint Expenses. Within five working days of the end of each month excluding December, the Company will report to Florida General the amount of joint expenses allocated to Florida General pursuant to the calculations. For the month of December, the Company shall provide to Florida General the report of allocated expenses by the 20th working day of January the following year. Final settlement of amounts due will be based on these reports and will be remitted on a monthly basis within fifteen days of receipt of the monthly reports. Costs shared under this agreement during 2013 amounted to \$0.

Expense Allocation Agreement

The Company entered into an Expense Allocation Agreement with Southern Casualty on July 1, 2005. To achieve potential cost efficiencies, the companies share in certain overhead expenses that are mutually beneficial. The agreement states that the Company will pay the pro-rata share (based on policy count) of the home office expense. Southern Casualty shall provide to the Company a monthly report of the home office expenses within five working days of each month end excluding December. For the month of December, the Company shall provide to Florida General the report of allocated expenses by the 20th working day of January the following year. Final settlement of amounts due will be based on these reports and will be remitted on a

monthly basis within fifteen days of receipt of the monthly reports. Costs shared under this agreement during 2013 amounted to \$3,900,191.

FIDELITY BOND AND OTHER INSURANCE

The Company maintained fidelity bond coverage up to \$5,000,000 with a deductible of \$250,000, which reached the suggested minimum as recommended by the NAIC.

The Company also maintained management liability insurance and professional liability insurance coverage with limits of \$10,000,000 and a deductible of \$200,000, as well as property and liability, directors & officers, errors & omissions, underground storage tank, cyber security, cyber liability, workers' compensation and commercial umbrella liability coverages.

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS

The Company participates in a noncontributory benefit pension plan. The plan is available to all employees who have satisfied certain eligibility requirements such as age and service. Contributions to the plan are funded through a group deposit administration contract with Southern Farm Bureau Life Insurance Company and are determined by the entry age normal cost method.

TERRITORY AND PLAN OF OPERATIONS

The Company was authorized to transact insurance only in the State of Florida.

Treatment of Policyholders

The Company established procedures for handling written complaints in accordance with Section 626.9541 (1) (j), Florida Statutes.

The Company maintained a claims procedure manual that included detailed procedures for handling each type of claim in accordance with Section 626.9541(1) (i) 3a, Florida Statutes.

COMPANY GROWTH

The Company's gross premiums steadily increased during the examination period, with net premiums increasing from \$175 million in 2009 to \$235 million in 2013. Net underwriting results and net income improved each year during the examination period. Surplus grew approximately \$47 million during the examination period, mostly due to the Company's favorable net income growth.

Profitability of Company

The following table shows the profitability trend (in dollars) of the Company for the period of examination, as reported in the filed annual statements.

	2013	2012	2011	2010	2009
Premiums Earned	232,721,128	221,785,724	208,226,232	188,047,859	169,663,056
Net Underwriting Gain/(Loss)	9,243,306	4,760,046	(4,789,168)	(10,934,832)	(16,565,751)
Net Income	19,934,177	14,764,415	9,006,790	3,505,602	507,452
Total Assets	502,802,726	474,030,190	444,136,280	438,675,793	420,050,794
Total Liabilities	256,532,848	246,484,808	231,793,585	237,014,046	220,866,957
Surplus As Regards Policyholders	246,269,878	227,545,382	212,342,695	201,661,747	199,183,837

LOSS EXPERIENCE

The Company's Loss and Loss Adjustment Expense ratio gradually decreased during the exam period, from 85.2% in 2009 to 73.3% in 2013. Loss Ratio has decreased from 71.1% in 2009 to 61.9% in 2013. There was a gradual reduction in Loss Adjustment Ratio from 14.1% in 2009 to 11.5% in 2013. The one and two-year net loss developments at the end of the current examination period were both favorable at \$2 million and \$0.9 million, respectively.

REINSURANCE

The reinsurance agreements reviewed complied with NAIC standards with respect to the standard insolvency clause, arbitration clause, intermediary clause, transfer of risk, reporting and settlement information deadlines.

Assumed

The Company assumed 100% of the premiums written, less the premium ceded to the Florida Hurricane Catastrophe Fund, of its subsidiary, Florida General.

Ceded

As of December 31, 2013, the Company's ceded reinsurance program consisted of property surplus share, excess of loss and catastrophe reinsurance provided by agreements with various commercial reinsurers through reinsurance intermediary, Aon Benfield. The Company also participated in the Florida Hurricane Catastrophe Fund.

The Company's liability excess of loss provides coverage up to \$30,000,000 in excess of \$750,000 of ultimate net losses per each event. The Company's umbrella coverage, which

consists of an excess and facultative, provides coverage up to \$10,000,000 in excess of \$500,000 of ultimate net loss per each event.

The Company's property surplus share treaty provides coverage of up to \$40,000,000 on property policies with over \$600,000 of total insured value.

The Company had the following catastrophe excess of loss coverage through commercial reinsurers and the Florida Hurricane Catastrophe Fund as of December 31, 2013, resulting in coverage of ultimate net losses of approximately \$567,000,000 for the first event:

- Occurrence Property and Auto Catastrophe (Layer 1) - \$10,000,000 in private reinsurance coverage with a retention limit of \$12,000,000 with a \$10,000,000 annual aggregate deductible
- Property Catastrophe First Excess of Loss - \$27,000,000 in private reinsurance coverage with a retention limit \$22,000,000
- Property Catastrophe Second Excess of Loss - \$14,000,000 in private reinsurance coverage with a retention limit of \$49,000,000
- Occurrence Property and Auto Catastrophe (Layer 4) - \$50,000,000 in private reinsurance coverage with a retention limit of \$63,000,000
- Property Catastrophe First High Excess of Loss - \$100,000,000 in private reinsurance coverage with a retention limit \$113,000,000
- Property Catastrophe Second High Excess of Loss - \$100,000,000 in private reinsurance coverage with a retention limit of \$213,000,000
- Property Catastrophe Third High Excess of Loss Top and Drop - \$100,000,000 in private reinsurance coverage with a retention limit of \$313,000,000

- Over Other Protections Excess of Loss - \$36,000,000 in private coverage with a retention of \$413,000,000
- Florida Catastrophe Hurricane Fund – \$118,297,371 payout limit with an attachment point of \$49,350,609

The Company elected to take reduced recoveries instead of paying reinstatement premiums for the second and third event. After reinstatements the Company would have up to \$449,000,000 of coverage with a \$12,000,000 retention.

The Company reinsured third and fourth events with retention of \$12,000,000, up to \$163,000,000 in coverage, provided the property catastrophe third high excess of loss top and drop had not been exhausted in the first two events.

The Company ceded \$69,609,000 in premiums during the year ended December 31, 2013.

The reinsurance contracts were reviewed by the Company's appointed actuary and were utilized in determining the ultimate loss opinion.

ACCOUNTS AND RECORDS

The Company maintained its principal operational offices in Gainesville, Florida. The Company's accounting records were maintained on a computerized system.

The Company and non-affiliates had the following agreements:

Custodial Agreement

In 2012, the custodial agreement with Merrill Lynch Trust Company was terminated and a new custodial agreement was entered into with Morgan Stanley Smith Barney, LLC. The agreement was in compliance with the requirements of Rule 69O-143.042, Florida Administrative Code.

Licensing Agreement

The Company, along with its subsidiary, Florida General, had an agreement with Florida Farm Bureau Federation, a member of the American Farm Bureau Federation, to use the “Farm Bureau” name and logo in connection with selling, placing and underwriting of property and casualty insurance products and services in the State of Florida. In return, the Company and Florida General paid a royalty of 0.87% per year on adjusted direct premiums written, less premiums collected from assigned risk pool and dividends declared by the licensees.

Independent Auditor Agreement

An independent CPA audited the Company’s statutory basis financial statements annually for the years 2009 through 2013, in accordance with Section 624.424(8), Florida Statutes. Supporting workpapers were prepared by the CPA as required by Rule 69O-137.002, Florida Administrative Code.

INFORMATION TECHNOLOGY REPORT

Lindsey Pittman, IT Specialist, of Lewis & Ellis, Inc. performed an evaluation of the information technology and computer systems of the Company. Results of the evaluation were noted in the Information Technology Report provided to the Company.

STATUTORY DEPOSITS

The following securities were deposited with the State of Florida as required by Section 624.411, Florida Statutes.

STATE	Description	Par Value	Market Value
FL	MIAMI-DADE CNTY, 5%, 05/01/2023 Bond	<u>\$ 2,000,000</u>	<u>\$ 2,204,540</u>
TOTAL STATUTORY DEPOSITS		<u>\$ 2,000,000</u>	<u>\$ 2,204,540</u>

FINANCIAL STATEMENTS PER EXAMINATION

The following pages contain financial statements showing the Company's financial position as of December 31, 2013, and the results of its operations for the year then ended as determined by this examination. Adjustments made as a result of the examination are noted in the section of this report captioned, "Comparative Analysis of Changes in Surplus."

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY

Assets

DECEMBER 31, 2013

	Per Company	Examination Adjustments	Per Examination
Bonds	\$338,151,795		\$338,151,795
Common stocks	17,148,897		17,148,897
Real Estate:			
Properties occupied by company	9,296,305		9,296,305
Properties held for the production of income	623,095		623,095
Cash and short-term investments	78,667,020		78,667,020
Receivable for securities	125,000		125,000
Investment Income	4,125,590		4,125,590
Agents' balances:			
Uncollected premium	8,350,068		8,350,068
Deferred premium	29,634,428		29,634,428
Amounts recoverable from reinsurers	1,126,792		1,126,792
Net deferred tax asset	13,420,303		13,420,303
Electronic data processing equipment and software	214,727		214,727
Receivable from parent, subsidiaries, and affiliates	325,384		325,384
Aggregate write-ins for liabilities	1,593,322		1,593,322
	<hr/>		
Totals	<u>\$502,802,726</u>	<u>\$0</u>	<u>\$502,802,726</u>

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY
Liabilities, Surplus and Other Funds

DECEMBER 31, 2013

	Per Company	Examination Adjustments	Per Examination
Losses	\$89,309,115		\$89,309,115
Loss adjustment expenses	15,172,361		15,172,361
Other expenses	4,355,482		4,355,482
Taxes, licenses and fees	678,128		678,128
Current federal/foreign income taxes	4,675,486		4,675,486
Unearned premium	111,050,800		111,050,800
Advance premium	8,446,236		8,446,236
Ceded reinsurance premiums payable	2,772,756		2,772,756
Amounts withheld or retained by company for account of others	1,408,859		1,408,859
Payable to parent, subsidiaries, and affiliates	1,295		1,295
Aggregate write-ins for liabilities	18,662,330		18,662,330
Total Liabilities	\$256,532,848	\$0	\$256,532,848
Aggregate Write-ins for special surplus funds	\$2,226,397		\$2,226,397
Common capital stock	500,000		500,000
Gross paid in and contributed surplus	77,090,000		77,090,000
Unassigned funds (surplus)	166,453,481		166,453,481
Surplus as regards policyholders	\$246,269,878	\$0	\$246,269,878
Total liabilities, surplus and other funds	\$502,802,726	\$0	\$502,802,726

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY
Statement of Income

DECEMBER 31, 2013

Underwriting Income

Premiums earned		\$232,721,128
	Deductions:	
Losses incurred		\$143,967,244
Loss expenses incurred		26,723,583
Other underwriting expenses incurred		52,783,534
Aggregate write-ins for underwriting deductions		3,461
Total underwriting deductions		<u>\$223,477,822</u>
Net underwriting gain		\$9,243,306

Investment Income

Net investment income earned		\$11,574,225
Net realized capital gains or (losses)		489,890
Net investment gain		<u>\$12,064,115</u>

Other Income

Net gain from agents' or premium balances charged off		(\$68,353)
Finance and service charges not included in premiums		1,171,943
Aggregate write-ins for miscellaneous income		1,046,422
Total other income		<u>\$2,150,012</u>

Net income before dividends to policyholders and before federal & foreign income taxes		\$23,457,433
Dividends to policyholders		0
Net Income, after dividends to policyholders, but before federal & foreign income taxes		<u>\$23,457,433</u>
Federal & foreign income taxes		3,523,256
Net Income		<u><u>\$19,934,177</u></u>

Capital and Surplus Account

Surplus as regards policyholders, December 31 prior year		\$227,545,382
Net Income		\$19,934,177
Change in net deferred income tax		(1,822,047)
Change in non-admitted assets		767,752
Change in net unrealized capital gains		(531,732)
Surplus adjustments: Paid in		-
Aggregate write-ins for gains and losses in surplus		376,346
Examination Adjustment		-
Change in surplus as regards policyholders for the year		<u>\$18,724,496</u>
Surplus as regards policyholders, December 31 current year		<u><u>\$246,269,878</u></u>

A comparative analysis of changes in surplus is shown below.

FLORIDA FARM BUREAU CASUALTY INSURANCE COMPANY
Comparative Analysis of Changes in Surplus

DECEMBER 31, 2013

The following is a reconciliation of Surplus as regards policyholders between that reported by the Company and as determined by the examination.

Surplus as regards policyholders December 31, 2013, per Annual Statement	\$246,269,878
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	<u>PER COMPANY</u>	<u>PER EXAM</u>	<u>INCREASE (DECREASE) IN SURPLUS</u>
ASSETS:			
No adjustment			
LIABILITIES:			
No adjustment			
Net change in surplus:			<u>0</u>
Surplus as regards policyholders December 31, 2013, per examination			<u><u>\$246,269,878</u></u>

COMMENTS ON FINANCIAL STATEMENTS

Liabilities

Losses and Loss Adjustment Expenses \$104,481,476

The appointed actuary for the parent company, Southern Casualty, rendered an opinion that the amounts carried in the balance sheet as of December 31, 2013, made a reasonable provision for all unpaid loss and loss expense obligations of the Company under the terms of its policies and agreements.

The Office consulting actuaries, Greg Wilson, FCAS, MAAA, and Patrick Glenn, ACAS, ASA, MAAA, of Lewis & Ellis, Inc., reviewed the loss and loss adjustment expense work papers provided by the Company and they were in concurrence with this opinion.

Capital and Surplus

The amount of capital and surplus reported by the Company of \$246,269,878 exceeded the minimum of \$24,541,360 required by Section 624.408, Florida Statutes.

SUMMARY OF RECOMMENDATIONS

Notification for Change of Officers

We recommend that the Company timely notify the Office of all director and officer changes in accordance with Section 628.261, Florida Statutes.

CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of Florida Farm Bureau Casualty Insurance Company as of December 31, 2013, consistent with the insurance laws of the State of Florida.

Per examination findings, the Company's surplus as regards policyholders was \$246,269,878 which exceeded the minimum of \$24,541,360 required by Section 624.408, Florida Statutes.

In addition to the undersigned, Ryne Davison, CFE, Examiner-In-Charge, Kate Bolbas, CFE, Participating Examiner, Lindsey Pittman, CPA, CFE, Participating Examiner, IT Specialist, Greg Wilson, FCAS, MAAA, consulting actuary, and Patrick Glenn, ACAS, ASA, MAAA, consulting actuary, of Lewis & Ellis, Inc. participated in the examination. Jonathan Frisard, Examination Manager, and Connie Hare, Participating Examiner, also participated in the examination.

Respectfully submitted,

Robin Brown, CFE
Chief Examiner
Florida Office of Insurance Regulation