REPORT ON EXAMINATION

OF

MAPFRE INSURANCE COMPANY OF FLORIDA

MIAMI, 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 **4**

GENERAL 4
DIVIDENDS TO STOCKHOLDERS 5
CAPITAL STOCK AND CAPITAL CONTRIBUTIONS 5
SURPLUS NOTES 5
ACQUISITIONS, MERGERS, DISPOSALS, DISSOLUTIONS AND PURCHASE OR SALES THROUGH REINSURANCE 5

CORPORATE RECORDS **6**

CONFLICT OF INTEREST 6
MANAGEMENT AND CONTROL 6
MANAGEMENT 6
AFFILIATED COMPANIES 7
SIMPLIFIED ORGANIZATIONAL CHART 9
TAX ALLOCATION AGREEMENT 10
MANAGEMENT COST ALLOCATION AGREEMENT 10
INTERCOMPANY POOLING 11

FIDELITY BOND AND OTHER INSURANCE **11**

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS **11**

TERRITORY AND PLAN OF OPERATIONS **12**

TREATMENT OF POLICYHOLDERS 12

COMPANY GROWTH **12**

PROFITABILITY OF COMPANY 13

LOSS EXPERIENCE **13**

REINSURANCE **14**

ASSUMED 14
CEDED 14

ACCOUNTS AND RECORDS **15**

CUSTODIAL AGREEMENT 15
INDEPENDENT AUDITOR AGREEMENT 16

INFORMATION TECHNOLOGY REPORT **16**

STATUTORY DEPOSITS **16**

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

CONCLUSION..23

May 29, 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:

MAPFRE INSURANCE COMPANY OF FLORIDA
5959 BLUE LAGOON DRIVE, SUITE 400
MIAMI, FLORIDA 33126

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 to 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 on November 17, 2014 to November 21, 2014. The fieldwork commenced on November 24, 2014 and concluded as of May 29, 2015.

This financial examination was an association examination conducted in accordance with the 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.

The examination was coordinated with the Massachusetts Division of Insurance serving as the Lead State in conjunction with their financial examination of The Commerce Insurance Company (Commerce), a Massachusetts domiciled property and casualty insurer and 100% owner of the Company. Commerce is the lead insurer in a pooling reinsurance arrangement among affiliates, in which the Company is a participant. Reliance was placed on work performed by the Lead State related to Corporate Governance, IT Review, Actuarial Review, controls assessment and testing, and detailed testing where applicable.

SUMMARY OF SIGNIFICANT FINDINGS

Current Exam Findings

The Company's reserves for Losses and Loss Adjustment Expenses were determined to be deficient by approximately $1,235,000 as of December 31, 2013. See the Comments on Financial Statements section of this report for additional information.

Prior Exam Findings

The following is a summary of material findings or exceptions contained in the Office's prior examination report as of December 31, 2008, along with resulting action taken by the Company in connection therewith.

Reinsurance Recoverables

The Company netted its reinsurance recoverables with its ceded reinsurance payables, which was not in accordance with NAIC Annual Statement Instructions and Rule 69O-137.001(4) (a), Florida Administrative Code. Resolution: As of December 31, 2013, the Company reported reinsurance recoverables and ceded reinsurance payables in accordance with NAIC Annual Statement Instructions and Rule 69O-137.001(4) (a), Florida Administrative Code.

Transactions with Affiliates

The Company was providing services to affiliates other than Amstar Insurance Company (Amstar), which were not party to the Administrative Services Agreement effective October 25, 2006. There was no formal/written related party policy as of December 31, 2008, (or for prior periods) with regards to other related parties or related party transactions. Accordingly, the Company was not in compliance with Rule 69O-143.046(2) (c) (5), Florida Administrative Code. Resolution: On July 1, 2009, Amstar and the Company were merged, with the Company being the surviving entity. As of December 31, 2013, all related party transactions were formalized in accordance with Rule 69O-143.046(2) (c) (5), Florida Administrative Code.

Losses and Loss Adjustment Expenses

The consulting actuary for the prior examination identified a loss reserve deficiency as of December 31, 2008 in the amount of $570,000. The Company's reserves were not in compliance with Section 625.101, Florida Statute. This is finding remains unresolved as of the current examination date.

HISTORY

General

The Company was incorporated on November 17, 1988, as a stock property and casualty insurer under the applicable provisions of the State of Florida as Consolidated Property and Casualty Insurance Company and commenced business on August 1, 1989. Mapfre Corporation of Florida Inc. received approval from the Office to purchase the Company on June 6, 2002, and the current name was adopted effective October 1, 2002. The Company merged with Mapfre Insurance Company of America on March 25, 2003. On July 1, 2009, Amstar was merged with and into the Company, with the Company being the surviving entity. Also on July 1, 2009, the Company was acquired by an affiliate, The Commerce Insurance Company.

The Company was party to Consent Order #113005-10 filed November 5, 2010, regarding the prior examination findings. The Company was in compliance with the consent order, with the exception of reserves as of December 31, 2013. See the Comments on Financial Statements section of this report for additional information.

The Company was authorized to transact the following insurance coverage in Florida on various dates in 1989, 2000, 2009 and continued to be authorized as of December 31, 2013:

Fire	Allied Lines
Homeowners Multi Peril	Glass
Commercial Multi Peril	Burglary and Theft
Inland Marine	Aircraft
Private Passenger Auto Physical Damage	Surety
Other Liability (including Product Liability)	Fidelity
Private Passenger Auto Liability	Commercial Auto Physical Damage
Commercial Automobile Liability	

The Articles of Incorporation and the Bylaws were not amended during the period covered by this examination.

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	30,000
Number of shares issued and outstanding	20,000
Total common capital stock	$2,000,000
Par value per share	$100

Control of the Company was maintained by its parent, Commerce, which owned 100% of the stock issued by the Company. Commerce is 100% owned by Mapfre U.S.A. Corp., which is 100% owned by Mapfre Internaciónal, which 100% is owned by Mapfre S.A., a financial services company domiciled in Spain. Mapfre S.A. is 67.7% owned by Fundación Mapfre, a non-profit foundation organized in Spain. There are no other persons who control 10% or more of Mapfre S.A.

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

On July 1, 2009, the Company's affiliate, Amstar Insurance Company (Amstar) was merged into the Company, with the Company being the surviving entity. Prior to the merger, Amstar was a 100% owned subsidiary of Mapfre U.S.A. Corp. As a result of this transaction, the Company assumed all assets and liabilities of Amstar and recorded an increase in paid-in surplus of $5,091,330, which represented the capital and surplus of Amstar on the date of the merger.

CORPORATE RECORDS

The recorded minutes of the Shareholder(s), 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 self-disclosure of conflicts of interest to the Board.

MANAGEMENT AND CONTROL

Management

The annual shareholder 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
Randall Vaughn Becker Webster, Massachusetts	Chief Financial Officer Mapfre U.S.A. Corp.
Robert Edward McKenna Webster, Massachusetts	Chief Accounting Officer Mapfre U.S.A. Corp.
Daniel Patrick Olohan Webster, Massachusetts	General Counsel Mapfre U.S.A. Corp.

Jaime NMN Tamayo Webster, Massachusetts	President and Chief Executive Officer Mapfre U.S.A. Corp.
Patrick Joseph McDonald Webster, Massachusetts	Senior Vice President Mapfre U.S.A. Corp.

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

Senior Officers

Name	**Title**
Jaime Tamayo	President and CEO
Michael Steven Sher	Secretary, Deputy General Counsel & VP
Robert Edward McKenna	Treasurer, CAO & SVP
Randall Vaughn Becker	Executive VP & CFO

The Company maintained an independent audit committee, as required by Section 624.424(8)(c), Florida Statutes. As of December 31, 2013, the following members were serving on the audit committee:

Audit Committee

Domingo Sugranyes Bickel [1]
Edward Leonard Timmes
Luis Manuel Viceira Alguacil

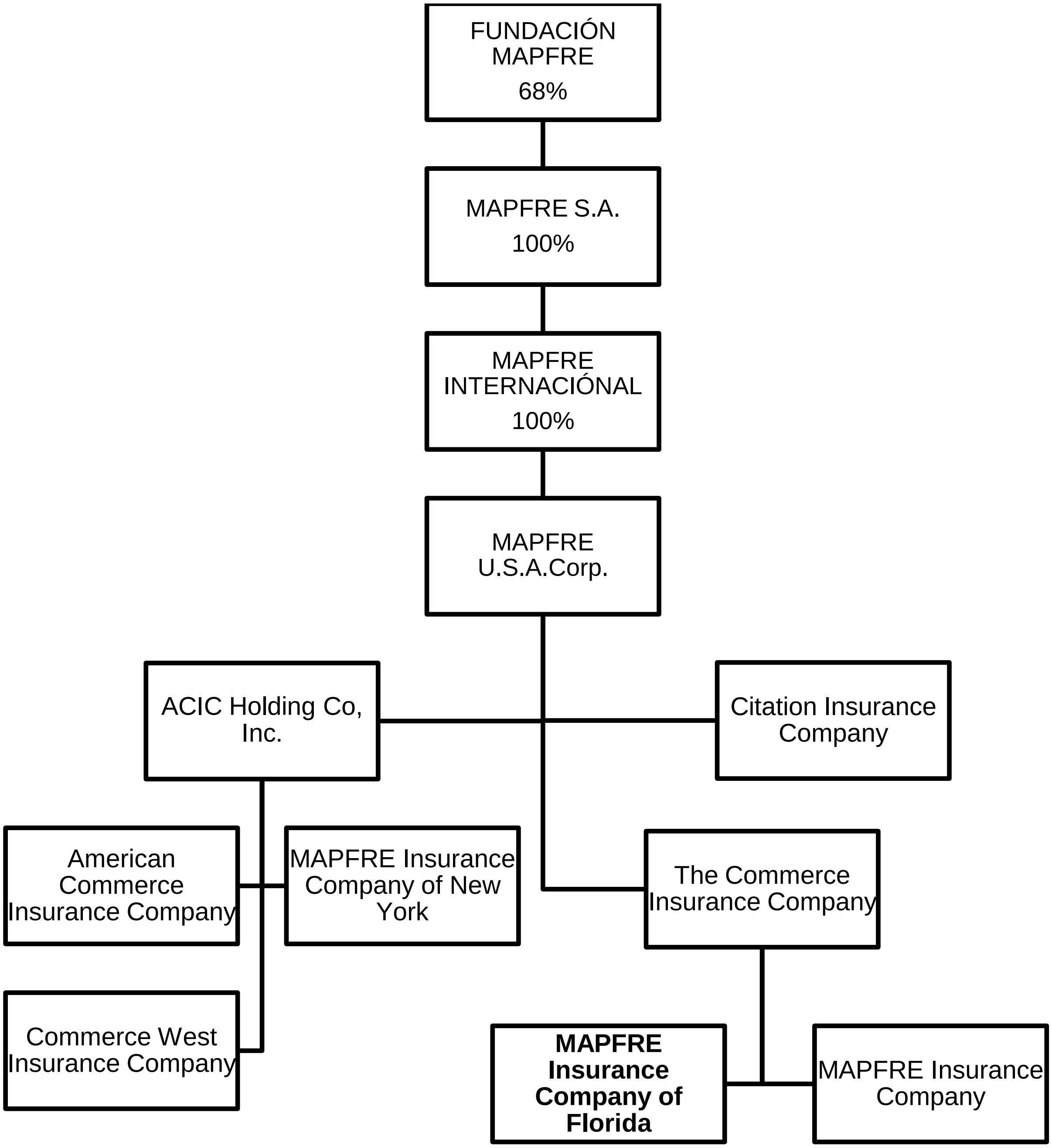
[1] Chairman

Affiliated Companies

The most recent holding company registration statement was filed with the Office on April 1, 2014 as required by Section 628.801, Florida Statutes, and Rule 69O-143.046, Florida Administrative Code. **Subsequent Event:** The Company filed an updated holding company registration statement on April 1, 2015.

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.

MAPFRE INSURANCE COMPANY OF FLORIDA
SIMPLIFIED ORGANIZATIONAL CHART
DECEMBER 31, 2013



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

Tax Allocation Agreement

The Company entered into a Tax Allocation Agreement by and between Mapfre U.S.A. Corp and its operating subsidiaries, effective December 31, 2009. The agreement allows the signatory companies, including the non-insurance company subsidiaries of Mapfre U.S.A. Corp, to file consolidated tax returns on a separate-entity basis at both the Federal and state level. The Office approved the Tax Allocation Agreement on December 15, 2011. The tax benefit allocated to the Company under this agreement during 2013 amounted to ($121,547).

Subsequent Event: Subsequent to the examination period, the Tax Allocation Agreement was amended and restated to add Cube Insurance Company (Cube). Cube is a newly created, Ohio domiciled, property and casualty subsidiary of Mapfre U.S.A. Corp. This amendment was filed with Office and approved May 7, 2015.

Management Cost Allocation Agreement

In 2009, the Company entered into a Management Cost Allocation Agreement by and among the direct and indirect property and casualty insurance company subsidiaries of Mapfre U.S.A. Corp. The Fourth Amended and Restated Management Cost Allocation Agreement, effective January 1, 2013, was approved by the Office on November 28, 2012. Under the agreement, the parties may provide services to and receive services from one another, including such corporate services as information technology, finance, legal, administrative and other services as defined in the agreement. Costs associated with this agreement are allocated among the parties in accordance with Statements of Statutory Accounting Principles (SSAP) No. 70, without a built-in profit factor.

In addition, under the agreement, Commerce manages the investments of all of the signatory insurers. Each signatory insurer compensates Commerce according to an Investment Services Formula as set forth in the agreement. As set forth therein, such compensation is limited in all cases to amounts not to exceed the actual costs and expenses incurred by Commerce in providing investment related services, without a built-in profit factor. Costs allocated to the Company under this agreement during 2013 amounted to $1,695,972.

Subsequent Event: Subsequent to the examination period, the Management Cost Allocation Agreement was amended and restated to add Cube. This amendment was filed with Office and approved May 7, 2015.

Intercompany Pooling

The Company is also a participant in an intercompany pooling arrangement with affiliates. See further discussion in the Reinsurance section.

FIDELITY BOND AND OTHER INSURANCE

The Company maintained fidelity bond coverage up to $10,000,000 with a deductible of $250,000, which met the suggested minimum as recommended by the NAIC.

The Company also maintained commercial property and liability, commercial auto, directors' and officers' liability, earthquake and flood, workers' compensation, and employment practices liability insurance with limits ranging from approximately $150 million to $1 million and deductibles ranging from $300,000 to $2,500.

PENSION, STOCK OWNERSHIP AND INSURANCE PLANS

The Company had no employees and therefore no pension, stock ownership or insurance plans.

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 direct written premium increased each year under examination, except in 2012 which saw a slight decline. The Company ceded 100% of its direct business to its parent, Commerce, as part of an affiliated pooling reinsurance arrangement. The Company assumed 2.1% of the net pool from Commerce. Assumed premium increased each year under examination and approximates direct written premium. The Company was profitable each of the last five years, excluding 2011, in which the Company recorded a small net loss. Policyholders' surplus increased each of the last five years, excluding 2011, in which surplus declined slightly primarily due to the net loss. Operating results of the Company are driven by the net results of the pool.

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	37,934,280	37,718,151	36,410,127	34,289,213	24,259,132
Net Underwriting Loss	(852,705)	(857,410)	(3,066,048)	(863,852)	(1,351,329)
Net Income (Loss)	1,427,664	1,302,991	(305,382)	1,776,975	468,583
Total Assets	77,495,945	72,944,818	80,020,919	79,496,863	74,862,108
Total Liabilities	41,430,720	39,851,302	47,370,845	46,456,221	43,384,587
Surplus As Regards Policyholders	36,065,225	33,143,516	32,650,074	33,040,642	31,477,521

LOSS EXPERIENCE

During the current examination period, the Company showed favorable reserve development in 2009 of $1.1 million or 5% of surplus; however, reserve development steadily deteriorated each subsequent year though 2013, in which the Company had unfavorable reserve development of $1.3 million or 3.8% of surplus. The unfavorable reserve development was primarily related to the private passenger auto liability line of business assumed pursuant to the affiliated reinsurance pooling agreement. The Company's net loss ratio fluctuated slightly over the period under examination, ending at 73.5% as of December 31, 2013.

REINSURANCE

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

Assumed

In 2009, the Company became a party to the Reinsurance Pooling Agreement (Pooling Agreement), by and among the affiliates listed below, all of which are direct and indirect property and casualty insurance company subsidiaries of Mapfre U.S.A. Corp. Effective January 1, 2012, the agreement was amended to increase the Company's pool percentage from 2% to 2.1%. The Office approved the amendment to the Pooling Agreement on December 15, 2011.

The Pooling Agreement allows the signatory companies to pool, or share through reinsurance, the results of underwriting operations proportionately among the signatory companies and to produce for each party a broader distribution of risk by having the parties cede and assume pooled liabilities (as defined in the Pooling Agreement) according to the percentages listed below:

The Commerce Insurance Company	71.2%
American Commerce Insurance Company	9.1%
Citation Insurance Company	7.4%
Commerce West Insurance Company	4.6%
Mapfre Insurance Company of New York	3.9%
Mapfre Insurance Company of Florida	2.1%
Mapfre Insurance Company	1.7%

Ceded

The Company cedes 100% of its direct business to Commerce, its parent, pursuant to the Reinsurance Pooling Agreement.

The Company received $3,254,495 in 2013 pursuant to its participation in this agreement, which represents the difference between assumed premium and assumed claims.

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

Subsequent Event: Subsequent to the examination period, the Pooling Agreement was amended and restated to add Cube and make changes to the pooling percentages. This amendment was filed with Office and approved May 7, 2015. Per the amended and restated agreement, the pooling percentages are as follows:

The Commerce Insurance Company	65.1%
American Commerce Insurance Company	9.8%
Citation Insurance Company	8.1%
Commerce West Insurance Company	5.4%
Mapfre Insurance Company of New York	5.0%
Mapfre Insurance Company of Florida	3.4%
Mapfre Insurance Company	2.4%
Cube Insurance Company	0.8%

ACCOUNTS AND RECORDS

The Company maintained its principal operational offices in Miami, Florida. The Company's accounting records were maintained electronically by affiliates of the Company pursuant to a Management Cost Allocation Agreement.

The Company and non-affiliates had the following agreements:

Custodial Agreement

The Company maintained a custodial agreement with Bank of New York Mellon executed on January 2, 2009. The agreement was amended July 1, 2009 to add the specific provisions required by the Florida Administrative Code. The amendment was effective January 2, 2009 and was in compliance with Rule 69O-143.042 (2), Florida Administrative Code.

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

Matt Moreau, CISA, of PricewaterhouseCoopers LLP, on behalf of the Massachusetts Division of Insurance, performed an evaluation of the significant information technology and computer systems of the Company. Results of the evaluation were communicated to the Company in a separate letter.

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	Cash	$900,000	$900,000
TOTAL FLORIDA DEPOSITS		$900,000	$900,000
TOTAL SPECIAL DEPOSITS		$900,000	$900,000

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 reported by the Company. Adjustments made as a result of the examination are noted in the section of this report captioned, "Comparative Analysis of Changes in Surplus".

MAPFRE INSURANCE COMPANY OF FLORIDA
Assets
DECEMBER 31, 2013

	Per Company	Examination Adjustments	Per Examination
Bonds	$50,911,250		$50,911,250
Stocks:			
Preferred stock	883,640		883,640
Cash and short-term investments	7,132,460		7,132,460
Investment income due and accrued	498,233		498,233
Agents' Balances:			
Uncollected premium	11,894,719		11,894,719
Reinsurance recoverable	1,193,943		1,193,943
Income tax recoverable	56,767		56,767
Net deferred tax asset	4,899,095		4,899,095
Electronic data processing equipment	25,838		25,838
Totals	$77,495,945	$0	$77,495,945

MAPFRE INSURANCE COMPANY OF FLORIDA
Liabilities, Surplus and Other Funds
DECEMBER 31, 2013

	Per Company	Examination Adjustments	Per Examination
Losses	$12,838,381	$989,000	$13,827,381
Reinsurance payable on losses and loss adjustment expenses	2,178,226		2,178,226
Loss adjustment expenses	3,190,701	246,000	3,436,701
Commissions payable	352,368		352,368
Other expenses	184,902		184,902
Taxes, licenses and fees	142,036		142,036
Unearned premium	19,306,746		19,306,746
Advance premium	41,515		41,515
Ceded reinsurance premiums payable	2,167,244		2,167,244
Payable to parent, subsidiaries and affiliates	822,485		822,485
Aggregate write-ins for liabilities	206,116		206,116
Total Liabilities	$41,430,720	$1,235,000	$42,665,720
Common capital stock	$2,000,000		$2,000,000
Gross paid in and contributed surplus	32,515,550		32,515,550
Unassigned funds (surplus)	1,549,675	(1,235,000)	314,675
Surplus as regards policyholders	$36,065,225	($1,235,000)	$34,830,225
Total liabilities, surplus and other funds	$77,495,945	$0	$77,495,945

MAPFRE INSURANCE COMPANY OF FLORIDA
Statement of Income
DECEMBER 31, 2013

Underwriting Income	
Premiums earned	$37,934,280
Deductions:	
Losses incurred	$23,629,040
Loss expenses incurred	4,253,097
Other underwriting expenses incurred	10,916,314
Aggregate write-ins for underwriting deductions	(11,466)
Total underwriting deductions	$38,786,985
Net underwriting gain or (loss)	($852,705)
Investment Income	
Net investment income earned	$1,948,294
Net realized capital gains or (losses)	172,371
Net investment gain or (loss)	$2,120,665
Other Income	
Net gain or (loss) from agents' or premium balances charged off	$0
Finance and service charges not included in premiums	21,685
Aggregate write-ins for miscellaneous income	70,411
Total other income	$92,096
Net income before dividends to policyholders and before federal & foreign income taxes	$1,360,055
Dividends to policyholders	0
Net Income, after dividends to policyholders, but before federal & foreign income taxes	$1,360,055
Federal & foreign income taxes	(67,609)
Net Income	$1,427,664
Capital and Surplus Account	
Surplus as regards policyholders, December 31 prior year	$33,143,516
Net Income	$1,427,664
Change in net unrealized capital gains or losses	(29,089)
Change in net deferred income tax	(546,714)
Change in non-admitted assets	2,061,010
Aggregate write-ins for gains and losses in surplus	8,838
Examination Adjustment	(1,235,000)
Change in surplus as regards policyholders for the year	$1,686,709
Surplus as regards policyholders, December 31 current year	$34,830,225

MAPFRE INSURANCE COMPANY OF FLORIDA
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				$36,065,225
	PER COMPANY	PER EXAM	INCREASE (DECREASE) IN SURPLUS	
ASSETS: No Adjustment.				
LIABILITIES:				
Losses	$12,838,381	$13,827,381	($989,000)	
Loss adjustment expenses	$3,190,701	$3,436,701	($246,000)	
Net Change in Surplus:				(1,235,000)
Surplus as Regards Policyholders December 31, 2013, Per Examination				$34,830,225

COMMENTS ON FINANCIAL STATEMENTS

Liabilities

Losses and Loss Adjustment Expenses (as adjusted by this examination) $17,264,082

An employee of the parent, appointed by the Board of Directors, 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 consulting actuary, Alan Hines, FCAS, MAAA of PricewaterhouseCoopers LLP, appointed by the Massachusetts Division of Insurance as the Lead State, reviewed the loss and loss adjustment expense work papers provided by the Company. This review indicated the net pooled reserves were understated by approximately $58,789,000. This deficiency was outside the range of reasonable estimates. The Company's portion of the pool of 2.1% resulted in the Company's reserves being deficient by approximately $1,235,000 as of December 31, 2013. The Company's reserves were not in compliance with Section 625.101, Florida Statute. An adjustment has been posted to the examination financial statements to reflect this difference.

Capital and Surplus

The amount of capital and surplus reported by the Company of $36,065,225, was reduced by $1,235,000 due to the adjustments noted above. The amount of capital and surplus reported per the examination of $34,830,225, exceeded the minimum of $5,000,000 required by Section 624.408, Florida Statutes.

CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of Mapfre Insurance Company of Florida 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 $34,830,225, which exceeded the minimum of $5,000,000 required by Section 624.408, Florida Statutes.

In addition to the undersigned, Eric Free, CFE, Examiner-In-Charge, Jean Adams-Harris, CFE, CPA, CISA, AES, MCM and Joanne Smith, CFE, MCM, Participating Examiners, of Johnson Lambert LLP participated in the examination. In addition, Alan Hines, FCAS, MAAA and Matt Moreau, CISA, of PricewaterhouseCoopers LLP participated in the examination as Consulting Actuary and IT Specialists, respectively. Jonathan Frisard, Financial Examiner/Analyst Supervisor participated in the examination.

Respectfully submitted,

____

Robin Brown, CFE
Chief Examiner
Florida Office of Insurance Regulation