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IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

In Re: The Receivership of
Gulfstream Property and Casualty Insurance Company,
a Florida corporation.
_____/

CASE NO.: 2021 CA 1308

THE FLORIDA DEPARTMENT OF FINANCIAL SERVICES AS RECEIVER OF GULFSTREAM PROPERTY AND CASUALTY INSURANCE COMPANY'S APPLICATION FOR ORDER AUTHORIZING EARLY ACCESS DISBURSEMENTS TO ELIGIBLE GUARANTY ASSOCIATIONS

COMES NOW, The Florida Department of Financial Services, Division of Rehabilitation and Liquidation as Receiver of Gulfstream Property and Casualty Insurance Company (hereinafter "Department"), by and through the undersigned counsel, and hereby files this Application for entry of an Order Authorizing the Department to disburse funds in the amount of Three Million, Seven Hundred Eighty-Four Thousand, Five Hundred Twenty-Three Dollars ($3,784,523.00) to eligible Guaranty Associations (hereinafter "GAs"). These funds are hereinafter referred to as early access funds. In support of its application, the Department states:

1. Gulfstream Property and Casualty Insurance Company (hereinafter "GPCIC") was a corporation authorized pursuant to the Florida Insurance Code to transact business in the State of Florida.

2. On July 28, 2021, this Court entered an *Order Appointing the Florida Department of Financial Services as the Receiver of Gulfstream Property and Casualty Insurance Company for purposes of Liquidation, Injunction, and Notice of Automatic Stay.*

3. As of December 31, 2025, the Department had distributed Fifty-Three Million, Four Hundred Twenty-Four Thousand, Seven Hundred Thirty-Nine Dollars ($53,424,739) to the

eligible guaranty associations as early access funds.[1] No other distribution has been made in this Estate to any other class of creditors as outlined in section 631.271, Florida Statutes.

4. Section 631.397, Florida Statutes, provides, in substance, that the Department may disburse assets out of GPCIC's marshaled assets, as such assets become available, to each GA entitled to receive such funds contingent on each GA agreeing to return to the Department such previously disbursed funds as may be required to pay claims of secured creditors and claims having a higher priority than the claims of the GAs.

5. In compliance with s. 631.397(2)(d), Florida Statutes, the Department has entered into Agreements with the eligible GAs which provide in substance that each GA shall return such early access disbursements as may be required to pay claims of secured creditors and claims falling within the priority scheme established by Part I of Chapter 631, Florida Statutes. Further, each GA will not be entitled to share in the funds ultimately distributed from the GPCIC receivership estate until such allocated distributions to which each GA is otherwise entitled exceed the previous disbursements ordered by this Court and the amount of early access disbursement prayed for in this application. A copy of the executed Early Access Agreements is attached hereto and incorporated herein by reference as **Exhibit A.**

6. The Department represents that in accord with s. 631.397(2)(a), Florida Statutes, there are sufficient assets in the estate of GPCIC to permit the proposed early access disbursements to two of the GAs[2], while reserving amounts for the payment of expenses of administration, the

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[1] In this Application, the Department reports that it has (a) disbursed to GAs the following amounts: Florida (FIGA): $47,179,449.00; Alabama: $285,711.00; Louisiana: $3,735,823.00; Mississippi: $139,293.00; South Carolina: $1,612,291.00; and Texas (TPCIGA): $472,172.00; and (b) considered FIGA's receipt of a direct payment of $1,357,457.86 from the Florida Hurricane Catastrophe Fund, as additional claims reimbursements, to enable the Department to satisfy the statutory objective that it equitably allocate disbursements to each GA entitled thereto in conformity with s. 631.397(2)(c), Florida Statutes, in this round of early access agreement disbursements.

[2] $3,756,635.00 to FIGA and $27,888.00 to TPCIGA; see **Exhibit B.**

payment of claims of secured creditors to the extent of the value of the security held, and the payment of claims falling within the priorities established by Part I of Chapter 631, Florida Statutes. A chart of GAs entitled to a disbursement from the GPCIC receivership and the amount each is entitled to receive is attached hereto as **Exhibit B,** and a copy of the December 31, 2025, Financial Statement of GPCIC is attached hereto as **Exhibit C**.

7. In accord with s. 631.397(2)(b), Florida Statutes, if additional assets become available in an amount sufficient to allow further early access disbursements, the Department will seek additional authority to disburse same.

8. The Department also represents that the proposed early access disbursements provide for the equitable allocation of disbursements to each association entitled thereto, consistent with s. 631.397(2)(c), Florida Statutes.

WHEREFORE, the Department respectfully requests this Court enter an Order authorizing the disbursement of early access funds in the amount of Three Million, Seven Hundred Eighty-Four Thousand, Five Hundred Twenty-Three Dollars ($3,784,523.00).

Respectfully submitted on this the 2nd day of April 2026.

/s/ **Timothy G. Schoenwalder**
Timothy G. Schoenwalder
Florida Bar Number 755930
Chief Attorney
Florida Department of Financial Services,
Division of Rehabilitation and Liquidation
323 John Knox Road, Suite 101
The Atrium
Tallahassee, Florida 32303
(850) 413-4479
Timothy.Schoenwalder@myfloridacfo.com

Counsel for Department of Financial Services,
Division of Rehabilitation and Liquidation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 2, 2026, a complete and accurate copy of the foregoing document was filed with the Clerk of Courts using the Florida Courts e-filing portal and was served on all email addresses listed in the portal for service in this matter.

/s/ **Timothy G. Schoenwalder**
Timothy G. Schoenwalder

EXHIBIT A

EXHIBIT A

Gulfstream Property and Casualty Insurance Company, In Liquidation

Early Access Agreement

This Early Access Agreement is entered into on this the 7th day of January ~~2021,~~ 2022 (R) between the **Florida Department of Financial Services, as Receiver of Gulfstream Property and Casualty Insurance Company ("Department")**, and the undersigned **Insurance Guaranty Association(s) ("Guaranty Association")**.

WHEREAS, Gulfstream Property and Casualty Insurance Company, ("Gulfstream"), was a Florida domiciled corporation previously authorized to transact insurance business in the State of Florida and other states; and

WHEREAS, on July 28, 2021, the Second Judicial Circuit Court in and for Leon County, Florida, (the "Court") entered its **Consent Order of Liquidation, Injunction, and Notice of Automatic Stay** ("Liquidation Order"); and

WHEREAS, section 631.397(1), Florida Statutes, provides, in relevant part, that the Department may apply to this Court for authorization to "disburse assets out of such insurer's marshaled assets, as such assets become available, to each Guaranty Association entitled thereto" ("Early Access disbursement"); and

WHEREAS, the Department will from time to time determine whether the Gulfstream receivership estate has sufficient liquid assets available to make an Early Access disbursement to the Guaranty Association; and

WHEREAS, if the Department determines that the Gulfstream receivership estate has sufficient liquid funds available to make an Early Access disbursement, the Department may apply to the Court for an order permitting the Department to make an Early Access disbursement to the Guaranty Association pursuant to section 631.397, Florida Statutes, for the partial payment of claims and/or administrative expenses; and

WHEREAS, the Guaranty Association may only receive such a disbursement if the total amount of the contemplated disbursement plus the total amount of all Early Access disbursements already received by the Guaranty Association is less than the Guaranty Association's incurred claims and administrative expenses; and

WHEREAS, the Department and the Guaranty Association acknowledge and agree that neither the Department' s review of the Guaranty Association's documentation for purposes of Early Access disbursement(s) nor this Early Access Agreement constitute an evaluation of or recommendation on any claim which the Guaranty Association may be entitled to under section 631.271, Florida Statutes;

NOW THEREFORE, the Department and the Guaranty Association agree as follows:

1. The Guaranty Association will respond in good faith to requests from the Department for information, files and documents. The Department will be permitted full access to the books, records, and files of the Guaranty Association pertaining to the handling and payment of covered claims and administrative expenses incurred by the Guaranty Association in fulfilling its obligations under its enabling statute.

2. Beginning with the quarter ending December 31, 2021, and on at least a quarterly basis thereafter, the Department shall produce a reasonably detailed and current statement of the Estate's financial condition. The statement will be in substantially the format published on the Department's website. The Department shall provide this information as soon as it is available following the close of each quarter.

3. The Guaranty Association will make reports to the Department no less frequently than quarterly, through the Secure Uniform Data Standard ("UDS") or in another form acceptable to the Department disclosing the status of the following items received, held or processed during the reporting period: current open claims count, open claims reserves, claim

payments, salvage or subrogation recoveries, if any, and such other items as may be reasonably required by the Department. The reports shall be sent to the Department electronically via the UDS server housed by the National Conference of Insurance Guaranty Funds ("NCIGF") or mailed to the Department at to the address listed in Paragraph 11 below, or such other location designated by the Department

4. The Guaranty Association will utilize any payment received pursuant to this Agreement solely for the payment of covered claims, as defined by section 631.271, and Part II, Chapter 631, Florida Statutes, or the pertinent part of the relevant state statute applicable to the Guaranty Association, and for the payment of claims handling or administrative expenses, as defined by section 631.271(1)(a)(2), Florida Statutes, relating to the Receivership of Gulfstream.

5. The Guaranty Association will not be penalized, by offset or otherwise, by the amount of any special deposit or any other statutory deposit or asset of the insolvent insurer held in that state unless the Guaranty Association has actually received such deposit orasset.

6. The Guaranty Association agrees to return to the Department within 60 days all or any portion of any Early Access disbursements acquired by the Guaranty Association pursuant to this Agreement, with any income earned thereon, if the Department determines, at any time, that such repayment is necessary to pay claims or expenses which the Department determines to be of equal or superior priority. Should it be necessary for the Guaranty Association to make an assessment in order to return the relevant portion of the disbursement to the Department, the Guaranty Association shall have 90 days within which to return the disbursement. In the event the Guaranty Association is required to repay to the Department any Early Access disbursements, the Guaranty Association will pay the Department in cash or

other liquid assets as may be acceptable to the Department.

7. Pursuant to section 631.271, Florida Statutes, the Guaranty Association understands and agrees that any disbursement made pursuant to this Agreement constitutes partial payment on any claim which the Guaranty Association may have in the Gulfstream Receivership and that it will not share in any final distribution of assets from the Gulfstream Receivership until claimants of an equal priority receive an equal pro rata distribution on their claims. Any and all interest that the Guaranty Association earns on funds so disbursed shall also be considered Early Access disbursements for purposes of this Agreement.

8. Prior to the final distribution of the assets of Gulfstream, the Department will be given reasonable access to the financial accounts, records and procedures of the Guaranty Association with respect to the receipt of assets or the payment of covered claims. The Guaranty Association will, within 30 days after receipt of a written request from the Department, return to the Department any Early Access disbursements made pursuant to this Agreement which are more than the amount ultimately determined by the Department to be due the Guaranty Association as a final distribution of the assets of Gulfstream. The Department and the Guaranty Association shall cooperate in planning the destruction or other final disposition of the information, files and documents received by the Guaranty Association from Gulfstream or the Department.

9. The Guaranty Association's execution of this Agreement and acceptance of any amount distributed thereunder, shall be without prejudice to the Guaranty Association's rights with respect to final or other distributions from the estate of Gulfstream.

10. This Early Access Agreement shall be construed in accordance with Florida

law. Any legal action by either party to enforce or interpret this Agreement or the parties' obligations under this Agreement shall be commenced, litigated, and adjudicated in and by the Second Judicial Circuit Court, in and for Leon County, Florida. The Guaranty Association's submission to the aforementioned jurisdiction is strictly for the purposes of enforcement of this Agreement and not for any other purpose.

11. Any notice required to be given to the parties shall be given by regular United States mail, postage prepaid, addressed as follows:

Department: Toma Wilkerson [or her successor],
Division Director
Florida Department of Financial Services,
Division of Rehabilitation and Liquidation
325 John Knox Rd,
Atrium Building, Suite 101
Tallahassee, Florida 32303

Guaranty Assoc.: See address identified in signature block below.

12. This Agreement merges all prior offers and agreements of every kind as related to Early Access and expresses the full and final intent of the parties and shall be effective only upon Court approval. This Agreement shall not be modified, except by an instrument in writing, executed by the authorized representatives of the parties, and subject to Court approval.

13. This Agreement supersedes all earlier Early Access agreements and will apply to all future Early Access disbursements to the Guaranty Association. It will be attached to all future Early Access motions filed by the Department.

14. This Agreement may be executed in any number of counterparts, any or all of which may contain the signature of only one of the Parties, and all of which together shall be considered a single original document.

IN WITNESS WHEREOF, the Parties have executed this Agreement on the date last indicated below:

[THIS SECTION INTENTIONALLY LEFT BLANK]

[SIGNATURES OF THE PARTIES ARE ON THE FOLLOWING PAGES]

Gulfstream Property and Casualty Insurance Company, in Liquidation
By and through Toma Wilkerson, Division Director Florida
Department of Financial Services,
Division of Rehabilitation and Liquidation

By: Toma L. Wilkerson

Printed Name: Toma L. Wilkerson

Date: 11/7/2022

Gulfstream Ins Co

Florida Insurance Guaranty Association

[~~Insert Name of Guaranty Association~~]

"Guaranty Association"

By: Thomas O. Strevkens

Printed Name: Thomas O. Strevkens

Title: Executive Director

Date: 12/17/2021

Address: P.O. Box 14249

Tallahassee, FL 32317

~~[Insert Name of Guaranty Association]~~Alabama Insurance Guaranty Association "Guaranty Association"

By: AC Lentine

Printed Name: AC Lentine

Title: Executive Director

Date: December 15, 2021

Address: 600 University Park Place

Suite 260

Birmingham AL 35209

[Insert Name of Guaranty Association]

"Guaranty Association"

By: Louisiana I. G. A.

Printed Name: John Wells

Title: Executive Director

Date: 1/4/2022

Address: 2142 Qual Run Drive

Baton Rouge, LA 70808

[Insert Name of Guaranty Association]

"Mississippi Insurance Guaranty Association"

By: Arthur Russell

Printed Name: Arthur Russell

Title: Executive Director

Date: 12/4/21

Address: 713 South Pear Orchard Road, Suite 200

Ridgeland, MS 39157

[Insert Name of Guaranty Association]

"Guaranty Association"

By: Tom Souder

Printed Name: Tom Souder

Title: Sr. Director

Date: 12/8/2022

Address: 240 Stoneridge Dr., Ste 101

Columbia, SC 29210

Texas Property and Casualty Guaranty Association

By: Annette Evans

Printed Name: Annette Evans

Title: Claims Director

Date: December 14, 2021

Address: 9120 Burnet Road
Austin, TX 78758

EXHIBIT B

Receiver's Proposed Early Access Agreement Distributions

GPCIC Receivership Estate

(March 2026)

State	State Guaranty Association	Proposed Distribution
Florida	Florida Insurance Guaranty Association	$3.756,635.00
Texas	Texas Property and Casualty Insurance Guaranty Association	$27,888.00

Total Proposed Disbursements in Round	**$3,784,523.00**

EXHIBIT C

Florida Department of Financial Services, Division of Rehabilitation and Liquidation

Gulfstream Property and Casualty Ins Co in Liquidation

Statement of Affairs

12/31/2025

	Estimated Realizable Value
ASSETS	
Pooled Cash in SPIA Due from the Admin Fund	$36,312,403.07
Short-Term Investments	2,505.26
Accrued Interest Receivable	131,494.12
Other Assets	129,849.95
Advance to Guaranty Associations	53,424,739.00
FI Hurricane Cat Fund Payments to Guaranty Assoc.	1,357,457.86
Total Assets	$91,358,449.26
LIABILITIES	
Class 1 Administrative Claims	
Class 1 - Guaranty Associations	10,351,282.96
Class 2 Loss Claims	
Class 2 - Guaranty Associations	56,189,202.37
Class 2 - Other	225,956.82
Class 3 Unearned Premium Claims under Non-assessable Policies	
Class 3 - Guaranty Associations	44,435,083.83
Class 3 - Other	522,705.17
Class 6 General Creditor Claims	
Class 6 - Other	507,466.79
Class 7 State & Local Government Claims	40,962.58
Class 8 Late Filed Claims	15,734.06
Total Liabilities	$112,288,394.58
EQUITY	
Contributed Equity - State of Florida	294,415.71
Estate Equity	(21,224,361.03)
Excess (Deficiency) of Assets over Liabilities	($20,929,945.32)
Total Liabilities and Equity	$91,358,449.26

The accompanying notes & schedules are an integral part of these financial statements

UNAUDITED

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property and Casualty Ins Co in Liquidation
Statement of Cash Receipts and Disbursements
From the Date of Liquidation through 12/31/2025

	Fiscal Year to Date	Since Date of Liquidation
CASH RECEIPTS		
Premium Collections	$0.00	$211,372.40
Reinsurance Recoveries	1,205,571.34	55,665,394.73
Agents' Balances Recoveries	0.00	5,342,357.54
Subrogation and Salvage Recoveries	1,100.00	1,670,241.61
Tax Recoveries	0.00	2,136,110.50
Other Collections / Recoveries	8,481.99	1,000,334.48
Sale of Personal Property Inventory	0.00	1,425.00
Sale of Real Property Inventory	0.00	2,300,000.00
Receipts Before Investment Activities	1,215,153.33	68,327,236.26
Interest and Dividend Receipts	768,723.95	4,135,497.82
Sale of Short Term Investment	0.00	21,403,651.19
Receipts From Investment Activities	768,723.95	25,539,149.01
Total Cash Receipts	1,983,877.28	93,866,385.27
CASH DISBURSEMENTS & DISTRIBUTIONS		
Professional Fees and Expenses	89,213.49	1,410,564.89
Salaries and Fringe Benefits	209,095.50	2,196,785.65
Employee Welfare	531.88	5,310.47
Travel Expenses	614.66	19,001.02
Admin Expenses	51,360.93	700,358.66
Equipment and Furniture Expenses	25,295.10	124,673.76
Rent, Building and Equipment	4,461.13	31,769.09
Taxes	56.09	15,423.86
Disbursements	380,628.78	4,503,887.40
Distributions		
Administrative Claims (Class 1)	0.00	0.00
Loss Claims (Class 2)	0.00	0.00
Unearned Premium-Non-Assessable Policies Claims (Class 3)	0.00	0.00
General Creditors Claims (Class 6)	0.00	0.00
Government Claims (Class 7)	0.00	0.00
Late Filed Claims (Class 8)	0.00	0.00
Early Access-Guaranty Associations	0.00	53,424,739.00
Total Distributed	0.00	53,424,739.00
Disbursements & Distributions Before Investment Activities	380,628.78	57,928,626.40
Financial Expenses	21,280.61	306,667.06
Purchase Short Term Investment	0.64	534,762.39
Disbursements for Investment Activities	21,281.25	841,429.45
Total Cash Disbursements & Distributions	**401,910.03**	**58,770,055.85**
Net Increase (Decrease) in Cash	**1,581,967.25**	**35,096,329.42**
Beginning Cash Balance:		
Beginning Cash	34,730,435.82	(1,630,962.63)
Adjustments to Beginning Cash	0.00	2,847,036.28
Adjusted Beginning Cash Balance	**34,730,435.82**	**1,216,073.65**
Ending Cash Balance	**36,312,403.07**	**36,312,403.07**

The accompanying notes & schedules are an integral part of these financial statements

UNAUDITED

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property and Casualty Insurance Co in Liquidation
Schedule of Short Term Investments
For the Six Months Ended December 31, 2025

Money Market Accounts

Description	Balance 7/1/25	Adjustments/Interest	Transfers	Balance 12/31/25
Hancock Whitney GSPCIC	2,504.62	0.64	0.00	2,505.26
	2,504.62	0.64	0.00	2,505.26

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property and Casualty Insurance Co in Liquidation
Schedule of Accrued Interest Receivable
For the Six Months Ended December 31, 2025

Accrued Interest Receivable

Description		Balance 7/1/25	Accrued	Received	Balance 12/31/25
State Treasury	SPIA, 4-20-0-010000-00000	106,412.82	767,484.08	(742,402.78)	131,494.12
	Totals:	106,412.82	767,484.08	(742,402.78)	131,494.12

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property and Casualty Insurance Co in Liquidation
Schedule of Other Assets
For the Six Months Ended December 31, 2025

Statutory Deposits

Description	Balance 7/1/25	Adjustments	Recovered	Balance 12/31/25
Principal Custody Solutions - South Carolina	129,102.40	747.55	0.00	129,849.95
Totals:	129,102.40	747.55	0.00	129,849.95

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property and Casualty Insurance Co in Liquidation
Schedule of Advance to Guaranty Associations
For the Six Months Ended December 31, 2025

Advance to Guaranty Associations

Description	Balance 7/1/25	Advanced	Recovered	Balance 12/31/25
Florida (FIGA)	47,179,449.00	0.00	0.00	47,179,449.00
Alabama	285,711.00	0.00	0.00	285,711.00
Louisiana	3,735,823.00	0.00	0.00	3,735,823.00
Mississippi	139,293.00	0.00	0.00	139,293.00
South Carolina	1,612,291.00	0.00	0.00	1,612,291.00
Texas	472,172.00	0.00	0.00	472,172.00
	53,424,739.00	0.00	0.00	53,424,739.00

Florida Hurricane Catastrophe Fund Payments to Guaranty Associations

Description	Balance 7/1/25	Advanced	Recovered	Balance 12/31/25
Florida Hurrican Catastrophe Fund	1,357,457.86	0.00	0.00	1,357,457.86
	1,357,457.86	0.00	0.00	1,357,457.86

Florida Department of Financial Services, Division of Rehabilitation and Liquidation
Gulfstream Property & Casualty Insurance Co in Liquidation
Notes to Financial Statements
Dated December 31, 2025

1. **Estate Information.** Gulfstream P & C Insurance Company was a property and casualty organization domiciled in Florida placed in liquidation on July 28, 2021.

2. **Basis of Presentation.** The accompanying financial statements have been prepared on a modified cash basis of accounting using a fiscal year of July 1, 2025 through June 30, 2026. The assets are stated at their estimated realizable values, while the liabilities are stated at their gross filed amounts and are periodically adjusted as evaluated, adjudicated and/or paid. Interest is accrued and reinsurance receivables are only posted when billed to reinsurers. In addition, the statements do not provide accruals for all future administrative expenses to liquidate the estate or costs to pursue or litigate claims against others.

3. **Unaudited.** The accompanying financial statements have not been audited by an independent certified public accountant and no opinion is expressed on their compliance with generally accepted accounting principles. Future developments in accounting, business, contract, legal, tax and other matters may result in subsequent updates to one or more categories of this insolvent insurer's assets and/or liabilities that differs from the calculations presented in these unaudited financial statements.

4. **Pooled Investments.** The majority of the invested assets of the estates are combined into two main pooled accounts: The Receiver's operating account held at Wells Fargo and the Special Purpose Investment Account held at the State of Florida Treasury. Each estate's share of the pooled investments is presented on the accompanying financial statements as "Pooled Cash Due from the Admin Fund".

5. **Short-Term Investments.** The investments are stated at fair value, which approximates market value. Market values are those provided by the depository trust institution or brokerage institution in possession of the securities at the balance sheet date. These investments consist of various accounts at Hancock Whitney Bank.

6. **Reinsurance.** Reinsurance receivables have resulted from losses that have been paid and billed to the reinsurer(s). The financial statements reflect the gross amount of the billed losses less an allowance for any receivable(s) where there is an uncertainty regarding collectability. The receivable amount may include paid losses that are ceded to one or more reinsurance contracts being collected on behalf of the Receiver by an intermediary or the Receiver's staff.

7. **Other Assets.** These assets consist of states' statutory deposits held at various financial institutions. The Schedule of Other Assets reflects the value of these deposits at December 31, 2025 or latest available, those that have been collected by the Receiver and those where the state has taken its deposit.

8. **Advance to Guaranty Association(s).** Represents funds advanced to guaranty associations for the payment of covered claims and expenses. The guaranty association is obligated to promptly return any of these funds if the Receiver determines that repayment of claims of equal or superior priority is necessary.

9. **Florida Hurricane Catastrophe Fund (FHCF) Advance to Guaranty Association (FIGA).** Represents funds advanced directly from FHCF to FIGA for the payment of covered claims and expenses pursuant to Chapter 215, Florida Statutes. The guaranty association is obligated to promptly return any or all of these funds, if it is determined that an overpayment has been made..

10. **Claims.** Unless otherwise noted, the Statement of Affairs contains claim liabilities by priority class pursuant to 631.271, Florida Statutes. Unless otherwise stated, the claim liabilities reported are gross filed, un-adjudicated, and have not been reduced by any early access payments from the Florida Receiver. Claim liability numbers are based upon the most current available information and documentation provided to the Receiver from both internal and external sources.

    - Class 1, Class 2, and Class 3 claims liabilities are based upon Guaranty Association payments, estimates, and Filed Proof of Claims forms.

    - All other classes are based on Filed Proof of Claims forms.

    - Proof of Claim form processing is complete. The evaluation of filed claims is in progress.

- On October 15, 2025, the Department began mailing 62,910 Notices of Determination (NODs) via US postal mail to claimants with Class 3, 6, 7, and 8 claims. The NODs inform the claimants of the Department's recommendation concerning the amount recommended and classification of their filed claim. The objection filing deadline is Friday, January 23, 2026.

11. **Interest Distributions.** For companies placed into receivership on or after July 1, 2012, Section 631.271, Florida Statutes authorizes the payment of interest on claims in Classes 1-9 prior to making any payment on shareholder claims. At this time, the Receiver does not anticipate having sufficient assets in this estate to pay all claims for Classes 1-9. Accordingly, this statement does not reflect an interest reserve for Classes 1-9 allowed claims.
12. **Federal Priority.** The federal government has taken the position that pursuant to 31 U.S.C.A. 3713 a federal government claim must be paid first, when a debtor to the United States is insolvent. The federal government has also taken the position that it is not subject to state insurance liquidation claim's proceedings deadlines. To establish finality, shield itself from potential liability, and ultimately discharge the estate, the Receiver will request a federal release from the U.S. Department of Justice.
13. **Contributed Equity – State of Florida.** The Receiver will, from time to time, expend public funds to carry out certain duties during the course of liquidating an insurance company. The Division accounts for these expenditures as a contribution of equity by the State.
14. **Excess (Deficiency) of Assets over Liabilities.** The excess or (deficiency) represents the estimated realizable value of assets after deducting the current estimate of liabilities. This excess or (deficiency) does not take into consideration any estimates for future administrative costs to liquidate the estate or costs to pursue or litigate claims against others.