



Report to the
Audit Committee

Citizens Property Insurance Company

May 19, 2021



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Communication with Those Charged with Governance

May 19, 2021

Audit Committee
Citizens Property Insurance Corporation
Tallahassee, FL

We have audited the financial statements prepared in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP-basis) and the financial statements prepared in accordance with statutory accounting principles prescribed or permitted by the Florida Department of Financial Services, Office of Insurance Regulation (statutory-basis financial statements) (collectively, the financial statements) of Citizens Property Insurance Corporation (Citizens) as of and for the year ended December 31, 2020, and have issued our report thereon dated May 19, 2021. Professional standards require that we provide you with information about our responsibilities in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States of America, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated August 4, 2020. Professional standards also require that we communicate to you the following information related to our audit.

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by Citizens are described in Note 2 and Note 3 to the U.S. GAAP-basis and statutory-basis financial statements, respectively. No new accounting policies were adopted and the application of existing policies was not changed during December 31, 2020. No matters have come to our attention that would require us, under professional standards, to inform you about (1) the methods used to account for significant unusual transactions and (2) the effect of significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.



Accounting estimates are an integral part of the financial statements prepared by management, and are based on management's knowledge and experience about past and current events, and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Loss Reserves and Loss Adjustment Expense Reserves

Liabilities for loss reserves and loss adjustment expense (LAE) reserves are estimated based on claims adjusters' evaluations and on actuarial evaluations for incurred but not reported reserves (IBNR), using Citizens' loss experience and industry statistics. While the ultimate amount of losses and LAE incurred is dependent on future development, in management's opinion, the estimated reserves are adequate to cover the expected future payment of losses and LAE. However, the ultimate settlement of losses may vary significantly from the reserves provided.

Adjustments to estimates recorded resulting from subsequent actuarial evaluations or ultimate payments will be reflected in operations in the period in which such adjustments are known or estimable. Management does not discount liabilities for loss reserves and LAE reserves. While anticipated price increases due to inflation are considered in estimating the ultimate claim costs, the increase in average severities of claims is caused by a number of factors that vary with the individual type of policy written. Future average severities are projected based on historical trends adjusted for implemented changes in underwriting standards, policy provisions, and general economic trends. Those anticipated trends are monitored based on actual development and the estimated liabilities are modified, if necessary.

In the event of loss recoveries through reinsurance agreements, loss and LAE reserves are reported net of reinsurance amounts recoverable for unpaid losses and LAE. Losses and LAE ceded through reinsurance are credited against losses and LAE incurred.

We evaluated the key factors and assumptions used to develop the liability for losses and LAE in determining that it is reasonable in relation to the Financial Statements taken as a whole. Specifically, we obtained an understanding of the Citizens' financial reporting process and internal controls with respect to the claims reserving process and development of IBNR. We tested the accuracy and completeness of the claims data used in the development of the reserves. Additionally, we performed other substantive procedures to test the appropriateness of reserves including reviewing a sample of case reserve files, testing a sample of closed and re-opened claims, and performing a subsequent look-back analysis on claims paid through issuance. Further we engaged an independent actuary to perform an independent review of Citizens' opening actuary's analysis in order to ascertain the reasonableness of the assumptions and methodologies employed. We concluded that the reserves for losses and LAE as of December 31, 2020 are fairly stated in all material respects to the Financial Statements taken as a whole.



As more information became available to management, it was determined that there was significant development related to Hurricane Eta which resulted in a change in the IBNR estimate of approximately \$71 million. Both management and the third party actuary assessed the development as of December 31, 2020 and determined that the IBNR estimate is still within the reasonable range and no adjustment is considered necessary.

The relevant disclosures regarding loss and LAE reserves can be found in Note 2 (Summary of Significant Accounting Policies), Note 5 (Liability for Loss Reserves and Loss Adjustment Expense Reserves), and Note 6 (Reinsurance Agreements) to the U.S. GAAP-basis financial statements and in Note 3 (Summary of Significant Accounting Policies), Note 6 (Liability for Loss Reserves and Loss Adjustment Expense Reserves), and Note 7 (Reinsurance Agreements) to the statutory-basis financial statements.

Bonds

Long-term investments in the U.S. GAAP-basis financial statements consist solely of debt securities issued by municipal bodies, U.S. Treasury, U.S. government agencies, asset-backed securities, and corporate bonds with an original maturity greater than twelve months at the time of acquisition. Within the U.S. GAAP-basis financial statements such investments are recorded at fair value, which is generally based on independent quoted market prices. If quoted market prices are not available, broker quotes or an estimation of the current liquidation values is determined through a collaborative process among various pricing experts and sources in the marketplace. Changes in fair value are reflected as a component of net investment income.

Within the statutory-basis financial statements, bonds which consist solely of debt securities, are recorded at admitted asset values, as prescribed by the Nation Association of Insurance Commissioner's (NAIC) valuation procedures and are rated in accordance with current NAIC guidelines. Bonds designated by the Securities Valuation Office (SVO) or equivalent as 1 or 2 are reported at amortized cost. Bonds designated as 3-6 are reported at the lower of amortized cost or fair value. Debt securities not backed by other loans are stated at amortized cost using the interest method. Loan backed debt securities and structured securities are stated at amortized cost using the interest method and adjusted retrospectively. Prepayment assumptions were obtained from broker dealer values. Fair values are generally measured using quoted prices in active markets for identical securities or other inputs that are observable either directly or indirectly, such as quoted prices for similar securities.

When, in the opinion of management, a decline in the estimated fair value of an investment is considered to be other-than-temporary, the investment is written down to its estimated fair value or for certain securities, its expected undiscounted cash flows. The determination of an other than temporary decline in estimated fair value includes, in addition to other relevant factors, consideration of the nature of the investments, the severity of the impairments, including the number of securities impaired, and the duration of the impairment.



We evaluated the key factors and assumptions used by management, including testing the fair value of the securities through an independent pricing source from that used by management, in determining that the fair value and other-than-temporary impairment charges recorded by management are reasonable in relation to the Financial Statements taken as a whole. Further, management represented that all debt securities in the unrealized loss position at year-end, for which an other than temporary impairment charge was not taken, are fully recoverable, even if through maturity of the underlying securities.

The relevant disclosures regarding bonds can be found in Note 2 (Summary of Significant Accounting Policies), Note 3 (Fair Value Measurements) and Note 4 (Investments) to the U.S. GAAP-basis financial statements and in Note 3 (Summary of Significant Accounting Policies), Note 4 (Fair Value Measurements), and Note 5 (Investments) to the statutory-basis financial statements.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. There were no corrected or uncorrected misstatements or omitted disclosures.

Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain written representations from management that are included in the management representation letter included at Appendix A.

Management Consultations with Other Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Citizens' financial statements or a determination of the type of auditors' opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.



Other Significant Matters, Findings, or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Citizens's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

This information is intended solely for the use of the Audit Committee, Board of Governors, and management of Citizens, and is not intended to be, and should not be, used by anyone other than these specified parties.

Sincerely,

Dixon Hughes Goodman LLP

Tampa, FL



Communication of Internal Control Related Matters

May 19, 2021

Audit Committee
Citizens Property Insurance Company
Tallahassee, FL

In planning and performing our audit of the statutory-basis financial statements of Citizens Property Insurance Company (Citizens) as of and for the year ended December 31, 2020, in accordance with auditing standards generally accepted in the United States of America, we considered Citizens' internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the statutory-basis financial statements, but not for the purpose of expressing an opinion on the effectiveness of Citizens internal control. Accordingly, we do not express an opinion on the effectiveness of Citizens' internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's statutory-basis financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.



This communication is intended solely for the information and use of the Audit Committee, Board of Governors, management of the Citizens, and for filing with state regulators and is not intended to be, and should not be, used by anyone other than these specified parties.

Sincerely,

Dixon Hughes Goodman LLP

Tampa, FL



Independent Auditor's Report On Internal Control Over Financial Reporting And On Compliance And Other Matters Based On An Audit Of Financial Statements Performed In Accordance With Government Auditing Standards

May 19, 2021

Audit Committee
Citizens Property Insurance Company
Tallahassee, FL

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of Citizens Property Insurance Corporation (Citizens), which comprise the statement of net position as of December 31, 2020, and the related statements of revenue, expenses and changes in net position, and cash flows for the year ended and the related notes to the financial statements, which collectively comprise the Citizens' basic financial statements, and have issued our report thereon dated May 19, 2021.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Citizens' internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Citizens' internal control. Accordingly, we do not express an opinion on the effectiveness of the Citizens' internal control.



A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Citizens' financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Sincerely,

Dixon Hughes Goodman LLP

Tampa, FL



Appendix A

Management Representation Letter

Statutory Basis

CITIZENS PROPERTY INSURANCE CORPORATION
2101 MARYLAND CIRCLE
TALLAHASSEE, FLORIDA 32303-1001

TELEPHONE: 850-513-3892 FAX: 850-513-3905



May 19, 2021

Dixon Hughes Goodman LLP
400 N. Ashley Drive
Suite 2540
Tampa, Florida 33602

This representation letter is provided in connection with your audits of the statutory-basis financial statements of Citizens Property Insurance Corporation (Citizens), which comprise the statutory-basis statements of admitted assets, liabilities and accumulated surplus as of December 31, 2020 and 2019, and the related statutory-basis statements of operations, changes in accumulated surplus, and cash flows for the years then ended, and the related notes to the statutory-basis financial statements, for the purpose of expressing an opinion as to whether the statutory-basis financial statements present fairly, in all material respects, the financial position, results of operations, and cash flows of Citizens in conformity with statutory accounting principles prescribed or permitted by the Florida Department of Financial Services, Office of Insurance Regulation (Office), which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm that, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves as of the date of this letter:

Financial Statements

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated August 4, 2020 for the preparation and fair presentation of the statutory-basis financial statements in conformity with accounting practices prescribed or permitted by the Office.
2. We acknowledge our responsibility for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the statutory-basis financial statements that are free from material misstatement, whether due to fraud or error.
3. We acknowledge our responsibilities for the design, implementation, and maintenance of internal control to prevent and detect fraud.

Carlos Beruff, Chairman, Manatee County • Marc W. Dunbar, Leon County • Lazaro Fields, Leon County
Jillian Hasner, Palm Beach County • Reynolds Henderson, Walton County • Erin Knight, Miami-Dade County
Carlos Lopez-Cantera, Miami-Dade County • Nelson Telemaco, Broward County • M. Scott Thomas, St. Johns County
Barry Gilway, President/CEO and Executive Director

4. The following have been properly accounted for and disclosed in the statutory-basis financial statements, where applicable:
 - a. Related-party relationships and transactions, including sales, purchases, loans, transfers, reinsurance arrangements, guarantees, and amounts receivable from or payable to related parties;
 - b. Guarantees, whether written or oral, under which Citizens is contingently liable;
 - c. Other liabilities or gain or loss contingencies;
 - d. All liabilities, both actual and contingent;
 - e. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances, line of credit or similar arrangements;
 - f. All other liens or encumbrances on assets and all other pledges of assets;
 - g. Amounts of contractual obligations for purchase of real property, equipment, other assets, and intangibles;
 - h. Investments in debt securities;
 - i. All leases under long-term leases;
 - j. All significant estimates and material concentrations known to management;
 - k. Assets and liabilities measured at fair value are disclosed;
 - l. Significant estimates and material concentrations known to management or third-party administrators that are required to be disclosed in accordance with Statement of Statutory Accounting Principles ("SSAP") No. 1, *Accounting Policies, Risks & Uncertainties, and Other Disclosures*;
 - m. Amount of credit risk and extent, nature, and terms of financial instruments with off-balance-sheet risk in accordance with SSAP No. 27, *Off-Balance Sheet and Credit Risk Disclosures*.
5. Significant estimates that may be subject to a material change in the near term have been properly disclosed in the statutory-basis financial statements. We understand that "near term" means the period within one year of the date of the statutory-basis financial statements. In addition, we have no knowledge of concentrations existing at the date of the statutory-basis financial statements that make Citizens vulnerable to the risk of severe impact that have not been properly disclosed in the statutory-basis financial statements.
6. Significant assumptions we used in making accounting estimates, including those measured at estimates of fair value, are reasonable.
7. There are no uncorrected or corrected misstatements or omitted disclosures that are material to the statutory-basis financial statements.
8. Citizens has properly classified all assets as admitted or nonadmitted in accordance with SSAP No. 4, *Assets and Nonadmitted Assets*.
9. Premiums receivable or uncollected premiums have been recorded and disclosed in conformity with statutory accounting principles prescribed or permitted by the Office in accordance with SSAP No. 6, *Uncollected Premium Balances, Bills Receivable for Premiums, and Amounts Due from Agents and Brokers*.

10. The Company's liabilities for unpaid losses and loss adjustment expenses are based on and recorded at management's best estimate in accordance with SSAP No. 55, *Unpaid Claims, Losses and Loss Adjustment Expenses*.

Information Provided

11. We have provided you with:
 - a. Access to all information of which we are aware that is relevant to the preparation and fair presentation of the statutory-basis financial statements, such as records, documentation, and other matters;
 - b. Additional information that you have requested from us for the purpose of performing your audit;
 - c. Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence;
 - d. Minutes of the meetings of the Board of Governors, and committees thereof, or summaries of actions of recent meetings for which minutes have not yet been prepared, for meetings held in 2020 and 2021 through the date of this letter.
12. All material transactions have been recorded in the accounting records and are reflected in the statutory-basis financial statements.
13. We have disclosed to you the results of our assessment of the risk that the statutory-basis financial statements may be materially misstated as a result of fraud.
14. We have no knowledge of any fraud or suspected fraud affecting the Company involving:
 - a. Management;
 - b. Employees or third-party's who have significant roles in internal control;
 - c. Others where fraud could have a material effect on the statutory-basis financial statements.
15. There have been no communications from regulatory agencies (including state insurance departments) concerning noncompliance with or deficiencies in financial reporting practices.
16. There have been no material adjustments, including changes in classification, to previously issued statutory-basis financial statements.
17. There are no violations or possible violations of laws or regulations, the effects of which should be considered for disclosure in the statutory-basis financial statements or as a basis for recording a loss contingency.
18. We are aware of no material weaknesses, or significant deficiencies, in the design or operation of internal controls that could adversely affect Citizens' ability to record, process, summarize, and report financial data.

19. We have disclosed to you the identity of the entity's related parties and all related-party relationships and transactions of which we are aware.
20. The Company has no plans or intentions that may materially affect the carrying value or classification of assets and liabilities as of December 31, 2020 and through the date of this letter.
21. The Company has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral except as disclosed in the statutory-basis financial statements.
22. We acknowledge our responsibility for presenting the Supplemental Combining Statutory-Basis Statements of Admitted Assets, Liabilities and Accumulated Surplus by Account, the Supplemental Combining Statutory-Basis Statements of Operations by Account, Summary Investment Schedule, and Supplemental Schedule of Investment Risks Interrogatories (collectively, "Supplementary Information") as of December 31, 2020 and for the year then ended, in conformity with statutory accounting principles, which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America, and we believe that the Supplementary Information, including its form and content, is fairly presented. The methods of measurement and presentation of the Supplementary Information have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the Supplementary Information.
23. Pursuant to a determination letter received from the Internal Revenue Service, Citizens is exempt from Federal income tax as a political subdivision and integral part of the State of Florida, and as such, is liable for income taxes only on business income unrelated to the purpose for which it is exempt. Citizens had no unrelated business income during 2020 and therefore no Federal or State income tax was incurred during 2020.

Contingencies

24. There are no:
 - a. Violations or possible violations of laws or regulations whose effects should be considered for disclosure in the statutory-basis financial statements or as a basis for recording a loss contingency;
 - b. Unasserted claims or assessments that our attorney (in-house or external) has advised us are probable of assertion and must be disclosed in accordance with SSAP No. 5R, *Liabilities, Contingencies and Impairment of Assets* (SSAP No. 5R).
25. The Company is not aware of any class action lawsuits against the Company, which are likely or probable to result in loss to the Citizens, except as disclosed in the statutory-basis financial statements.
26. The Company has not entered into any buy or sell arrangements which would require it to record a related liability or require disclosure in the statutory-basis financial statements.
27. There were no material commitments for construction or acquisition of property, plant and equipment, or to acquire other noncurrent assets, such as investments or intangibles.
28. We have complied with all aspects of contractual agreements that would have a material effect on the statutory-basis financial statements in the event of noncompliance.

29. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the statutory-basis financial statements.

Use of a Specialist

30. We agree with the findings of the independent specialist in evaluating loss and LAE reserves and have adequately considered the qualifications of the independent specialist in determining the amounts and disclosures used in the statutory-basis financial statements and underlying accounting records. We did not give or cause any instructions to be given to the specialist with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had impact on the independence of objectivity of the specialist.

Financial Instruments

31. Citizens has properly recorded investments in debt securities at amortized cost except as disclosed in the statutory-basis financial statements, based on the accounting treatment prescribed by the Office. Investments with original maturity (at the time of purchase) of one year or less are classified as short-term investments.
32. For investments that are impaired, we have evaluated whether the impairment is other-than-temporary. For debt securities that are impaired, we have evaluated whether we intend to sell the security and, if we do not intend to sell, whether it is more likely than not that we will be required to sell the security before recovery of its amortized cost basis. We have also evaluated whether we expect to recover the entire amortized cost basis of the debt security, including comparing the present value of cash flows expected to be collected from the security with the amortized cost basis of the security. Other-than-temporary declines in the value of securities have been properly recognized in the statutory-basis financial statements. We have determined that all unrealized losses not recorded as other-than-temporary impairments will be recovered, even if through maturity, by the Company.
33. Investments are appropriately recorded and valued as follows:
- a. Bonds - are recorded and disclosed in accordance with SSAP No. 26, *Bonds, and SSAP No. 43R, Loan-Backed and Structured Securities*, as applicable and interpretations thereof;
 - b. Cash equivalents and Short-term investments - are recorded and disclosed in accordance with SSAP No. 2R, *Revised, Cash, Cash Equivalents, Drafts, and Short-term Investments*, and interpretations thereof.
34. We represent to you the following for Citizens' fair value measurements and disclosures:
- a. The underlying assumptions are reasonable and they appropriately reflect management's intent and ability to carry out its stated courses of action;
 - b. The measurement methods and related assumptions used in determining fair value are appropriate in the circumstances and have been consistently applied;
 - c. The disclosures related to estimated fair values are complete and adequate, in conformity with statutory accounting principles prescribed or permitted by the Office, and SSAP No. 100R, *Fair Value*;
 - d. There are no subsequent events that require adjustments to the fair value measurements and disclosures included in the statutory-basis financial statements.

35. All investment transactions have credit exposure to the extent that a counterparty may default on an obligation to Citizens. To manage credit risk, Citizens focuses primarily on higher quality, fixed income securities, reviews the credit strength of all entities in which it invests, limits its exposure in any one investment, and monitors portfolio quality, taking into account credit ratings assigned by recognized credit rating organizations.
36. The methods and significant inputs and assumptions used to determine fair values of financial instruments include the following: valuation of securities based on average bid prices of identical or similar issues with the same life and expected yields. The methods and significant inputs and assumptions used result in a measure of fair value appropriate for statutory-basis financial statement measurement and disclosure purposes.
37. Financial institutions with significant individual or group concentration of credit risk have been appropriately identified, properly recorded, and disclosed in the statutory-basis financial statements.

Premiums and Unearned Premiums

38. The inforce files properly reflect all policies and contracts in force for all lines of insurance coverage as of and for the year ended December 31, 2020. We are not aware of any material commitments or concessions to a policyholder that are outside of the terms of the written policy agreements.
39. Unearned premiums are fairly stated at December 31, 2020 and the calculations of such are consistent with those of the preceding year. Business written from all sources, including reinsurance ceded, has been included in premiums in force and unearned. Business expired has been excluded from premiums in force and unearned.
40. We have fully disclosed to you all premium terms, including all rights of return or price adjustments including endorsements and cancellations.
41. As of December 31, 2020, Citizens has other receivables under reinsurance contracts due which represents amounts due under depopulation reinsurance assumption agreements.
42. Citizens determined a premium deficiency reserve is not needed as of December 31, 2020 in accordance with SSAP No. 53- *Property Casualty Contracts-Premiums*. Citizens anticipates investment income as a factor in the premium deficiency calculation. For purposes of determining premium deficiencies, contracts are grouped in a manner consistent with how Citizens' policies are marketed, serviced, and measured for the profitability of such contracts.
43. The reserve for unpaid losses and loss adjustment expense (LAE) for Citizens at December 31, 2020 is management's best estimate recorded in accordance with SSAP No. 55, *Unpaid Claims, Losses and Loss Adjustment Expenses* (SSAP No. 55) and makes a reasonable provision for all reported and unreported claims incurred as of December 31, 2020 based upon the consolidation of all information available at the date the statutory-basis financial statements were prepared, including actuarial indications and other factors.
44. The findings of all actuarial studies, which have been completed and accepted by Citizens, have been considered in establishing the required level of loss and LAE reserves.

45. With respect to Citizens' reserve for losses and LAE:
- a. For the year ended December 31, 2020, we have processed claims received by Citizens in a manner and timing consistent with prior years;
 - b. We have considered all information that, in our judgement, is necessary to adequately estimate the loss and LAE reserves at the balance sheet date, including among other things:
 - i. Anticipated and historical claims experience of Citizens;
 - ii. Expected impact of inflation and other economic or social factors on future payments of losses and LAE incurred at the date of the statutory-basis statement of admitted assets, liabilities and accumulated surplus;
 - iii. Lines and geographical locations of the business written by Citizens;
 - iv. Citizens' underwriting and claims policies and procedures;
 - v. The timeliness and reliability of reports from reinsurers;
 - vi. Estimates of claim recoveries, exclusive of reinsurance recoveries;
 - c. Citizens has considered and properly disclosed in the statutory-basis financial statements all the information with respect to losses and LAE reserves and related claim recoveries, which in our judgement, is necessary to adequately identify and understand the nature of reserving the estimates and underlying coverage issues, including the potential volatility, complexity, and uncertainty of such estimate and the possibility that the ultimate liability may vary significantly from the recorded reserve and related recovery amounts.
46. We believe the reserves for possible claims are adequate to cover claim losses, which might result from pending and possible claims.
47. All material reinsurance transactions have been recorded and disclosed in accordance with SSAP No. 62R, *Property and Casualty Reinsurance* (SSAP No 62R).
48. All reinsurance transactions entered into by Citizens are final and there are no side agreements with reinsurers, or other terms in effect, which allow for the modification of terms under existing reinsurance agreements. All contracts have been reviewed during 2020 and those accounted for as reinsurance meet the risk transfer provisions for which Citizens maintains documentation of risk transfer and are recorded in accordance with SSAP No. 62R.
49. We believe that policy slips and other documents obtained from brokers and counterparties with binding signatures represent enforceable insurance and reinsurance contracts. There are no separate written or oral agreements between Citizens and reinsurers that would under any circumstances, reduce, limit, mitigate, or otherwise affect any actual or potential loss to the parties under the reinsurance contract that, if considered, would change Citizens' application of accounting principles or the amounts recorded with respect to the transaction, other than insuring contracts that are explicitly defined in the reinsurance contract.
50. At December 31, 2020, Citizens has reinsurance recoverables on paid and unpaid losses on catastrophe reinsurance coverage related to Hurricane Irma, including amounts on internally allocated loss adjustment expenses. Citizens believes these reinsurance recoverables are fully collectible under the terms of the applicable reinsurance agreements.

Accounting Methods

51. Citizens is responsible for determining and maintaining the adequacy of the allowance for uncollectible premium installment receivables and reinsurance recoverable, as well as estimates used to determine such amounts. In making its determination of the necessary allowance, management considered past experience and all information currently available. Management further considered information with respect to receivable aging and credit ratings of debtors, challenges or potential challenges, including litigation and arbitration proceedings, with respect to reinsurance balances and amounts due from other reinsurers as a result of loss communication, solvency and other actions. Management believed the allowances are adequate to cover uncollectible account balances as of December 31, 2020.
52. Citizens has no plans or intentions to discontinue the operations of any subsidiary or division or to discontinue any significant product lines.
53. We have reviewed long-lived assets to be held and used for impairment whenever events or changes in circumstances have indicated that the carrying amount of the assets might not be recoverable and have determined no adjustments are necessary.

Other

54. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances or similar arrangements have been properly disclosed.
55. Regarding Citizens' Information Systems (IS) function, we have made available to you all information and documentation responsive to your review of the IS function; and we have, to the best of our knowledge and belief, answered all questions and inquiries fully and accurately.
56. None of the Company's third-party service providers, upon which the Company relies, has known problems which would be likely to threaten the reliability of Company's information systems and/or the systems' internal controls, or which could have a material impact on Company's statutory-basis financial statements.
57. In regard to the non-attest services (specifically advising management about appropriate accounting principles and assistance in preparation of audited statutory-based financial statements) performed by you, we have:
 - a. Assumed all management responsibilities;
 - b. Overseen the service by designating an individual within senior management, who possesses suitable skills, knowledge, or experience;
 - c. Evaluated the adequacy and results of the services performed;
 - d. Accepted responsibility for the results of the services;
 - e. Evaluated and maintained internal controls, including monitoring ongoing activities.
58. In accordance with Section 627.351(6) of the Florida Statutes, Citizens is not subject to Risk-Based Capital (RBC) requirements or required to have a pledged deposit on file with the State of Florida.
59. There are no known or expected circumstances, as of the date of this letter that would either threaten the solvency of Citizens under applicable insurance regulations, or require significant capital infusions to Citizens in order to comply with applicable regulations.

60. Citizens has properly disclosed all affiliate transactions in its statutory-basis financial statements.
61. Citizens has no knowledge of any guaranty fund assessments as of December 31, 2020.
62. Citizens is in compliance with all covenants and limitations associated with its outstanding obligations.
63. The statutory-basis financial statements disclose all the matters of which we are aware that are relevant to Citizens' ability to continue as a going concern. We have evaluated whether there are conditions or events, considered in aggregate, that raise substantial doubt about Citizens' ability to continue as a going concern within one year after the date that the statutory-basis financial statements are issued (or within one year after the date that the statutory-basis financial statements are available to be issued when applicable) and determined no such substantial doubt exists.
64. There have been no updates or additional claims which would require disclosure or accrual of a liability under SSAP No. 5R. related to the following internal legal counsel confirmations received since their respective confirmation dates:
 - a. Belinda Miller – Citizens' Interim Legal Counsel – May 11, 2021.
65. Citizens is party to claims and legal actions arising routinely in the ordinary course of business. In the opinion of management, the ultimate disposition of these matter specific to insurance policy claims are included in the methods and assumptions of management's determination of incurred but not reported reserves as of December 31, 2020. The ultimate disposition of these matters is not expected to have a material, adverse effect on the Company's financial position or liquidity.
66. Citizens is named as a defendant in legal actions arising from claims filed under insurance policies it has underwritten and other claims incidental to its normal business activities. In the opinion of management, which is based on the advice of legal counsel, the ultimate outcome of such proceedings is not expected to have a material effect on Citizens' financial position or results of operations.
67. Citizens has issued Senior Secured Bonds for the purpose of funding losses in the event of a future catastrophe. The bonds are secured by pledged revenues which consist of monies and investments held in accounts established under the trust indenture, proceeds from any surcharges, regular, and emergency assessments, and/or reimbursements from the Florida Hurricane Catastrophe Fund (FHCF). The carrying value of the bonds is \$849,690,000 as of December 31, 2020.
68. In accordance with the Florida Office of Insurance Regulation, memorandum OIR-20-04M, Citizens issued a moratorium on cancellations and non-renewals on May 22, 2020. As of December 31, 2020, Citizens appropriately accounted for policies that were cancelled after year-end but would have been cancelled prior to year-end if the moratorium was not in place.
69. Citizens appropriately accounted for the ceded premium adjustment as a result of the final TIV exceeding 10% of projected TIV.

We have evaluated subsequent events through the date of this letter, which is the date the statutory-basis financial statements are available to be issued. No events have occurred subsequent to the statutory-basis statement of admitted assets, liabilities and accumulated surplus date and through the date of this letter except as disclosed in Note 16, Subsequent Events, that would require adjustment to or disclosure in the aforementioned statutory-basis financial statements.

Citizens Property Insurance Company

Barry Gilway

Barry Gilway (May 20, 2021 15:21 EDT)

*Barry Gilway, President, Chief Executive Officer
and Executive Director*

Jennifer Montero

Jennifer Montero (May 19, 2021 08:42 EDT)

Jennifer Montero, Chief Financial Officer

Andrew Woodward

Andrew Woodward (May 19, 2021 08:29 EDT)

Andrew Woodward, Controller

Brian Donovan

Brian Donovan (May 19, 2021 09:41 EDT)

Brian Donovan, Chief Actuary



Appendix B
Management Representation Letter
U.S. GAAP Basis

CITIZENS PROPERTY INSURANCE CORPORATION
2101 MARYLAND CIRCLE
TALLAHASSEE, FLORIDA 32303-1001

TELEPHONE: 850-513-3892 FAX: 850-513-3905



May 19, 2021

Dixon Hughes Goodman LLP
400 N. Ashley Drive
Suite 2540
Tampa, Florida 33602

This representation letter is provided in connection with your audits of the financial statements of Citizens Property Insurance Company (Citizens), an enterprise fund of the State of Florida, which comprise the statements of net position as of December 31, 2020 and 2019, and the related statements of revenues, expenses and changes in net position, and cash flows for the years then ended, and the related notes to the financial statements, for the purpose of expressing an opinion on whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm that, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves as of the date of this letter:

Financial Statements

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated August 4, 2020, for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP and for the preparation of the supplementary information in accordance with the applicable criteria.
2. The financial statements referred to above are fairly presented in conformity with U.S. GAAP established by the Government Accounting Standards Board (GASB), and include all properly classified funds and other financial information of the primary government and all component units required by U.S. GAAP to be included in the financial reporting entity.
3. We acknowledge our responsibility for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Carlos Beruff, Chairman, Manatee County • Marc W. Dunbar, Leon County • Lazaro Fields, Leon County
Jillian Hasner, Palm Beach County • Reynolds Henderson, Walton County • Erin Knight, Miami-Dade County
Carlos Lopez-Cantera, Miami-Dade County • Nelson Telemaco, Broward County • M. Scott Thomas, St. Johns County
Barry Gilway, President/CEO and Executive Director

4. The following have been properly accounted for and disclosed in the financial statements, where applicable:
 - a. Related-party relationships and transactions, including sales, purchases, loans, transfers, reinsurance arrangements, and guarantees, and amounts receivable from or payable to related parties;
 - b. Guarantees, whether written or oral, under which Citizens is contingently liable;
 - c. Other liabilities or gain or loss contingencies;
 - d. All liabilities, both actual and contingent;
 - e. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances, line of credit or similar arrangement;
 - f. All other liens or encumbrances on assets and all other pledges of assets;
 - g. Amounts of contractual obligations for purchase of real property, equipment, other assets, and intangibles;
 - h. Investments in debt securities;
 - i. All leases under long-term leases;
 - j. All significant estimates and material concentrations known to management;
 - k. Assets and liabilities measured at fair value are disclosed.
5. Significant estimates that may be subject to a material change in the near term have been properly disclosed in the financial statements. We understand that "near term" means the period within one year of the date of the financial statements. In addition, we have no knowledge of concentrations existing at the date of the financial statements that make Citizens vulnerable to the risk of severe impact that have not been properly disclosed in the financial statements.
6. We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.
7. Significant assumptions we used in making accounting estimates, including estimates of fair value, are reasonable.
8. Adjustments or disclosures have been made for all events, including instances of noncompliance, subsequent to the date of the financial statements that would require adjustment to or disclosure in the financial statements.
9. There are no uncorrected or corrected misstatements. There are no omitted disclosures material to the financial statements.
10. We are aware of no material weaknesses, including significant deficiencies, in the design or operation of internal controls that could adversely affect Citizens' ability to record, process, summarize, and report financial data.
11. The effects of all known actual or possible litigation, claims, and assessments have been accounted for and disclosed in accordance with U.S. GAAP.
12. We have identified to you any previous audits, attestation engagements, and other studies related to the audit objectives and whether related recommendations have been implemented.

13. Citizens has no plans or intentions that may materially affect the carrying value or classification of assets, liabilities, or net position.
14. We are responsible for compliance with the laws, regulations, and provisions of contracts and grant agreements applicable to us, including tax or debt limits and debt contracts, and legal and contractual provisions for reporting specific activities in separate funds.
15. We have not identified any instances that have occurred or are likely to have occurred, of fraud, abuse or noncompliance with provisions of laws and regulations that we believe have a material effect on the financial statements or other financial data significant to the audit objectives, and any other instances that warrant the attention of those charged with governance.
16. We have not identified any instances, which have occurred or are likely to have occurred, of noncompliance with provisions of contracts and grant agreements that we believe have a material effect on the determination of financial statement amounts or other financial data significant to the audit objectives.
17. We have not identified any instances that have occurred or are likely to have occurred, or abuse that could be quantitatively or qualitatively material to the financial statements or other financial data significant to the audit objectives.
18. Citizens has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral, beyond those assets pledged in trust for Senior Secured Bonds as disclosed in footnote 7, Long-Term Debt, of the financial statements.
19. The financial statements properly classify all funds and activities in accordance with GASB Statement No. 34, *Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments* (GASB Statement No. 34).
20. All funds that meet the quantitative criteria in GASB Statement No. 34 and 37, *Basic Financial Statements - and Management's Discussion and Analysis - for State and Local Governments: Omnibus - an Amendment of GASB Statement No. 34*, for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
21. Components of net position (net investment in capital assets; restricted; and unrestricted) are properly classified and, if applicable, approved.
22. Provisions for uncollectible receivables have been properly identified and recorded.
23. Expenses have been appropriately classified in or allocated to functions and programs in the statements of revenues, expenses and changes in net position, and allocations have been made on a reasonable basis.
24. Deposits and investment securities are properly classified as to risk and are properly disclosed.
25. Capital assets, including infrastructure, are properly capitalized, reported, and, if applicable, depreciated.

26. We have appropriately disclosed Citizens' policy regarding whether to first apply restricted or unrestricted resources when an expense is incurred for purposes for which both restricted and unrestricted net position is available and have determined that net position is properly recognized under the policy.
27. With respect to the Supplemental Combining Statements of Net Position, Supplemental Combining Statements of Revenues, Expenses and Changes in Net Position, and Supplemental Revenues, Expenses and Claim Development Information, (collectively Supplemental Information):
 - a. We acknowledge our responsibility for presenting the Supplemental Information in accordance with U.S. GAAP, and we believe the Supplemental Information, including its form and content, is fairly presented in accordance with U.S. GAAP. The methods of measurement and presentation of the Supplemental Information have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the Supplemental Information;
 - b. We acknowledge our responsibility for the Required Supplementary Information (RSI). The RSI is measured and presented within prescribed guidelines and the methods of measurement and presentation have not changed from those used in the prior period. We have disclosed to you any significant assumptions and interpretations underlying the measurement and presentation of the RSI.

Information Provided

28. We have provided you with:
 - a. Access to all information of which we are aware that is relevant to the preparation and fair presentation of the financial statements such as records, documentation and other matters, if any, received from funding sources;
 - b. Additional information that you have requested from us for the purpose of the audit;
 - c. Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence;
 - d. Minutes of the meetings of the Board of Governors, and committees thereof, or summaries of actions of recent meetings for which minutes have not yet been prepared for meetings held in 2020 and 2021 and through the date of this letter.
29. All material transactions have been recorded in the accounting records and are reflected in the financial statements.
30. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
31. We have no knowledge of any fraud or suspected fraud affecting Citizens involving:
 - a. Management;
 - b. Employees who have significant roles in internal control;
 - c. Others when the fraud could have a material effect on the financial statements.
32. We have no knowledge of any allegations of fraud or suspected fraud affecting Citizens' financial statements received in communications from employees, former employees, analysts, regulators, or others.

33. We have no knowledge of instances of noncompliance or suspected noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse, whose effects should be considered when preparing financial statements.
34. We have disclosed to you the identity of Citizens' related parties and all the related party relationships and transactions of which we are aware.
35. Pursuant to a determination letter received from the Internal Revenue Service, Citizens is exempt from Federal income tax as a political subdivision and integral part of the State of Florida, and as such, is liable for income taxes only on business income unrelated to the purpose for which it is exempt. Citizens had no unrelated business income during 2020 and therefore no Federal or State income tax was incurred during 2020.

Contingencies

36. There are no:
 - a. Violations or possible violations of laws or regulations whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency;
 - b. Unasserted claims or assessments that our attorney (in-house or external) has advised us are probable of assertion beyond those disclosed in the notes to the financial statements.
37. Management is not aware of any class action lawsuits against Citizens which are likely or probable to result in loss to Citizens, except for those disclosed in the financial statements.
38. Citizens has not entered into any buy or sell arrangements which would require it to record a related liability or require disclosure in the financial statements.
39. There were no material commitments for construction or acquisition of property, plant and equipment, or to acquire other noncurrent assets, such as investments or intangibles.
40. We have complied with all aspects of contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
41. We have disclosed to you all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements. The effects of all known and actual or possible litigation and claims have been accounted for and disclosed in the financial statements.

Premiums and Unearned Premiums

42. The in-force files properly reflect all policies and contracts in force for all lines of insurance coverage as of and for the year ended December 31, 2020. We are not aware of any material commitments or concessions to a policyholder that are outside of the terms of the written policy agreements.
43. Unearned premiums are fairly stated at December 31, 2020 and the calculations of such are consistent with those of the preceding year. Business written from all sources, including reinsurance ceded, has been included in premiums in force and unearned. Business expired has been excluded from premiums in force and unearned.
44. We have fully disclosed to you all premium terms, including all rights of return or price adjustments including endorsements and cancellations.

45. As of December 31, 2020, Citizens has other receivables under reinsurance contracts due which represents amounts due under depopulation reinsurance assumption agreements.
46. Citizens determined a premium deficiency reserve is not needed as of December 31, 2020. Citizens anticipates investment income as a factor in the premium deficiency calculation. For purposes of determining premium deficiencies, contracts are grouped in a manner consistent with how Citizens' policies are marketed, serviced, and measured for the profitability of such contracts. Additionally, Citizens' premium deficiency calculation is performed separately for the individual accounts required pursuant to Section 627.351 (c) of the Florida Statutes.

Reserve for Loss and Loss Adjustment Expenses

47. Citizens' reserve for unpaid losses and loss adjustment expenses (LAE) at December 31, 2020 is management's best estimate and makes a reasonable provision for all reported and unreported claims incurred as of December 31, 2020 based upon the consolidation of all information available at the date those financial statements were prepared, including actuarial indications and other factors.
48. The findings of all actuarial studies, which have been completed and accepted by Citizens, have been considered in establishing the required level of loss and LAE reserves.
49. With respect to Citizens' reserve for losses and LAE:
 - a. For the year ended December 31, 2020, we have processed claims received by Citizens in a manner and timing consistent with prior years;
 - b. We have considered all information that, in our judgment, is necessary to adequately estimate the loss and loss adjustment expense reserves at the balance sheet date, including among other things;
 - i. Anticipated and historical claims experience of Citizens;
 - ii. Expected impact of inflation and other economic or social factors on future payments of losses incurred at the statement of net position date;
 - iii. Lines and geographical locations of the business written by Citizens;
 - iv. Citizens' underwriting and claims policies and procedures;
 - v. The timeliness and reliability of reports from reinsurers;
 - vi. Estimates of claim recoveries, exclusive of reinsurance recoveries;
 - c. Citizens has considered and properly disclosed in the financial statements all the information with respect to losses and loss adjustment expense reserves and related claim recoveries, which in our judgment, is necessary to adequately identify and understand the nature of reserving estimates and underlying coverage issues, including the potential volatility, complexity, and uncertainty of such estimates and the possibility that the ultimate liability may vary significantly from the recorded reserve and related recovery amounts.
50. We agree with the findings of the specialists in evaluating the loss and loss adjustment expense reserves and have adequately considered the qualifications of the specialists in determining the amounts and disclosures used in the financial statements and underlying accounting records. We did not give or cause any instructions to be given to specialists with respect to the values or amounts derived in an attempt to bias their work, and we are not otherwise aware of any matters that have had impact on the independence of objectivity of the specialists.

51. We believe the reserves for possible claims are adequate to cover claim losses, which might result from pending and possible claims.
52. All material reinsurance transactions have been recorded and disclosed.
53. All reinsurance transactions entered into by Citizens are final and there are no side agreements with reinsurers, or other terms in effect, which allow for the modification of terms under existing reinsurance arrangements. All contracts have been reviewed during 2020 and those accounted for as reinsurance meet the risk transfer provisions for which Citizens maintains documentation of risk transfer.
54. We believe that policy slips and other documents obtained from broker and counterparties with binding signatures represent enforceable insurance and reinsurance contracts. There are no separate written or oral agreements between Citizens and reinsurers that would under any circumstances, reduce, limit, mitigate, or otherwise affect any actual or potential loss to the parties under the reinsurance contract that, if considered, would change Citizens' application of accounting principles or the amounts recorded with respect to the transaction, other than insuring contracts that are explicitly defined in the reinsurance contract.
55. At December 31, 2020, Citizens has reinsurance recoverables on paid and unpaid losses on catastrophe reinsurance coverage related to Hurricane Irma, including amounts on internally allocated loss adjustment expenses. Citizens believes these reinsurance recoverables are fully collectible under the terms of the applicable reinsurance agreements.

Accounting Methods

56. Receivables recorded in the financial statements represent valid claims against debtors for sales or other charges arising on or before the statement of net position and appropriate provisions have been made for losses that may be sustained on uncollectible receivables.
57. Citizens is responsible for determining and maintaining the adequacy of the allowance for uncollectible premium installment receivables and reinsurance recoverable, as well as estimates used to determine such amounts. In making its determination of the necessary allowance, management considered past experience and all information currently available. Management further considered information with respect to receivable aging and credit ratings of debtors, challenges or potential challenges, including litigation and arbitration proceedings, with respect to reinsurance balances and amounts due from other reinsurers as a result of loss communications, solvency and other actions. Management believes the allowances are adequate to cover uncollectible account balances as of December 31, 2020.
58. Citizens has no plans or intentions to discontinue the operations of any subsidiary or division or to discontinue any significant product lines.
59. We have reviewed long-lived assets to be held and used for impairment whenever events or changes in circumstances have indicated that the carrying amount of the assets might not be recoverable and have determined no adjustments are necessary.

Financial Instruments

60. Citizens has properly recorded investments in debt securities at their fair value.
61. For investments that are impaired, we have evaluated whether the impairment is other than temporary. For debt securities that are impaired, we have evaluated whether we intend to sell the security and, if we do not intend to sell, whether it is more likely than not that we will be required to sell the security before recovery of its amortized cost basis, even if not until maturity. We have also evaluated whether we expect to recover the entire amortized cost basis of the debt security, including comparing the present value of cash flows expected to be collected from the security with the amortized cost basis of the security. Other than temporary declines in the value of securities have been properly recognized in the statutory basis financial statements. We have determined that all material unrealized losses (when considered in the aggregate) not recorded as other-than-temporary impairments will be recovered, even if through maturity, by Citizens, and that from time to time, realized losses may be taken when overall portfolio returns are evaluated as part of the management strategy of our investment portfolio. The decline in fair value is attributable to changes in interest rates or market conditions and not credit quality, and because Citizens has the ability and intent to hold substantially all of its bond securities until a market price recovery or maturity, Citizens does not consider any of its bonds to be other-than-temporarily impaired at December 31, 2020.
62. We represent to you the following for Citizens' fair value measurements and disclosures:
- a. The underlying assumptions are reasonable, and they appropriately reflect management's intent and ability to carry out its stated courses of action;
 - b. The measurement methods and related assumptions used in determining fair value are appropriate in the circumstances and have been consistently applied;
 - c. The disclosures related to estimated fair values are complete and adequate;
 - d. There are no subsequent events that require adjustments to the fair value measurements and disclosures included in financial statements.
63. All investment transactions have credit exposure to the extent that a counterparty may default on an obligation to Citizens. To manage credit risk, Citizens focuses primarily on higher quality, fixed income securities, reviews the credit strength of all entities in which it invests, limits its exposure in any one investment, and monitors portfolio quality, taking into account credit ratings assigned by recognized credit rating organizations.
64. The methods and significant inputs and assumptions used to determine fair values of financial instruments include the following: valuation of securities based on average bid prices of identical or similar issues with the same life and expected yields. The methods and significant inputs and assumptions used result in a measure of fair value appropriate for financial statement measurement and disclosure purposes.
65. Financial institutions with significant individual or group concentration of credit risk have been appropriately identified, properly recorded, and disclosed in the financial statements.

Other

66. Arrangements with financial institutions involving compensating balances or other arrangements involving restrictions on cash balances or similar arrangements have been properly disclosed.
67. Citizens has made available all communications from regulators. There have been no communications from regulatory agencies concerning noncompliance with or deficiencies in financial reporting practices.
68. Regarding Citizens' Information Systems (IS) function, we have made available to you all information and documentation responsive to your review of the IS function; and we have, to the best of our knowledge and belief, answered all questions and inquiries fully and accurately.
69. None of Citizens' third-party service providers, upon which Citizens relies, has known problems which would be likely to threaten the reliability of Citizens' information systems and/or the systems' internal controls, or which could have a material impact on Citizens' financial statements.
70. There are no known or expected circumstances, as of the date of this letter that would either threaten the solvency of Citizens under applicable insurance regulations, or require significant capital infusions to Citizens in order to comply with applicable regulations applicable to their individual domiciliary states or countries.
71. Citizens has properly disclosed all affiliate transactions in its financial statements.
72. Citizens has no knowledge of any guaranty fund assessments as of December 31, 2020.
73. Citizens is in compliance with all covenants and limitations associated with its outstanding obligations.
74. The financial statements disclose all of the matters of which we are aware that are relevant to Citizens' ability to continue as a going concern. We have evaluated whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Citizens' ability to continue as a going concern within one year after the date that the financial statements are issued (or within one year after the date that the financial statements are available to be issued when applicable) and determined no such substantial doubt exists.
75. In regard to the non-attest services (specifically advising management about appropriate accounting principles and assistance in preparation of audited financial statements) performed by you, we have:
 - a. Assumed all management responsibilities;
 - b. Overseen the service, by designating an individual, within senior management, who possess suitable skill, knowledge, or experience;
 - c. Evaluated the adequacy and results of the services performed;
 - d. Accepted responsibility for the results of the services;
 - e. Evaluated and maintained internal controls, including monitoring ongoing activities.
76. There have been no updates or additional claims which would require disclosure or accrual of a liability related to the following internal legal counsel confirmations received since their respective confirmation dates:
 - a. Belinda Miller – Citizens' Interim Legal Counsel – May 11, 2021.

77. Citizens is party to claims and legal actions arising routinely in the ordinary course of business. In the opinion of management, the ultimate disposition of these matters specific to insurance policy claims are included in the methods and assumptions of management's determination of incurred but not reported reserves as of December 31, 2020. The results of outstanding legal cases on insurance claims as summarized in Mr. Sumner's legal response letter referenced above are included in the methods and assumptions of management's determination of incurred but not reported reserves as of December 31, 2020. The ultimate disposition of these matters are not expected to have a material, adverse effect on Citizens' financial position or liquidity.
78. Citizens is named as a defendant in legal actions arising from claims filed under insurance policies it has underwritten and other claims incidental to its normal business activities. In the opinion of management, which is based on the advice of legal counsel, the ultimate outcome of such proceedings is not expected to have a material effect on Citizens' financial position or results of operations.
79. Citizens has issued Senior Secured Bonds for the purpose of funding losses in the event of a future catastrophe. The bonds are secured by pledged revenues which consist of monies and investments held in accounts established under the trust indenture, proceeds from any surcharges, regular, and emergency assessments, and/or reimbursements from the Florida Hurricane Catastrophe Fund (FHCF). The carrying value of the bonds is \$849,690,000 as of December 31, 2020.
80. In accordance with the Florida Office of Insurance Regulation, memorandum OIR-20-04M, Citizens issued a moratorium on cancellations and non-renewals on May 22, 2020. As of December 31, 2020, Citizens appropriately accounted for policies that were cancelled after year-end but would have been cancelled prior to year-end if the moratorium was not in place.
81. Citizens appropriately accounted for the ceded premium adjustment as a result of the final TIV exceeding 10% of projected TIV.

We have evaluated subsequent events through the date of this letter, which is the date the financial statements are available to be issued. No events have occurred subsequent to the statement of admitted assets, liabilities and accumulated surplus date and through the date of this letter except as disclosed in Note 16, Subsequent Events, that would require adjustment to or disclosure in the aforementioned statutory-basis financial statements.

Citizens Property Insurance Company

Barry Gilway

Barry Gilway (May 20, 2021 15:21 EDT)

Barry Gilway, President, Chief Executive Officer
and Executive Director

Jennifer Montero

Jennifer Montero (May 19, 2021 08:42 EDT)

Jennifer Montero, Chief Financial Officer

Andrew Woodward

Andrew Woodward (May 19, 2021 08:29 EDT)

Andrew Woodward, Controller

Brian Donovan

Brian Donovan (May 19, 2021 09:41 EDT)

Brian Donovan, Chief Actuary



Appendix C

Qualification Letter

May 19, 2021

Audit Committee
Citizens Property Insurance Corporation
Tallahassee, FL

We have audited, in accordance with auditing standards generally accepted in the United States of America (GAAS), the statutory-basis financial statements of Citizens Property Insurance Corporation (Citizens) as of and for the years ended December 31, 2020 and 2019, and have issued our report thereon dated May 19, 2021. In connection therewith, we advise you as follows:

- a. We are independent certified public accountants with respect to Citizens and conform to the standards of the accounting profession as contained in the Code of Professional Conduct and pronouncements of the American Institute of Certified Public Accountants and the Rules of Professional Conduct of the Florida Department of Business Regulation, Division of Certified Public Accounting.
- b. The engagement partner and manager, who are certified public accountants, have over 14 years and 5 years, respectively, of experience in public accounting and are experienced in auditing insurance entities. Members of the engagement team, most of whom have had experience in auditing insurance entities and 43% of whom are certified public accountants, were assigned to perform tasks commensurate with their training and experience.
- c. We understand that Citizens intends to file its audited statutory-basis financial statements and our report thereon with the Florida Department of Financial Services, Office of Insurance Regulation (the Office) and that the Insurance Commissioner of the State of Florida (Insurance Commissioner) will be relying on that information in monitoring and regulating the statutory financial condition of Citizens.

Although we understand that an objective of issuing a report on the statutory-basis financial statements is to satisfy regulatory requirements, our audit was not planned to satisfy all objectives or responsibilities of insurance regulators. In this context, Citizens and the Insurance Commissioner should understand that the objective of an audit of statutory-basis financial statements in accordance with GAAS is to form an opinion and issue a report on whether the statutory-basis financial statements present fairly, in all material respects, the admitted assets, liabilities and accumulated surplus as well as the results of operations and cash flows in conformity with accounting practices prescribed or permitted by the Office.

Consequently, under GAAS, we have the responsibility, within the inherent limitations of the auditing process, to plan and perform our audit to obtain reasonable assurance about whether the statutory-basis financial statements are free of material misstatement, whether caused by error or fraud, and to exercise due professional care in the conduct of the audit. The concept of selective testing of the data being audited, which involves judgment both as to the number of transactions to be audited and the areas to be tested, has been generally accepted as a valid and sufficient basis for an auditor to express an opinion on statutory-basis financial statements. Audit procedures that are effective for detecting errors, if they exist, may be ineffective for detecting misstatements resulting from fraud. Because of the characteristics of fraud, a properly planned and performed audit may not detect a material misstatement resulting from fraud. In addition, an audit does not address the possibility that material misstatements caused by error or fraud may occur in the future. Also, our use of professional judgment and the assessment of materiality for the purpose of our audit means that matters may exist that would be assessed differently by the Insurance Commissioner.

It is the responsibility of management of Citizens to adopt sound accounting policies, to maintain an adequate and effective system of accounts and to establish and maintain an internal control that will, among other things, provide reasonable, but not absolute, assurance that assets are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of statutory-basis financial statements in conformity with accounting practices prescribed or permitted by the Office.

The Insurance Commissioner should exercise due diligence to obtain whatever other information may be necessary for the purpose of monitoring and regulating the statutory financial position of insurers and should not rely solely upon the independent auditor's report.

- d. We will retain audit working papers (including those kept in a hard copy or electronic medium) prepared in compliance with professional standards, for seven years from the date that we grant permission to use our report in connection with the issuance of Citizens' statutory-basis financial statements (report release date). After notification to Citizens, we will make the working papers available for review by the Office, or its delegates, at the offices of the insurer, at our offices, at the office of the Insurance Commissioner, or at any other reasonable place designated by the Insurance Commissioner. Furthermore, in the conduct of the aforementioned periodic review by the Office, photocopies of pertinent audit working papers may be made under the control of Dixon Hughes Goodman LLP and such copies may be retained by the Office. In addition, to the extent requested, we may provide the Office with copies of certain of our audit working papers (such as unlocked electronic copies of Excel spreadsheets that do not contain password protection or encryption). As such, these audit working papers will be subject to potential modification by the Office or by others. We are not responsible for any modifications made to the copies, electronic or otherwise, after they are provided to the Office and we are likewise not responsible for any effect that any such modifications, whether intentional or not, might have on the process, substance or outcome of regulatory examination.

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Citizens Property Insurance Corporation
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- e. The engagement partner has served in that capacity with respect to Citizens since 2020, is licensed by the Florida Board of Accountancy and is a member in good standing of the American Institute of Certified Public Accountants.
- f. To the best of our knowledge and belief, we are in compliance with the requirements of section 7 of the NAIC *Annual Financial Reporting Model Regulation Model Rule (Regulation) Requiring Annual Audited Financial Reports* regarding qualifications of independent certified public accountants.

The letter is intended solely for the information and use of the Audit Committee, Board of Governors, and management of Citizens, and the Office, and is not intended to be, and should not be used for anyone other than these specified parties.

Dixon Hughes Goodman LLP

Tampa, FL