

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

In Re: Receivership of  
VANGUARD FIRE AND CASUALTY  
COMPANY, A Florida Corporation.

Case No.: 2007-CA-0186

**RECEIVER'S MOTION FOR ORDER APPROVING FINAL CLAIMS REPORT, CLAIMS  
DISTRIBUTION REPORT, DISTRIBUTION ACCOUNTING STATEMENT, AND  
AUTHORIZING DISTRIBUTION**

COMES NOW, the Florida Department of Financial Services, as Receiver of Vanguard Fire & Casualty Company (hereinafter "Receiver"), by and through undersigned counsel, and hereby files this Motion for Order Approving Final Claims Report, Claims Distribution Report, Distribution Accounting Statement, and Authorizing Distribution and as good grounds therefor states the following:

1. Vanguard Fire & Casualty Company (hereinafter "Vanguard") was a corporation authorized pursuant to the Florida Insurance Code to transact business in the State of Florida.
2. On January 19, 2007, this Court entered an Order Appointing the Florida Department of Financial Services as the Receiver of Vanguard for purposes of Rehabilitation, Injunction, and Notice of Automatic Stay ("Rehabilitation Order"). By subsequent order of this Court, Vanguard was placed in receivership for purposes of liquidation on March 26, 2007 ("Liquidation Order").
3. Pursuant to section 631.021(1), Florida Statutes, this Court has jurisdiction over the Receivership and is authorized to enter all necessary and/or proper orders to carry out the purpose of the Florida Insurers Rehabilitation and Liquidation Act, sections 631.001 et seq., Florida Statutes.

4. On July 12, 2012, this Court entered an *Order Approving Receiver's First Interim Claims Report and Recommendation on Claims*. The First Interim Claims Report reflects the Receiver's evaluation and recommendations on claims filed in Classes 1 through 3. Because the limitation of assets in the estate will not allow for a distribution beyond Class 3 claims, claims in Classes 4 through 10 were evaluated for class only.

5. On May 31, 2015, this Court entered an *Order Approving Receiver's Second Interim Claims Report and Recommendation on Claims*. The Second Interim Claims Report reflects the Receiver's evaluation and recommendation of one Class 2 claim and the evaluation as to class only of one Class 8 claim. The two claims were filed after the First Interim Claims Report was presented to this Court for approval.

6. The Receiver has compiled a Final Claims Report dated June 21, 2016, which reflects the classification of all filed claims by priority in accordance with section 631.271, Florida Statutes, and the claims filing deadline. This report also incorporates the resolution of all timely filed objections and claimant information updates. The Final Claims Report is attached hereto and incorporated herein by reference as **Exhibit "A."**

7. The Final Claims Report is broken down into two sections: Part A of the Report consists of all claims by non-guaranty association claimants, and Part B consists of all claims by guaranty association claimants. **Part A** of the report reflects that 50,179 non-guaranty association claims were filed with an aggregate claim amount of \$73,233,143.01, of which the total amount recommended by the Receiver to be paid is \$5,396,933.22. **Part B** of the report reflects that 5 guaranty association claims were filed with an aggregate claim amount of \$ 61,904,854.58, of which the total amount recommended by the Receiver to be paid is \$ 61,676,457.18.

8. With the approval of the Receiver's Final Claims Report, the Receiver is now in the position to make a final distribution of receivership assets. Said assets will be distributed to claimants in Classes 1-3 in accordance with the Claims Distribution Report dated June 21, 2016. The Claims Distribution Report is attached hereto and incorporated herein by reference as **Exhibit "B."**

9. The Receiver has compiled a Distribution Accounting Statement—*Projected for a August 2016 Distribution*, (the "*Distribution Accounting*"). As shown in the *Distribution Accounting*, the Receiver is prepared to make a final distribution of \$3,269,322.76 to all claimants in Classes 1-3. This distribution constitutes 100% of the amount recommended in Classes 1 and 2 and 35.2060% of the amount recommended in Class 3. The calculated distribution percentage takes into account the funds previously disbursed as early access funds. The final pro-rata calculation and the amount distributed may have a slight variance due to rounding at the time of check processing. The *Distribution Accounting* is attached hereto and incorporated herein by reference as **Exhibit "C."**

10. The Receiver recommends that the Final Claims Report, Claims Distribution Report, and Distribution Accounting be approved.

11. Upon the filing of this Motion for Order Authorizing Distribution, no further assignment of claim shall be accepted by the Receiver.

12. In an ongoing effort to maintain accuracy and efficiency, the Receiver proactively works to update its records to reflect change of address information for interested parties (e.g. agents, claimants, creditors, policyholders, subscribers) before mailing notifications and distribution checks. The Receiver has access to databases and other publicly available information that provides updated address information. The Receiver requests the authority to search for

change of address information when applicable and to use the change of address information for future mailings without further direction of this Court.

13. Despite its best efforts, the Receiver is not always able to distribute funds to every claimant when funds are ready for distribution due to either bad addresses or W-9 issues. The Receiver recommends that the unclaimed funds be transferred to the unclaimed property unit(s) of the state(s) reflected in the claimants' last address of record in the Receiver's files.

**WHEREFORE**, the Receiver moves this Honorable Court for entry of an Order:

A. Approving and adopting the Receiver's Final Claims Report, Claims Distribution Report, and Distribution Accounting Statement;

B. Directing the Receiver to make the above-referenced distribution to the claimants as indicated in the Distribution Accounting;

C. Directing the Receiver not to recognize or accept further assignment of claims;

D. Authorizing the Receiver to update its records to incorporate change of address information for an interested individual/entity (e.g. agent, claimant, creditor, policyholder, subscriber) if the Receiver determines that there has been a change of address for an interested individual/entity and authorizing the Receiver to use the change of address information for future mailings; and

E. Authorizing the Receiver to transfer unclaimed funds to the unclaimed property unit(s) of the state(s) reflected in the claimants' last address of record in the Receiver's files.

**RESPECTFULLY SUBMITTED** this the 2nd day of August, 2016.

/s/ Jamila G. Gooden

**JAMILA G. GOODEN**

**Senior Attorney**

Florida Bar No. 46740

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FLORIDA DEPARTMENT OF FINANCIAL SERVICES - DIVISION OF REHABILITATION AND LIQUIDATION  
 VANGUARD FIRE AND CASUALTY COMPANY  
 FINAL CLAIMS REPORT  
 PART A - FOR NON GUARANTY ASSOCIATION CLAIMANTS

EXHIBIT A

SUMMARY TOTALS

TOTAL AMOUNT CLAIMED BY NON GUARANTY ASSOCIATION CLAIMANTS	\$73,233,143.01
TOTAL AMOUNT RECOMMENDED TO NON GUARANTY ASSOCIATION CLAIMANTS	\$5,396,933.22
TOTAL NUMBER	50,179

**Secured Claims**

COUNT OF SECURED CLAIMS :	0
AMOUNT CLAIMED FOR SECURED CLAIMS BY NON GUARANTY ASSOCIATION	\$0.00
AMOUNT RECMD FOR SECURED CLAIMS TO NON GUARANTY ASSOCIATION	

**UnSecured Claims**

COUNT OF CLASS 1 CLAIMS :	0	COUNT OF CLASS 6 CLAIMS :	171
AMOUNT CLAIMED FOR CLASS 1 CLAIMS BY NON GUARANTY ASSOCIATION	\$0.00	AMOUNT CLAIMED FOR CLASS 6 CLAIMS BY NON GUARANTY ASSOCIATION	\$17,962,444.23
AMOUNT RECMD FOR CLASS 1 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS :		AMOUNT RECMD FOR CLASS 6 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS :	
<hr/>			
COUNT OF CLASS 2 CLAIMS :	526	COUNT OF CLASS 7 CLAIMS :	1
AMOUNT CLAIMED FOR CLASS 2 CLAIMS BY NON GUARANTY ASSOCIATION	\$15,567,341.40	AMOUNT CLAIMED FOR CLASS 7 CLAIMS BY NON GUARANTY ASSOCIATION	\$8,380.80
AMOUNT RECMD FOR CLASS 2 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:	\$953,684.13	AMOUNT RECMD FOR CLASS 7 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:	
<hr/>			
COUNT OF CLASS 3 CLAIMS :	49,403	COUNT OF CLASS 8 CLAIMS :	65
AMOUNT CLAIMED FOR CLASS 3 CLAIMS BY NON GUARANTY ASSOCIATION	\$36,952,157.28	AMOUNT CLAIMED FOR CLASS 8 CLAIMS BY NON GUARANTY ASSOCIATION	\$2,697,788.66
AMOUNT RECMD FOR CLASS 3 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:	\$4,443,249.09	AMOUNT RECMD FOR CLASS 8 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:	
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COUNT OF CLASS 4 CLAIMS :	3	COUNT OF CLASS 9 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 4 CLAIMS BY NON GUARANTY ASSOCIATION	\$14,081.34	AMOUNT CLAIMED FOR CLASS 9 CLAIMS BY NON GUARANTY ASSOCIATION	\$0.00
AMOUNT RECMD FOR CLASS 4 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:		AMOUNT RECMD FOR CLASS 9 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:	
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COUNT OF CLASS 5 CLAIMS :	10	COUNT OF CLASS 10 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 5 CLAIMS BY NON GUARANTY ASSOCIATION	\$30,949.30	AMOUNT CLAIMED FOR CLASS 10 CLAIMS BY NON GUARANTY ASSOCIATION	\$0.00
AMOUNT RECMD FOR CLASS 5 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS:		AMOUNT RECMD FOR CLASS 10 CLAIMS TO NON GUARANTY ASSOCIATION CLAIMANTS :	

Note: If status is unevaluated, then dollar amounts have been suppressed

FLORIDA DEPARTMENT OF FINANCIAL SERVICES - DIVISION OF REHABILITATION AND LIQUIDATION  
 VANGUARD FIRE AND CASUALTY COMPANY  
 FINAL CLAIMS REPORT  
 PART B - FOR GUARANTY ASSOCIATION

SUMMARY TOTALS

TOTAL AMOUNT CLAIMED BY GUARANTY ASSOCIATION	\$61,904,854.58
TOTAL AMOUNT RECOMMENDED TO GUARANTY ASSOCIATION	\$61,676,457.18
TOTAL NUMBER	5

COUNT OF CLASS 1 CLAIMS :	3	COUNT OF CLASS 6 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 1 CLAIMS BY GUARANTY ASSOCIATION :	\$6,086,007.57	AMOUNT CLAIMED FOR CLASS 6 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00
AMOUNT RECMD FOR CLASS 1 CLAIMS TO GUARANTY ASSOCIATION :	\$5,857,610.17	AMOUNT RECMD FOR CLASS 6 CLAIMS TO GUARANTY ASSOCIATION :	
<hr/>			
COUNT OF CLASS 2 CLAIMS :	1	COUNT OF CLASS 7 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 2 CLAIMS BY GUARANTY ASSOCIATION :	\$23,318,057.38	AMOUNT CLAIMED FOR CLASS 7 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00
AMOUNT RECMD FOR CLASS 2 CLAIMS TO GUARANTY ASSOCIATION :	\$23,318,057.38	AMOUNT RECMD FOR CLASS 7 CLAIMS TO GUARANTY ASSOCIATION :	
<hr/>			
COUNT OF CLASS 3 CLAIMS :	1	COUNT OF CLASS 8 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 3 CLAIMS BY GUARANTY ASSOCIATION :	\$32,500,789.63	AMOUNT CLAIMED FOR CLASS 8 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00
AMOUNT RECMD FOR CLASS 3 CLAIMS TO GUARANTY ASSOCIATION :	\$32,500,789.63	AMOUNT RECMD FOR CLASS 8 CLAIMS TO GUARANTY ASSOCIATION :	
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COUNT OF CLASS 4 CLAIMS :	0	COUNT OF CLASS 9 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 4 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00	AMOUNT CLAIMED FOR CLASS 9 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00
AMOUNT RECMD FOR CLASS 4 CLAIMS TO GUARANTY ASSOCIATION :		AMOUNT RECMD FOR CLASS 9 CLAIMS TO GUARANTY ASSOCIATION :	
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COUNT OF CLASS 5 CLAIMS :	0	COUNT OF CLASS 10 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 5 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00	AMOUNT CLAIMED FOR CLASS 10 CLAIMS BY GUARANTY ASSOCIATION :	\$0.00
AMOUNT RECMD FOR CLASS 5 CLAIMS TO GUARANTY ASSOCIATION :		AMOUNT RECMD FOR CLASS 10 CLAIMS TO GUARANTY ASSOCIATION :	

Note: If status is unevaluated, then dollar amounts have been suppressed

FLORIDA DEPARTMENT OF FINANCIAL SERVICES-DIVISION OF REHABILITATION AND LIQUIDATION  
 VANGUARD FIRE AND CASUALTY COMPANY  
 CLAIMS DISTRIBUTION REPORT

**EXHIBIT B**

**SUMMARY TOTALS**

TOTAL AMOUNT CLAIMED	108,306,270.37
TOTAL AMOUNT RECOMMENDED	\$67,073,390.40
TOTAL NUMBER	49,781

**Secured Claims**

COUNT OF SECURED CLAIMS :	0
AMOUNT CLAIMED FOR SECURED CLAIMS :	
AMOUNT RECOMMENDED FOR SECURED CLAIMS :	

**Unsecured Claims**

COUNT OF CLASS 1 CLAIMS :	2	COUNT OF CLASS 6 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 1 CLAIMS :	\$5,857,610.17	AMOUNT CLAIMED FOR CLASS 6 CLAIMS :	
AMOUNT RECOMMENDED FOR CLASS 1 CLAIMS :	\$5,857,610.17	AMOUNT RECOMMENDED FOR CLASS 6 CLAIMS :	
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COUNT OF CLASS 2 CLAIMS :	434	COUNT OF CLASS 7 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 2 CLAIMS :	\$32,995,772.29	AMOUNT CLAIMED FOR CLASS 7 CLAIMS :	
AMOUNT RECOMMENDED FOR CLASS 2 CLAIMS :	\$24,271,741.51	AMOUNT RECOMMENDED FOR CLASS 7 CLAIMS :	
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COUNT OF CLASS 3 CLAIMS :	49,345	COUNT OF CLASS 8 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 3 CLAIMS :	\$69,452,887.91	AMOUNT CLAIMED FOR CLASS 8 CLAIMS :	
AMOUNT RECOMMENDED FOR CLASS 3 CLAIMS :	\$36,944,038.72	AMOUNT RECOMMENDED FOR CLASS 8 CLAIMS :	
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COUNT OF CLASS 4 CLAIMS :	0	COUNT OF CLASS 9 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 4 CLAIMS :		AMOUNT CLAIMED FOR CLASS 9 CLAIMS :	
AMOUNT RECOMMENDED FOR CLASS 4 CLAIMS :		AMOUNT RECOMMENDED FOR CLASS 9 CLAIMS :	
<hr/>			
COUNT OF CLASS 5 CLAIMS :	0	COUNT OF CLASS 10 CLAIMS :	0
AMOUNT CLAIMED FOR CLASS 5 CLAIMS :		AMOUNT CLAIMED FOR CLASS 10 CLAIMS :	
AMOUNT RECOMMENDED FOR CLASS 5 CLAIMS :		AMOUNT RECOMMENDED FOR CLASS 10 CLAIMS :	

Note: if status is unevaluated, then dollar amounts have been suppressed



**Claim Distribution Listing**  
**For Company # 513**  
**VANGUARD FIRE AND CASUALTY COMPANY**

06/21/2016  
11:38:41

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Parameters used for Distribution Processing

		GF	Non-GF
Post Period	12-2016		
		100.0000	100.0000
		100.0000	100.0000
Doc Date	06/21/2016		
	Class 1 Percentage	100.0000	100.0000
	Class 2 Percentage	100.0000	100.0000
	Class 3 Percentage	35.2060	35.2060
	Class 4 Percentage	0.0000	0.0000
	Class 5 Percentage	0.0000	0.0000
	Class 6 Percentage	0.0000	0.0000
	Class 7 Percentage	0.0000	0.0000
	Class 8 Percentage	0.0000	0.0000
	Class 9 Percentage	0.0000	0.0000
	Class 10 Percentage	0.0000	0.0000
	Class 11 Percentage	0.0000	0.0000
	Secured Percentage	0.0000	0.0000

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# EXHIBIT C

**Vanguard Fire & Casualty Co.**  
Distribution Accounting  
Projected for August 2016 Distribution

**ESTIMATED ASSETS AT JULY 31 2016**

	<u>Value</u>	<u>Reference</u>
Cash	\$ 3,558,954.35	Schedule A
Accrued Interest Rec. (To be paid 8/01/2016)	2,970.00	Schedule D
Advance Payments to Guaranty Assoc.	39,400,000.00	
FHCF Advance to Guaranty Assoc.	466,553.56	
<b>Total Assets</b>	<b>\$ 43,428,477.91</b>	

**ESTIMATED FUNDS RETAINAGE**

	<u>Value</u>	<u>Reference</u>
Class I - Administrative Claims Retainage for Receiver Expenses Estimate (August 2016 - February 2017)	210,606.00	Schedule B
Discharge Expenses Retainage for records storage, records destruction, tax return prep. & labor	82,000.00	Schedule E
<b>Total Proposed Retainage</b>	<b>292,606.00</b>	

**TOTAL AVAILABLE TO DISTRIBUTE** **\$ 43,135,871.91**

**DISTRIBUTION RECOMMENDATION**

	<u>Claims Value</u>	<u>Less Previous Claims Distributions</u>	<u>Value of Claims Outstanding</u>	<u>Apply Adv. Pmts. to Guaranty Assoc.</u>	<u>Recommended Distribution</u>	<u>% Value of Claims Outstanding</u>	<u>% Value of Gross Filed Claims</u>	<u>Total % of Claims Value Distributed</u>
Class I - Administrative Claims-Guaranty Funds	\$ 5,857,610.17	\$ -	\$ 5,857,610.17	\$ 5,857,610.17	\$ -	100.0000%	100.0000%	100.0000%
Class II - Loss Claims-Guaranty Funds	23,318,057.38	-	23,318,057.38	\$ 23,318,057.38	-	100.0000%	100.0000%	100.0000%
Class II - Loss Claims-Other	953,684.13	-	953,684.13	<del>953,684.13</del>	953,684.13	100.0000%	100.0000%	100.0000%
Class III - Return Premium Claims-Guaranty Funds	32,500,789.63	-	32,500,789.63	10,690,886.01	751,348.36	35.2060%	35.5418%	35.2060%
Class III - Return Premium Claims-Other	4,443,249.09	-	4,443,249.09	<del>4,443,249.09</del>	1,564,290.27	35.2060%	35.5415%	35.2060%
Class IV - Federal Government Claims	14,081.34	-	14,081.34	<del>14,081.34</del>	-	0.0000%	0.0000%	0.0000%
Class V - Employee Claims	20,000.00	-	20,000.00	<del>20,000.00</del>	-	0.0000%	0.0000%	0.0000%
Class VI - General Creditors Claims GA	-	-	-	<del>-</del>	-	0.0000%	0.0000%	0.0000%
Class VI - General Creditors Claims Other	17,973,393.53	-	17,973,393.53	<del>17,973,393.53</del>	-	0.0000%	0.0000%	0.0000%
Class VII - State & Local Government Claims	8,380.80	-	8,380.80	<del>8,380.80</del>	-	0.0000%	0.0000%	0.0000%
Class VIII - Late Filed Claims	897,590.40	-	897,590.40	<del>897,590.40</del>	-	0.0000%	0.0000%	0.0000%
Class IX - Surplus/Other-GA	-	-	-	<del>-</del>	-	0.0000%	0.0000%	0.0000%
Class IX - Surplus/Other Claims	-	-	-	<del>-</del>	-	0.0000%	0.0000%	0.0000%
<b>Totals</b>	<b>\$ 85,986,836.47</b>	<b>\$ -</b>	<b>\$ 85,986,836.47</b>	<b>\$ 39,866,553.56</b>	<b>\$ 3,269,322.76</b>			

**Index to Attached Schedules:**

- Schedule A - Available Cash Projection
- Schedule B - Estimated Funds to be Retained by the Receiver for Discharge of the Estate
- Schedule C - Allocated State Funds Expensed
- Schedule D - Interest Earnings Projection - Pooled Cash
- Schedule E - Receiver Discharge Expenses
- Schedule F - Contributed Equity

**Vanguard Fire & Casualty Co.**  
**Available Cash Projection**  
**Projected for August 2016 Distribution**

	Cash Balance as of May 31, 2016	Jun-16	Jul-16
<b>Beginning Pooled Cash Balance</b>	\$	3,589,188.19	\$ 3,575,152.35
<b>Reinsurance Recovery - Net</b>			
<b>Direct Receiver Expenses (Actual or Estimated)</b>			
Rent-Records, Bank Fees, Postage		1,500.00	1,500.00
<b>Sub-total</b>		<b>1,500.00</b>	<b>1,500.00</b>
<b>Allocated Receiver Expenses (Estimated)</b>			
Labor & Benefits		12,308.00	12,308.00 <sup>1</sup>
Indirect Expenses		5,400.00	5,400.00 <sup>2</sup>
<b>Sub-total</b>		<b>17,708.00</b>	<b>17,708.00</b>
<b>Cash Balance Before Interest Earnings</b>		<b>3,569,980.19</b>	<b>3,555,944.35</b>
<b>Interest Earnings</b>			
<b>Pooled Cash:</b>			
Actual SPIA Earnings for April to be credited on 5/01/2016.		5,172.16	
Estimate based on assumed SPIA APR on the previous month's average Pooled Cash balance (See Schedule D)			3,010.00
<b>Ending Pooled Cash Balance</b>	<b>\$</b>	<b>3,589,188.19</b>	<b>\$ 3,575,152.35</b>
		<b>\$ 3,558,954.35</b>	

**Assumptions for Allocated Receiver Expenses:**

<sup>1</sup> Labor & Benefits: This estimate is based on a four month actual average. Doubled for increased activity leading up to distribution.

February Actual	\$ 3,500.54
March Actual	3,073.71
April Actual	2,326.99
May Actual	15,713.86
Sub-total	24,615.10
4 mth. actual average (rounded)	6,154.00
Doubled for increased activity level	<u>\$ 12,308.00</u>

<sup>2</sup> Indirect Expenses: This estimate is Vanguard's estimated pro rata share of the Receiver's estimated total indirect expenses. The pro rata share calculation is based on Vanguard's estimated total assets divided by the Receiver's estimated total assets for all receiverships.

Estimated Total Asset %	3.00%
Estimated Total for the Receiver	\$ 180,000.00
Estimated Expense (rounded)	<u>\$ 5,400.00</u>

**Vanguard Fire & Casualty Co.**  
 Estimated Funds to be Retained by the Receiver for Discharge of the Estate  
 Estimated from August 2016 through the Projected Discharge Date of February 2017

	July	August	September	October	November	December	January 2017	February 2017	Retainage Calculation
<b>Beginning Cash Balance</b>	<del>3,575,152.35</del>	\$ 3,575,152.35	\$ 248,621.59	\$ 220,503.59	\$ 195,495.59	\$ 170,457.59	\$ 145,399.59	\$ 120,321.59	
<b>Direct Receiver Expenses</b>									
Records Storage, Bank Fees, Postage		29,500.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	2,000.00	
<b>Sub-total</b>		<u>29,500.00</u>	<u>2,000.00</u>	<u>2,000.00</u>	<u>2,000.00</u>	<u>2,000.00</u>	<u>2,000.00</u>	<u>2,000.00</u>	\$ 41,500.00
<b>Allocated Receiver Expenses</b>									
Labor & Benefits		22,308.00	22,308.00	22,308.00	22,308.00	22,308.00	22,308.00	22,308.00	1
Indirect Expenses		5,400.00	5,400.00	900.00	900.00	900.00	900.00	900.00	2
<b>Sub-total</b>		<u>27,708.00</u>	<u>27,708.00</u>	<u>23,208.00</u>	<u>23,208.00</u>	<u>23,208.00</u>	<u>23,208.00</u>	<u>23,208.00</u>	\$ 171,456.00
<b>Claims Distribution (Approx.)</b>		<u>3,269,322.76</u>							
<b>Cash Balance Before Interest Earnings</b>		248,621.59	218,913.59	195,295.59	170,287.59	145,249.59	120,191.59	95,113.59	
<b>Interest Earnings</b>									
Estimate based on assumed SPIA APR on the previous month's average Pooled Cash balance (See Schedule D).			1,590.00	200.00	170.00	150.00	130.00	110.00	\$ 2,350.00
<b>Projected Ending Cash Balance</b>	<del>\$ 3,575,152.35</del>	<u>\$ 248,621.59</u>	<u>\$ 220,503.59</u>	<u>\$ 195,495.59</u>	<u>\$ 170,457.59</u>	<u>\$ 145,399.59</u>	<u>\$ 120,321.59</u>	<u>\$ 95,223.59</u>	
<b>Retainage for Receiver's Expenses</b>									<u>\$ 210,606.00</u>

**Assumptions for Allocated Receiver Expenses:**

<sup>1</sup> Labor & Benefits: This estimate is based on a four month actual average adjusted for increased labor through distribution due to the large volume of checks to be processed and issued (estimated 40-50,000).

February Actual	\$ 3,500.54
March Actual	3,073.71
April Actual	2,326.99
May Actual	15,713.86
Sub-total	<u>24,615.10</u>
4 mth. actual average (rounded)	\$ 6,154.00
Adjusted for increased distribution activity and high volume of distribution checks	<u>\$ 22,308.00</u>

<sup>2</sup> Indirect Expenses: This estimate is Vanguard's estimated pro rata share of the Receiver's estimated total indirect expenses. The pro rata share calculation is based on Vanguard's estimated total assets divided by the Receiver's estimated total assets for all receiverships.

	Before Distribution	After Distribution
Estimated Total Asset %	3.00%	0.50%
Estimated Total for the Receiver	<u>\$ 180,000.00</u>	<u>\$ 180,000.00</u>
Estimated Expense (rounded)	<u>\$ 5,400.00</u>	<u>\$ 900.00</u>

<sup>3</sup> The July 2016 interest is not included in the 'Retainage Calculation' as it is included as Accrued Interest in the Estimated Assets at July 31, 2016 on the Distribution Accounting Statement.

**Vanguard Fire & Casualty Co.**  
**Allocated State Funds Expensed**  
**Estimated from June 2016 through the Projected Discharge Date of February 2017**  
**THIS STATEMENT INCLUDED FOR INFORMATION PURPOSES ONLY - AMOUNTS NOT PART OF DISTRIBUTION CALCULATION**

	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Totals
<b>Accrued Allocated State of Florida Expenses (Estimated)</b>										
Labor & Benefits	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ - <sup>1</sup>	\$ -
Indirect Expenses	450.00	450.00	450.00	450.00	5.00	5.00	5.00	5.00	5.00 <sup>2</sup>	1,825.00
<b>Total</b>	<b>\$ 450.00</b>	<b>\$ 450.00</b>	<b>\$ 450.00</b>	<b>\$ 450.00</b>	<b>\$ 5.00</b>	<b>\$ 5.00</b>	<b>\$ 5.00</b>	<b>\$ 5.00</b>	<b>\$ 5.00</b>	<b>\$ 1,825.00<sup>3</sup></b>

**Assumptions for Allocated State of Florida Expenses:**

<sup>1</sup> Labor & Benefits: This estimate is based on a four month actual average doubled for increased labor activity during the distribution period.

February Actual	-
March Actual	-
April Actual	-
May Actual	-
Sub-total	-
4 mth. actual average (rounded)	\$ -
Doubled for increased distribution activity	\$ -

<sup>2</sup> Indirect Expenses: This estimate is Vanguard's estimated pro rata share of the Receiver's estimated total indirect expenses. The pro rata share calculation is based on Vanguard's estimated total assets divided by the Receiver's estimated total assets for all receiverships.

	<u>Before Distribution</u>	<u>After Distribution</u>
Estimated Total Asset %	3.00%	0.03%
Estimated Total for the State	\$ 15,000.00	\$ 15,000.00
Estimated Expense (rounded)	\$ 450.00	\$ 5.00

<sup>3</sup> Per current Receiver policies and procedures, these accumulated amounts are recorded directly against estate equity as opposed to a liability account.

**Vanguard Fire & Casualty Co.**  
**Interest Earnings Projection - Pooled Cash**  
**Projected for August 2016 Distribution**

<b><u>Interest accrued for June 2016</u></b>	
Beginning cash balance at 6/01/2016	3,589,188.19
Ending cash balance at 6/30/2016	3,575,152.35
Average cash balance for June	3,582,170.27
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	35,821.70
<b>Accrual for June</b>	<b>\$ 2,990.00</b>
<b><u>Interest accrued for July 2016</u></b>	
Beginning cash balance at 7/01/2016	3,575,152.35
Ending cash balance at 7/31/2016	3,558,954.35
Average cash balance for July	3,567,053.35
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	35,670.53
<b>Accrual for July</b>	<b>\$ 2,970.00</b>
<b><u>Interest accrued for August 2016</u></b>	
Beginning cash balance at 8/01/2016	3,575,152.35
Ending cash balance at 8/31/2016	248,621.59
Average cash balance for August	1,911,886.97
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	19,118.87
<b>Accrual for August</b>	<b>\$ 1,590.00</b>
<b><u>Interest accrued for September</u></b>	
Beginning cash balance at 9/01/2016	248,621.59
Ending cash balance at 9/30/2016	220,503.59
Average cash balance for September	234,562.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	2,345.63
<b>Accrual for September</b>	<b>\$ 200.00</b>
<b><u>Interest accrued for October 2016</u></b>	
Beginning cash balance at 10/01/2016	220,503.59
Ending cash balance at 10/31/2016	195,495.59
Average cash balance for October	207,999.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	2,080.00
<b>Accrual for October</b>	<b>\$ 170.00</b>
<b><u>Interest accrued for November 2016</u></b>	
Beginning cash balance at 11/01/2016	195,495.59
Ending cash balance at 11/30/2016	170,457.59
Average cash balance for November	182,976.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	1,829.77
<b>Accrual for November</b>	<b>\$ 150.00</b>
<b><u>Interest accrued for December 2016</u></b>	
Beginning cash balance at 12/01/2016	170,457.59
Ending cash balance at 12/31/2016	145,399.59
Average cash balance for December	157,928.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	1,579.29
<b>Accrual for December</b>	<b>\$ 130.00</b>
<b><u>Interest accrued for January 2017</u></b>	
Beginning cash balance at 1/01/2017	145,399.59
Ending cash balance at 1/31/2017	120,321.59
Average cash balance for January	132,860.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	1,328.61
<b>Accrual for January</b>	<b>\$ 110.00</b>
<b><u>Interest accrued for February 2017</u></b>	
Beginning cash balance at 2/01/2017	120,321.59
Ending cash balance at 2/29/2017	95,223.59
Average cash balance for February	107,772.59
Assumed SPIA interest rate (Annualized)	1.00%
Subtotal (Annualized)	1,077.73
<b>Accrual for February</b>	<b>\$ 90.00</b>

**Vanguard Fire & Casualty Co.**  
**Receiver Discharge Expenses**  
**Projected for August 2016 Distribution**

**Discharge Expenses (Projected for Post 2/28/2017)**

Records Storage, Labor, Scanning Permanent Records,  
Unclaimed Property Scanning and Holders Rpts  
2015-2017 Tax Return Preparation

82,000.00

**Total**

**\$ 82,000.00**

**Vanguard Fire & Casualty Co.**  
**Statement of Contributed Equity from Regulatory Trust Fund Estimated Balances**  
**Projected for Discharge by 2/28/2017**

<b>Contributed Equity Balance as of 5/31/2016</b>		\$ 347,701.99
Accrual for June - February 2017 (Estimate from Schedule C)	<u>\$ 1,825.00</u>	
<b>Total</b>		<u>\$ 1,825.00</u>
<b>Projected Contributed Equity Balance as of 2/28/2017</b>		<u><u>\$ 349,526.99</u></u>