

Protecting Your Paycheck: Charlie Crist's Plan to Reverse Rick Scott's Hikes to Property Insurance

Rick Scott Forces Floridians to Pay More for Less

Charlie Crist knows that the high cost of property insurance can drain household finances and stifle business growth. As the People's Governor, Charlie Crist always put the interests of Floridians before big corporations, lobbyists, and other special interests. During his first term, Charlie took on the insurance companies to lower the cost of insurance and protect Floridians' policies. Rick Scott, in a sharp contrast, has used the power of the Governor's Office to help his insurance industry donors and their wealthy cronies, while forcing Florida property owners to bear the brunt of anti-consumer policies. Under Rick Scott, property insurance costs have risen and coverage has been reduced. In other words, **Floridians are paying more money for less coverage:**

Comparing Records ON PROPERTY INSURANCE		
	CHARLIE CRIST	RICK SCOTT
Average Premiums for Personal Residential Property¹	 Decreased by \$161, or 10%	 Increased by \$214, or 14%. Premiums have gone up every year under Scott.
Florida's national ranking in cost of premiums²	 Fell (from #1 to #3)	 Increased (from #3 to #1). Florida now has the most expensive homeowners' insurance in the nation.
Average Premiums for Citizen Residential Property Policyholders³	 Decreased by \$547, or \$21	 Increased by \$309, or 15%
Scope of property coverage (including windstorm and sinkhole coverage) ⁴	 Better!	 Worse. Policies no longer cover attached structures such as pool cages, decks, fences, or patios.
Cost of coverage (%premium to exposure) ⁵	 Decreased (0.53% to 0.47%)	 Increased (0.47% to 0.55%)

Figure 1.

Floridians say that **property insurance costs are the number one hindrance to business growth and the number one drain on a family's household finances.**⁶ As such, Rick Scott should be fighting to keep those costs down.

However, the legislation signed into law by Rick Scott has been a boon for insurance companies, not for Floridians. In fact, homeowner insurance in our state is now so expensive that Floridians on average are paying twice as much as the rest of the United States.⁷

"A new report ranks Florida as the most expensive state in the nation for home insurance, a dubious distinction that is straining homeowners' budgets and increasingly threatening the state's economy."

[Sarasota Herald-Tribune, 12/17/2013]

According to data published by the National Association of Insurance Commissioners, the average premium for a standard homeowner's (HO-3) policy in Florida is now \$1,933.⁸ **Under Rick Scott, Floridians are paying an average of \$543 more in standard homeowner's insurance than they did when Charlie Crist protected them from rate increases.**⁹

A news article featured in the *Sarasota Herald-Tribune* highlights the problem, saying that Florida's record high insurance rates are "straining homeowners' budgets and increasingly threatening the state's economy."¹⁰ Floridians need a Governor who understands the importance of keeping insurance rates low. Figure 2 shows that Gov. Crist's policies reduced insurance premiums for homeowners, while Rick Scott's favors to the insurance industry have caused Floridians to pay more for their residential property insurance.

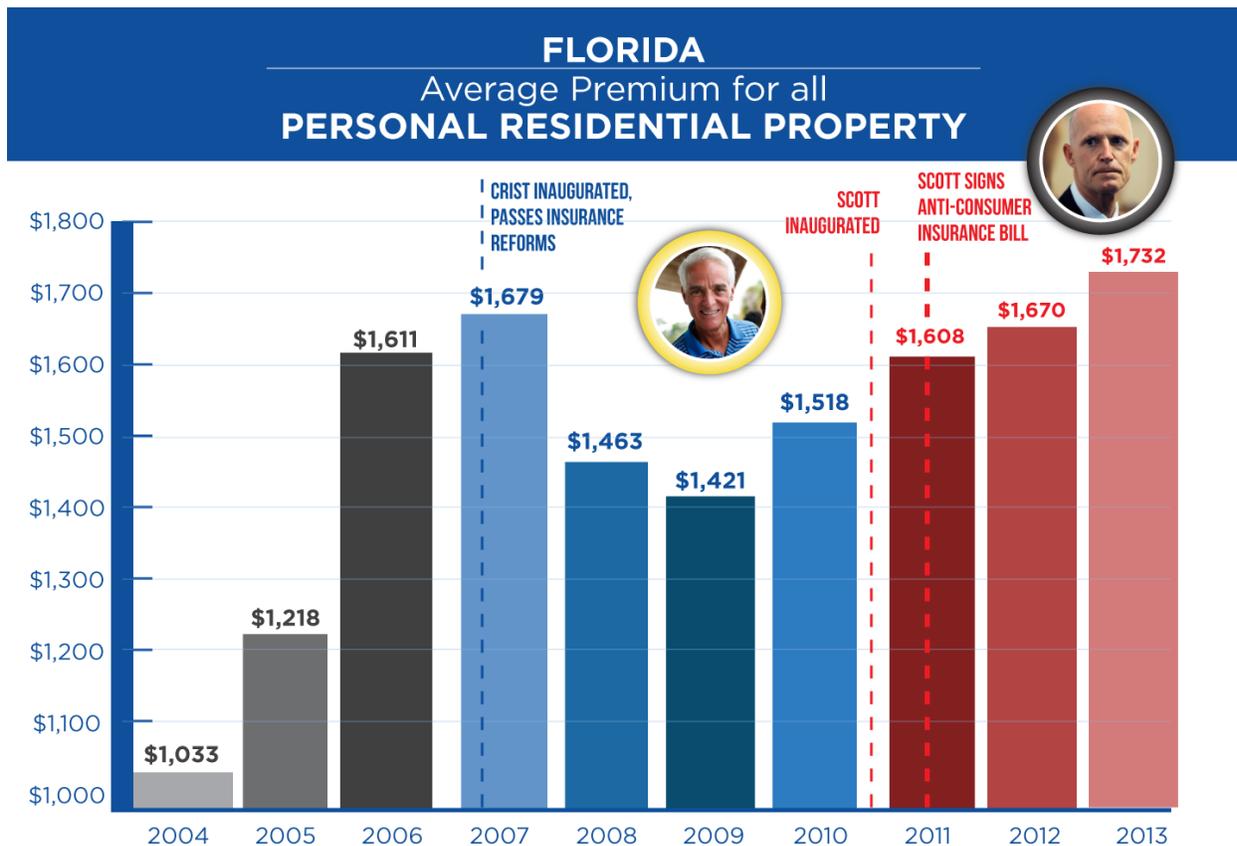


Figure 2: Source: Florida Office of Insurance Regulation. History (Per Quasr) of Personal Residential Property. Includes Citizens.

The rise of insurance premiums in Figure 2 demonstrates the increased financial burden placed upon homeowners since Rick Scott became Governor. However, it doesn't reveal the value, or the amount of coverage, that those premiums purchase.

During Scott's tenure premiums rose while the amount of coverage declined.¹¹ In other words, **under Rick Scott, homeowners are paying higher premiums for less coverage.**¹²

To measure the cost of coverage, insurance experts use a metric called the 'percent premium to exposure', which measures how much premium is required to insure a given amount of property value. Figure 3 shows that under Gov. Crist, the percent of premium to exposure decreased; homeowners got more coverage value from their premiums. Under Rick Scott, however, the cost of coverage has increased every year, reaching the same levels experienced during the insurance rate crisis.

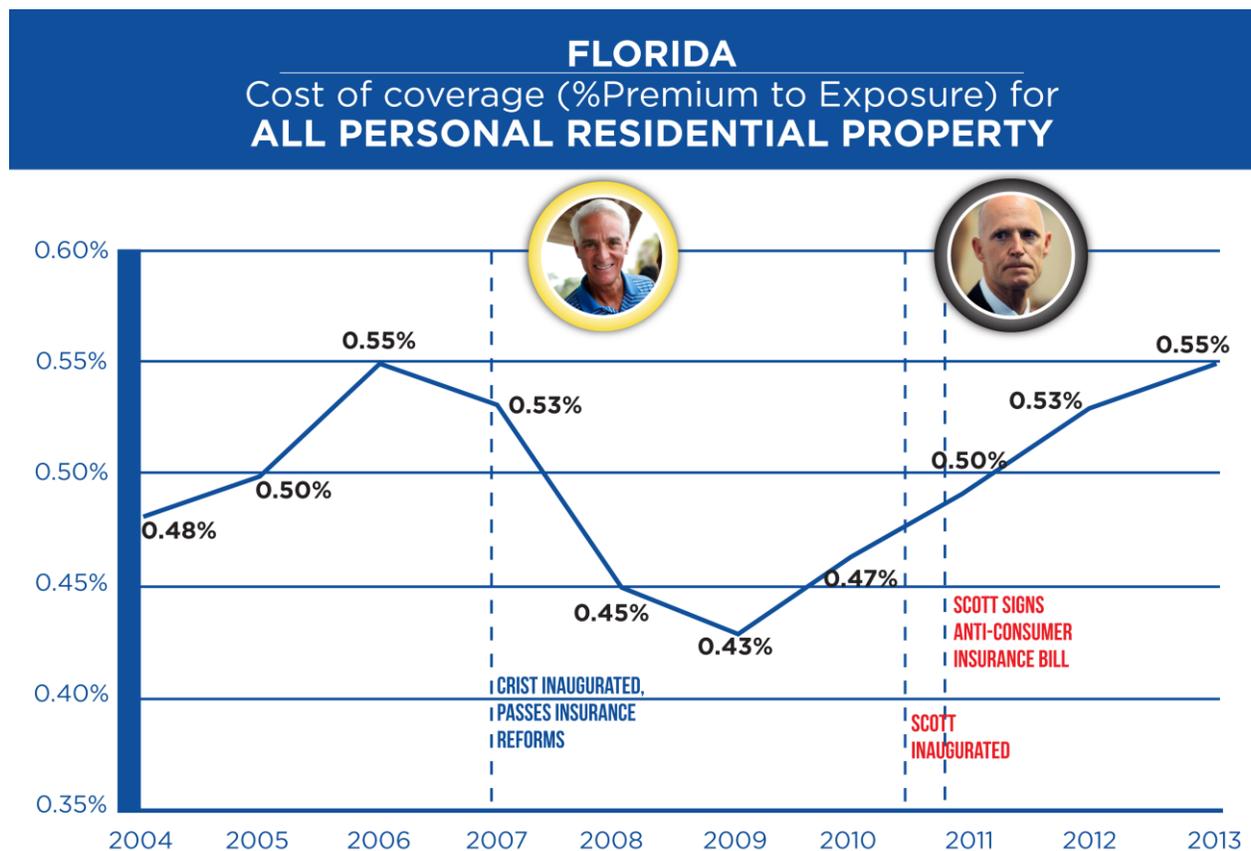


Figure 3. Source: Florida Office of Insurance Regulation. History (Per Quasr) of Personal Residential Property. Includes Citizens.

Charlie Crist's Record of Protecting Floridians from Premium Increases and Coverage Reductions

In January 2007, as Charlie was taking his oath of office for his first term as Florida's Governor, the state was in the midst of a homeowners' insurance rate crisis.¹³ After eight hurricanes in 2004 and 2005, private insurers had drastically raised rates and some were leaving the state. Gov. Crist was

determined to save our insurance market so that Florida's families and businesses had insurance coverage and that the coverage was both reliable and affordable.

Beginning with the first few weeks of his term and throughout his entire four years as Governor, Charlie proudly built a record of fighting for the best interests of Florida's policyholders:

- **Charlie successfully reduced insurance premiums.** One of Gov. Crist's first official acts as Governor was to order the legislature into an emergency special session to save Floridians from skyrocketing insurance rates. Working in partnership with both Republicans and Democrats in the legislature, Gov. Crist put property insurance on firm ground with a set of sweeping reforms that reduced premiums and maintained coverage.

“Democratic candidate Charlie Crist moved aggressively to hold down property insurance rates when he was in the governor's mansion.”

[*Gainesville Sun*, [12/17/2013](#). Originally appeared in the *Sarasota Herald-Tribune*, [12/17/03](#)]

But Charlie didn't stop there. One week after the session ended and the insurance reforms were passed, Gov. Crist froze insurance rates and blocked insurance companies from canceling policies while the law was pending.¹⁴ "It's fundamental that we make sure no policies are canceled and we make sure that no rate increases are slipped under the door before this law becomes effective," he said at the time.¹⁵

Although the legislation passed in January 2007, it could only take effect on renewals or new policies which came up after the effective date. There were many different effective dates in the bill, and the insurers required many months to calculate what the new rates would be. The rate reduction began in late 2007, and reduced rates in subsequent years. 2008 was the first full year under Charlie's plan, and average premiums and the cost of insurance coverage (referred to within the industry as "the percent of premium to exposure") decreased under Charlie. **Because of Gov. Crist's insurance reforms, average premiums fell by 10% during his term.**¹⁶

Later, in 2010, Governor Crist vetoed a bill that could have led to increased premiums.¹⁷ In his veto message, Gov. Crist said that "during these very difficult economic times, Florida's consumers should not have to be concerned with an additional premium increase to their policy."¹⁸

The Miami Herald Editorial Board agreed, saying the bill would have "opened the door to a rollback of premium discounts based on home improvements made by homeowners" and called it a "bad idea"¹⁹.

- **Charlie protected homeowners and businesses from unregulated rate hikes.** In 2009, Gov. Crist vetoed HB 1171 – deceptively called the "Consumer Choice" bill – which would have allowed large insurance companies to charge Florida's homeowners and businesses anything they wanted.

“Although the legislation (HB 1171) was called the "consumer choice" bill, it actually would have allowed about 40 of the largest property insurers to start charging virtually any price they want for policies with hurricane coverage, and to bypass regulations the state imposes on other companies.”

[*Sun-Sentinel*, [6/25/2009](#)]

Gov. Crist wrote in his veto message that "the bill actually gives the 'choice' to a select group of property insurance companies and allows them to decide who they are willing to sell a non-regulated policy."²⁰

- **Charlie refused to hand over funds from Citizens policy holders to private insurers.** In 2008, Charlie vetoed a legislative initiative that would have handed \$250 million from Citizens Property Insurance to start-up private insurers.²¹

Rick Scott's Favors for the Insurance Industry have Cost Floridians More

Under Rick Scott, Florida's insurance premiums have risen every year and are now the most expensive in the United States. The average rate is almost \$1,933 per home -- twice the national average.²² This is up 25% from \$1,544, the average rate during at the beginning of Gov. Scott's term.²³ Insurance companies continue to ask for steep price increases despite the fact they are making huge profits.²⁴ Their coverage continues to shrink.

As Governor, Rick Scott has amassed a dismal record of helping the insurance industry at the expense of Florida policyholders:

- **Rick Scott made it harder for policyholders to recover losses.** In 2011, Rick Scott signed SB 408, an anti-consumer, pro-insurer bill that was similar to the one Charlie vetoed in 2010. The new law made it harder for residential and commercial property owners to recover losses. It shortened the statute of limitations for policyholders to bring claims for sinkhole, hurricane, or other natural disasters, and it limited the amounts of recovery in some circumstances to the actual cash value (the value of the property minus depreciation) instead of the replacement costs.²⁵

"Unlike the changes pushed through a willing GOP Legislature by then-Gov. Charlie Crist in 2007, these [SB 408] reforms are largely industry-friendly."

[Florida Times-Union, 4/10/11]

The changes have been a boon to insurance companies, since it made it more difficult for Floridians to recover the value of their property. Citizens Insurance, for example, estimated a 54.7% reduction in payments to policyholders with sinkhole damage.²⁶

- **Rick Scott reduced the amount of insurance coverage.** Rick Scott's new law has given insurers free reign to adopt more restrictive policies that reduce coverage and expose Floridians to more risk. Since the law's enactment, insurers have continued to reduce the amount of coverage they offer to homeowners. For example:
 - In 2011, Citizens Property Insurance announced it would drop coverage for almost everything but the primary building. Secondary structures such as awnings, gazebos, and most carports and screened-in pool enclosures would no longer be covered under its policies.²⁷

- In 2012 State Farm eliminated hurricane coverage for attached structures, such as pool cages, fences, decks, patios, etc.²⁸
- In 2013 Universal stopped paying replacement cost on damages for some of its policies. It pays only the actual cash value until the insured has first used his/her own funds to pay for all of the repairs.²⁹ For many policyholders this is difficult or impossible to do.
- **Rick Scott allowed insurance companies to increase deductibles.** In signing SB 408, Rick Scott allowed insurers to increase sinkhole coverage deductibles to as much as 10%. Most insurers today, including two of the three largest in Florida, now only write policies with a 10% deductible on sinkhole premiums.³⁰ Such a large deductible results in a substantial decrease in coverage.
- **Under Rick Scott, insurance companies reap huge profits but continue to seek higher rates.** With no hurricane activity in 2013, Florida's insurance companies had an incredibly profitable year. The top 10 Florida-based property insurers, for example, made "\$283 million in net underwriting profits through the third quarter of 2013."³¹ And yet, they still requested rate increases. In fact, as of October 2013, 69% of the rate requests from insurers were for increases.³²

The massive changes in favor of the insurance industry should have resulted in a substantial decrease in premiums. Reinsurance (which is insurance purchased by insurers) makes up approximately 40-50% of the cost of the average homeowner's insurance policy in Florida.³³ Reinsurance rates have plummeted in the last two years and again this year, but we have seen no corresponding reduction in property insurance rates.³⁴ Republican CFO Jeff Atwater asked this question in October 2013, and yet homeowner's rates still continued to climb.³⁵

"Year after year, insurance companies have been telling their customers and the Legislature that the "simple" explanation for the higher rates they are charging was due to reinsurance costs going up. Furthermore, they made representations that if reinsurance rates were to fall they would pass those savings along to their customers. But now that insurance companies are experiencing a significant decrease in the cost of their reinsurance, they are not lowering rates for consumers."

[Letter from Florida CFO Jeff Atwater to Florida Insurance Commissioner Kevin McCarty, 10/29/13]

In fact, reinsurance rates have gone down even further since Atwater asked about it, but there has still been no reduction in homeowner's rates.³⁶

- **Rick Scott rakes in campaign cash from his insurance company cronies who receive millions of dollars in taxpayer-funded giveaways.** Rick Scott is bending over backwards to help the insurance companies, and Florida policyholders are paying for it:
 - **Fledgling new insurance company donates \$110,000 to Rick Scott and then receives \$52 million from Citizens' coffers.** Just two months after donating \$110,000 to Rick Scott's reelection campaign, Heritage Property and Casualty Insurance Co., a St. Petersburg company which opened just nine months beforehand, was paid a whopping \$52

million to take over 60,000 policies from Citizens.³⁷ To make matters worse, Heritage was paid to assume claims that went back to January 2013.³⁸ Since it could cherry-pick the policies it wanted, it was able to purchase only the most profitable policies – those which had no claims pending.³⁹

As noted by the *Tampa Bay Times*, “critics see the campaign cash and lobbying by Heritage as evidence that Citizens and Scott are tapping the insurer’s \$6.4 billion surplus for special giveaways to politically connected companies.”⁴⁰ Rick Scott’s staff denied any involvement in the decision, although emails show they knew about the giveaway in advance.⁴¹ Even Republican legislators expressed concern over the deal: Senate President Don Gaetz (R-Destin) said the agreement needed a “thorough investigation”.⁴² State Representative Frank Artiles (R-Miami), an outspoken critic of the deal, said “it appears they are charging us more while doing less.”⁴³

“Critics see the campaign cash and lobbying by Heritage as evidence that Citizens and Scott are tapping the insurer’s \$6.4 billion surplus for special giveaways to politically connected companies.”

[*Tampa Bay Times*, [5/21/2013](#)]

As Governor, Charlie Crist vetoed a similar giveaway that would have handed \$250 million from Citizens Property Insurance to start-up private insurers.⁴⁴

- **Law firm with ties to Rick Scott’s crony had “no particular expertise in property insurance” but received a \$6.5 million contract from Citizens.**⁴⁵ In January 2014, Citizens signed with Ackerman, Link & Sartory a contract that was supposed to bring down the cost of handling claims lawsuits.⁴⁶ Though the law firm had “no particular expertise in property insurance,” its contract hourly fee of \$525 outpaced all other competitors.⁴⁷ The next highest hourly rate was \$360.⁴⁸ The law firm’s total fee – up to \$6.5 million over four years – isn’t tied to any specific amount of savings to Citizens or any number of cases to be closed.⁴⁹

At a Citizens meeting after the contract was signed, there was no mention of the firm’s close ties to Rick Scott’s ally and neighbor, Tom Grady.⁵⁰ As recently as 2010, Grady was a paid ‘of counsel’ attorney of Ackerman, Link & Sartory, and he served as interim Citizens President when the first contract was bid in an ‘expedited process’.⁵¹

Under Rick Scott, his cronies receive taxpayer-funded giveaways and windfall profits, while he rakes in their campaign donations. At the same time, policyholders receive the brunt of his policies, paying higher premiums to get less coverage.

Florida needs a Governor who will fight for Florida's policyholders

It's tough enough trying to make ends meet -- paying bills, raising a family, living on a fixed income, or getting a business off the ground. Rick Scott and the legislature shouldn't make it harder by letting insurance companies increase their rates in the midst of huge profits.

When Charlie is elected in November, he'll work with the insurance industry, but the people of Florida must come first. We need a Governor who will push to keep insurance rates low and to provide security against reductions in coverage.

As Governor, Charlie will work to make the insurance market strong and fair so that affordable, quality insurance will be available to all Florida families and businesses. He'll make sure insurance policies serve their property owners by keeping costs in line and by fighting against unexpected expenses. Specifically, Governor Crist will:

- a) **Work to lower insurance premiums.** Charlie didn't just talk the talk, he walked the walk. He reduced rates before, and can do it again. For example, Charlie will work to mandate that insurance companies pass reinsurance savings on to consumers.
- b) **Work with common sense members of the legislature to repeal the anti-consumer insurance laws passed by Rick Scott.** Many of the coverage reductions during Rick Scott's tenure as Governor have resulted in little or no rate reductions. First and foremost, an insurance policy must protect the insured consumers.
- c) **Require transparency for all insurers** so that rates, coverage, and information on their participation in Florida insurance markets are open to the public.
- d) **Increase the coverage of the state's Cat fund.** The Florida Hurricane Catastrophe Fund (often called the 'Cat fund') is a state-run reinsurer for every insurance company that provides homeowners' insurance in Florida. Typically, insurance companies purchase reinsurance from both the state-based Cat fund (which is cheap) and from foreign private reinsurers (which is very expensive). By expanding the amount of coverage available from the Cat fund, insurance companies can purchase more reinsurance from the Cat fund and dramatically reduce the cost to homeowners.⁵²
- e) **Advocate for a national Cat fund.** Charlie will push for a national catastrophe fund that would enable our state to provide reinsurance for Citizens and other insurers at much lower rates.

¹ History (Per Quasr) of Personal Residential Property, including Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

² NAIC Annual HO reports, Dwelling Fire and Homeowners Owner-Occupied Average Premiums. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

³ History (Per Quasr) of Personal Residential Property. Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014. For Charlie Crist: \$2,585 (Dec-07) - \$2,038 (Dec-10) = \$547, or 21%. For Rick Scott: \$2,038 (Dec-07) - \$2,347 (Mar-14) = \$309, or 15%.

⁴ "Citizens SB 408 Sinkhole Analysis" Report, which is included in Citizens 2012 rate filing 12-13991, obtained from Florida's Office of Insurance Regulation (<https://apps8.fldfs.com/IFileExternalSearch>), http://articles.sun-sentinel.com/2011-11-03/business/fl-citizens-drops-coverage-20111103_1_citizens-property-insurance-citizens-spokeswoman-christine-ashburn-citizens-president-scott-wallace, State Farm 2012 rate filing 12-11559, obtained from Florida's Office of Insurance Regulation (<https://apps8.fldfs.com/IFileExternalSearch>), Universal 2013 rate filing 13-22777, obtained from Florida's Office of Insurance Regulation (<https://apps8.fldfs.com/IFileExternalSearch>), Universal 2011 rate filing 11-15242, obtained from Florida's Office of Insurance Regulation (<https://apps8.fldfs.com/IFileExternalSearch>), <https://universalproperty.com/docs/Dwelling%20Manual.pdf> and <http://www.tampabay.com/news/business/banking/citizens-homeowners-face-soaring-deductibles-for-sinkhole-repairs/1271353>

⁵ History (Per Quasr) of Personal Residential Property, including Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

⁶ <http://www.floridatoday.com/article/20110410/COLUMNISTS0207/104100318/Matt-Reed-Fear-your-insurance-bill-not-Shariah-law>

⁷ <http://www.heraldtribune.com/article/20131217/ARTICLE/131219638?tc=ar>

⁸ NAIC Annual HO reports, Dwelling Fire and Homeowners Owner-Occupied Average Premiums. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

⁹ NAIC Annual HO reports, Dwelling Fire and Homeowners Owner-Occupied Average Premiums. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014. Comparing the average premium under Rick Scott (\$1,933) with the average premium amount for 2008, the first full year of Gov. Crist's insurance reforms (\$1,390).

¹⁰ <http://www.heraldtribune.com/article/20131217/ARTICLE/131219638?tc=ar>

¹¹ History (Per Quasr) of Personal Residential Property, including Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

¹² History (Per Quasr) of Personal Residential Property, including Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

¹³ Florida governor freezes property insurance rates, *Michael Peltier* Reuters, Tuesday, January 30, 2007; 12:13 PM. <http://www.washingtonpost.com/wp-dyn/content/article/2007/01/30/AR2007013000718.html>

¹⁴ <http://www.washingtonpost.com/wp-dyn/content/article/2007/01/30/AR2007013000718.html>

¹⁵ <http://www.washingtonpost.com/wp-dyn/content/article/2007/01/30/AR2007013000718.html>

¹⁶ History (Per Quasr) of Personal Residential Property, including Citizens. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

¹⁷ <http://www.ocala.com/article/20100602/ARTICLES/100609959?template=printpicart>

¹⁸ http://articles.sun-sentinel.com/2010-06-01/news/fl-insurance-bill-veto-20100601_1_insurance-rate-hikes-property-insurance-premiums

¹⁹ <http://tbo.com/list/news-opinion-editorials/legislators-sticking-it-to-windstorm-insurance-customers-203553>

²⁰ Gov. Charlie Crist's veto message for HB 1171. Dated June 24, 2009.

²¹ http://staugustine.com/opinions/2012-09-12/perspective-citizens-corporate-welfare-puts-consumers-hook#.U_vQ9PldW8A

²² NAIC Annual HO reports, Dwelling Fire and Homeowners Owner-Occupied Average Premiums. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

²³ NAIC Annual HO reports, Dwelling Fire and Homeowners Owner-Occupied Average Premiums. Obtained from the Florida Office of Insurance Regulation per a public records request from former Senator Steve Geller. Received August 21, 2014.

²⁴ Gainesville Sun, "Florida most expensive in nation for home insurance", *Zac Anderson, Tuesday, December 17, 2013 at 6:26 p.m.*

²⁵ Florida Senate Rules Committee Staff Analysis for Senate Bill 408. April 7, 2011.

<http://myfloridahouse.gov/Sections/Documents/loadoc.aspx?FileName=2011s0408.rc.DOCX&DocumentType=Analysis&BillNumber=0408&Session=2011>

²⁶ "Citizens SB 408 Sinkhole Analysis" Report, which is included in Citizens 2012 rate filing 12-13991, obtained from Florida's Office of Insurance Regulation. (<https://apps8.fldfs.com/IFileExternalSearch>)

²⁷ "Citizens SB 408 Sinkhole Analysis" Report, which is included in Citizens 2012 rate filing 12-13991, obtained from Florida's Office of Insurance Regulation. (<https://apps8.fldfs.com/IFileExternalSearch>) Also http://articles.sun-sentinel.com/2011-11-03/business/fl-citizens-drops-coverage-20111103_1_citizens-property-insurance-citizens-spokeswoman-christine-ashburn-citizens-president-scott-wallace

²⁸ State Farm 2012 rate filing 12-11559, obtained from Florida's Office of Insurance Regulation.

<https://apps8.fldfs.com/IFileExternalSearch>

²⁹ Universal 2013 rate filing 13-22777, obtained from Florida's Office of Insurance Regulation.

<https://apps8.fldfs.com/IFileExternalSearch>

³⁰ Universal 2011 rate filing 11-15242, obtained from Florida's Office of Insurance Regulation.

<https://apps8.fldfs.com/IFileExternalSearch> Also, <https://universalproperty.com/docs/Dwelling%20Manual.pdf> and <http://www.tampabay.com/news/business/banking/citizens-homeowners-face-soaring-deductibles-for-sinkhole-repairs/1271353>

³¹ Sarasota Herald Tribune, 5/18/14. <http://www.heraldtribune.com/article/20140518/OPINION/305189999>

³² Sarasota Herald Tribune, 5/18/14. <http://www.heraldtribune.com/article/20140518/OPINION/305189999>

³³ Florida Association for Insurance Reform, "Florida's Property Insurance Market – Lowering Risk and Rates" presentation. Slide 14.

³⁴

<http://www.guycarp.com/content/dam/guycarp/en/documents/PressRelease/2014/Reinsurance%20Pricing%20Falls%20Again%20at%20June%201,%202014%20as%20Competition%20Heightens,%20Guy%20Carpenter%20Reports.pdf>

³⁵ <http://www.myfloridacfo.com/sitePages/newsroom/pressRelease.aspx?ID=4215>

³⁶ <http://www.gccapitalideas.com/2014/06/02/reinsurance-pricing-falls-again-at-june-1-2014-as-competition-heightens/>

³⁷ <http://www.tampabay.com/news/business/banking/sweet-deal-for-state-taxpayers-or-startup-st-pete-insurance-company/2122303>

³⁸ <http://www.tampabay.com/news/business/banking/sweet-deal-for-state-taxpayers-or-startup-st-pete-insurance-company/2122303>

³⁹ <http://www.tampabay.com/news/business/banking/sweet-deal-for-state-taxpayers-or-startup-st-pete-insurance-company/2122303>

⁴⁰ <http://www.tampabay.com/news/business/banking/sweet-deal-for-state-taxpayers-or-startup-st-pete-insurance-company/2122303>

⁴¹ <http://www.abcactionnews.com/news/state/florida-governor-rick-scott-others-knew-in-advance-about-citizens-property-insurance-deal>

⁴² <http://www.abcactionnews.com/news/state/florida-governor-rick-scott-others-knew-in-advance-about-citizens-property-insurance-deal>

⁴³ <http://www.mypalmbeachpost.com/news/business/citizens-critic-lawyers-charging-more-doing-less/nfK5G/>

⁴⁴ http://staugustine.com/opinions/2012-09-12/perspective-citizens-corporate-welfare-puts-consumers-hook#.U_vQ9PIdW8A

⁴⁵ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁴⁶ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁴⁷ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁴⁸ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁴⁹ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁵⁰ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁵¹ <http://www.palmbeachpost.com/news/business/citizens-pays-west-palm-beach-firm-65-million-to-br/ndTn3/>

⁵² Florida Association for Insurance Reform, “Proposed Statutory Changes to the Florida Hurricane Cat Fund” white paper. 2013.