

# MEETING OF THE STATE BOARD OF ADMINISTRATION

GOVERNOR DESANTIS AS CHAIR  
CHIEF FINANCIAL OFFICER PATRONIS  
ATTORNEY GENERAL MOODY

June 12, 2024

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ITEM 1A. A RESOLUTION OF THE STATE BOARD OF ADMINISTRATION APPROVING THE FISCAL SUFFICIENCY OF AN AMOUNT NOT EXCEEDING \$357,100,000 STATE OF FLORIDA, FULL FAITH AND CREDIT, DEPARTMENT OF TRANSPORTATION RIGHT-OF-WAY ACQUISITION AND BRIDGE CONSTRUCTION BONDS, SERIES 2024 (TO BE DETERMINED)

(See Attachment 1A)

ACTION REQUIRED

ITEM 1B. A RESOLUTION OF THE STATE BOARD OF ADMINISTRATION APPROVING THE FISCAL SUFFICIENCY OF AN AMOUNT NOT EXCEEDING \$483,900,000 STATE OF FLORIDA, DEPARTMENT OF TRANSPORTATION TURNPIKE REVENUE BONDS, SERIES 2024 (TO BE DETERMINED)

(See Attachment 1B)

ACTION REQUIRED

ITEM 2A. REQUEST APPROVAL OF DRAFT LETTER TO THE JOINT LEGISLATIVE AUDITING COMMITTEE AFFIRMING "THE SBA TRUSTEES HAVE REVIEWED AND APPROVED THE MONTHLY [FLORIDA PRIME] SUMMARY REPORTS AND ACTIONS TAKEN, IF ANY, TO ADDRESS ANY IMPACTS" FOR THE FIRST QUARTER OF 2024, (SECTION 218.409(6)(a)1, F.S.)

(See Attachment 2A)

ACTION REQUIRED

ITEM 2B. REQUEST APPROVAL OF FLORIDA PRIME 2024 BEST PRACTICES REVIEW

(See Attachment 2B)

ACTION REQUIRED

ITEM 2C. REQUEST APPROVAL OF 2024 LOCAL GOVERNMENT SURPLUS FUNDS TRUST FUND STATUTORY COMPLIANCE REVIEW

(See Attachment 2C)

ACTION REQUIRED

**ITEM 3. REQUEST APPROVAL OF SBA QUARTERLY REPORT REQUIRED BY THE PROTECTING FLORIDA’S INVESTMENTS ACT (PFIA).**

Pursuant to sections 215.442, 215.473, 215.4725, 215.4702, and 215.471 Florida Statutes, the SBA is required to submit a quarterly report that includes lists of “continued examination” and “scrutinized companies” with activities in Sudan and Iran, Anti-BDS, Northern Ireland, Cuba and Syria, and Venezuela.

**(See Attachment 3)**

**ACTION REQUIRED**

**ITEM 4. REQUEST APPROVAL OF THE 2024-2025 FLORIDA HURRICANE CATASTROPHE FUND REIMBURSEMENT PREMIUM FORMULA.**

**(See Attachment 4)**

**ACTION REQUIRED**

**ITEM 5. REQUEST APPROVAL OF, AND AUTHORITY TO FILE, A NOTICE OF PROPOSED RULE FOR FLORIDA HURRICANE CATASTROPHE FUND RULE 19-8.028, F.A.C., REIMBURSEMENT PREMIUM FORMULA, AND TO FILE THIS RULE, ALONG WITH THE INCORPORATED FORM, FOR ADOPTION IF NO MEMBER OF THE PUBLIC TIMELY REQUESTS A RULE HEARING OR IF A HEARING IS REQUESTED AND NO NOTICE OF CHANGE IS NEEDED.**

**(See Attachment 5)**

**ACTION REQUIRED**

**ITEM 6. REQUEST APPROVAL OF THE REVISIONS TO THE INVESTMENT POLICY STATEMENT FOR THE FLORIDA RETIREMENT SYSTEM PENSION PLAN AS REQUIRED UNDER S. 215.475(2), F.S.**

The Investment Policy Statement, required pursuant to s. 215.475, is the principal vehicle through which the Trustees establish an investment objective(s), asset allocation, and address associated policy issues for the FRS Pension Plan.

Adding language to the Investment Policy Statement to clarify investment restrictions pertaining to Florida Statutes and SBA policy and clarify domicile of the High Yield benchmark. Also, additional language is added which conforms with House Bill 7071 – Foreign Investments by the State Board of Administration - effective May 15, 2024. HB 7071 creates a new Section 215.4735, Florida Statutes, which imposes certain limitations on the SBA’s direct investments in Chinese companies as defined under the statute. The statute requires the State Board of Administration to (1) stop making such investments in the future, (2) initiate a review of its current holdings of such investments by June 1, 2024, (3) create a plan by September 1, 2024 for the divestment of such holdings, and (4) complete the divestment of such holdings by September 1, 2025. The Board’s actions taken in compliance with the statute must be adopted and incorporated into the Investment Policy Statement as provided in Section 215.475, Florida Statutes. In conformity with the Statute, the proposed changes to the Investment Policy Statement were presented to the Investment Advisory Council for review on June 10, 2024, for recommendation to the Trustees. The proposed change to the Investment Policy Statement that conforms to HB 7071 will be implemented over a reasonable period of time based on market conditions.

**(See Attachment 6)**

**ACTION REQUIRED**

**ITEM 7. REQUEST APPROVAL OF CHANGES TO THE INVESTMENT POLICY STATEMENT FOR THE FRS DEFINED CONTRIBUTION PLAN**

**(See Attachment 7)**

**ACTION REQUIRED**

**ITEM 8. REQUEST APPROVAL OF THE PROPOSED INVESTMENT POLICY STATEMENT FOR FLORIDA PRIME**

**(SEE ATTACHMENT 8)**

**ACTION REQUIRED**

**ITEM 9. REQUEST APPROVAL OF THE STATE BOARD OF ADMINISTRATION'S PROPOSED BUDGETS FOR FISCAL YEAR 2024-2025: (1) STATE BOARD OF ADMINISTRATION; (2) FRS INVESTMENT PLAN; (3) FLORIDA HURRICANE CATASTROPHE FUND; (4) DIVISION OF BOND FINANCE; AND, (5) FLORIDA PREPAID COLLEGE BOARD.**

**(See Attachment 9)**

**ACTION REQUIRED**

**ITEM 10. QUARTERLY REPORTS PURSUANT TO SECTION 215.44 (2)(e), FLORIDA STATUTES**

- **Introductory Remarks and Standing Reports**
- **Major Mandates Investment Performance Reports**
  - Florida Retirement System Pension Plan (DB)
  - Florida Retirement System Investment Plan (DC)
  - Florida PRIME (Local Government Surplus Funds Trust Fund)
  - Lawton Chiles Endowment Fund (LCEF)
  - Florida Hurricane Catastrophe Fund (FHCF)

**(See Attachment 10)**


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**STATE BOARD OF ADMINISTRATION  
1801 HERMITAGE BOULEVARD  
TALLAHASSEE, FLORIDA 32308**

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**TO:** Lamar Taylor  
**FROM:** Ben Alonzo  
**SUBJECT:** Fiscal Sufficiency  
**DATE:** May 20, 2024



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**APPROVAL OF FISCAL SUFFICIENCY OF AN AMOUNT NOT EXCEEDING  
\$483,900,000 STATE OF FLORIDA, DEPARTMENT OF TRANSPORTATION  
TURNPIKE REVENUE BONDS, SERIES 2024 (TO BE DETERMINED):**

The Division of Bond Finance of the State Board of Administration (the “Division”), on behalf of the State of Florida Department of Transportation (the “Department”), has submitted for approval as to fiscal sufficiency a proposal to issue an amount not exceeding \$483,900,000 State of Florida, Department of Transportation Turnpike Revenue Bonds, Series 2024 (to be determined) (the “Bonds”) for the purpose of financing a portion of the costs of capital improvements to the Turnpike System and to pay costs associated with the issuance and sale of the proposed Bonds. The Bonds will be issued pursuant to the Original Authorizing Resolution adopted on October 25, 1988, as amended and restated on May 17, 2005, and as amended by the Forty-eighth Supplemental Resolution adopted on December 4, 2018, and the Sixty-second Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 12, 2024.

The Division, on behalf of the Department, has heretofore issued Turnpike Revenue and Revenue Refunding Bonds, Series 2012A through 2024B (collectively, the “Outstanding Bonds”). The State Board of Administration has approved the fiscal sufficiency of an amount not exceeding \$275,000,000 Turnpike Revenue Refunding Bonds, Series (to be determined) at its September 21, 2021, meeting, and amount not exceeding \$200,000,000 Turnpike Revenue Refunding Bonds, Series (to be determined) at its March 26, 2024, meeting, of which \$81,555,000 and \$59,470,000, respectively, remains unissued (together, the “Previously Approved Bonds”). Except for the remaining balances of the Previously Approved Bonds, the Division is requesting the rescission of the remaining balance, if any, of fiscal sufficiency approvals for Turnpike Revenue and Revenue Refunding Bonds. The proposed Bonds shall be issued on a parity as to source and security for payment with the Outstanding Bonds, and the unissued portion of the Previously Approved Bonds, when and if issued. The Bonds shall not be secured by a pledge of the full faith and credit or the taxing power of the State of Florida or any political subdivision thereof.

A study of this proposal and the estimates of revenue expected to accrue indicate that the proposed Bonds are fiscally sufficient and that the proposal will be executed pursuant to the applicable provisions of law.

**RECOMMENDATION:** It is recommended that the Board approve the proposal outlined above.

cc: Janie Knight

**A RESOLUTION OF THE STATE BOARD OF ADMINISTRATION  
APPROVING THE FISCAL SUFFICIENCY OF AN AMOUNT NOT EXCEEDING  
\$483,900,000 STATE OF FLORIDA, DEPARTMENT OF TRANSPORTATION  
TURNPIKE REVENUE BONDS, SERIES 2024 (TO BE DETERMINED)**

**WHEREAS**, the Division of Bond Finance of the State Board of Administration (the “Division”) proposes to issue an amount not exceeding \$483,900,000 State of Florida, Department of Transportation Turnpike Revenue Bonds, Series 2024 (to be determined) (the “Bonds”), on behalf of the State of Florida Department of Transportation (the “Department”), for the purpose of financing a portion of the costs of capital improvements to the Turnpike System and to pay costs associated with the issuance and sale of the proposed bonds; and,

**WHEREAS**, the Bonds will be issued pursuant to the Original Authorizing Resolution adopted on October 25, 1988, as amended and restated on May 17, 2005, and as amended by the Forty-eighth Supplemental Resolution adopted on December 4, 2018, and as supplemented by the Sixty-second Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 12, 2024, (together, the “Resolution”); and,

**WHEREAS**, the Division has requested the State Board of Administration to approve the fiscal sufficiency of the proposed bond issue as required by Section 215.73, Florida Statutes; and,

**WHEREAS**, the Division, on behalf of the Department, has heretofore issued Turnpike Revenue and Revenue Refunding Bonds, Series 2012A through 2024B (collectively, the “Outstanding Bonds”); and,

**WHEREAS**, the State Board of Administration has approved the fiscal sufficiency of an amount not exceeding \$275,000,000 Turnpike Revenue Refunding Bonds, Series (to be determined) at its September 21, 2021, meeting, and amount not exceeding \$200,000,000 Turnpike Revenue Refunding Bonds, Series (to be determined) at its March 26, 2024, meeting, of which \$81,555,000 and \$59,470,000, respectively, remains unissued (together, the “Previously Approved Bonds”); and,

**WHEREAS**, the Division has requested the State Board of Administration to rescind its approval of fiscal sufficiency with respect to the remaining balance, if any, of fiscal sufficiency approvals for Turnpike Revenue and Revenue Refunding Bonds, with the exception of the remaining balances of \$81,555,000 and \$59,470,000 for the Previously Approved Bonds; and,

**WHEREAS**, the proposed Bonds shall be issued on a parity as to source and security for payment with the Outstanding Bonds, and the unissued portions of the Previously Approved Bonds, when and if issued; and,

**WHEREAS**, the proposed Bonds shall be secured by a first lien upon Net Revenues of the Turnpike System, which consists of all tolls, revenues, rates, fees, charges, receipts, rents or other income derived from, or in connection with, the operation of the Florida Turnpike, less any necessary contribution to fund the Cost of Maintenance and Cost of Operation after taking into account other sources of funds available to fund the Cost of Maintenance and Cost of Operation; and,

**WHEREAS**, the Department has covenanted to pay the Cost of Maintenance and Cost of Operation of the Turnpike System from moneys in the State Transportation Trust Fund; and,

**WHEREAS**, tolls are required to be fixed, and adjusted if necessary, so that gross revenues shall be sufficient to pay at least (i) 100% of Operation and Maintenance costs; (ii) 120% of the Annual Debt Service Requirement; and (iii) 100% of all other payments required by the Resolution; and,

**WHEREAS**, an examination of this plan of financing indicated that the same will be executed pursuant to the applicable provisions of law, and that the revenue to be used in servicing and liquidating the indebtedness to be created thereby may be reasonably expected to accrue in amounts sufficient to accomplish this purpose; and,

**WHEREAS**, the estimate of toll revenues available indicates that sufficient moneys can be pledged to exceed the debt service requirements of the proposed issue and that in no State fiscal year will the moneys pledged for the debt service requirement of the proposed issue be less than the required coverage amount; and,

**WHEREAS**, the Division has furnished sufficient information to enable the State Board of Administration to fulfill its duties pursuant to Section 215.73, Florida Statutes; and,

**WHEREAS**, the State Board of Administration has relied upon information from others but has not independently verified the accuracy or completeness of such information; and,

**WHEREAS**, the State Board of Administration does not approve or disapprove the Bonds as an investment and has not passed upon the accuracy or adequacy of the Official Statement; **Now, Therefore**,

**BE IT RESOLVED**, by the State Board of Administration of Florida, a constitutional body created by Section 4 of Article IV of the Constitution of the State of Florida, as revised in 1968 and subsequently amended, that pursuant to the requirements of Section 215.73, Florida Statutes, the proposal of the Division of Bond Finance of the State Board of Administration to issue an amount not exceeding \$483,900,000 State of Florida, Department of Transportation Turnpike Revenue Bonds, Series 2024 (to be determined) for the uses and purposes hereinabove set forth, is hereby approved as to fiscal sufficiency. In addition, except for the remaining balances of \$81,555,000 and \$59,470,000 of the Previously Approved Bonds for which fiscal sufficiency was approved on September 21, 2021, and on March 26, 2024, respectively, the approval of fiscal sufficiency with respect to the remaining balance, if any, of fiscal sufficiency approvals for Turnpike Revenue and Revenue Refunding Bonds is hereby rescinded.

**ADOPTED** June 12, 2024

STATE OF FLORIDA )  
  :  
COUNTY OF LEON    )

**I, Lamar Taylor**, Interim Executive Director & CIO of the State Board of Administration of Florida, a constitutional body described in Section 4 of Article IV of the Constitution of the State of Florida, as revised in 1968 and subsequently amended, **DO HEREBY CERTIFY** that the above and foregoing is a true and correct copy of a resolution adopted by said Board at a meeting held June 12, 2024, approving the fiscal sufficiency of an amount not exceeding \$483,900,000 State of Florida, Department of Transportation Turnpike Revenue Bonds, Series (to be determined) and rescinding the approval of fiscal sufficiency with respect to the remaining balance, if any, of fiscal sufficiency approvals for Turnpike Revenue and Revenue Refunding Bonds, except for the remaining balances of \$81,555,000 for the fiscal sufficiency approved on September 21, 2021, and \$59,470,000 for the fiscal sufficiency approved on March 26, 2024.

**IN WITNESS WHEREOF**, I have hereunto set my hand and the seal of said Board at Tallahassee, Leon County, Florida, this 12<sup>th</sup> day of June 2024.

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**Lamar Taylor**, Interim Executive Director & CIO

(SEAL)



**J. BEN WATKINS III**  
DIRECTOR

## STATE OF FLORIDA DIVISION OF BOND FINANCE

**RON DeSANTIS**  
GOVERNOR

**ASHLEY MOODY**  
ATTORNEY GENERAL

**JIMMY PATRONIS**  
CHIEF FINANCIAL OFFICER

**WILTON SIMPSON**  
COMMISSIONER OF AGRICULTURE

May 13, 2024

Mr. Lamar Taylor  
Interim Executive Director  
State Board of Administration  
Post Office Box 13300  
Tallahassee, Florida 32317-3300

RE: Not Exceeding \$483,900,000 State of Florida, Department of Transportation  
Turnpike Revenue Bonds, Series 2024 (to be determined)

Dear Mr. Taylor:

In compliance with Section 215.73, Florida Statutes, the Division of Bond Finance requests State Board of Administration approval as to fiscal sufficiency for the above referenced bonds. We request such approval at your board meeting of June 11, 2024.

The proposed bonds will be payable from the net revenues of the turnpike system on a parity with the outstanding Series 2012A through 2024B Bonds, and the remaining balance of Turnpike Revenue Refunding Bonds, Series (to be determined) of \$81,555,000 and \$59,470,000, previously authorized to be issued for the purpose of refunding the outstanding Turnpike Revenue Bonds, Series 2012A and 2014A for debt service savings, for which fiscal sufficiency was approved on September 21, 2021, and March 26, 2024, when and if issued. The remaining balance of the prior fiscal sufficiency approvals for the Turnpike Revenue Refunding Bonds referenced above should be retained; the remaining balance of any other prior fiscal sufficiency approval for Turnpike Revenue or Revenue Refunding Bonds should be rescinded.

The proposed bonds will be issued to finance a portion of the costs of various capital improvements to the Turnpike System and to pay costs associated with the issuance and sale of the proposed bonds.

The proposed bonds will be issued in one or more series pursuant to the Original Resolution adopted on October 25, 1988, as amended and restated on May 17, 2005, as amended by the Forty-eighth Supplemental Resolution adopted on December 4, 2018, and as supplemented by the Sixty-second Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 11, 2024. Copies of the Original Resolution and the Forty-eighth Supplemental Resolution have previously been provided to you.

May 13, 2024

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The following documents are enclosed for your consideration:

Enclosure 1: an estimated coverage table for the program, including the issuance of the proposed bonds;

Enclosure 2: an estimated debt service schedule for the proposed bonds; and

Enclosure 3: a draft copy of the Sixty-second Supplemental Resolution, which is expected to be adopted on June 11, 2024.

A draft of the fiscal sufficiency resolution should be sent to Whitney Fason and Kristy Mock of this office for review. Should you have any questions, please contact either myself or Kristy Mock at (850) 488-4782. Your consideration of this matter is appreciated.

Very truly yours,

  
J. Ben Watkins III  
Director

JBW:km

Enclosures

cc: Ben Alonzo  
Janie Knight  
Sharon Vice  
Alex Nottingham

**NOT EXCEEDING \$483,900,000**  
**STATE OF FLORIDA**  
**DEPARTMENT OF TRANSPORTATION**  
**TURNPIKE REVENUE BONDS SERIES 2024 (TO BE DETERMINED)**

**ESTIMATED COVERAGE TABLE**

FISCAL YEAR ENDING JUNE 30	HISTORICAL/PROJECTED PLEDGED REVENUES <sup>1</sup>				Estimated \$483,900,000 New Money Debt Service Requested for Approval on June 12, 2024			TOTAL DEBT SERVICE	LESS FEDERAL SUBSIDY <sup>4</sup>	NET DEBT SERVICE	NET DEBT SERVICE COVERAGE
	TURNPIKE SYSTEM REVENUES	OPERATIONS & MAINTENANCE EXPENSES <sup>2</sup>	NET REVENUE	OUTSTANDING DEBT SERVICE	Principal	Interest <sup>3</sup>	Total				
<u>Historical</u>											
2019	\$1,078,094,000	\$238,344,000	\$839,750,000	\$262,541,720				\$262,541,720	(\$3,561,256)	\$258,980,464	3.24 x
2020	995,849,000	242,882,000	752,967,000	251,894,668				251,894,668		251,894,668	2.99 x
2021	1,012,039,000	252,491,000	759,548,000	257,794,504				257,794,504		257,794,504	2.95 x
2022	1,153,380,000	251,867,000	901,513,000	262,947,627				262,947,627		262,947,627	3.43 x
2023	1,179,419,000	262,164,000	917,255,000	273,543,817				273,543,817		273,543,817	3.35 x
<u>Projected</u>											
2024	\$1,301,692,000	\$296,126,000	\$1,005,566,000	\$273,516,706				\$273,516,706		\$273,516,706	3.68 x
2025	1,334,611,000	306,684,000	1,027,927,000	287,728,169	\$6,975,000	\$25,404,750	\$32,379,750	320,107,919		320,107,919	3.21 x
2026	1,360,624,000	314,364,000	1,046,260,000	268,917,821	7,340,000	25,038,563	32,378,563	301,296,384		301,296,384	3.47 x
2027	1,390,425,000	322,239,000	1,068,186,000	268,241,671	7,730,000	24,653,213	32,383,213	300,624,884		300,624,884	3.55 x
2028	1,415,316,000	330,310,000	1,085,006,000	242,159,825	8,135,000	24,247,388	32,382,388	274,542,213		274,542,213	3.95 x
2029	1,439,518,000	338,583,000	1,100,935,000	236,741,975	8,560,000	23,820,300	32,380,300	269,122,275		269,122,275	4.09 x
2030	1,469,059,000	347,063,000	1,121,996,000	232,309,375	9,010,000	23,370,900	32,380,900	264,690,275		264,690,275	4.24 x
2031	1,496,059,000	355,757,000	1,140,302,000	229,830,975	9,485,000	22,897,875	32,382,875	262,213,850		262,213,850	4.35 x
2032	1,519,407,000	364,666,000	1,154,741,000	229,811,050	9,980,000	22,399,913	32,379,913	262,190,963		262,190,963	4.40 x
2033	1,542,960,000	373,802,000	1,169,158,000	229,833,750	10,505,000	21,875,963	32,380,963	262,214,713		262,214,713	4.46 x
2034	1,566,353,000	383,164,000	1,183,189,000	219,376,350	11,055,000	21,324,450	32,379,450	251,755,800		251,755,800	4.70 x
2035	1,566,353,000	383,164,000	1,183,189,000	205,934,200	11,635,000	20,744,063	32,379,063	238,313,263		238,313,263	4.96 x
2036	1,566,353,000	383,164,000	1,183,189,000	205,945,713	12,250,000	20,133,225	32,383,225	238,328,938		238,328,938	4.96 x
2037	1,566,353,000	383,164,000	1,183,189,000	176,230,413	12,890,000	19,490,100	32,380,100	208,610,513		208,610,513	5.67 x
2038	1,566,353,000	383,164,000	1,183,189,000	166,303,763	13,570,000	18,813,375	32,383,375	198,687,138		198,687,138	5.96 x
2039	1,566,353,000	383,164,000	1,183,189,000	166,232,213	14,280,000	18,100,950	32,380,950	198,613,163		198,613,163	5.96 x
2040	1,566,353,000	383,164,000	1,183,189,000	149,091,175	15,030,000	17,351,250	32,381,250	181,472,425		181,472,425	6.52 x
2041	1,566,353,000	383,164,000	1,183,189,000	137,438,069	15,820,000	16,562,175	32,382,175	169,820,244		169,820,244	6.97 x
2042	1,566,353,000	383,164,000	1,183,189,000	132,257,563	16,650,000	15,731,625	32,381,625	164,639,188		164,639,188	7.19 x
2043	1,566,353,000	383,164,000	1,183,189,000	125,949,225	17,525,000	14,857,500	32,382,500	158,331,725		158,331,725	7.47 x
2044	1,566,353,000	383,164,000	1,183,189,000	117,093,463	18,445,000	13,937,438	32,382,438	149,475,900		149,475,900	7.92 x
2045	1,566,353,000	383,164,000	1,183,189,000	110,318,088	19,410,000	12,969,075	32,379,075	142,697,163		142,697,163	8.29 x
2046	1,566,353,000	383,164,000	1,183,189,000	100,278,050	20,430,000	11,950,050	32,380,050	132,658,100		132,658,100	8.92 x
2047	1,566,353,000	383,164,000	1,183,189,000	100,275,000	21,505,000	10,877,475	32,382,475	132,657,475		132,657,475	8.92 x
2048	1,566,353,000	383,164,000	1,183,189,000	100,282,950	22,635,000	9,748,463	32,383,463	132,666,413		132,666,413	8.92 x
2049	1,566,353,000	383,164,000	1,183,189,000	82,169,475	23,820,000	8,560,125	32,380,125	114,549,600		114,549,600	10.33 x
2050	1,566,353,000	383,164,000	1,183,189,000	72,628,788	25,070,000	7,309,575	32,379,575	105,008,363		105,008,363	11.27 x
2051	1,566,353,000	383,164,000	1,183,189,000	63,377,088	26,390,000	5,993,400	32,383,400	95,760,488		95,760,488	12.36 x
2052	1,566,353,000	383,164,000	1,183,189,000	37,298,450	27,775,000	4,607,925	32,382,925	69,681,375		69,681,375	16.98 x
2053	1,566,353,000	383,164,000	1,183,189,000	16,407,800	29,230,000	3,149,738	32,379,738	48,787,538		48,787,538	24.25 x
2054	1,566,353,000	383,164,000	1,183,189,000	16,406,000	30,765,000	1,615,163	32,380,163	48,786,163		48,786,163	24.25 x
					<u>\$483,900,000</u>	<u>\$487,536,000</u>	<u>\$971,436,000</u>				

<sup>1</sup> Numbers are rounded to nearest thousand dollars. Fiscal Years 2019 through 2023 represent audited financial results. Revenues and Expenses for Fiscal Years 2024 through 2034 have been provided by the Turnpike's traffic and revenue consultant as of February 2024. For Fiscal Years after 2034, revenue and expense projections have been held constant. **No representation is made that the amounts shown in any projected fiscal year will be collected.**

<sup>2</sup> The operations and maintenance expenses are paid by the Department of Transportation under an operations agreement and then reimbursed by the Turnpike after debt service. The operations agreement is enforceable by bondholders.

<sup>3</sup> Estimated interest calculated at 5.25%.

<sup>4</sup> Represents federal subsidy payments received for Build America Bonds Series 2009B, adjusted for actual impact for Sequestration through 2019. The Build America Bonds Series 2009B were called and redeemed on July 1, 2019.

## BOND DEBT SERVICE


### Turnpike FY 2024-25 New Money Authorization Estimated Debt Service for Fiscal Sufficiency Approval Request

<i>Period Ending</i>	<i>Principal</i>	<i>Coupon</i>	<i>Interest</i>	<i>Debt Service</i>	<i>Annual Debt Service</i>
01/01/2025			12,702,375.00	12,702,375.00	
07/01/2025	6,975,000.00	5.250%	12,702,375.00	19,677,375.00	32,379,750.00
01/01/2026			12,519,281.25	12,519,281.25	
07/01/2026	7,340,000.00	5.250%	12,519,281.25	19,859,281.25	32,378,562.50
01/01/2027			12,326,606.25	12,326,606.25	
07/01/2027	7,730,000.00	5.250%	12,326,606.25	20,056,606.25	32,383,212.50
01/01/2028			12,123,693.75	12,123,693.75	
07/01/2028	8,135,000.00	5.250%	12,123,693.75	20,258,693.75	32,382,387.50
01/01/2029			11,910,150.00	11,910,150.00	
07/01/2029	8,560,000.00	5.250%	11,910,150.00	20,470,150.00	32,380,300.00
01/01/2030			11,685,450.00	11,685,450.00	
07/01/2030	9,010,000.00	5.250%	11,685,450.00	20,695,450.00	32,380,900.00
01/01/2031			11,448,937.50	11,448,937.50	
07/01/2031	9,485,000.00	5.250%	11,448,937.50	20,933,937.50	32,382,875.00
01/01/2032			11,199,956.25	11,199,956.25	
07/01/2032	9,980,000.00	5.250%	11,199,956.25	21,179,956.25	32,379,912.50
01/01/2033			10,937,981.25	10,937,981.25	
07/01/2033	10,505,000.00	5.250%	10,937,981.25	21,442,981.25	32,380,962.50
01/01/2034			10,662,225.00	10,662,225.00	
07/01/2034	11,055,000.00	5.250%	10,662,225.00	21,717,225.00	32,379,450.00
01/01/2035			10,372,031.25	10,372,031.25	
07/01/2035	11,635,000.00	5.250%	10,372,031.25	22,007,031.25	32,379,062.50
01/01/2036			10,066,612.50	10,066,612.50	
07/01/2036	12,250,000.00	5.250%	10,066,612.50	22,316,612.50	32,383,225.00
01/01/2037			9,745,050.00	9,745,050.00	
07/01/2037	12,890,000.00	5.250%	9,745,050.00	22,635,050.00	32,380,100.00
01/01/2038			9,406,687.50	9,406,687.50	
07/01/2038	13,570,000.00	5.250%	9,406,687.50	22,976,687.50	32,383,375.00
01/01/2039			9,050,475.00	9,050,475.00	
07/01/2039	14,280,000.00	5.250%	9,050,475.00	23,330,475.00	32,380,950.00
01/01/2040			8,675,625.00	8,675,625.00	
07/01/2040	15,030,000.00	5.250%	8,675,625.00	23,705,625.00	32,381,250.00
01/01/2041			8,281,087.50	8,281,087.50	
07/01/2041	15,820,000.00	5.250%	8,281,087.50	24,101,087.50	32,382,175.00
01/01/2042			7,865,812.50	7,865,812.50	
07/01/2042	16,650,000.00	5.250%	7,865,812.50	24,515,812.50	32,381,625.00
01/01/2043			7,428,750.00	7,428,750.00	
07/01/2043	17,525,000.00	5.250%	7,428,750.00	24,953,750.00	32,382,500.00
01/01/2044			6,968,718.75	6,968,718.75	
07/01/2044	18,445,000.00	5.250%	6,968,718.75	25,413,718.75	32,382,437.50
01/01/2045			6,484,537.50	6,484,537.50	
07/01/2045	19,410,000.00	5.250%	6,484,537.50	25,894,537.50	32,379,075.00
01/01/2046			5,975,025.00	5,975,025.00	
07/01/2046	20,430,000.00	5.250%	5,975,025.00	26,405,025.00	32,380,050.00
01/01/2047			5,438,737.50	5,438,737.50	
07/01/2047	21,505,000.00	5.250%	5,438,737.50	26,943,737.50	32,382,475.00
01/01/2048			4,874,231.25	4,874,231.25	
07/01/2048	22,635,000.00	5.250%	4,874,231.25	27,509,231.25	32,383,462.50
01/01/2049			4,280,062.50	4,280,062.50	
07/01/2049	23,820,000.00	5.250%	4,280,062.50	28,100,062.50	32,380,125.00
01/01/2050			3,654,787.50	3,654,787.50	
07/01/2050	25,070,000.00	5.250%	3,654,787.50	28,724,787.50	32,379,575.00
01/01/2051			2,996,700.00	2,996,700.00	
07/01/2051	26,390,000.00	5.250%	2,996,700.00	29,386,700.00	32,383,400.00
01/01/2052			2,303,962.50	2,303,962.50	
07/01/2052	27,775,000.00	5.250%	2,303,962.50	30,078,962.50	32,382,925.00
01/01/2053			1,574,868.75	1,574,868.75	
07/01/2053	29,230,000.00	5.250%	1,574,868.75	30,804,868.75	32,379,737.50
01/01/2054			807,581.25	807,581.25	
07/01/2054	30,765,000.00	5.250%	807,581.25	31,572,581.25	32,380,162.50
	483,900,000.00		487,536,000.00	971,436,000.00	971,436,000.00



**STATE BOARD OF ADMINISTRATION  
1801 HERMITAGE BOULEVARD  
TALLAHASSEE, FLORIDA 32308**

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**TO:** Lamar Taylor  
**FROM:** Ben Alonzo   
**SUBJECT:** Fiscal Sufficiency  
**DATE:** May 20, 2024

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**APPROVAL OF FISCAL SUFFICIENCY OF AN AMOUNT NOT EXCEEDING \$357,100,000 STATE OF FLORIDA, FULL FAITH AND CREDIT, DEPARTMENT OF TRANSPORTATION RIGHT-OF-WAY ACQUISITION AND BRIDGE CONSTRUCTION BONDS, SERIES 2024 (TO BE DETERMINED)**

The Division of Bond Finance of the State Board of Administration (the "Division") has submitted for approval as to fiscal sufficiency a proposal to issue an amount not exceeding \$357,100,000 State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds, Series 2024 (to be determined) (the "Bonds"), in one or more series, for the purpose of financing the acquisition of right-of-way and bridge construction for the Department of Transportation, and to pay costs associated with the issuance and sale of the Bonds. The Bonds will be issued pursuant to an authorizing resolution adopted by the Governor and Cabinet on February 28, 1989, as amended and restated on May 28, 2020, and a Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 12, 2024.

The Bonds to be issued pursuant to Section 17 of Article VII of the State Constitution and Chapter 88-247, Laws of Florida, are to be secured by a pledge of and shall be payable primarily from motor fuel and special fuel taxes, except those defined in Section 9(c) of Article XII of the State Constitution, as provided by law (the "Pledged Gas Taxes"), and shall additionally be secured by the full faith and credit of the State. The Division has heretofore issued State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds and Refunding Bonds, Series 2015A through 2024A (the "Outstanding Bonds"). The Division has additionally requested the State Board of Administration to rescind its approval of fiscal sufficiency with respect to the remaining balance, if any, of prior fiscal sufficiency approvals for Right-of-Way Acquisition and Bridge Construction Bonds or Refunding Bonds. The Bonds will be issued on a parity as to lien and security for payment from the Pledged Gas Taxes with the Outstanding Bonds.

A study of this proposal and the estimates of revenue expected to accrue from the Pledged Gas Taxes, indicate that the proposed Bonds are fiscally sufficient and that the proposal will be executed pursuant to the applicable provisions of law.

**RECOMMENDATION:** It is recommended that the Board approve the proposal outlined above.

cc: Janie Knight

**A RESOLUTION OF THE STATE BOARD OF ADMINISTRATION  
APPROVING THE FISCAL SUFFICIENCY OF AN AMOUNT NOT  
EXCEEDING \$357,100,000 STATE OF FLORIDA, FULL FAITH AND  
CREDIT, DEPARTMENT OF TRANSPORTATION RIGHT-OF-WAY  
ACQUISITION AND BRIDGE CONSTRUCTION BONDS,  
SERIES 2024 (TO BE DETERMINED)**

**WHEREAS**, the Division of Bond Finance of the State Board of Administration (the "Division") proposes to issue an amount not exceeding \$357,100,000 State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds, Series 2024 (to be determined) (the "Bonds"), in one or more series, for the purpose of financing the acquisition of right-of-way and bridge construction for the Department of Transportation, and to pay costs associated with the issuance and sale of the Bonds; and,

**WHEREAS**, during the 1988 Legislative Session, the Florida Legislature passed and submitted to the electors of the State for approval or rejection at the general election held on November 8, 1988, Senate Joint Resolution 391, which created Section 17 of Article VII of the State Constitution, providing for the issuance of bonds pledging the full faith and credit of the State, without a vote of the electors, to finance or refinance the cost of acquiring real property or the rights to real property for State roads as defined by law, or to finance or refinance the cost of State bridge construction, and purposes incidental to such property acquisition or State bridge construction; and,

**WHEREAS**, the majority of the electors of the State approved the creation of Section 17 of Article VII of the State Constitution at the general election held on November 8, 1988; and,

**WHEREAS**, the Florida Legislature also enacted Chapter 88-247, Laws of Florida, which implements the provisions of Section 17 of Article VII of the State Constitution, providing for the issuance of the Bonds by the Division on behalf of the Department of Transportation; and,

**WHEREAS**, the Bonds to be issued pursuant to Section 17 of Article VII of the State Constitution and Chapter 88-247, Laws of Florida, are to be secured by a pledge of and shall be payable primarily from motor fuel and special fuel taxes, except those defined in Section 9(c) of Article XII of the State Constitution, as provided by law (the "Pledged Gas Taxes"), and shall additionally be secured by the full faith and credit of the State; and,

**WHEREAS**, the Bonds will be issued pursuant to an authorizing resolution adopted by the Governor and Cabinet on February 28, 1989, as amended and restated on May 28, 2020, and a Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 12, 2024; and,

**WHEREAS**, the Division has heretofore issued State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds and Refunding Bonds, Series 2015A through 2024A (the "Outstanding Bonds"); and,

**WHEREAS**, the Division has requested the State Board of Administration to rescind its approval of fiscal sufficiency with respect to the remaining balance, if any, of prior fiscal sufficiency approvals for Right-of-Way Acquisition and Bridge Construction Bonds or Refunding Bonds; and,

**WHEREAS**, the Bonds will be issued on a parity as to lien and security for payment from the Pledged Gas Taxes with the Outstanding Bonds; and,

**WHEREAS**, it appears and the Board so finds that this financing will be executed pursuant to the applicable provisions of law, and that the revenue to be used in servicing and liquidating the indebtedness to be created thereby may be reasonably expected to accrue in amounts sufficient to accomplish this purpose; and,

**WHEREAS**, in no State fiscal year will the annual debt service exceed ninety percent (90%) of the Pledged Gas Taxes available for payment of the annual debt service; and,

**WHEREAS**, the Division has furnished sufficient information to enable the State Board of Administration to fulfill its duties pursuant to Section 215.73, Florida Statutes; and,

**WHEREAS**, the State Board of Administration has relied upon information from others but has not independently verified the accuracy or completeness of such information; and,

**WHEREAS**, the State Board of Administration does not approve or disapprove the Bonds as an investment and has not passed upon the accuracy or adequacy of the Official Statement; **Now, Therefore,**

**BE IT RESOLVED**, by the State Board of Administration of Florida, a constitutional body described Section 4 of Article IV of the Constitution of the State of Florida, as revised in 1968 and subsequently amended, that pursuant to the requirements of Section 215.73, Florida Statutes, the proposal of the Division of Bond Finance of the State Board of Administration of Florida to issue an amount not exceeding \$357,100,000 State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds, Series 2024 (to be determined), is hereby approved as to fiscal sufficiency. In addition, the approval of fiscal sufficiency with respect to the remaining balance, if any, of prior fiscal sufficiency approvals for Right-of-Way Acquisition and Bridge Construction Bonds and Refunding Bonds is hereby rescinded.

**ADOPTED** June 12, 2024

STATE OF FLORIDA)  
:  
COUNTY OF LEON )

**I, Lamar Taylor**, Interim Executive Director & CIO of the State Board of Administration of Florida, a constitutional body described in Section 4 of Article IV of the Constitution of the State of Florida, as revised in 1968 and subsequently amended, **DO HEREBY CERTIFY** that the above and foregoing is a true and correct copy of a resolution adopted by said Board at a meeting held June 12, 2024, approving the fiscal sufficiency of an issue of an amount not exceeding \$357,100,000 State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds, Series 2024 (to be determined), and rescinding the approval of fiscal sufficiency with respect to the remaining balance, if any, of prior fiscal sufficiency approvals for Right-of-Way Acquisition and Bridge Construction Bonds and Refunding Bonds.

**IN WITNESS WHEREOF**, I have hereunto set my hand and the seal of said Board at Tallahassee, Leon County, Florida, this 12<sup>th</sup> day of June 2024.

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**Lamar Taylor**, Interim Executive Director & CIO

(SEAL)



**J. BEN WATKINS III**  
DIRECTOR

## **STATE OF FLORIDA DIVISION OF BOND FINANCE**

**RON DeSANTIS**  
GOVERNOR

**ASHLEY MOODY**  
ATTORNEY GENERAL

**JIMMY PATRONIS**  
CHIEF FINANCIAL OFFICER

**WILTON SIMPSON**  
COMMISSIONER OF AGRICULTURE

May 7, 2024

Mr. Lamar Taylor  
Interim Executive Director & CIO  
State Board of Administration  
Post Office Box 13300  
Tallahassee, Florida 32317-3300

RE: Not Exceeding \$357,100,000 State of Florida, Full Faith and Credit, Department of Transportation Right-of-Way Acquisition and Bridge Construction Bonds, Series (to be determined)

Dear Mr. Taylor:

In compliance with Section 215.73, Florida Statutes, the Division of Bond Finance requests State Board of Administration approval as to fiscal sufficiency for the above referenced bonds. We request such approval at your board meeting of June 11, 2024.

The bonds will be payable from pledged gas taxes, consisting of certain motor fuel and diesel fuel taxes, and are additionally secured by the full faith and credit of the State of Florida. The proposed bonds will be payable on a parity with the outstanding Series 2015A through 2024A Bonds. The remaining balance, if any, of prior fiscal sufficiency approvals of Right-of-Way Acquisition and Bridge Construction Bonds or Refunding Bonds should be rescinded. The proposed bonds are being issued to finance the acquisition of real property or the rights to real property for state roads and bridge construction for the Department of Transportation and to pay costs associated with the issuance and sale of the bonds.

The bonds will be issued in one or more series pursuant to the Authorizing Resolution adopted on February 28, 1989, as amended and restated on May 28, 2020, and a Supplemental Resolution expected to be adopted by the Governor and Cabinet on June 11, 2024. A copy of the amended and restated Authorizing Resolution has previously been provided to you.

Enclosed for your review are the following:

Enclosure 1: an estimated coverage schedule based upon the estimated pledged revenues available for debt service;

Enclosure 2: an estimated debt service schedule for the proposed bonds;

Enclosure 3: a schedule showing the estimated Highway Fuel Sales Tax collections (the motor and diesel fuel taxes pledged) as projected by the Florida Consensus Estimating Conference at its January 2024 meeting; and

Enclosure 4: a draft copy of the Supplemental Resolution expected to be adopted on June 11, 2024.

A draft of the fiscal sufficiency resolution should be sent to Whitney Fason and Kristy Mock of this office for review. Should you have any questions, please contact either myself or Kristy Mock at 488-4782. Your consideration of this matter is appreciated.

Very truly yours,



J. Ben Watkins III  
Director

JBW:km

Enclosures

cc: Ben Alonzo  
Janie Knight  
Sharon Vice  
Alex Nottingham

**NOT EXCEEDING \$357,100,000**  
**STATE OF FLORIDA, FULL FAITH AND CREDIT**  
**DEPARTMENT OF TRANSPORTATION**  
**RIGHT-OF-WAY ACQUISITION AND BRIDGE CONSTRUCTION BONDS**  
**SERIES (TO BE DETERMINED)**  
**ESTIMATED SCHEDULE OF COVERAGE ON BONDS**

Fiscal Year Ended June 30	Projected Motor & Diesel Fuel Sales Tax Available for Debt Service <sup>1</sup>	Outstanding Debt Service	Not Exceeding \$357,100,000 Series (to be determined)			Estimated Total Debt Service	Debt Service Coverage <sup>3</sup>	Maximum Allowable Debt Service <sup>4</sup>	Pro Forma Debt Service Coverage <sup>5</sup>
			Principal	Interest <sup>2</sup>	Total				
2024	\$1,865,900,000	\$180,708,493				\$180,708,493	10.33x	\$ 358,519,000	5.20x
2025	1,962,300,000	178,547,994	\$5,150,000	\$18,747,750	\$23,897,750	202,445,744	9.69x	372,260,000	5.27x
2026	2,030,500,000	175,274,744	5,420,000	18,477,375	23,897,375	199,172,119	10.19x	379,855,000	5.35x
2027	2,087,600,000	166,950,244	5,705,000	18,192,825	23,897,825	190,848,069	10.94x	386,736,000	5.40x
2028	2,145,600,000	149,517,244	6,000,000	17,893,313	23,893,313	173,410,556	12.37x	393,603,000	5.45x
2029	2,201,900,000	141,894,369	6,315,000	17,578,313	23,893,313	165,787,681	13.28x	400,491,000	5.50x
2030	2,256,000,000	141,870,344	6,650,000	17,246,775	23,896,775	165,767,119	13.61x	407,260,000	5.54x
2031	2,312,700,000	141,843,644	7,000,000	16,897,650	23,897,650	165,741,294	13.95x	413,609,000	5.59x
2032	2,373,100,000	134,802,794	7,365,000	16,530,150	23,895,150	158,697,944	14.95x	420,490,000	5.64x
2033	2,424,500,000	125,469,694	7,750,000	16,143,488	23,893,488	149,363,181	16.23x	425,000,000	5.70x
2034	2,424,500,000	110,920,094	8,160,000	15,736,613	23,896,613	134,816,706	17.98x	425,000,000	5.70x
2035	2,424,500,000	95,914,069	8,590,000	15,308,213	23,898,213	119,812,281	20.24x	425,000,000	5.70x
2036	2,424,500,000	95,877,200	9,040,000	14,857,238	23,897,238	119,774,438	20.24x	425,000,000	5.70x
2037	2,424,500,000	95,843,213	9,515,000	14,382,638	23,897,638	119,740,850	20.25x	425,000,000	5.70x
2038	2,424,500,000	87,660,969	10,015,000	13,883,100	23,898,100	111,559,069	21.73x	425,000,000	5.70x
2039	2,424,500,000	87,667,306	10,540,000	13,357,313	23,897,313	111,564,619	21.73x	425,000,000	5.70x
2040	2,424,500,000	76,580,306	11,090,000	12,803,963	23,893,963	100,474,269	24.13x	425,000,000	5.70x
2041	2,424,500,000	76,589,906	11,675,000	12,221,738	23,896,738	100,486,644	24.13x	425,000,000	5.70x
2042	2,424,500,000	71,684,106	12,285,000	11,608,800	23,893,800	95,577,906	25.37x	425,000,000	5.70x
2043	2,424,500,000	71,691,056	12,930,000	10,963,838	23,893,838	95,584,894	25.36x	425,000,000	5.70x
2044	2,424,500,000	71,689,256	13,610,000	10,285,013	23,895,013	95,584,269	25.37x	425,000,000	5.70x
2045	2,424,500,000	71,688,731	14,325,000	9,570,488	23,895,488	95,584,219	25.37x	425,000,000	5.70x
2046	2,424,500,000	71,687,119	15,075,000	8,818,425	23,893,425	95,580,544	25.37x	425,000,000	5.70x
2047	2,424,500,000	66,751,275	15,870,000	8,026,988	23,896,988	90,648,263	26.75x	425,000,000	5.70x
2048	2,424,500,000	44,726,638	16,700,000	7,193,813	23,893,813	68,620,450	35.33x	425,000,000	5.70x
2049	2,424,500,000	30,267,406	17,580,000	6,317,063	23,897,063	54,164,469	44.76x	425,000,000	5.70x
2050	2,424,500,000	20,432,656	18,500,000	5,394,113	23,894,113	44,326,769	54.70x	425,000,000	5.70x
2051	2,424,500,000	11,498,194	19,475,000	4,422,863	23,897,863	35,396,056	68.50x	425,000,000	5.70x
2052	2,424,500,000	11,498,063	20,495,000	3,400,425	23,895,425	35,393,488	68.50x	425,000,000	5.70x
2053	2,424,500,000	11,500,606	21,570,000	2,324,438	23,894,438	35,395,044	68.50x	425,000,000	5.70x
2054	2,424,500,000		22,705,000	1,192,013	23,897,013	23,897,013	101.46x	425,000,000	5.70x
			\$357,100,000	\$359,776,725	\$716,876,725				

<sup>1</sup> The bonds are payable from the motor fuel and diesel fuel taxes pursuant to Sections 206.41(g) and 206.87(1)(c), Florida Statutes. The projected motor and diesel fuel tax collections for fiscal years 2024 through 2033 are as adopted by the Florida Consensus Estimating Conference on Transportation Revenues, January 2024. The fiscal year 2033 projections are held constant for future years. **The projections are based on the best information available when the estimates are made, which is believed to be accurate. Projections are statements of opinion and are subject to future events which may cause the actual results to differ materially from those set forth herein. Undue reliance should not be placed on these projections. No representation is made that the amounts shown in any projected fiscal year will be collected.**

<sup>2</sup> Estimated interest calculated at 5.25%.

<sup>3</sup> Coverage has been calculated by dividing the amount of Projected Motor and Diesel Fuel Sales Tax Available for Debt Service by the Estimated Total Debt Service.

<sup>4</sup> Pursuant to Section 206.46(2), Florida Statutes, debt service cannot exceed the lesser of 7% of state revenues transferred to the STTF or \$425 million.

<sup>5</sup> Coverage has been calculated by dividing the amount of Projected Motor and Diesel Fuel Sales Tax Available for Debt Service by the Maximum Allowable Debt Service.

**BOND DEBT SERVICE**

**State of Florida**  
**Full Faith and Credit**  
**Department of Transportation**  
**Right-of-Way Acquisition and Bridge Construction Bonds, Series (TBD)**

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**NTE \$357,100,000 Fiscal Sufficiency Request**

<i>Period Ending</i>	<i>Principal</i>	<i>Coupon</i>	<i>Interest</i>	<i>Debt Service</i>	<i>Annual Debt Service</i>
01/01/2025	-	-	9,373,875.00	9,373,875.00	-
07/01/2025	5,150,000	5.250%	9,373,875.00	14,523,875.00	23,897,750.00
01/01/2026	-	-	9,238,687.50	9,238,687.50	-
07/01/2026	5,420,000	5.250%	9,238,687.50	14,658,687.50	23,897,375.00
01/01/2027	-	-	9,096,412.50	9,096,412.50	-
07/01/2027	5,705,000	5.250%	9,096,412.50	14,801,412.50	23,897,825.00
01/01/2028	-	-	8,946,656.25	8,946,656.25	-
07/01/2028	6,000,000	5.250%	8,946,656.25	14,946,656.25	23,893,312.50
01/01/2029	-	-	8,789,156.25	8,789,156.25	-
07/01/2029	6,315,000	5.250%	8,789,156.25	15,104,156.25	23,893,312.50
01/01/2030	-	-	8,623,387.50	8,623,387.50	-
07/01/2030	6,650,000	5.250%	8,623,387.50	15,273,387.50	23,896,775.00
01/01/2031	-	-	8,448,825.00	8,448,825.00	-
07/01/2031	7,000,000	5.250%	8,448,825.00	15,448,825.00	23,897,650.00
01/01/2032	-	-	8,265,075.00	8,265,075.00	-
07/01/2032	7,365,000	5.250%	8,265,075.00	15,630,075.00	23,895,150.00
01/01/2033	-	-	8,071,743.75	8,071,743.75	-
07/01/2033	7,750,000	5.250%	8,071,743.75	15,821,743.75	23,893,487.50
01/01/2034	-	-	7,868,306.25	7,868,306.25	-
07/01/2034	8,160,000	5.250%	7,868,306.25	16,028,306.25	23,896,612.50
01/01/2035	-	-	7,654,106.25	7,654,106.25	-
07/01/2035	8,590,000	5.250%	7,654,106.25	16,244,106.25	23,898,212.50
01/01/2036	-	-	7,428,618.75	7,428,618.75	-
07/01/2036	9,040,000	5.250%	7,428,618.75	16,468,618.75	23,897,237.50
01/01/2037	-	-	7,191,318.75	7,191,318.75	-
07/01/2037	9,515,000	5.250%	7,191,318.75	16,706,318.75	23,897,637.50
01/01/2038	-	-	6,941,550.00	6,941,550.00	-
07/01/2038	10,015,000	5.250%	6,941,550.00	16,956,550.00	23,898,100.00
01/01/2039	-	-	6,678,656.25	6,678,656.25	-
07/01/2039	10,540,000	5.250%	6,678,656.25	17,218,656.25	23,897,312.50
01/01/2040	-	-	6,401,981.25	6,401,981.25	-
07/01/2040	11,090,000	5.250%	6,401,981.25	17,491,981.25	23,893,962.50
01/01/2041	-	-	6,110,868.75	6,110,868.75	-
07/01/2041	11,675,000	5.250%	6,110,868.75	17,785,868.75	23,896,737.50
01/01/2042	-	-	5,804,400.00	5,804,400.00	-
07/01/2042	12,285,000	5.250%	5,804,400.00	18,089,400.00	23,893,800.00
01/01/2043	-	-	5,481,918.75	5,481,918.75	-
07/01/2043	12,930,000	5.250%	5,481,918.75	18,411,918.75	23,893,837.50
01/01/2044	-	-	5,142,506.25	5,142,506.25	-
07/01/2044	13,610,000	5.250%	5,142,506.25	18,752,506.25	23,895,012.50
01/01/2045	-	-	4,785,243.75	4,785,243.75	-
07/01/2045	14,325,000	5.250%	4,785,243.75	19,110,243.75	23,895,487.50
01/01/2046	-	-	4,409,212.50	4,409,212.50	-
07/01/2046	15,075,000	5.250%	4,409,212.50	19,484,212.50	23,893,425.00
01/01/2047	-	-	4,013,493.75	4,013,493.75	-
07/01/2047	15,870,000	5.250%	4,013,493.75	19,883,493.75	23,896,987.50
01/01/2048	-	-	3,596,906.25	3,596,906.25	-
07/01/2048	16,700,000	5.250%	3,596,906.25	20,296,906.25	23,893,812.50
01/01/2049	-	-	3,158,531.25	3,158,531.25	-
07/01/2049	17,580,000	5.250%	3,158,531.25	20,738,531.25	23,897,062.50
01/01/2050	-	-	2,697,056.25	2,697,056.25	-
07/01/2050	18,500,000	5.250%	2,697,056.25	21,197,056.25	23,894,112.50
01/01/2051	-	-	2,211,431.25	2,211,431.25	-
07/01/2051	19,475,000	5.250%	2,211,431.25	21,686,431.25	23,897,862.50
01/01/2052	-	-	1,700,212.50	1,700,212.50	-
07/01/2052	20,495,000	5.250%	1,700,212.50	22,195,212.50	23,895,425.00
01/01/2053	-	-	1,162,218.75	1,162,218.75	-
07/01/2053	21,570,000	5.250%	1,162,218.75	22,732,218.75	23,894,437.50
01/01/2054	-	-	596,006.25	596,006.25	-
07/01/2054	22,705,000	5.250%	596,006.25	23,301,006.25	23,897,012.50
	357,100,000		359,776,725.00	716,876,725.00	716,876,725.00





**STATE BOARD OF ADMINISTRATION  
OF FLORIDA**

**1801 HERMITAGE BOULEVARD, SUITE 100  
TALLAHASSEE, FLORIDA 32308  
(850) 488-4406**

**POST OFFICE BOX 13300  
32317-3300**

**RON DESANTIS  
GOVERNOR  
CHAIR**

**JIMMY PATRONIS  
CHIEF FINANCIAL OFFICER**

**ASHLEY MOODY  
ATTORNEY GENERAL**

**LAMAR TAYLOR  
INTERIM EXECUTIVE DIRECTOR &  
CHIEF INVESTMENT OFFICER**

June 12, 2024

Representative Michael A. Caruso  
Alternating Chair  
Joint Legislative Auditing Committee  
200 House Office Building  
402 South Monroe Street  
Tallahassee, Florida 32399-1300

Senator Jason W. B. Pizzo  
Alternating Chair  
Joint Legislative Auditing Committee  
222 Senate Office Building  
404 South Monroe Street  
Tallahassee, Florida 32399-1100

Dear Representative Caruso and Senator Pizzo:

Pursuant to section 218.409(6)(a)1, Florida Statutes, the trustees of the State Board of Administration shall "provide quarterly a report to the Joint Legislative Auditing Committee that the trustees have reviewed and approved the monthly reports [Florida PRIME Management Summary] and actions taken, if any, to address any impacts."

Please be advised that the Trustees have reviewed the attached reports and authorized me to convey their action to you. During the period January 1, 2024, through March 31, 2024, there were no material impacts on the trust fund in question and, therefore, no associated actions or escalations.

Please contact me if you have any questions.

Sincerely,

Lamar Taylor  
Interim Executive Director & Chief Investment Officer

**Attachments**

cc: Senator Jason Brodeur  
Senator Tracie Davis  
Senator Nick DiCeglie  
Senator Corey Simon  
Representative Christopher Benjamin  
Representative Peggy Gossset-Seidman  
Representative Dianne "Ms Dee" Hart  
Representative Rachel Lora Saunders Plakon  
Representative Taylor Michael Yarkosky  
Kathy DuBose, Coordinator

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## **MONTHLY SUMMARY REPORT**

**State Board of Administration of Florida**

**January 2024**

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## **Past performance is no guarantee of future results.**

Views are as of the issue date and are subject to change based on market conditions and other factors. These views should not be construed as a recommendation for any specific security.

An investment in Florida PRIME is neither insured nor guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

Although money market funds seek to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in this fund.

## INTRODUCTION

This report is prepared for stakeholders in Florida PRIME in accordance with Section 218.409(6)(a), Florida Statutes. The statute requires:

- (1) Reporting of any material impacts on the funds and any actions or escalations taken by staff to address such impacts;
- (2) Presentation of a management summary that provides an analysis of the status of the current investment portfolio and the individual transactions executed over the last month; and
- (3) Preparation of the management summary “in a manner that will allow anyone to ascertain whether the investment activities during the reporting period have conformed to investment policies.”

This report, which covers the period from January 1, 2024, through January 31, 2024, has been prepared by the SBA with input from Federated Hermes (“Federated”), investment advisor for Florida PRIME in a format intended to comply with the statute.

## DISCLOSURE OF MATERIAL IMPACTS

During the reporting period, Florida PRIME was in material compliance with investment policy. There were no developments that had a material impact on the liquidity or operation of Florida PRIME. Details are available in the PRIME policy compliance table. This report also includes details on market conditions; fees; fund holdings, transactions and performance; and client composition.

### PRIME™ STATISTICS

(As of January 31, 2024)

Total Participants  
**782**

Florida PRIME™  
Total Participant Balance  
**\$28,622,978,398**

Total Number of Accounts  
**1,448**

**FACTS-AT-A-GLANCE** PRIME is an exclusive service for Florida governmental organizations, providing a cost-effective investment vehicle for their surplus funds. Florida PRIME, the Local Government Surplus Funds Trust Fund, is utilized by hundreds of governmental investors including state agencies, state universities and colleges, counties, cities, special districts, school boards, and other direct support organizations of the State of Florida.

Florida PRIME is a government investment pool that offers management by an industry leader in professional money management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting.

## PORTFOLIO MANAGER COMMENTARY

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A busy month of news pertaining to the liquidity markets ended on a high note when the Federal Reserve maintained the target fed funds rate at 5.25-5.50% and pushed the probable first rate hike to late spring at the earliest.

### Degrees of confidence

Fed Chair Jerome Powell returned to the word “confidence” many times in his post-FOMC meeting press conference yesterday. He said the Fed has confidence in the authenticity of inflation’s downward trajectory over the last six months, but needs more. Not sure two months will make that much of a difference, but this stance allows policymakers to sneak in a few more months of “higher for longer.” Think of it as an “insurance pause” lest inflation hovers at present levels for a few readings. While the phrase “reduce the target range” appeared amid the extensive changes to the FOMC statement, Powell slammed the door on any chance of easing in March, saying it is not the “base case.”

His pronouncement means March will be a busy meeting, as Powell revealed the future of QT will also be discussed at length. While Powell characterized it as working well, he acknowledged hearing market rumblings about how the reduction of the Fed’s balance sheet might soon negatively impact liquidity in the Treasury market. This doesn’t mean the Fed will adjust the amount of the security roll-off immediately, but certainly suggests trimming it is on the horizon. Powell affirmed that policymakers could reduce the balance sheet and rates in tandem.

Investing in the front end of the Treasury yield curve improved last month as the markets pushed out forecasts for the first cut past March, a development likely to continue after Powell’s comments yesterday. Trades are now more in line with our firm view of 75 basis points of cuts this year, helping us find more value along the curve than when the fed futures trading called for upwards of six cuts. This should be aided by the U.S. Treasury’s quarterly refunding plans released this week that indicate bill supply will likely remain robust.

### New birds, same cage

The composition of the FOMC changes each year when the presidents of four regional Fed branches have a hockey-like line change. Occasionally, this can shift the alignment of the 12 voting members, but this time the change will be negligible as none of the new voters hold extreme views. We consider Atlanta’s Raphael Bostic a centrist, Cleveland’s Loretta Mester and Richmond’s Tom Barkin as hawkish, and San Francisco’s Mary Daly dovish. Given the momentum the Fed has in this current cycle, the change won’t make much of a difference.

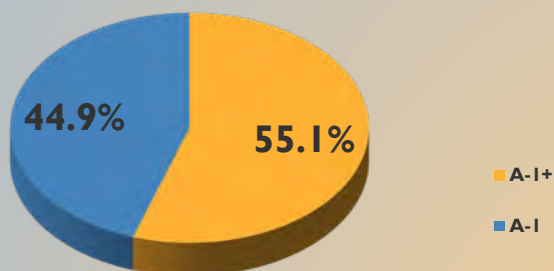
### Bye-bye, BSBY

We, and the greater financial world, thought we’d finally put the London interbank finance rate (Libor) price-fixing scandal behind us when the British Financial Conduct Authority ceased to support it last year. With the Fed’s Secured Overnight Financing Rate (SOFR) now serving as the risk-free benchmark, the Bloomberg Short Term Bank Yield Index (BSBY) emerged in 2021 as an alternative reference rate for transactions in the credit markets. While it had worked well, it was punched in the gut by regulators over the summer and has been used less and less, and Bloomberg will shut it down by November. We and others made the case for it, but to no avail. The irony is that, while regulators such as the International Organization of Securities Commissions (IOSCO) and the SEC say BSBY is not secure enough to base short-term contracts on, market participants are now left with pricing rates at a spread over SOFR, meaning the risk of mispricing loans remains.

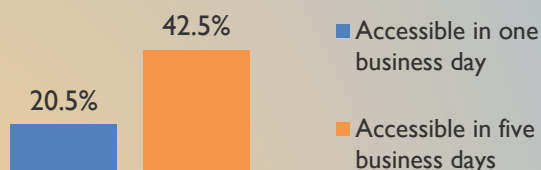
The tax-collecting season for most participants continued in January, resulting in another influx of assets to the Pool, raising its total to \$28.6 billion. The yield of the portfolio declined by 2 basis points to 5.61%, reflecting market expectations the Fed will ease policy in 2024, but also due to reduced supply of commercial paper and CDs. These reasons led the manager to invest in fixed and floating-rate paper and U.S. government securities in the 1- to 6-month area of the yield curve.

## PORTFOLIO COMPOSITION FOR JANUARY 2024

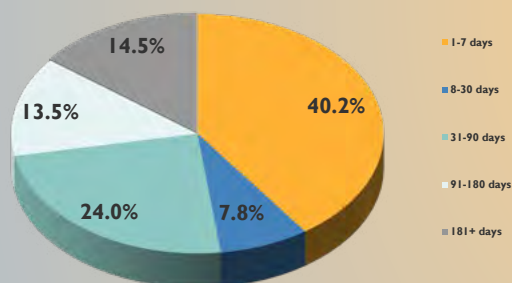
### CREDIT QUALITY COMPOSITION



### HIGHLY LIQUID HOLDINGS



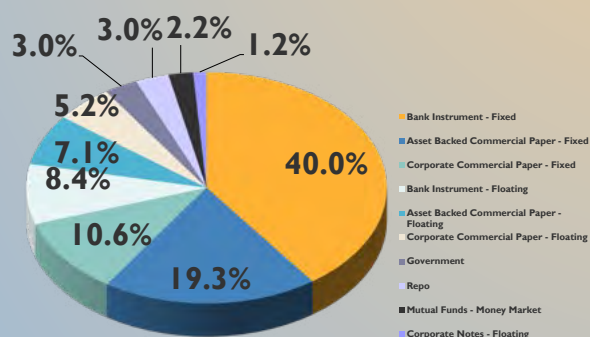
### EFFECTIVE MATURITY SCHEDULE



### TOP HOLDINGS & AVG. MATURITY

1. Mizuho Financial Group, Inc.	4.9%
2. Mitsubishi UFJ Financial Group, Inc.	4.9%
3. Credit Agricole Group	4.9%
4. Australia & New Zealand Banking Group, Melbourne	4.9%
5. ABN Amro Bank NV	4.9%
6. Cooperative Rabobank UA	4.9%
7. Sumitomo Mitsui Trust Holdings, Inc.	4.7%
8. DNB Bank ASA	4.2%
9. Bank of Montreal	3.8%
10. Bank of America Corp.	3.1%

### PORTFOLIO COMPOSITION



#### Average Effective Maturity (WAM)

33 Days

#### Weighted Average Life (Spread WAL)

74 Days

Percentages based on total value of investments

## FUND PERFORMANCE THROUGH JANUARY 2024

Florida PRIME Performance Data			
	Annualized Net Participant Yield <sup>1</sup>	Net-of-Fee Benchmark <sup>2</sup>	Above (Below) Benchmark
One Month	5.70%	5.28%	0.42%
Three Months	5.74%	5.35%	0.40%
One Year	5.49%	5.10%	0.39%
Three Years	2.57%	2.29%	0.28%
Five Years	2.13%	1.89%	0.24%
Ten Years	1.53%	1.29%	0.24%
Since 1/96	2.50%	2.28%	0.22%

**Note:** Net asset value at month end: \$28,631.4 million, which includes investments at market value, plus all cash, accrued interest receivable and payables.,

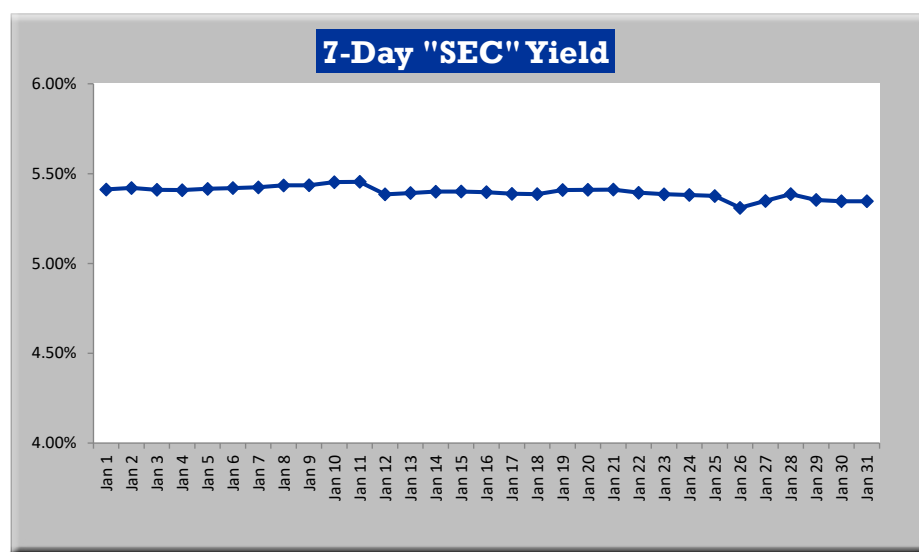
<sup>1</sup>Net of fees. Participant yield is calculated on a 365-day basis and includes adjustments for expenses and other accounting items to reflect realized earnings by participants.

<sup>2</sup>The net-of-fee benchmark is the S&P AAA/AA Rated GIP All 30-Day Net Index for all time periods.

### ABOUT ANNUALIZED YIELDS:

Performance data in the table and chart is annualized, meaning that the amounts are based on yields for the periods indicated, converted to their equivalent if obtained for a 12-month period.

For example, ignoring the effects of compounding, an investment that earns 0.10% over a 1-month period yields 1.20% on an annualized basis. Likewise, an investment that earns a total of 3.60% over three years yields 1.20% on an annualized basis, ignoring compounding.



The 7-Day "SEC" Yield in the chart is calculated in accordance with the yield methodology set forth by SEC Rule 2a-7 for money market funds. The 7-day yield = net income earned over a 7-day period / average units outstanding over the period / 7 times 365. Note that unlike other performance measures, the SEC yield does not include realized gains and losses from sales of securities.



## PRIME ACCOUNT SUMMARY FOR JANUARY 2024

Summary of Cash Flows		
Opening Balance (01/01/24)	\$	27,847,195,537
Participant Deposits		3,503,350,994
Gross Earnings		135,144,587
Participant Withdrawals		(2,861,953,242)
Fees		(759,478)
Closing Balance (01/31/24)	\$	28,622,978,398
<b>Net Change over Month</b>	<b>\$</b>	<b>775,782,861</b>

Detailed Fee Disclosure			
January		Amount	Basis Point Equivalent*
SBA Client Service, Account Mgt. & Fiduciary Oversight Fee	\$	240,625.10	1.02
Federated Investment Management Fee		465,820.83	1.98
BNY Mellon Custodial Fee**		9,102.53	0.04
Bank of America Transfer Agent Fee		34,989.59	0.15
S&P Rating Maintenance Fee		4,065.57	0.02
Audit/External Review Fees		4,874.27	0.02
<b>Total Fees</b>	<b>\$</b>	<b>759,477.89</b>	<b>3.23</b>

\*The basis point equivalent is an annualized rate based on the dollar amount of fees charged for the month times 12, divided by an average of the fund's beginning and ending total value (amortized cost) for the month which was \$28,235,086,968.

\*\*All custodian banking fees are allocated based on both market value (size) and level of service accurately passing through all charges to pool participants. Charges may fluctuate month-to-month.

The data included in this report is unaudited.

## INVENTORY OF HOLDINGS FOR JANUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
I320 W Jefferson LLC, Sep 01, 2060	VARIABLE RATE DEMAND NOTE	5.46	9/1/2060	2/7/2024	5,500,000	5.54	\$5,500,000	\$5,500,000	\$0
ABN Amro Bank NV, Amsterdam TD	TIME DEPOSIT	5.33	2/7/2024		1,400,000,000	5.42	\$1,400,000,000	\$1,400,000,000	\$0
AJC Capital, LLC, Jan 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	1/1/2042	2/1/2024	5,530,000	5.45	\$5,530,000	\$5,530,000	\$0
Albion Capital LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/21/2024		25,367,000	5.74	\$25,284,430	\$25,286,768	\$2,338
Albion Capital LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		129,064,000	5.62	\$128,006,966	\$127,999,996	-\$6,969
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/1/2024		304,500,000	5.41	\$304,455,002	\$304,454,989	-\$13
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/5/2024		30,000,000	5.76	\$29,976,792	\$29,977,804	\$1,012
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/1/2024		210,000,000	5.46	\$209,063,750	\$209,060,250	-\$3,500
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/4/2024		200,000,000	5.47	\$199,019,167	\$199,015,500	-\$3,667
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/18/2024		200,000,000	5.51	\$198,597,833	\$198,597,834	\$1
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/22/2024		100,000,000	5.59	\$99,230,750	\$99,239,250	\$8,500
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		150,000,000	5.48	\$148,620,500	\$148,612,578	-\$7,922
Archer I LLC, Jun 01, 2060	VARIABLE RATE DEMAND NOTE	5.46	6/1/2060	2/1/2024	18,000,000	5.54	\$18,000,000	\$18,000,000	\$0
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/13/2024		50,000,000	5.58	\$49,683,250	\$49,684,417	\$1,167
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		120,000,000	5.59	\$119,004,500	\$119,006,333	\$1,833
Australia & New Zealand Banking Group, Melbourne TD	TIME DEPOSIT	5.33	2/7/2024		1,400,000,000	5.42	\$1,400,000,000	\$1,400,000,000	\$0
BNG Bank N.V. CP4-2	COMMERCIAL PAPER - 4-2		2/1/2024		50,000,000	5.40	\$49,992,625	\$49,992,639	\$14
BPCE SA CP4-2	COMMERCIAL PAPER - 4-2		3/7/2024		200,000,000	5.66	\$198,900,000	\$198,929,200	\$29,200
BPCE SA CP4-2	COMMERCIAL PAPER - 4-2		3/12/2024		200,000,000	5.68	\$198,743,806	\$198,779,718	\$35,912
BWF Forge TL Properties Owner LLC, May 01, 2059	VARIABLE RATE DEMAND NOTE	5.46	5/1/2059	2/1/2024	28,500,000	5.46	\$28,500,000	\$28,500,000	\$0
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.92	8/9/2024		100,000,000	5.92	\$100,000,000	\$100,256,735	\$256,735
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	6.00	7/31/2024		100,000,000	6.00	\$100,000,000	\$100,289,605	\$289,605
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.18	1/24/2025		114,000,000	5.20	\$114,000,000	\$114,058,259	\$58,259
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	5/28/2024		100,000,000	5.80	\$100,000,000	\$100,051,851	\$51,851
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	6/7/2024		104,000,000	5.80	\$104,000,000	\$104,064,100	\$64,100
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.83	6/17/2024		125,000,000	5.82	\$125,000,000	\$125,099,384	\$99,384
Bank of America N.A. Triparty Repo Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.32	2/1/2024		594,000,000	5.39	\$594,000,000	\$594,000,000	\$0
Bank of America N.A., Apr 19, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.04	4/19/2024	2/1/2024	101,000,000	6.12	\$101,000,000	\$101,116,826	\$116,826
Bank of America, N.A. CD	CERTIFICATE OF DEPOSIT	6.00	9/23/2024		50,000,000	5.99	\$50,000,000	\$50,210,588	\$210,588
Bank of America, N.A. CD	CERTIFICATE OF DEPOSIT	5.44	2/7/2024		100,000,000	5.44	\$100,000,000	\$99,996,147	-\$3,853
Bank of Montreal CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.82	5/28/2024		100,000,000	5.81	\$100,000,000	\$100,070,344	\$70,344
Bank of Montreal, Apr 12, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.99	4/12/2024	2/1/2024	100,000,000	6.07	\$100,000,000	\$100,109,386	\$109,386
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.82	1/6/2025	2/1/2024	165,000,000	5.90	\$165,000,000	\$165,000,000	\$0
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/6/2025	2/1/2024	135,000,000	5.77	\$135,000,000	\$135,000,000	\$0
Bank of Montreal, Jan 06, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.69	1/6/2025	2/1/2024	175,000,000	5.77	\$175,000,000	\$175,000,000	\$0
Bank of Montreal, Jun 14, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.96	6/14/2024	2/1/2024	100,000,000	6.04	\$100,000,000	\$100,185,302	\$185,302
Bank of Montreal, May 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.91	5/3/2024	2/1/2024	100,000,000	5.99	\$100,000,000	\$100,123,377	\$123,377
Bank of Montreal, Sep 16, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.88	9/16/2024	2/1/2024	40,200,000	5.96	\$40,200,000	\$40,200,000	\$0
Bank of Nova Scotia, Toronto CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/18/2024		52,000,000	5.99	\$52,000,000	\$52,272,720	\$272,720
Bank of Nova Scotia, Toronto, Feb 13, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.70	2/13/2024	2/1/2024	30,000,000	5.78	\$29,999,810	\$30,002,621	\$2,811
Bank of Nova Scotia, Toronto, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/3/2025	2/1/2024	170,000,000	5.77	\$170,000,000	\$170,086,907	\$86,907
Bank of Nova Scotia, Toronto, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.95	7/3/2024	2/1/2024	75,000,000	6.03	\$75,000,000	\$75,129,724	\$129,724

See notes at end of table.

# INVENTORY OF HOLDINGS FOR JANUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Bank of Nova Scotia, Toronto, Jul 10, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.96	7/10/2024	2/1/2024	50,000,000	6.04	\$50,000,000	\$50,093,527	\$93,527
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/5/2024		50,000,000	5.47	\$49,962,778	\$49,963,076	\$298
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/12/2024		50,000,000	5.48	\$49,695,347	\$49,693,943	-\$1,405
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		50,000,000	5.89	\$49,287,167	\$49,324,056	\$36,889
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/20/2024		70,000,000	5.86	\$68,800,083	\$68,863,751	\$63,668
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/28/2024		50,000,000	5.89	\$49,077,306	\$49,131,903	\$54,597
Bedford Row Funding Corp., Jun 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.71	6/3/2024	2/1/2024	50,000,000	5.79	\$50,000,000	\$50,037,572	\$37,572
Bedford Row Funding Corp., Oct 16, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.60	10/16/2024	2/1/2024	80,000,000	5.68	\$80,000,000	\$80,000,000	\$0
CAFCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		75,000,000	5.63	\$74,148,438	\$74,163,281	\$14,844
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$98,864,583	\$98,882,292	\$17,709
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/30/2024		50,000,000	5.70	\$49,313,750	\$49,330,000	\$16,250
CIESCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/5/2024		100,000,000	5.85	\$99,922,083	\$99,926,012	\$3,929
CIESCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/14/2024		30,000,000	5.67	\$29,388,000	\$29,406,563	\$18,563
CRC Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$98,864,583	\$98,878,125	\$13,542
Canadian Imperial Bank of Commerce CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/17/2024		25,000,000	5.99	\$25,000,000	\$25,134,476	\$134,476
Canadian Imperial Bank of Commerce CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.25	2/5/2024		75,000,000	5.25	\$75,000,000	\$74,996,239	-\$3,761
Canadian Imperial Bank of Commerce CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		75,000,000	5.56	\$74,144,600	\$74,133,908	-\$10,693
Canadian Imperial Bank of Commerce, Apr 01, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.01	4/1/2024	2/1/2024	150,000,000	6.09	\$150,000,000	\$150,166,670	\$166,670
Canadian Imperial Bank of Commerce, Apr 11, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.96	4/11/2024	2/1/2024	208,000,000	6.04	\$208,000,000	\$208,252,262	\$252,262
Canadian Imperial Bank of Commerce, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.82	1/3/2025	2/1/2024	110,000,000	5.90	\$110,000,000	\$110,000,000	\$0
Canadian Imperial Bank of Commerce, Mar 06, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.56	3/6/2024	2/1/2024	100,000,000	5.64	\$100,000,000	\$100,020,140	\$20,140
Canadian Imperial Bank of Commerce, Mar 27, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	6.01	3/27/2024	2/1/2024	100,000,000	6.09	\$100,000,000	\$100,103,200	\$103,200
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/14/2024		65,000,000	5.51	\$64,863,753	\$64,864,960	\$1,207
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/16/2024		50,000,000	5.53	\$49,879,778	\$49,881,208	\$1,430
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/19/2024		125,000,000	5.51	\$124,105,000	\$124,104,000	-\$1,000
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/20/2024		50,000,000	5.53	\$49,633,861	\$49,633,997	\$136
Chariot Funding LLC, Aug 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.54	8/1/2024	2/1/2024	50,000,000	5.62	\$50,000,000	\$50,000,000	\$0
Chesham Finance LLC Series VII CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/16/2024		25,000,000	5.47	\$24,940,444	\$24,940,604	\$159
Chesham Finance LLC Series VII CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/20/2024		50,000,000	5.48	\$49,851,111	\$49,851,324	\$213
Citibank N.A., New York, Jan 10, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/10/2025	2/1/2024	220,000,000	5.77	\$220,000,000	\$220,013,418	\$13,418
Citibank N.A., New York, Oct 28, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	10/28/2024	2/1/2024	100,000,000	5.99	\$100,000,000	\$100,219,852	\$219,852
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	6.01	9/18/2024		130,000,000	6.00	\$130,000,000	\$130,548,765	\$548,765
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	5.92	7/22/2024		150,000,000	5.96	\$150,000,000	\$150,361,673	\$361,673
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/3/2024		75,000,000	5.92	\$74,255,813	\$74,275,763	\$19,950
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		75,000,000	5.97	\$73,919,375	\$73,974,064	\$54,689
City Furniture, Inc., Aug 01, 2044	VARIABLE RATE DEMAND NOTE	5.46	8/1/2044	2/1/2024	77,000,000	5.46	\$77,000,000	\$77,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.85	7/1/2024	2/1/2024	100,000,000	5.93	\$100,000,000	\$100,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.73	7/1/2024	2/1/2024	140,000,000	5.81	\$140,000,000	\$140,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.63	7/3/2024	2/1/2024	155,000,000	5.71	\$155,000,000	\$155,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.85	7/8/2024	2/1/2024	115,000,000	5.93	\$115,000,000	\$115,055,716	\$55,716

See notes at end of table.

## INVENTORY OF HOLDINGS FOR JANUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Collateralized Commercial Paper FLEX Co., LLC, Jul 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/23/2024	2/1/2024	70,000,000	5.80	\$70,000,000	\$70,000,000	\$0
Collateralized Commercial Paper V Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.86	7/10/2024	2/1/2024	100,000,000	5.94	\$100,000,000	\$100,118,179	\$118,179
Collateralized Commercial Paper V Co. LLC, Jul 22, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/22/2024	2/1/2024	50,000,000	5.80	\$50,000,000	\$50,013,584	\$13,584
Commonwealth Bank of Australia, Mar 21, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.96	3/21/2024	2/1/2024	50,000,000	6.04	\$50,000,000	\$50,038,566	\$38,566
Cooperative Rabobank UA TD	TIME DEPOSIT	5.33	2/1/2024		700,000,000	5.42	\$700,000,000	\$700,000,000	\$0
Cooperative Rabobank UA TD	TIME DEPOSIT	5.33	2/7/2024		700,000,000	5.42	\$700,000,000	\$700,000,000	\$0
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.69	2/1/2024		58,500,000	5.77	\$58,500,000	\$58,500,500	\$500
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	2/2/2024		350,000,000	5.41	\$350,000,000	\$350,000,000	\$0
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	2/6/2024		600,000,000	5.41	\$600,000,000	\$600,000,000	\$0
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	2/7/2024		300,000,000	5.41	\$300,000,000	\$300,000,000	\$0
DNB Bank ASA CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		190,000,000	5.88	\$187,680,258	\$187,833,975	\$153,717
DNB Bank ASA TD	TIME DEPOSIT	5.31	2/1/2024		1,000,000,000	5.40	\$1,000,000,000	\$1,000,000,000	\$0
DZ Bank AG Deutsche Zentral-Genossenschaftsbank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/24/2024		100,000,000	5.88	\$100,000,000	\$100,062,018	\$62,018
Dino P Kanelos Irrevocable Trust, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	2/1/2024	4,515,000	5.45	\$4,515,000	\$4,515,000	\$0
Dreyfus Government Cash Management Fund	OVERNIGHT MUTUAL FUND	5.15	2/1/2024		6,104,899	5.24	\$6,104,899	\$6,104,899	\$0
Enterprise Fleet Financing, LLC 2023-3, A1, 5.906%, 10/21/2024	ASSET BACKED NOTE	5.91	10/21/2024		7,005,251	5.91	\$7,005,251	\$7,011,904	\$6,652
Enterprise Fleet Financing, LLC 2024-1, A1, 5.548%, 02/20/2025	ASSET BACKED NOTE	5.55	2/20/2025		30,000,000	5.55	\$30,000,000	\$30,009,538	\$9,538
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/7/2024		35,000,000	5.68	\$34,321,778	\$34,340,353	\$18,575
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/17/2024		50,000,000	5.69	\$48,955,417	\$48,986,965	\$31,548
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/21/2024		100,000,000	5.69	\$97,850,278	\$97,917,623	\$67,345
Federated Hermes Institutional Prime Value Obligations Fund - Class IS	MUTUAL FUND MONEY MARKET	5.51	2/1/2024	2/1/2024	630,872,087	5.51	\$631,124,436	\$631,124,436	\$0
Fiore Capital LLC, Series 2005-A, Aug 01, 2045	VARIABLE RATE DEMAND NOTE	5.45	8/1/2045	2/1/2024	8,690,000	5.45	\$8,690,000	\$8,690,000	\$0
GTA Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/13/2024		90,000,000	5.81	\$88,565,725	\$88,623,473	\$57,748
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/1/2024		100,000,000	5.58	\$99,081,611	\$99,090,140	\$8,529
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/3/2024		44,500,000	5.54	\$44,081,032	\$44,081,889	\$857
Great Bear Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/7/2024		52,000,000	5.47	\$51,945,804	\$51,946,007	\$202
Great Bear Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/14/2024		50,000,000	5.46	\$49,895,972	\$49,895,418	-\$554
GreatAmerica Leasing Receivables 2024-1, A1, 5.55%, 02/18/2025	ASSET BACKED NOTE	5.55	2/18/2025		40,000,000	5.55	\$40,000,000	\$40,013,688	\$13,688
HSBC Securities (USA), Inc. Repo Tri Party Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.31	2/1/2024		100,000,000	5.38	\$100,000,000	\$100,000,000	\$0
HWV Hellman Building, LP, Mar 01, 2062	VARIABLE RATE DEMAND NOTE	5.46	3/1/2062	2/1/2024	50,000,000	5.46	\$50,000,000	\$50,000,000	\$0
J.P. Morgan Securities LLC	CALLABLE COMMERCIAL PAPER	5.94	8/21/2024	2/1/2024	50,000,000	6.02	\$50,000,000	\$50,050,471	\$50,471
Jupiter Securitization Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/10/2024	2/1/2024	75,000,000	5.80	\$75,000,000	\$75,008,779	\$8,779
Jupiter Securitization Co. LLC, Oct 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.66	10/23/2024	2/1/2024	100,000,000	5.74	\$100,000,000	\$100,000,000	\$0
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/6/2024		350,000,000	5.58	\$349,682,083	\$349,689,165	\$7,082
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/8/2024		200,000,000	5.53	\$197,971,333	\$197,972,340	\$1,007
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/25/2024		75,000,000	5.55	\$74,047,292	\$74,050,538	\$3,247
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/26/2024		60,000,000	5.55	\$59,228,867	\$59,231,542	\$2,676
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/27/2024		51,250,000	5.76	\$51,035,134	\$51,042,643	\$7,508

See notes at end of table.

# INVENTORY OF HOLDINGS FOR JANUARY 2024

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LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/18/2024		50,000,000	5.58	\$49,645,542	\$49,647,500	\$1,958
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/1/2024		225,000,000	5.41	\$224,966,750	\$224,966,795	\$45
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/6/2024		80,000,000	5.42	\$79,929,067	\$79,928,971	-\$95
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/8/2024		75,000,000	5.42	\$74,911,333	\$74,911,152	-\$181
MUFG Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.75	2/16/2024		50,000,000	5.83	\$50,000,000	\$50,007,905	\$7,905
MUFG Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.50	3/28/2024		100,000,000	5.58	\$100,000,000	\$100,001,038	\$1,038
MUFG Bank Ltd. CP	COMMERCIAL PAPER		2/13/2024		100,000,000	5.83	\$99,795,792	\$99,808,765	\$12,973
MUFG Bank Ltd. CP	COMMERCIAL PAPER		2/20/2024		300,000,000	5.78	\$299,065,000	\$299,117,334	\$52,334
MUFG Bank Ltd. CP	COMMERCIAL PAPER		2/28/2024		180,000,000	5.73	\$179,221,600	\$179,258,450	\$36,850
MUFG Bank Ltd. CP	COMMERCIAL PAPER		3/6/2024		50,000,000	5.69	\$49,731,181	\$49,741,503	\$10,322
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.46	5/2/2024		90,000,000	5.55	\$90,000,000	\$90,000,000	\$0
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.50	4/23/2024		100,000,000	5.59	\$100,000,000	\$99,997,254	-\$2,746
Manhattan Asset Funding Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/4/2024		40,000,000	5.57	\$39,616,000	\$39,616,190	\$190
Matchpoint Finance plc CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		45,000,000	5.55	\$44,582,275	\$44,583,567	\$1,292
Microsoft Corp. CP4-2	COMMERCIAL PAPER - 4-2		2/2/2024		100,000,000	5.50	\$99,970,111	\$99,970,595	\$484
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.75	2/2/2024		75,000,000	5.83	\$75,000,000	\$75,001,547	\$1,547
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.60	3/11/2024		125,000,000	5.68	\$125,000,000	\$125,023,329	\$23,329
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.60	3/13/2024		150,000,000	5.68	\$150,000,000	\$150,028,037	\$28,037
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.58	3/19/2024		195,000,000	5.66	\$195,000,000	\$195,030,504	\$30,504
Mizuho Bank Ltd. TD	TIME DEPOSIT	5.32	2/1/2024		440,000,000	5.41	\$440,000,000	\$440,000,000	\$0
Mizuho Bank Ltd., Canada Branch TD	TIME DEPOSIT	5.33	2/1/2024		415,000,000	5.42	\$415,000,000	\$415,000,000	\$0
Mizuho Securities USA, Inc. - REPO TRIPARTY OVERNIGHT FIXED	REPO TRIPARTY OVERNIGHT FIXED	5.32	2/1/2024		150,000,000	5.39	\$150,000,000	\$150,000,000	\$0
National Australia Bank Ltd., Melbourne CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		110,000,000	5.88	\$108,433,157	\$108,493,217	\$60,060
National Australia Bank Ltd., Melbourne, Dec 09, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.76	12/9/2024	2/1/2024	100,000,000	5.84	\$100,000,000	\$100,000,000	\$0
National Australia Bank Ltd., Melbourne, Sep 24, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.85	9/24/2024	2/1/2024	100,000,000	5.93	\$100,000,000	\$100,219,618	\$219,618
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		5/24/2024		130,000,000	5.77	\$127,723,483	\$127,805,240	\$81,757
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		6/17/2024		200,000,000	5.77	\$195,771,833	\$195,957,674	\$185,841
National Bank of Canada, Montreal, Jan 16, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.68	1/16/2025	2/1/2024	200,000,000	5.76	\$200,000,000	\$200,063,334	\$63,334
National Bank of Canada, Montreal, Jan 17, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.68	1/17/2025	2/1/2024	100,000,000	5.76	\$100,000,000	\$100,000,000	\$0
National Bank of Canada, Montreal, Mar 06, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.56	3/6/2024	2/1/2024	50,000,000	5.64	\$50,000,000	\$50,007,718	\$7,718
Nordea Bank Abp CP4-2	COMMERCIAL PAPER - 4-2		4/19/2024		130,000,000	5.87	\$128,395,313	\$128,494,466	\$99,154
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		100,000,000	5.58	\$99,187,000	\$99,187,000	\$0
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		40,000,000	5.58	\$39,668,778	\$39,668,778	-\$0
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		48,750,000	5.90	\$48,069,057	\$48,102,602	\$33,545
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		48,600,000	5.89	\$47,899,512	\$47,933,510	\$33,998
Old Line Funding, LLC, Aug 20, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.58	8/20/2024	2/1/2024	50,000,000	5.66	\$50,000,000	\$50,002,384	\$2,384
Old Line Funding, LLC, Aug 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.58	8/23/2024	2/1/2024	100,000,000	5.66	\$100,000,000	\$100,000,000	\$0
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	7/8/2024	2/1/2024	50,000,000	5.79	\$50,000,000	\$50,000,000	\$0
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	7/8/2024	2/1/2024	75,000,000	5.79	\$75,000,000	\$75,000,000	\$0
Old Line Funding, LLC, Mar 18, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	3/18/2024	2/1/2024	90,000,000	5.79	\$90,000,000	\$90,000,000	\$0
Old Line Funding, LLC, Oct 28, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.60	10/28/2024	2/1/2024	75,000,000	5.68	\$75,000,000	\$75,000,000	\$0

See notes at end of table.

## INVENTORY OF HOLDINGS FOR JANUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Overbaugh Family (2016) Survivorship Trust, Apr 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	4/1/2042	2/1/2024	7,015,000	5.45	\$7,015,000	\$7,015,000	\$0
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		3/6/2024		20,000,000	5.53	\$19,895,194	\$19,895,389	\$194
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		3/8/2024		50,000,000	5.53	\$49,723,014	\$49,723,734	\$720
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		6/5/2024		100,000,000	5.69	\$98,089,000	\$98,147,730	\$58,730
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/6/2024		45,000,000	5.47	\$44,959,800	\$44,960,036	\$236
Ridgefield Funding Company, LLC Series A, Feb 02, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.59	2/2/2024	2/1/2024	40,000,000	5.67	\$40,000,000	\$40,000,323	\$323
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		3/20/2024		45,000,000	5.53	\$44,678,438	\$44,670,516	-\$7,922
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/11/2024		150,000,000	6.00	\$144,009,833	\$144,672,068	\$662,234
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/16/2024		47,000,000	6.00	\$45,086,134	\$45,302,396	\$216,262
Scheel Investments, LLC, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	2/1/2024	6,720,000	5.45	\$6,720,000	\$6,720,000	\$0
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/27/2024		80,000,000	5.75	\$79,665,200	\$79,674,920	\$9,720
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/11/2024		100,000,000	5.61	\$99,394,444	\$99,387,549	-\$6,895
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/12/2024		90,000,000	5.61	\$89,441,375	\$89,449,558	\$8,183
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		100,000,000	5.61	\$99,182,500	\$99,181,600	-\$900
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		20,000,000	5.61	\$19,833,472	\$19,833,269	-\$204
Sheffield Receivables Company LLC, Feb 02, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.61	2/2/2024	2/1/2024	95,000,000	5.69	\$95,000,000	\$95,000,979	\$979
Sheffield Receivables Company LLC, Feb 22, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.61	2/22/2024	2/1/2024	50,000,000	5.69	\$50,000,000	\$50,006,267	\$6,267
Sheffield Receivables Company LLC, Feb 23, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.61	2/23/2024	2/1/2024	48,000,000	5.69	\$48,000,000	\$48,000,000	\$0
Sheffield Receivables Company LLC, Feb 26, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.63	2/26/2024	2/1/2024	52,000,000	5.71	\$52,000,000	\$52,000,000	\$0
Starbird Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/1/2024		125,000,000	5.40	\$124,981,563	\$124,981,523	-\$40
Sumitomo Mitsui Banking Corp., Mar 28, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.51	3/28/2024	2/1/2024	200,000,000	5.59	\$200,000,000	\$200,024,904	\$24,904
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.70	2/22/2024		80,000,000	5.78	\$80,000,000	\$80,014,498	\$14,498
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.68	2/14/2024		100,000,000	5.76	\$100,000,000	\$100,011,599	\$11,599
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.52	2/5/2024		100,000,000	5.60	\$100,000,000	\$100,002,399	\$2,399
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.55	3/26/2024		200,000,000	5.63	\$200,000,000	\$200,030,298	\$30,298
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.55	3/27/2024		125,000,000	5.63	\$125,000,000	\$125,018,985	\$18,985
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/18/2024		240,000,000	5.54	\$240,000,000	\$240,004,454	\$4,454
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/5/2024		205,000,000	5.54	\$205,000,000	\$205,004,080	\$4,080
Sumitomo Mitsui Trust Bank Ltd. CP4-2	COMMERCIAL PAPER - 4-2		4/8/2024		100,000,000	5.55	\$98,983,778	\$98,988,387	\$4,609
Sumitomo Mitsui Trust Bank Ltd.(London) ECD	EURO CERTIFICATE OF DEPOSIT	0.00	3/7/2024		200,000,000	5.69	\$198,893,688	\$198,924,419	\$30,731
Svenska Handelsbanken, Stockholm CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/4/2024		10,000,000	5.88	\$10,000,000	\$10,006,585	\$6,585
Taxable Tender Option Bond Trust 2021-MIZ9064TX, (Series 2021-MIZ-9064TX), 11/01/2056	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.74	11/1/2056	2/1/2024	6,500,000	5.74	\$6,500,000	\$6,500,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9084TX, (Series 2022-MIZ-9084TX), 02/01/2027	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.74	2/1/2027	2/1/2024	5,150,000	5.74	\$5,150,000	\$5,150,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9094TX, (Series 2022-MIZ-9094TX), 12/01/2059	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.74	12/1/2059	2/1/2024	3,200,000	5.74	\$3,200,000	\$3,200,000	\$0

See notes at end of table.

# INVENTORY OF HOLDINGS FOR JANUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Texas State,Veterans Bonds (Taxable Series 2023A), 12/01/2054	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.40	12/1/2054	2/7/2024	18,000,000	5.40	\$18,000,000	\$18,000,000	\$0
The Greathouse 2021 Children's Trust, Dec 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	12/1/2046	2/1/2024	13,625,000	5.45	\$13,625,000	\$13,625,000	\$0
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		35,250,000	5.90	\$34,757,626	\$34,784,612	\$26,986
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/6/2024		40,000,000	5.89	\$39,398,400	\$39,431,595	\$33,195
Thunder Bay Funding, LLC, May 06, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	5/6/2024	2/1/2024	75,000,000	5.79	\$75,000,000	\$75,000,000	\$0
Thunder Bay Funding, LLC, May 29, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	5/29/2024	2/1/2024	100,000,000	5.79	\$100,000,000	\$100,000,000	\$0
Thunder Bay Funding, LLC, Oct 17, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.60	10/17/2024	2/1/2024	50,000,000	5.68	\$50,000,000	\$50,000,000	\$0
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	9/6/2024		25,000,000	5.99	\$25,000,000	\$25,099,306	\$99,306
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/3/2024		118,500,000	6.04	\$118,500,000	\$118,742,653	\$242,653
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/10/2024		97,000,000	6.04	\$97,000,000	\$97,199,863	\$199,863
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.02	7/3/2024		100,000,000	6.01	\$100,000,000	\$100,185,552	\$185,552
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.44	2/13/2024		80,000,000	5.44	\$80,000,000	\$79,995,066	-\$4,934
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		5/16/2024		60,000,000	5.80	\$59,030,983	\$59,058,873	\$27,890
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		8/23/2024		50,000,000	6.00	\$48,388,472	\$48,556,316	\$167,844
Toronto Dominion Bank, Apr 29, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	4/29/2024	2/1/2024	100,000,000	5.99	\$100,000,000	\$100,126,245	\$126,245
Toronto Dominion Bank, Jan 16, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.66	1/16/2025	2/1/2024	235,000,000	5.74	\$235,000,000	\$235,064,150	\$64,150
TotalEnergies Capital S.A. CP4-2	COMMERCIAL PAPER - 4-2		2/23/2024		50,000,000	5.45	\$49,829,417	\$49,828,977	-\$440
Toyota Credit Canada Inc. CP	COMMERCIAL PAPER		7/18/2024		40,000,000	5.99	\$38,929,667	\$39,020,257	\$90,590
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		4/25/2024		13,000,000	5.91	\$12,826,269	\$12,832,204	\$5,934
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		5/23/2024		50,000,000	5.73	\$49,135,236	\$49,150,952	\$15,715
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		6/17/2024		30,000,000	5.74	\$29,367,500	\$29,379,299	\$11,799
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		7/17/2024		55,000,000	5.61	\$53,624,267	\$53,631,248	\$6,981
Toyota Motor Credit Corp., Dec 09, 2024	VARIABLE MEDIUM TERM NOTE	5.81	12/9/2024	2/1/2024	95,000,000	5.89	\$95,000,000	\$95,119,909	\$119,909
U.S.Treasury Bill 02/01/2024	US TREASURY BILL	0.00	2/1/2024		462,000,000	5.38	\$461,932,368	\$462,000,000	\$67,632
U.S.Treasury Bill 02/08/2024	US TREASURY BILL	0.00	2/8/2024		400,000,000	5.38	\$399,531,556	\$399,598,276	\$66,720
UnitedHealth Group, Inc. CP4-2	COMMERCIAL PAPER - 4-2		2/1/2024		200,000,000	5.40	\$199,970,500	\$199,970,484	-\$16
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		2/28/2024		50,000,000	5.65	\$49,786,111	\$49,790,700	\$4,589
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/28/2024		100,000,000	5.49	\$99,152,917	\$99,149,433	-\$3,484
Wells Fargo Bank, N.A., Jul 31, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	7/31/2024	2/1/2024	100,000,000	5.99	\$100,000,000	\$100,210,334	\$210,334
Wells Fargo Bank, N.A., Nov 07, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	11/7/2024	2/1/2024	100,000,000	5.99	\$100,000,000	\$100,262,705	\$262,705
Wells Fargo Bank, N.A., Nov 13, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	11/13/2024	2/1/2024	50,000,000	5.99	\$50,000,000	\$50,130,903	\$130,903
Wells Fargo Bank, N.A., Sep 12, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	9/12/2024	2/1/2024	225,000,000	5.99	\$225,000,000	\$225,474,581	\$474,581
Wylie Bice Life Insurance Trust, Aug 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	8/1/2046	2/1/2024	7,625,000	5.45	\$7,625,000	\$7,625,000	\$0
Total Value of Assets					28,688,033,238		\$28,611,905,711	\$28,621,805,044	\$9,899,333

**Notes:** The data included in this report is unaudited. Amounts above are the value of investments. Income accruals, payables and uninvested cash are not included. Amortizations/accretions are reported with a one-day lag in the above valuations.

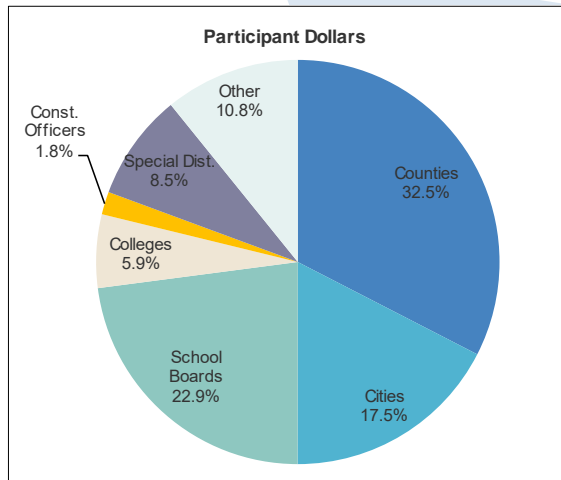
<sup>1</sup> Market values of the portfolio securities are provided by the custodian, BNY Mellon. The portfolio manager, Federated Hermes, is the source for other data shown above.

<sup>2</sup> Amortized cost is calculated using a straight line method.

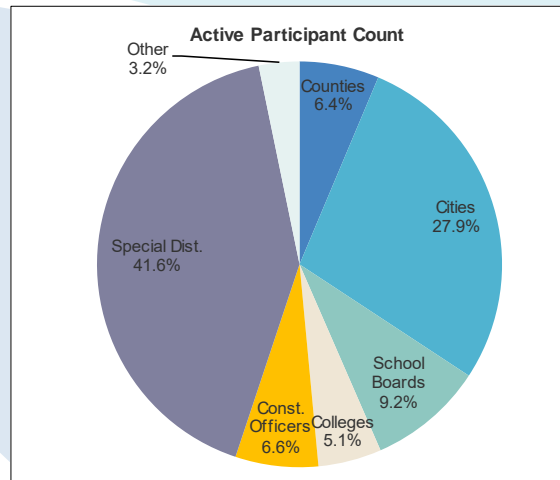


## PARTICIPANT CONCENTRATION DATA - AS OF JANUARY 2024

Participant Balance	Share of Total Fund	Share of Participant Count	Participant Balance	Share of Total Fund	Share of Participant Count
<b>All Participants</b>	<b>100.0%</b>	<b>100.0%</b>	<b>Colleges &amp; Universities</b>	<b>5.9%</b>	<b>5.1%</b>
Top 10	31.9%	1.3%	Top 10	5.1%	1.3%
\$100 million or more	78.0%	9.6%	\$100 million or more	4.0%	0.5%
\$10 million up to \$100 million	19.6%	20.0%	\$10 million up to \$100 million	1.7%	1.7%
\$1 million up to \$10 million	2.2%	19.6%	\$1 million up to \$10 million	0.2%	1.0%
Under \$1 million	0.3%	50.8%	Under \$1 million	0.01%	1.8%
<b>Counties</b>	<b>32.5%</b>	<b>6.4%</b>	<b>Constitutional Officers</b>	<b>1.8%</b>	<b>6.6%</b>
Top 10	25.9%	1.3%	Top 10	1.0%	1.3%
\$100 million or more	31.4%	2.5%	\$100 million or more	0.5%	0.1%
\$10 million up to \$100 million	1.1%	1.2%	\$10 million up to \$100 million	1.0%	0.9%
\$1 million up to \$10 million	0.1%	1.2%	\$1 million up to \$10 million	0.3%	2.2%
Under \$1 million	0.0%	1.6%	Under \$1 million	0.0%	3.4%
<b>Municipalities</b>	<b>17.5%</b>	<b>27.9%</b>	<b>Special Districts</b>	<b>8.5%</b>	<b>41.6%</b>
Top 10	6.0%	1.3%	Top 10	5.1%	1.3%
\$100 million or more	7.1%	1.7%	\$100 million or more	5.1%	1.3%
\$10 million up to \$100 million	9.7%	9.3%	\$10 million up to \$100 million	2.5%	3.4%
\$1 million up to \$10 million	0.6%	5.6%	\$1 million up to \$10 million	0.7%	7.4%
Under \$1 million	0.1%	11.3%	Under \$1 million	0.2%	29.6%
<b>School Boards</b>	<b>22.9%</b>	<b>9.2%</b>	<b>Other</b>	<b>10.8%</b>	<b>3.2%</b>
Top 10	14.5%	1.3%	Top 10	9.7%	1.3%
\$100 million or more	19.5%	2.5%	\$100 million or more	10.5%	1.0%
\$10 million up to \$100 million	3.3%	3.1%	\$10 million up to \$100 million	0.2%	0.4%
\$1 million up to \$10 million	0.1%	1.3%	\$1 million up to \$10 million	0.1%	0.9%
Under \$1 million	0.0%	2.3%	Under \$1 million	0.0%	0.9%



**Total Fund Value: \$28,622,978,398**



**Total Active Participant Count: 771**

Note: Active accounts include only those participant accounts valued above zero.



## COMPLIANCE WITH INVESTMENT POLICY FOR JANUARY 2024

As investment manager, Federated monitors compliance daily on Florida PRIME to ensure that investment practices comply with the requirements of the Investment Policy Statement (IPS). Federated provides a monthly compliance report to the SBA and is required to notify the Investment Oversight Group (IOG) of compliance exceptions within 24 hours of identification. The IOG will meet as necessary based on the occurrence and resolution of compliance exceptions or upon the occurrence of a material event. Minutes from the IOG meetings are posted to the Florida PRIME website.

In addition to the compliance testing performed by Federated, SBA Risk Management and Compliance conducts daily independent testing on Florida PRIME using a risk-based approach. Under this approach, each IPS parameter is ranked as “High” or “Low” with respect to the level of risk associated with a potential guideline breach. Negative test results are subject to independent verification and review for possible escalation. These rankings, along with the frequency for testing, are reviewed and approved by the IOG on an annual basis or more often if market conditions dictate. Additionally, any parameter reported in “Fail” status on the Federated compliance report, regardless of risk ranking, is also independently verified and escalated accordingly. The results of independent testing are currently reported monthly to the IOG.

Test by Source	Pass/Fail
Securities must be USD denominated	Pass
Unregistered securities must be eligible for sale to Accredited Investors or Qualified Purchasers.	Pass
<u>Ratings requirements</u>	
First Tier Securities	Pass
Long-term securities must have long-term ratings in the three highest categories	Pass
Commercial Paper must have short-term ratings from at least one NRSRO	Pass
Securities in Highest Rating Category (A-1+ or equivalent)	Pass
Repurchase Agreement Counterparties must be rated by S&P	Pass
S&P Weighted Average Life	Pass
<u>Maturity</u>	
Individual Security	Pass
Government floating rate notes/variable rate notes	Pass
Dollar Weighted Average Maturity	Pass
Weighted Average Life	Pass
<u>Issuer Diversification</u>	
First tier issuer (limit does not apply to cash, cash items, U.S. Government securities and repo collateralized by these securities)	Pass
<u>Demand Feature and Guarantor Diversification</u>	
First Tier securities issued by or subject to demand features and guarantees of a non-controlled person	Pass
First Tier securities issued by or subject to demand features and guarantees of a controlled person	Pass

Test by Source	Pass/Fail
<u>Money Market Mutual Funds</u>	
Invested in any one Money Market Mutual Fund	Pass
<u>Repurchase Agreements</u>	
Repurchase Agreement Counterparty Rating	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (More than 5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (More than 5 business days)	Pass
Repurchase Agreements with any single dealer - Counterparty Rating A-1	Pass
<u>Concentration Tests</u>	
Industry Concentration, excluding financial services industry	Pass
Any Single Government Agency	Pass
Illiquid Securities	Pass
Assets invested in securities accessible within 1 business day	Pass
Assets invested in securities accessible within 5 business days	Pass

16 Florida PRIME<sup>TM</sup> Monthly Summary Report - January 31, 2024



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18 Florida PRIME™ Monthly Summary Report - January 31, 2024



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20 Florida PRIME<sup>TM</sup> Monthly Summary Report - January 31, 2024







22 *Florida PRIME<sup>TM</sup> Monthly Summary Report - January 31, 2024*





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## TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
GREAT BEAR FUNDING CPAB54	02/07/24	01/11/24	01/11/24	2,000,000	1,991,960	0	1,991,960	0
GREAT BEAR FUNDING CPAB54	02/14/24	01/16/24	01/16/24	50,000,000	49,784,514	0	49,784,514	0
GALC 2024-1 A1	02/18/25	01/23/24	01/31/24	40,000,000	40,000,000	0	40,000,000	0
JUPITER SECURITIZATION CO LLC	10/23/24	01/23/24	01/23/24	50,000,000	50,000,000	0	50,000,000	0
JUPITER SECURITIZATION CO LLC	10/23/24	01/23/24	01/23/24	50,000,000	50,000,000	0	50,000,000	0
JUPITER SECURITIZATCPAB54	04/08/24	01/16/24	01/16/24	50,000,000	49,380,958	0	49,380,958	0
JUPITER SECURITIZATCPAB54	04/08/24	01/16/24	01/16/24	50,000,000	49,380,958	0	49,380,958	0
JUPITER SECURITIZATCPAB54	04/08/24	01/16/24	01/16/24	50,000,000	49,380,958	0	49,380,958	0
JUPITER SECURITIZATCPAB54	04/08/24	01/16/24	01/16/24	50,000,000	49,380,958	0	49,380,958	0
JUPITER SECURITIZATCPAB54	04/25/24	01/18/24	01/18/24	50,000,000	49,267,722	0	49,267,722	0
JUPITER SECURITIZATCPAB54	04/25/24	01/18/24	01/18/24	25,000,000	24,633,861	0	24,633,861	0
JUPITER SECURITIZATCPAB54	04/26/24	01/19/24	01/19/24	50,000,000	49,267,722	0	49,267,722	0
JUPITER SECURITIZATCPAB54	04/26/24	01/19/24	01/19/24	10,000,000	9,853,544	0	9,853,544	0
LONGSHIP FUNDING LLCAB54	01/17/24	01/08/24	01/08/24	50,000,000	49,933,500	0	49,933,500	0
LONGSHIP FUNDING LLCAB54	01/17/24	01/08/24	01/08/24	16,000,000	15,978,720	0	15,978,720	0
LONGSHIP FUNDING LLCAB54	01/18/24	01/11/24	01/11/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	01/18/24	01/11/24	01/11/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	01/19/24	01/12/24	01/12/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	01/19/24	01/12/24	01/12/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	02/01/24	01/25/24	01/25/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	02/01/24	01/25/24	01/25/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	02/01/24	01/25/24	01/25/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCAB54	02/01/24	01/25/24	01/25/24	25,000,000	24,974,139	0	24,974,139	0
LONGSHIP FUNDING LLCAB54	02/06/24	01/29/24	01/29/24	50,000,000	49,940,889	0	49,940,889	0
LONGSHIP FUNDING LLCAB54	02/06/24	01/29/24	01/29/24	30,000,000	29,964,533	0	29,964,533	0
LONGSHIP FUNDING LLCAB54	02/08/24	01/26/24	01/26/24	50,000,000	49,903,944	0	49,903,944	0
LONGSHIP FUNDING LLCAB54	02/08/24	01/26/24	01/26/24	25,000,000	24,951,972	0	24,951,972	0
MANHATTAN ASSET FUNCPAB54	04/04/24	01/05/24	01/05/24	40,000,000	39,460,000	0	39,460,000	0
MATCHPOINT FINANCE CPAB54	04/02/24	01/03/24	01/03/24	45,000,000	44,393,625	0	44,393,625	0
NATIONAL BANK OF CANADA	01/16/25	01/18/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	01/16/25	01/18/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	01/16/25	01/18/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	01/16/25	01/18/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	01/17/25	01/19/24	01/19/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	01/17/25	01/19/24	01/19/24	50,000,000	50,000,000	0	50,000,000	0
NATIONWIDE BUILDINGCP4-2	01/26/24	01/18/24	01/18/24	35,000,000	34,958,622	0	34,958,622	0
NATIONWIDE BUILDINGCP4-2	01/30/24	01/22/24	01/22/24	50,000,000	49,941,000	0	49,941,000	0
NATIONWIDE BUILDINGCP4-2	01/30/24	01/22/24	01/22/24	50,000,000	49,941,000	0	49,941,000	0
OLD LINE FUNDING LLC	08/20/24	01/08/24	01/09/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING LLC	08/23/24	01/09/24	01/10/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING LLC	08/23/24	01/09/24	01/10/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING LLC	10/28/24	01/23/24	01/23/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING LLC	10/28/24	01/23/24	01/23/24	25,000,000	25,000,000	0	25,000,000	0
PODIUM FUNDING TRUSCPAB53	03/06/24	01/03/24	01/03/24	20,000,000	19,811,350	0	19,811,350	0
PODIUM FUNDING TRUSCPAB53	03/08/24	01/03/24	01/03/24	50,000,000	49,513,403	0	49,513,403	0
RIDGEFIELD FUNDING CPAB54	02/06/24	01/11/24	01/11/24	45,000,000	44,825,800	0	44,825,800	0
STARBOARD FUNDING COCPAB54	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
STARBOARD FUNDING COCPAB54	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
STARBOARD FUNDING COCPAB54	02/01/24	01/31/24	01/31/24	25,000,000	24,996,313	0	24,996,313	0
SUMITOMO MITSUI TRUCP4-2	04/08/24	01/08/24	01/08/24	50,000,000	49,320,028	0	49,320,028	0
SUMITOMO MITSUI TRUCP4-2	04/08/24	01/08/24	01/08/24	50,000,000	49,320,028	0	49,320,028	0
SUMITOMO MITSUI TRUCDYAN	04/18/24	01/04/24	01/05/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/18/24	01/04/24	01/05/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/18/24	01/04/24	01/05/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/18/24	01/04/24	01/05/24	40,000,000	40,000,000	0	40,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/05/24	01/05/24	01/08/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/05/24	01/05/24	01/08/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/05/24	01/05/24	01/08/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/05/24	01/05/24	01/08/24	5,000,000	5,000,000	0	5,000,000	0
SUMITOMO MITSUI TRUCDYAN	04/05/24	01/05/24	01/08/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	01/16/24	01/08/24	01/08/24	50,000,000	50,000,000	0	50,000,000	0
THUNDER BAY FUNDING LLC	10/17/24	01/17/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO-DOMINION BANK/NY	01/16/25	01/16/24	01/16/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO-DOMINION BANK/NY	01/16/25	01/16/24	01/16/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO-DOMINION BANK/NY	01/16/25	01/16/24	01/16/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO-DOMINION BANK/NY	01/16/25	01/16/24	01/16/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO-DOMINION BANK/NY	01/16/25	01/16/24	01/16/24	35,000,000	35,000,000	0	35,000,000	0
TOTALENERGIES CAPITCP4-2	02/23/24	01/24/24	01/24/24	50,000,000	49,777,500	0	49,777,500	0
TOYOTA CREDIT DE PUCP	07/17/24	01/08/24	01/09/24	50,000,000	48,585,556	0	48,585,556	0
TOYOTA CREDIT DE PUCP	07/17/24	01/08/24	01/09/24	5,000,000	4,858,556	0	4,858,556	0
UNITEDHEALTH GROUPCP4-2	01/22/24	01/19/24	01/19/24	50,000,000	49,977,875	0	49,977,875	0
UNITEDHEALTH GROUPCP4-2	01/22/24	01/19/24	01/19/24	50,000,000	49,977,875	0	49,977,875	0
UNITEDHEALTH GROUPCP4-2	01/25/24	01/18/24	01/18/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/25/24	01/18/24	01/18/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/25/24	01/18/24	01/18/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/25/24	01/18/24	01/18/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/26/24	01/25/24	01/25/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/26/24	01/25/24	01/25/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/26/24	01/25/24	01/25/24	50,000,000	49,992,625	0	49,992,625	0



# TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
UNITEDHEALTH GROUPCP4-2	01/26/24	01/25/24	01/25/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/29/24	01/22/24	01/22/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/29/24	01/22/24	01/22/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	01/30/24	01/29/24	01/29/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/30/24	01/29/24	01/29/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/26/24	01/26/24	50,000,000	49,963,056	0	49,963,056	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/26/24	01/26/24	50,000,000	49,963,056	0	49,963,056	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/26/24	01/26/24	10,000,000	9,992,611	0	9,992,611	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/30/24	01/30/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/30/24	01/30/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/30/24	01/30/24	30,000,000	29,995,575	0	29,995,575	0
UNITEDHEALTH GROUPCP4-2	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUPCP4-2	02/01/24	01/31/24	01/31/24	50,000,000	49,992,625	0	49,992,625	0
VICTORY RECEIVABLESCPAB54	03/28/24	01/25/24	01/26/24	50,000,000	49,539,306	0	49,539,306	0
VICTORY RECEIVABLESCPAB54	03/28/24	01/25/24	01/26/24	50,000,000	49,539,306	0	49,539,306	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/02/24	01/02/24	162,572,548	162,572,548	0	162,572,548	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/05/24	01/05/24	4,530,265	4,530,265	0	4,530,265	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/09/24	01/09/24	3,226,571	3,226,571	0	3,226,571	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/12/24	01/12/24	3,946,566	3,946,566	0	3,946,566	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/17/24	01/17/24	9,371,929	9,371,929	0	9,371,929	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/19/24	01/19/24	3,685,045	3,685,045	0	3,685,045	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/23/24	01/23/24	1,900,395	1,900,395	0	1,900,395	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/29/24	01/29/24	16,687,582	16,687,582	0	16,687,582	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/31/24	01/31/24	6,104,899	6,104,899	0	6,104,899	0
MIZUHO TRIPARTY	01/04/24	01/03/24	01/03/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/04/24	01/03/24	01/03/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/04/24	01/03/24	01/03/24	777,000,000	777,000,000	0	777,000,000	0
MIZUHO TRIPARTY	01/05/24	01/04/24	01/04/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/05/24	01/04/24	01/04/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/05/24	01/04/24	01/04/24	550,000,000	550,000,000	0	550,000,000	0
MIZUHO TRIPARTY	01/08/24	01/05/24	01/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/08/24	01/05/24	01/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/08/24	01/05/24	01/05/24	482,000,000	482,000,000	0	482,000,000	0
MIZUHO TRIPARTY	01/09/24	01/08/24	01/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/09/24	01/08/24	01/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/09/24	01/08/24	01/08/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO TRIPARTY	01/10/24	01/09/24	01/09/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/10/24	01/09/24	01/09/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/10/24	01/09/24	01/09/24	563,000,000	563,000,000	0	563,000,000	0
MIZUHO TRIPARTY	01/11/24	01/10/24	01/10/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/11/24	01/10/24	01/10/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/11/24	01/10/24	01/10/24	739,000,000	739,000,000	0	739,000,000	0
MIZUHO TRIPARTY	01/12/24	01/11/24	01/11/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/12/24	01/11/24	01/11/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/12/24	01/11/24	01/11/24	634,000,000	634,000,000	0	634,000,000	0
MIZUHO TRIPARTY	01/16/24	01/12/24	01/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/16/24	01/12/24	01/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/16/24	01/12/24	01/12/24	410,000,000	410,000,000	0	410,000,000	0
MIZUHO TRIPARTY	01/17/24	01/16/24	01/16/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/17/24	01/16/24	01/16/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/17/24	01/16/24	01/16/24	200,000,000	200,000,000	0	200,000,000	0
MIZUHO TRIPARTY	01/18/24	01/17/24	01/17/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/18/24	01/17/24	01/17/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/18/24	01/17/24	01/17/24	477,000,000	477,000,000	0	477,000,000	0
MIZUHO TRIPARTY	01/19/24	01/18/24	01/18/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/19/24	01/18/24	01/18/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/19/24	01/18/24	01/18/24	266,000,000	266,000,000	0	266,000,000	0
MIZUHO TRIPARTY	01/22/24	01/19/24	01/19/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/22/24	01/19/24	01/19/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/22/24	01/19/24	01/19/24	630,000,000	630,000,000	0	630,000,000	0
MIZUHO TRIPARTY	01/23/24	01/22/24	01/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/23/24	01/22/24	01/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/23/24	01/22/24	01/22/24	566,000,000	566,000,000	0	566,000,000	0
MIZUHO TRIPARTY	01/24/24	01/23/24	01/23/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/24/24	01/23/24	01/23/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/24/24	01/23/24	01/23/24	652,000,000	652,000,000	0	652,000,000	0
MIZUHO TRIPARTY	01/25/24	01/24/24	01/24/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/25/24	01/24/24	01/24/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/25/24	01/24/24	01/24/24	437,000,000	437,000,000	0	437,000,000	0
MIZUHO TRIPARTY	01/26/24	01/25/24	01/25/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/26/24	01/25/24	01/25/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/26/24	01/25/24	01/25/24	787,000,000	787,000,000	0	787,000,000	0
MIZUHO TRIPARTY	01/29/24	01/26/24	01/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/29/24	01/26/24	01/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/29/24	01/26/24	01/26/24	845,000,000	845,000,000	0	845,000,000	0
MIZUHO TRIPARTY	01/30/24	01/29/24	01/29/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/30/24	01/29/24	01/29/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/30/24	01/29/24	01/29/24	743,000,000	743,000,000	0	743,000,000	0
MIZUHO TRIPARTY	01/31/24	01/30/24	01/30/24	150,000,000	150,000,000	0	150,000,000	0

## TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
HSBC TRIPARTY	01/31/24	01/30/24	01/30/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/31/24	01/30/24	01/30/24	184,000,000	184,000,000	0	184,000,000	0
MIZUHO TRIPARTY	02/01/24	01/31/24	01/31/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/01/24	01/31/24	01/31/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/01/24	01/31/24	01/31/24	594,000,000	594,000,000	0	594,000,000	0
Total Buys				54,831,244,802	54,803,045,182	0	54,803,045,182	0
Cash Closes								
COLLATERALIZED COMMERCIAL PAPER FLEX CO LLC	04/03/24	01/04/24	01/04/24	135,000,000	135,000,000	43,575	135,043,575	0
COLLATERALIZED COMMERCIAL PAPER FLEX CO LLC	04/15/24	01/18/24	01/18/24	25,000,000	25,000,000	63,861	25,063,861	0
FIOR CAPITAL LLC	08/01/45	01/26/24	01/26/24	275,000	275,000	980	275,980	0
OLD LINE FUNDING LLC	02/21/24	01/09/24	01/09/24	50,000,000	50,000,000	153,472	50,153,472	0
OLD LINE FUNDING LLC	02/22/24	01/10/24	01/10/24	100,000,000	100,000,000	306,944	100,306,944	0
OLD LINE FUNDING LLC	03/05/24	01/23/24	01/23/24	75,000,000	75,000,000	216,979	75,216,979	0
TAMMI R SITZ IRREVOCABLE LIFE INSURANCE TRUST/THE	11/01/46	01/31/24	01/31/24	5,950,000	5,950,000	25,694	5,975,694	0
THUNDER BAY FUNDING LLC	03/01/24	01/18/24	01/18/24	50,000,000	50,000,000	124,472	50,124,472	0
THUNDER BAY FUNDING LLC	02/07/24	01/05/24	01/05/24	75,000,000	75,000,000	349,500	75,349,500	0
Total Cash Closes				516,225,000	516,225,000	1,285,478	517,510,478	0
Deposits								
MIZUHO BANK, LTD., CANADA BRANCH	01/08/24	01/05/24	01/05/24	840,000,000	840,000,000	0	840,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/09/24	01/08/24	01/08/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/10/24	01/09/24	01/09/24	850,000,000	850,000,000	0	850,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/17/24	01/10/24	01/10/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	01/17/24	01/10/24	01/10/24	1,300,000,000	1,300,000,000	0	1,300,000,000	0
RABOBANK NEW YORK	01/17/24	01/10/24	01/10/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/11/24	01/10/24	01/10/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/18/24	01/11/24	01/11/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/12/24	01/11/24	01/11/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	01/16/24	01/12/24	01/12/24	300,000,000	300,000,000	0	300,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/16/24	01/12/24	01/12/24	860,000,000	860,000,000	0	860,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/17/24	01/16/24	01/16/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/24/24	01/17/24	01/17/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/24/24	01/17/24	01/17/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	01/24/24	01/17/24	01/17/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/18/24	01/17/24	01/17/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/25/24	01/18/24	01/18/24	725,000,000	725,000,000	0	725,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/19/24	01/18/24	01/18/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/22/24	01/19/24	01/19/24	760,000,000	760,000,000	0	760,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/22/24	01/19/24	01/19/24	90,000,000	90,000,000	0	90,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/23/24	01/22/24	01/22/24	650,000,000	650,000,000	0	650,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/23/24	01/22/24	01/22/24	150,000,000	150,000,000	0	150,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/24/24	01/23/24	01/23/24	650,000,000	650,000,000	0	650,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/24/24	01/23/24	01/23/24	200,000,000	200,000,000	0	200,000,000	0
ABN AMRO BANK N.V.	01/31/24	01/24/24	01/24/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/31/24	01/24/24	01/24/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	01/31/24	01/24/24	01/24/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/25/24	01/24/24	01/24/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	02/01/24	01/25/24	01/25/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/26/24	01/25/24	01/25/24	870,000,000	870,000,000	0	870,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/29/24	01/26/24	01/26/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/30/24	01/29/24	01/29/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	01/31/24	01/30/24	01/30/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/31/24	01/30/24	01/30/24	415,000,000	415,000,000	0	415,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/31/24	01/30/24	01/30/24	455,000,000	455,000,000	0	455,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/07/24	01/31/24	01/31/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	02/07/24	01/31/24	01/31/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	02/07/24	01/31/24	01/31/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/01/24	01/31/24	01/31/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/01/24	01/31/24	01/31/24	415,000,000	415,000,000	0	415,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	02/01/24	01/31/24	01/31/24	440,000,000	440,000,000	0	440,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/10/24	01/03/24	01/03/24	1,375,000,000	1,375,000,000	0	1,375,000,000	0
RABOBANK NEW YORK	01/10/24	01/03/24	01/03/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	01/10/24	01/03/24	01/03/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/04/24	01/03/24	01/03/24	830,000,000	830,000,000	0	830,000,000	0
RABOBANK NEW YORK	01/11/24	01/04/24	01/04/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/05/24	01/04/24	01/04/24	840,000,000	840,000,000	0	840,000,000	0
Total Deposits				38,515,000,000	38,515,000,000	0	38,515,000,000	0
Maturities								
ANGLESEA FUNDING LLC PABS4	01/03/24	01/03/24	01/03/24	325,000,000	325,000,000	0	325,000,000	0
ANGLESEA FUNDING LLC PABS4	01/05/24	01/05/24	01/05/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	01/08/24	01/08/24	01/08/24	400,000,000	400,000,000	0	400,000,000	0
ANGLESEA FUNDING LLC PABS4	01/09/24	01/09/24	01/09/24	700,000,000	700,000,000	0	700,000,000	0
ANGLESEA FUNDING LLC PABS4	01/10/24	01/10/24	01/10/24	160,000,000	160,000,000	0	160,000,000	0
ANGLESEA FUNDING LLC PABS4	01/11/24	01/11/24	01/11/24	160,000,000	160,000,000	0	160,000,000	0
ANGLESEA FUNDING LLC PABS4	01/12/24	01/12/24	01/12/24	160,000,000	160,000,000	0	160,000,000	0
ANGLESEA FUNDING LLC PABS4	01/16/24	01/16/24	01/16/24	455,000,000	455,000,000	0	455,000,000	0
ANGLESEA FUNDING LLC PABS4	01/17/24	01/17/24	01/17/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	01/18/24	01/18/24	01/18/24	150,000,000	150,000,000	0	150,000,000	0
ANGLESEA FUNDING LLC PABS4	01/19/24	01/19/24	01/19/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	01/22/24	01/22/24	01/22/24	100,000,000	100,000,000	0	100,000,000	0
ANGLESEA FUNDING LLC PABS4	01/23/24	01/23/24	01/23/24	450,000,000	450,000,000	0	450,000,000	0
ANGLESEA FUNDING LLC PABS4	01/24/24	01/24/24	01/24/24	170,000,000	170,000,000	0	170,000,000	0

# TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
ANGLESEA FUNDING LLC PABS4	01/25/24	01/25/24	01/25/24	170,000,000	170,000,000	0	170,000,000	0
ANGLESEA FUNDING LLC PABS4	01/26/24	01/26/24	01/26/24	175,000,000	175,000,000	0	175,000,000	0
ANGLESEA FUNDING LLC PABS4	01/29/24	01/29/24	01/29/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	01/30/24	01/30/24	01/30/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	01/31/24	01/31/24	01/31/24	200,000,000	200,000,000	0	200,000,000	0
ANTALIS S.A. CPABS4CPABS4	01/12/24	01/12/24	01/12/24	100,000,000	100,000,000	0	100,000,000	0
BMW US CAPITAL LLC CP4-2	01/11/24	01/11/24	01/11/24	100,000,000	100,000,000	0	100,000,000	0
BPCE SA CP4-2CP4-2	01/31/24	01/31/24	01/31/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL/CHICAGO IL	01/05/24	01/05/24	01/05/24	105,000,000	105,000,000	0	105,000,000	0
BANK OF MONTREAL CDCDYAN	01/08/24	01/08/24	01/08/24	75,000,000	75,000,000	0	75,000,000	0
BANK OF MONTREAL CPCP4-2	01/10/24	01/10/24	01/10/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL	01/19/24	01/19/24	01/19/24	115,000,000	115,000,000	0	115,000,000	0
BANK OF MONTREAL	01/05/24	01/05/24	01/05/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF NOVA SCOTIA/THE	01/08/24	01/08/24	01/08/24	65,000,000	65,000,000	0	65,000,000	0
BANK OF NOVA SCOTIA/THE	01/23/24	01/23/24	01/23/24	155,000,000	155,000,000	0	155,000,000	0
BARTON CAPITAL S.A. CPABS4	01/16/24	01/16/24	01/16/24	114,777,000	114,777,000	0	114,777,000	0
BARTON CAPITAL S.A. CPABS4	01/26/24	01/26/24	01/26/24	50,000,000	50,000,000	0	50,000,000	0
BNG BANK N.V. CP4-2CP4-2	01/11/24	01/11/24	01/11/24	25,000,000	25,000,000	0	25,000,000	0
CANADIAN IMPERIAL BCDYAN	01/16/24	01/16/24	01/16/24	150,000,000	150,000,000	0	150,000,000	0
CANADIAN IMPERIAL BCDYAN	01/24/24	01/24/24	01/24/24	104,000,000	104,000,000	0	104,000,000	0
CANADIAN IMPERIAL BANK OF COMMERCE/NEW YORK NY	01/18/24	01/18/24	01/18/24	115,000,000	115,000,000	0	115,000,000	0
CANADIAN IMPERIAL BCP4-2	01/22/24	01/22/24	01/22/24	125,000,000	125,000,000	0	125,000,000	0
CHARIOT FUNDING LLC CPABS4	01/03/24	01/03/24	01/03/24	100,000,000	100,000,000	0	100,000,000	0
CHARIOT FUNDING LLC CPABS4	01/05/24	01/05/24	01/05/24	49,000,000	49,000,000	0	49,000,000	0
CHARIOT FUNDING LLC CPABS4	01/12/24	01/12/24	01/12/24	100,000,000	100,000,000	0	100,000,000	0
CHESHAM FINANCE LLC CPABS4	01/02/24	01/02/24	01/02/24	151,000,000	151,000,000	0	151,000,000	0
CIESCO, LLC. CPABS4-CPABS4	01/25/24	01/25/24	01/25/24	6,219,000	6,219,000	0	6,219,000	0
CREDIT AGRICOLE CORCDYAN	01/03/24	01/03/24	01/03/24	350,000,000	350,000,000	0	350,000,000	0
CREDIT AGRICOLE CORCDYAN	01/03/24	01/03/24	01/03/24	50,000,000	50,000,000	0	50,000,000	0
CREDIT AGRICOLE CORCDYAN	01/10/24	01/10/24	01/10/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	01/12/24	01/12/24	01/12/24	400,000,000	400,000,000	0	400,000,000	0
CREDIT AGRICOLE CORCDYAN	01/16/24	01/16/24	01/16/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	01/17/24	01/17/24	01/17/24	325,000,000	325,000,000	0	325,000,000	0
CREDIT AGRICOLE CORCDYAN	01/19/24	01/19/24	01/19/24	400,000,000	400,000,000	0	400,000,000	0
CREDIT AGRICOLE CORCDYAN	01/23/24	01/23/24	01/23/24	410,000,000	410,000,000	0	410,000,000	0
CREDIT AGRICOLE CORCDYAN	01/24/24	01/24/24	01/24/24	250,000,000	250,000,000	0	250,000,000	0
CREDIT AGRICOLE CORCDYAN	01/26/24	01/26/24	01/26/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	01/30/24	01/30/24	01/30/24	500,000,000	500,000,000	0	500,000,000	0
CREDIT AGRICOLE CORCDYAN	01/31/24	01/31/24	01/31/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/04/24	01/04/24	01/04/24	1,300,000,000	1,300,000,000	0	1,300,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/05/24	01/05/24	01/05/24	1,287,000,000	1,287,000,000	0	1,287,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/08/24	01/08/24	01/08/24	1,100,000,000	1,100,000,000	0	1,100,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/09/24	01/09/24	01/09/24	1,100,000,000	1,100,000,000	0	1,100,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/10/24	01/10/24	01/10/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/11/24	01/11/24	01/11/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/12/24	01/12/24	01/12/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/16/24	01/16/24	01/16/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/17/24	01/17/24	01/17/24	1,300,000,000	1,300,000,000	0	1,300,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/18/24	01/18/24	01/18/24	1,150,000,000	1,150,000,000	0	1,150,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/19/24	01/19/24	01/19/24	1,100,000,000	1,100,000,000	0	1,100,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/22/24	01/22/24	01/22/24	1,100,000,000	1,100,000,000	0	1,100,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/23/24	01/23/24	01/23/24	1,207,000,000	1,207,000,000	0	1,207,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/24/24	01/24/24	01/24/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/25/24	01/25/24	01/25/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/26/24	01/26/24	01/26/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/29/24	01/29/24	01/29/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	01/30/24	01/30/24	01/30/24	1,402,000,000	1,402,000,000	0	1,402,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	01/31/24	01/31/24	01/31/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA CP4-2CP4-2	01/03/24	01/03/24	01/03/24	600,000,000	600,000,000	0	600,000,000	0
GREAT BEAR FUNDING CPABS4	01/03/24	01/03/24	01/03/24	50,000,000	50,000,000	0	50,000,000	0
GREAT BEAR FUNDING CPABS4	01/04/24	01/04/24	01/04/24	250,000,000	250,000,000	0	250,000,000	0
GREAT BEAR FUNDING CPABS4	01/11/24	01/11/24	01/11/24	20,000,000	20,000,000	0	20,000,000	0
GREAT BEAR FUNDING CPABS4	01/16/24	01/16/24	01/16/24	20,000,000	20,000,000	0	20,000,000	0
GREAT BEAR FUNDING CPABS4	01/19/24	01/19/24	01/19/24	55,000,000	55,000,000	0	55,000,000	0
JUPITER SECURITIZATCPABS4	01/16/24	01/16/24	01/16/24	175,000,000	175,000,000	0	175,000,000	0
JUPITER SECURITIZATCPABS4	01/18/24	01/18/24	01/18/24	100,000,000	100,000,000	0	100,000,000	0
JUPITER SECURITIZATCPABS4	01/19/24	01/19/24	01/19/24	60,000,000	60,000,000	0	60,000,000	0
JUPITER SECURITIZATCPABS4	01/23/24	01/23/24	01/23/24	45,000,000	45,000,000	0	45,000,000	0
LMA-AMERICAS LLC CPCPABS4	01/04/24	01/04/24	01/04/24	30,050,000	30,050,000	0	30,050,000	0
LONGSHIP FUNDING LLC PABS4	01/08/24	01/08/24	01/08/24	197,000,000	197,000,000	0	197,000,000	0
LONGSHIP FUNDING LLC PABS4	01/09/24	01/09/24	01/09/24	100,000,000	100,000,000	0	100,000,000	0
LONGSHIP FUNDING LLC PABS4	01/12/24	01/12/24	01/12/24	100,000,000	100,000,000	0	100,000,000	0
LONGSHIP FUNDING LLC PABS4	01/17/24	01/17/24	01/17/24	66,000,000	66,000,000	0	66,000,000	0
LONGSHIP FUNDING LLC PABS4	01/18/24	01/18/24	01/18/24	100,000,000	100,000,000	0	100,000,000	0
LONGSHIP FUNDING LLC PABS4	01/19/24	01/19/24	01/19/24	100,000,000	100,000,000	0	100,000,000	0
MUFG BANK LTD. CDYACDYAN	01/08/24	01/08/24	01/08/24	100,000,000	100,000,000	0	100,000,000	0
MUFG BANK LTD. CDYACDYAN	01/31/24	01/31/24	01/31/24	60,000,000	60,000,000	0	60,000,000	0
MANHATTAN ASSET FUNCPABS4	01/11/24	01/11/24	01/11/24	25,000,000	25,000,000	0	25,000,000	0
MANHATTAN ASSET FUNCPABS4	01/18/24	01/18/24	01/18/24	50,000,000	50,000,000	0	50,000,000	0
NRW BANK	01/03/24	01/03/24	01/03/24	189,000,000	189,000,000	0	189,000,000	0
NATIONWIDE BUILDINGCP4-2	01/26/24	01/26/24	01/26/24	35,000,000	35,000,000	0	35,000,000	0



## TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
NATIONWIDE BUILDINGCP4-2	01/30/24	01/30/24	01/30/24	100,000,000	100,000,000	0	100,000,000	0
OLD LINE FUNDING, LCPAB54	01/26/24	01/26/24	01/26/24	25,000,000	25,000,000	0	25,000,000	0
ROYAL BANK OF CANADA/NEW YORK NY	01/09/24	01/09/24	01/09/24	100,000,000	100,000,000	0	100,000,000	0
ROYAL BANK OF CANADA/NEW YORK NY	01/10/24	01/10/24	01/10/24	100,000,000	100,000,000	0	100,000,000	0
STARBIRD FUNDING COCPAB54	01/05/24	01/05/24	01/05/24	170,000,000	170,000,000	0	170,000,000	0
SUMITOMO MITSUI TRUCDYAN	01/04/24	01/04/24	01/04/24	500,000,000	500,000,000	0	500,000,000	0
SUMITOMO MITSUI TRUCDYAN	01/16/24	01/16/24	01/16/24	50,000,000	50,000,000	0	50,000,000	0
UNITEDHEALTH GROUPCP4-2	01/22/24	01/22/24	01/22/24	100,000,000	100,000,000	0	100,000,000	0
UNITEDHEALTH GROUPCP4-2	01/25/24	01/25/24	01/25/24	200,000,000	200,000,000	0	200,000,000	0
UNITEDHEALTH GROUPCP4-2	01/26/24	01/26/24	01/26/24	200,000,000	200,000,000	0	200,000,000	0
UNITEDHEALTH GROUPCP4-2	01/29/24	01/29/24	01/29/24	100,000,000	100,000,000	0	100,000,000	0
UNITEDHEALTH GROUPCP4-2	01/30/24	01/30/24	01/30/24	100,000,000	100,000,000	0	100,000,000	0
UNITEDHEALTH GROUPCP4-2	01/31/24	01/31/24	01/31/24	240,000,000	240,000,000	0	240,000,000	0
UNITED STATES TREASURY BILL	01/25/24	01/25/24	01/25/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
UNITED STATES TREASURY BILL	01/16/24	01/16/24	01/16/24	100,000,000	100,000,000	0	100,000,000	0
VICTORY RECEIVABLESCPAB54	01/03/24	01/03/24	01/03/24	40,000,000	40,000,000	0	40,000,000	0
VICTORY RECEIVABLESCPAB54	01/25/24	01/25/24	01/25/24	100,000,000	100,000,000	0	100,000,000	0
HSBC TRIPARTY	01/03/24	01/03/24	01/03/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/03/24	01/03/24	01/03/24	1,155,000,000	1,155,000,000	0	1,155,000,000	0
MIZUHO TRIPARTY	01/04/24	01/04/24	01/04/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/04/24	01/04/24	01/04/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/04/24	01/04/24	01/04/24	777,000,000	777,000,000	0	777,000,000	0
MIZUHO TRIPARTY	01/05/24	01/05/24	01/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/05/24	01/05/24	01/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/05/24	01/05/24	01/05/24	550,000,000	550,000,000	0	550,000,000	0
MIZUHO TRIPARTY	01/08/24	01/08/24	01/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/08/24	01/08/24	01/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/08/24	01/08/24	01/08/24	482,000,000	482,000,000	0	482,000,000	0
MIZUHO TRIPARTY	01/09/24	01/09/24	01/09/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/09/24	01/09/24	01/09/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/09/24	01/09/24	01/09/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO TRIPARTY	01/10/24	01/10/24	01/10/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/10/24	01/10/24	01/10/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/10/24	01/10/24	01/10/24	563,000,000	563,000,000	0	563,000,000	0
MIZUHO TRIPARTY	01/11/24	01/11/24	01/11/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/11/24	01/11/24	01/11/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/11/24	01/11/24	01/11/24	739,000,000	739,000,000	0	739,000,000	0
MIZUHO TRIPARTY	01/12/24	01/12/24	01/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/12/24	01/12/24	01/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/12/24	01/12/24	01/12/24	634,000,000	634,000,000	0	634,000,000	0
MIZUHO TRIPARTY	01/16/24	01/16/24	01/16/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/16/24	01/16/24	01/16/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/16/24	01/16/24	01/16/24	410,000,000	410,000,000	0	410,000,000	0
MIZUHO TRIPARTY	01/17/24	01/17/24	01/17/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/17/24	01/17/24	01/17/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/17/24	01/17/24	01/17/24	200,000,000	200,000,000	0	200,000,000	0
MIZUHO TRIPARTY	01/18/24	01/18/24	01/18/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/18/24	01/18/24	01/18/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/18/24	01/18/24	01/18/24	477,000,000	477,000,000	0	477,000,000	0
MIZUHO TRIPARTY	01/19/24	01/19/24	01/19/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/19/24	01/19/24	01/19/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/19/24	01/19/24	01/19/24	266,000,000	266,000,000	0	266,000,000	0
MIZUHO TRIPARTY	01/22/24	01/22/24	01/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/22/24	01/22/24	01/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/22/24	01/22/24	01/22/24	630,000,000	630,000,000	0	630,000,000	0
MIZUHO TRIPARTY	01/23/24	01/23/24	01/23/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/23/24	01/23/24	01/23/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/23/24	01/23/24	01/23/24	566,000,000	566,000,000	0	566,000,000	0
MIZUHO TRIPARTY	01/24/24	01/24/24	01/24/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/24/24	01/24/24	01/24/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/24/24	01/24/24	01/24/24	652,000,000	652,000,000	0	652,000,000	0
MIZUHO TRIPARTY	01/25/24	01/25/24	01/25/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/25/24	01/25/24	01/25/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/25/24	01/25/24	01/25/24	437,000,000	437,000,000	0	437,000,000	0
MIZUHO TRIPARTY	01/26/24	01/26/24	01/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/26/24	01/26/24	01/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/26/24	01/26/24	01/26/24	787,000,000	787,000,000	0	787,000,000	0
MIZUHO TRIPARTY	01/29/24	01/29/24	01/29/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/29/24	01/29/24	01/29/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/29/24	01/29/24	01/29/24	845,000,000	845,000,000	0	845,000,000	0
MIZUHO TRIPARTY	01/30/24	01/30/24	01/30/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/30/24	01/30/24	01/30/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/30/24	01/30/24	01/30/24	743,000,000	743,000,000	0	743,000,000	0
MIZUHO TRIPARTY	01/31/24	01/31/24	01/31/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	01/31/24	01/31/24	01/31/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	01/31/24	01/31/24	01/31/24	184,000,000	184,000,000	0	184,000,000	0
ABN AMRO BANK N.V.	01/03/24	01/03/24	01/03/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
RABOBANK NEW YORK	01/03/24	01/03/24	01/03/24	200,000,000	200,000,000	0	200,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/03/24	01/03/24	01/03/24	1,375,000,000	1,375,000,000	0	1,375,000,000	0
ABN AMRO BANK N.V.	01/04/24	01/04/24	01/04/24	100,000,000	100,000,000	0	100,000,000	0
RABOBANK NEW YORK	01/04/24	01/04/24	01/04/24	200,000,000	200,000,000	0	200,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/03/24	01/03/24	01/03/24	835,000,000	835,000,000	0	835,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/08/24	01/08/24	01/08/24	840,000,000	840,000,000	0	840,000,000	0

## TRADING ACTIVITY FOR JANUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
MIZUHO BANK, LTD., CANADA BRANCH	01/09/24	01/09/24	01/09/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/10/24	01/10/24	01/10/24	850,000,000	850,000,000	0	850,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/17/24	01/17/24	01/17/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	01/17/24	01/17/24	01/17/24	1,300,000,000	1,300,000,000	0	1,300,000,000	0
RABOBANK NEW YORK	01/17/24	01/17/24	01/17/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/11/24	01/11/24	01/11/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/18/24	01/18/24	01/18/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/12/24	01/12/24	01/12/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	01/16/24	01/16/24	01/16/24	300,000,000	300,000,000	0	300,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/16/24	01/16/24	01/16/24	860,000,000	860,000,000	0	860,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/17/24	01/17/24	01/17/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/24/24	01/24/24	01/24/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/24/24	01/24/24	01/24/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	01/24/24	01/24/24	01/24/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/18/24	01/18/24	01/18/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	01/25/24	01/25/24	01/25/24	725,000,000	725,000,000	0	725,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/19/24	01/19/24	01/19/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/22/24	01/22/24	01/22/24	760,000,000	760,000,000	0	760,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/22/24	01/22/24	01/22/24	90,000,000	90,000,000	0	90,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/23/24	01/23/24	01/23/24	650,000,000	650,000,000	0	650,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/23/24	01/23/24	01/23/24	150,000,000	150,000,000	0	150,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/24/24	01/24/24	01/24/24	650,000,000	650,000,000	0	650,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/24/24	01/24/24	01/24/24	200,000,000	200,000,000	0	200,000,000	0
ABN AMRO BANK N.V.	01/31/24	01/31/24	01/31/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/31/24	01/31/24	01/31/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	01/31/24	01/31/24	01/31/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/25/24	01/25/24	01/25/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/26/24	01/26/24	01/26/24	870,000,000	870,000,000	0	870,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/29/24	01/29/24	01/29/24	850,000,000	850,000,000	0	850,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/30/24	01/30/24	01/30/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	01/31/24	01/31/24	01/31/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/31/24	01/31/24	01/31/24	415,000,000	415,000,000	0	415,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	01/31/24	01/31/24	01/31/24	455,000,000	455,000,000	0	455,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	01/10/24	01/10/24	01/10/24	1,375,000,000	1,375,000,000	0	1,375,000,000	0
RABOBANK NEW YORK	01/10/24	01/10/24	01/10/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	01/10/24	01/10/24	01/10/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/04/24	01/04/24	01/04/24	830,000,000	830,000,000	0	830,000,000	0
RABOBANK NEW YORK	01/11/24	01/11/24	01/11/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	01/05/24	01/05/24	01/05/24	840,000,000	840,000,000	0	840,000,000	0
Total Maturities				91,780,046,000	91,780,046,000	0	91,780,046,000	0
Paydowns								
EFF 2023-3 A1	10/21/24	01/22/24	01/22/24	1,330,451	1,330,451	0	1,330,451	0
Total Paydowns				1,330,451	1,330,451	0	1,330,451	0
Sells								
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/03/24	01/03/24	154,285,260	154,285,260	0	154,285,260	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/04/24	01/04/24	8,287,288	8,287,288	0	8,287,288	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/08/24	01/08/24	4,530,265	4,530,265	0	4,530,265	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/10/24	01/10/24	3,226,571	3,226,571	0	3,226,571	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/16/24	01/16/24	3,946,566	3,946,566	0	3,946,566	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/18/24	01/18/24	9,371,929	9,371,929	0	9,371,929	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/22/24	01/22/24	65,212	65,212	0	65,212	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/24/24	01/24/24	5,520,228	5,520,228	0	5,520,228	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	01/30/24	01/30/24	16,687,582	16,687,582	0	16,687,582	0
Total Sells				205,920,902	205,920,902	0	205,920,902	0



1801 Hermitage Boulevard, Suite 100  
Tallahassee, Florida 32308  
(850) 488-4406

[www.sbafla.com/prime](http://www.sbafla.com/prime)

## Our Mission

Our mission is to provide superior investment management and trust services by proactively and comprehensively managing risk and adhering to the highest ethical, fiduciary, and professional standards.

# Federated Hermes

The logo graphic for Federated Hermes, consisting of four horizontal blue bars of decreasing length, stacked vertically, with a small blue dot at the bottom right.





## **MONTHLY SUMMARY REPORT**

**State Board of Administration of Florida**

**February 2024**

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## **Past performance is no guarantee of future results.**

Views are as of the issue date and are subject to change based on market conditions and other factors. These views should not be construed as a recommendation for any specific security.

An investment in Florida PRIME is neither insured nor guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

Although money market funds seek to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in this fund.

## INTRODUCTION

This report is prepared for stakeholders in Florida PRIME in accordance with Section 218.409(6)(a), Florida Statutes. The statute requires:

- (1) Reporting of any material impacts on the funds and any actions or escalations taken by staff to address such impacts;
- (2) Presentation of a management summary that provides an analysis of the status of the current investment portfolio and the individual transactions executed over the last month; and
- (3) Preparation of the management summary “in a manner that will allow anyone to ascertain whether the investment activities during the reporting period have conformed to investment policies.”

This report, which covers the period from February 1, 2024, through February 29, 2024, has been prepared by the SBA with input from Federated Hermes (“Federated”), investment advisor for Florida PRIME in a format intended to comply with the statute.

## DISCLOSURE OF MATERIAL IMPACTS

During the reporting period, Florida PRIME was in material compliance with investment policy. There were no developments that had a material impact on the liquidity or operation of Florida PRIME. Details are available in the PRIME policy compliance table. This report also includes details on market conditions; fees; fund holdings, transactions and performance; and client composition.

### PRIME™ STATISTICS

(As of February 29, 2024)

Total Participants  
**783**

Florida PRIME™  
Total Participant Balance  
**\$28,086,450,657**

Total Number of Accounts  
**1,450**

**FACTS-AT-A-GLANCE** PRIME is an exclusive service for Florida governmental organizations, providing a cost-effective investment vehicle for their surplus funds. Florida PRIME, the Local Government Surplus Funds Trust Fund, is utilized by hundreds of governmental investors including state agencies, state universities and colleges, counties, cities, special districts, school boards, and other direct support organizations of the State of Florida.

Florida PRIME is a government investment pool that offers management by an industry leader in professional money management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting.

## PORTFOLIO MANAGER COMMENTARY

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Federal Reserve Chair Jerome Powell has been talking himself hoarse lately. Ever since he failed to push back against the market's overly ebullient expectations for rate cuts following the December policy meeting, he has told anyone who'd listen the Fed isn't ready to declare victory over inflation. His press conference in January and a 60 Minutes interview didn't do the trick; neither has sending forth nearly every Federal Open Market Committee (FOMC) member to shout this message from street corners.

In an appropriate twist for the data-dependent Fed, it was a series of economic reports that stemmed the tide. Robust gross domestic product and employment figures, sticky wage, consumer and producer inflation, and respectable manufacturing and housing numbers did what the policymakers could not. In late December, futures contracts predicted upward of seven quarter-point cuts in 2024. Following the bump in the month-over-month core Personal Consumption Expenditures (PCE) index in January, they have priced in essentially three—in line with Fed projections. That's why we—and really everyone—anticipates no rate action at the mid-March or early May policy-setting meetings and expect the first ease to come in June or July.

Market participants will surely raise their fists to the Fed again, and it is understandable. Powell and company were so behind the ball when they first tightened rates long after inflation had exploded. But the shift in sentiment, along with the pause itself, has benefited cash managers and investors. Across the liquidity industry, elevated yields and extended average maturities have created better relative value in our humble opinion.

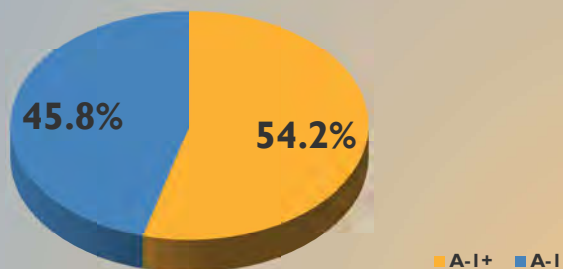
This means the street can worry about something else, and the Fed's balance sheet fits that bill. The pace and ramifications of quantitative easing also should not spark concern. It's been so long since it's been a focus, my guess is more than a few have forgotten the exact numbers (\$95 billion in government securities, split between \$60 billion in Treasuries and \$35 billion in agency mortgage back securities) rolling off each month. The balance sheet had ballooned to \$8.9 trillion but sits at around \$7.6 trillion now. The point of contention is that it will shrink too far, lowering reserves and reducing market liquidity. In the back of the policymakers' collective mind is to avoid a spike in overnight rates like what occurred in September 2019. This should not happen. Not only is the balance sheet much larger now, but also banks hold more reserves to ensure liquidity. Short of a revolt in the bond market, the taper should continue smoothly with a target of between \$6 and \$7 trillion and end in 2025. But this depends on how well the Fed communicates the process, starting in the upcoming FOMC meeting—and if the markets listen.

As tax collection season approaches its end, outflows exceeded inflows, resulting in a slight decline for pool assets. At month end, assets were down \$600 million to \$28 billion.

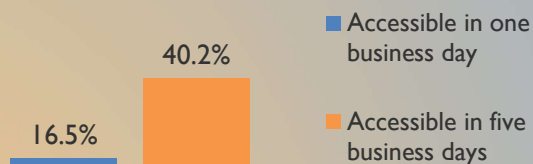
The Pool's manager extended the portfolio's Weighted Average Maturity (WAM) by 10 days to 44 days; its Weighted Average Life (WAL) extended by 6 days to 80 days. The yield of the portfolio declined by 2 basis points to 5.59%, reflecting market expectations the Fed will ease policy in 2024. The Pool continued to favor fixed and floating-rate commercial and bank paper in the 1- to 3-month and 1-year areas of the yield curve. At the end of the month, yields on 1-, 3-, 6- and 12-month U.S. Treasuries were 5.40%, 5.40%, 5.33% and 5.00%, respectively.

## PORTFOLIO COMPOSITION FOR FEBRUARY 2024

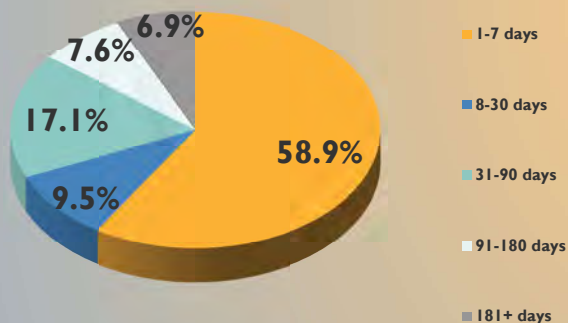
### CREDIT QUALITY COMPOSITION



### HIGHLY LIQUID HOLDINGS



### EFFECTIVE MATURITY SCHEDULE



### TOP HOLDINGS & AVG. MATURITY

1. Mizuho Financial Group, Inc.	5.0%
2. Cooperatieve Rabobank UA	5.0%
3. ABN Amro Bank NV	5.0%
4. Australia & New Zealand Banking Group, Melbourne	5.0%
5. DNB Bank ASA	4.9%
6. Mitsubishi UFJ Financial Group, Inc.	4.8%
7. Credit Agricole Group	4.6%
8. Bank of Montreal	4.1%
9. National Bank of Canada, Montreal	3.8%
10. Sumitomo Mitsui Trust Holdings, Inc.	3.8%

#### Average Effective Maturity (WAM)

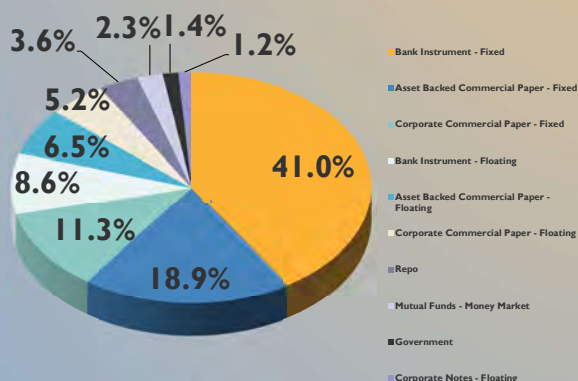
44 Days

#### Weighted Average Life (Spread WAL)

80 Days

Percentages based on total value of investments

### PORTFOLIO COMPOSITION



## FUND PERFORMANCE THROUGH FEBRUARY 2024

Florida PRIME Performance Data			
	Annualized Net Participant Yield <sup>1</sup>	Net-of-Fee Benchmark <sup>2</sup>	Above (Below) Benchmark
One Month	5.69%	5.63%	0.06%
Three Months	5.72%	5.41%	0.32%
One Year	5.56%	5.18%	0.39%
Three Years	2.71%	2.44%	0.28%
Five Years	2.18%	1.94%	0.23%
Ten Years	1.57%	1.33%	0.24%
Since 1/96	2.51%	2.29%	0.22%

Note: Net asset value at month end: \$28,091.5 million, which includes investments at market value, plus all cash, accrued interest receivable and payables.

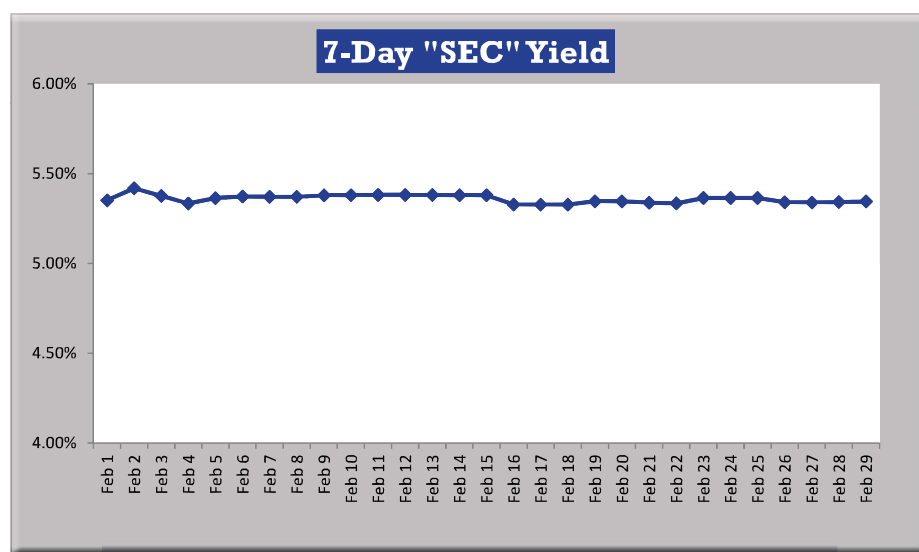
<sup>1</sup>Net of fees. Participant yield is calculated on a 365-day basis and includes adjustments for expenses and other accounting items to reflect realized earnings by participants.

<sup>2</sup>The net-of-fee benchmark is the S&P AAA/AA Rated GIP All 30-Day Net Index for all time periods.

### ABOUT ANNUALIZED YIELDS:

Performance data in the table and chart is annualized, meaning that the amounts are based on yields for the periods indicated, converted to their equivalent if obtained for a 12-month period.

For example, ignoring the effects of compounding, an investment that earns 0.10% over a 1-month period yields 1.20% on an annualized basis. Likewise, an investment that earns a total of 3.60% over three years yields 1.20% on an annualized basis, ignoring compounding.



The 7-Day "SEC" Yield in the chart is calculated in accordance with the yield methodology set forth by SEC Rule 2a-7 for money market funds. The 7-day yield = net income earned over a 7-day period / average units outstanding over the period / 7 times 365. Note that unlike other performance measures, the SEC yield does not include realized gains and losses from sales of securities.

## PRIME ACCOUNT SUMMARY FOR FEBRUARY 2024

Summary of Cash Flows		
Opening Balance (02/01/24)	\$	28,622,978,398
Participant Deposits		2,370,225,773
Gross Earnings		125,418,533
Participant Withdrawals		(3,031,474,964)
Fees		(697,083)
Closing Balance (02/29/24)	\$	28,086,450,657
<b>Net Change over Month</b>	<b>\$</b>	<b>(536,527,741)</b>

Detailed Fee Disclosure			
February		Amount	Basis Point Equivalent*
SBA Client Service, Account Mgt. & Fiduciary Oversight Fee	\$	224,253.83	0.95
Federated Investment Management Fee		435,163.44	1.84
BNY Mellon Custodial Fee**		22,564.26	0.10
Bank of America Transfer Agent Fee		6,738.16	0.03
S&P Rating Maintenance Fee		3,803.28	0.02
Audit/External Review Fees		4,559.79	0.02
<b>Total Fees</b>	<b>\$</b>	<b>697,082.76</b>	<b>2.95</b>

\*The basis point equivalent is an annualized rate based on the dollar amount of fees charged for the month times 12, divided by an average of the fund's beginning and ending total value (amortized cost) for the month which was \$28,354,764,528.

\*\*All custodian banking fees are allocated based on both market value (size) and level of service accurately passing through all charges to pool participants. Charges may fluctuate month-to-month.

The data included in this report is unaudited.

## INVENTORY OF HOLDINGS FOR FEBRUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
I320 VV Jefferson LLC, Sep 01, 2060	VARIABLE RATE DEMAND NOTE	5.45	9/1/2060	3/6/2024	5,500,000	5.53	\$5,500,000	\$5,500,000	\$0
ABN Amro Bank NV, Amsterdam TD	TIME DEPOSIT	5.33	3/6/2024		1,400,000,000	5.42	\$1,400,000,000	\$1,400,000,000	\$0
AJC Capital, LLC, Jan 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	1/1/2042	3/7/2024	5,530,000	5.45	\$5,530,000	\$5,530,000	\$0
ARI Fleet Lease Trust 2024-A, A1, 5.568%, 03/14/2025	ASSET BACKED NOTE	5.57	3/14/2025		37,700,000	5.57	\$37,700,000	\$37,706,303	\$6,303
Albion Capital LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		129,064,000	5.62	\$128,574,632	\$128,578,815	\$4,183
Albion Capital LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		5/21/2024		25,347,000	5.54	\$25,036,387	\$25,036,194	-\$193
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/11/2024		200,000,000	5.41	\$199,970,444	\$199,970,436	-\$8
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/11/2024		210,000,000	5.46	\$209,968,792	\$209,968,958	\$166
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/4/2024		200,000,000	5.47	\$199,881,111	\$199,881,650	\$539
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/18/2024		200,000,000	5.51	\$199,463,000	\$199,465,100	\$2,100
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/22/2024		100,000,000	5.59	\$99,668,167	\$99,672,702	\$4,535
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		150,000,000	5.48	\$149,265,750	\$149,261,625	-\$4,125
Anglesea Funding LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		75,000,000	5.49	\$74,300,438	\$74,295,056	-\$5,381
Anglesea Funding LLC, Aug 02, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.54	8/2/2024	3/1/2024	65,000,000	5.62	\$65,000,000	\$65,005,335	\$5,335
Archer I LLC, Jun 01, 2060	VARIABLE RATE DEMAND NOTE	5.45	6/1/2060	3/7/2024	18,000,000	5.53	\$18,000,000	\$18,000,000	\$0
Atlantic Asset Securitization LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/13/2024		50,000,000	5.58	\$49,901,958	\$49,903,575	\$1,616
Atlantic Asset Securitization LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		120,000,000	5.59	\$119,529,400	\$119,535,216	\$5,816
Atlantic Asset Securitization LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		5/11/2024		20,000,000	5.48	\$19,816,756	\$19,813,380	-\$3,376
Atlantic Asset Securitization LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		5/30/2024		62,000,000	5.51	\$61,161,536	\$61,155,424	-\$6,112
Atlantic Asset Securitization LLC CPAB54-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		5,332,000	5.52	\$5,259,100	\$5,258,582	-\$518
Australia & New Zealand Banking Group, Melbourne TD	TIME DEPOSIT	5.33	3/6/2024		1,400,000,000	5.42	\$1,400,000,000	\$1,400,000,000	\$0
BNG Bank N.V. CP4-2	COMMERCIAL PAPER - 4-2		3/6/2024		50,000,000	5.40	\$49,955,750	\$49,955,834	\$84
BPCE SA CP4-2	COMMERCIAL PAPER - 4-2		3/7/2024		200,000,000	5.66	\$199,786,111	\$199,792,334	\$6,223
BPCE SA CP4-2	COMMERCIAL PAPER - 4-2		3/12/2024		200,000,000	5.68	\$199,632,333	\$199,644,000	\$11,667
BWF Forge TL Properties Owner LLC, May 01, 2059	VARIABLE RATE DEMAND NOTE	5.45	5/1/2059	3/7/2024	28,500,000	5.45	\$28,500,000	\$28,500,000	\$0
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.92	8/9/2024		100,000,000	5.92	\$100,000,000	\$100,145,099	\$145,099
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	6.00	7/31/2024		100,000,000	6.00	\$100,000,000	\$100,167,502	\$167,502
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.18	1/24/2025		114,000,000	5.20	\$114,000,000	\$113,806,814	-\$193,186
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.22	2/5/2025		95,000,000	5.24	\$95,000,000	\$94,877,007	-\$122,993
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.20	2/10/2025		50,000,000	5.22	\$50,000,000	\$49,926,046	-\$73,954
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	5/28/2024		100,000,000	5.80	\$100,000,000	\$100,050,271	\$50,271
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	6/7/2024		104,000,000	5.80	\$104,000,000	\$104,050,987	\$50,987
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.83	6/17/2024		125,000,000	5.82	\$125,000,000	\$125,069,496	\$69,496
Bank of America N.A. Triparty Repo Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.31	3/1/2024		767,000,000	5.38	\$767,000,000	\$767,000,000	\$0
Bank of America N.A., Apr 19, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.04	4/19/2024	3/1/2024	101,000,000	6.12	\$101,000,000	\$101,079,389	\$79,389
Bank of America, N.A. CD	CERTIFICATE OF DEPOSIT	6.00	9/23/2024		50,000,000	5.99	\$50,000,000	\$50,125,918	\$125,918
Bank of Montreal CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.82	5/28/2024		100,000,000	5.81	\$100,000,000	\$100,046,019	\$46,019
Bank of Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/27/2025		35,000,000	5.15	\$33,420,100	\$33,348,819	-\$71,281
Bank of Montreal, Apr 12, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.99	4/12/2024	3/1/2024	100,000,000	6.07	\$100,000,000	\$100,063,864	\$63,864
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.82	1/6/2025	3/1/2024	165,000,000	5.90	\$165,000,000	\$165,241,369	\$241,369
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/6/2025	3/1/2024	135,000,000	5.77	\$135,000,000	\$135,000,000	\$0
Bank of Montreal, Jan 06, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.69	1/6/2025	3/1/2024	175,000,000	5.77	\$175,000,000	\$175,070,014	\$70,014
Bank of Montreal, Jun 14, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.96	6/14/2024	3/1/2024	100,000,000	6.04	\$100,000,000	\$100,145,781	\$145,781
Bank of Montreal, May 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.91	5/3/2024	3/1/2024	100,000,000	5.99	\$100,000,000	\$100,082,207	\$82,207
Bank of Montreal, Sep 16, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.88	9/16/2024	3/1/2024	40,200,000	5.96	\$40,200,000	\$40,274,034	\$74,034

See notes at end of table.



# INVENTORY OF HOLDINGS FOR FEBRUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Bank of Nova Scotia, Toronto CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/18/2024		52,000,000	5.99	\$52,000,000	\$52,163,532	\$163,532
Bank of Nova Scotia, Toronto, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/3/2025	3/1/2024	170,000,000	5.77	\$170,000,000	\$170,139,322	\$139,322
Bank of Nova Scotia, Toronto, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.95	7/3/2024	3/1/2024	75,000,000	6.03	\$75,000,000	\$75,112,478	\$112,478
Bank of Nova Scotia, Toronto, Jul 10, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.96	7/10/2024	3/1/2024	50,000,000	6.04	\$50,000,000	\$50,081,359	\$81,359
Barton Capital S.A. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/4/2024		35,000,000	5.41	\$34,979,311	\$34,979,289	-\$22
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/7/2024		110,000,000	5.46	\$109,885,569	\$109,886,212	\$642
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/12/2024		50,000,000	5.48	\$49,910,833	\$49,911,188	\$354
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		50,000,000	5.89	\$49,514,333	\$49,538,502	\$24,169
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/20/2024		70,000,000	5.86	\$69,116,425	\$69,156,903	\$40,477
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/28/2024		50,000,000	5.89	\$49,304,069	\$49,338,640	\$34,570
Bedford Row Funding Corp., Jun 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.71	6/3/2024	3/1/2024	50,000,000	5.79	\$50,000,000	\$50,032,781	\$32,781
Bedford Row Funding Corp., Oct 16, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.60	10/16/2024	3/1/2024	80,000,000	5.68	\$80,000,000	\$80,027,882	\$27,882
Bennington Stark Capital Co., LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/1/2024		60,000,000	5.44	\$59,991,083	\$59,991,124	\$40
CAFCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		75,000,000	5.63	\$74,477,708	\$74,485,439	\$7,731
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$99,303,611	\$99,313,833	\$10,222
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/30/2024		50,000,000	5.70	\$49,534,875	\$49,545,070	\$10,195
CIESCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/14/2024		30,000,000	5.67	\$29,519,467	\$29,527,947	\$8,480
CRC Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$99,303,611	\$99,313,663	\$10,052
Canadian Imperial Bank of Commerce CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/17/2024		25,000,000	5.99	\$25,000,000	\$25,077,031	\$77,031
Canadian Imperial Bank of Commerce CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		75,000,000	5.56	\$74,462,633	\$74,456,359	-\$6,275
Canadian Imperial Bank of Commerce CP4-2	COMMERCIAL PAPER - ABS- 4(2)		2/4/2025		50,000,000	5.20	\$47,669,833	\$47,593,433	-\$76,400
Canadian Imperial Bank of Commerce, Apr 01, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.01	4/1/2024	3/1/2024	150,000,000	6.09	\$150,000,000	\$150,084,828	\$84,828
Canadian Imperial Bank of Commerce, Apr 11, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.96	4/11/2024	3/1/2024	208,000,000	6.04	\$208,000,000	\$208,143,836	\$143,836
Canadian Imperial Bank of Commerce, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.82	1/3/2025	3/1/2024	110,000,000	5.90	\$110,000,000	\$110,229,637	\$229,637
Canadian Imperial Bank of Commerce, Mar 06, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.56	3/6/2024	3/1/2024	100,000,000	5.64	\$100,000,000	\$100,002,846	\$2,846
Canadian Imperial Bank of Commerce, Mar 27, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	6.01	3/27/2024	3/1/2024	100,000,000	6.09	\$100,000,000	\$100,047,923	\$47,923
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/19/2024		125,000,000	5.51	\$124,645,729	\$124,647,005	\$1,276
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/20/2024		50,000,000	5.53	\$49,850,556	\$49,851,324	\$768
Chariot Funding LLC, Aug 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.54	8/1/2024	3/1/2024	50,000,000	5.62	\$50,000,000	\$50,003,903	\$3,903
Chesham Finance LLC Series VII CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/20/2024		40,000,000	5.47	\$39,880,889	\$39,881,059	\$170
Citibank N.A., New York, Jan 10, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.69	1/10/2025	3/1/2024	220,000,000	5.77	\$220,000,000	\$220,054,056	\$54,056
Citibank N.A., New York, Oct 28, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	10/28/2024	3/1/2024	100,000,000	5.99	\$100,000,000	\$100,202,761	\$202,761
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	6.01	9/18/2024		130,000,000	6.00	\$130,000,000	\$130,341,896	\$341,896
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	5.92	7/22/2024		150,000,000	5.96	\$150,000,000	\$150,229,776	\$229,776
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/3/2024		75,000,000	5.92	\$74,598,375	\$74,618,114	\$19,739
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		75,000,000	5.97	\$74,263,750	\$74,301,380	\$37,630
City Furniture, Inc., Aug 01, 2044	VARIABLE RATE DEMAND NOTE	5.46	8/1/2044	3/7/2024	77,000,000	5.46	\$77,000,000	\$77,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.85	7/1/2024	3/1/2024	100,000,000	5.93	\$100,000,000	\$100,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.73	7/1/2024	3/1/2024	140,000,000	5.81	\$140,000,000	\$140,094,738	\$94,738
Collateralized Commercial Paper FLEX Co., LLC, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.63	7/3/2024	3/1/2024	155,000,000	5.71	\$155,000,000	\$155,000,000	\$0

See notes at end of table.

## INVENTORY OF HOLDINGS FOR FEBRUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Collateralized Commercial Paper FLEX Co., LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.85	7/8/2024	3/1/2024	115,000,000	5.93	\$115,000,000	\$115,042,528	\$42,528
Collateralized Commercial Paper FLEX Co., LLC, Jul 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/23/2024	3/1/2024	70,000,000	5.80	\$70,000,000	\$70,034,679	\$34,679
Collateralized Commercial Paper V Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.86	7/10/2024	3/1/2024	100,000,000	5.94	\$100,000,000	\$100,110,026	\$110,026
Collateralized Commercial Paper V Co. LLC, Jul 22, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/22/2024	3/1/2024	50,000,000	5.80	\$50,000,000	\$50,016,632	\$16,632
Commonwealth Bank of Australia, Mar 21, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.96	3/21/2024	3/1/2024	50,000,000	6.04	\$50,000,000	\$50,016,366	\$16,366
Cooperative Rabobank UATD	TIME DEPOSIT	5.33	3/6/2024		700,000,000	5.42	\$700,000,000	\$700,000,000	\$0
Cooperative Rabobank UATD	TIME DEPOSIT	5.33	3/7/2024		700,000,000	5.42	\$700,000,000	\$700,000,000	\$0
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	3/5/2024		955,000,000	5.41	\$955,000,000	\$954,995,626	-\$4,374
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	3/6/2024		200,000,000	5.41	\$200,000,000	\$199,998,784	-\$1,216
DNB Bank ASA CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		190,000,000	5.88	\$188,542,726	\$188,636,723	\$93,997
DNB Bank ASA TD	TIME DEPOSIT	5.31	3/1/2024		1,200,000,000	5.40	\$1,200,000,000	\$1,200,000,000	\$0
DZ Bank AG Deutsche Zentral-Genossenschaftsbank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/24/2024		100,000,000	5.88	\$100,000,000	\$100,044,511	\$44,511
Dino P. Kanelos Irrevocable Trust, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	3/7/2024	4,515,000	5.45	\$4,515,000	\$4,515,000	\$0
Dreyfus Government Cash Management Fund	OVERNIGHT MUTUAL FUND	5.14	3/1/2024		3,189,433	5.23	\$3,189,433	\$3,189,433	\$0
Enterprise Fleet Financing, LLC 2023-3, A1, 5.906%, 10/21/2024	ASSET BACKED NOTE	5.91	10/21/2024		5,744,575	5.91	\$5,744,575	\$5,748,829	\$4,254
Enterprise Fleet Financing, LLC 2024-1, A1, 5.548%, 02/20/2025	ASSET BACKED NOTE	5.55	2/20/2025		23,296,892	5.55	\$23,296,892	\$23,300,151	\$3,259
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/7/2024		35,000,000	5.68	\$34,475,437	\$34,484,004	\$8,566
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/17/2024		50,000,000	5.69	\$49,174,931	\$49,189,918	\$14,987
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/21/2024		100,000,000	5.69	\$98,289,306	\$98,321,636	\$32,330
Federated Hermes Institutional Prime Value Obligations Fund - Class IS	MUTUAL FUND MONEY MARKET	5.48	3/1/2024	3/1/2024	630,872,087	5.48	\$631,124,436	\$630,998,262	-\$126,174
Fiore Capital LLC, Series 2005-A, Aug 01, 2045	VARIABLE RATE DEMAND NOTE	5.45	8/1/2045	3/7/2024	8,690,000	5.45	\$8,690,000	\$8,690,000	\$0
GTA Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/13/2024		90,000,000	5.81	\$88,969,550	\$89,006,550	\$37,000
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/1/2024		100,000,000	5.58	\$99,518,222	\$99,522,548	\$4,326
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/3/2024		44,500,000	5.54	\$44,273,891	\$44,274,199	\$308
Great Bear Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/14/2024		25,000,000	5.45	\$24,948,083	\$24,947,709	-\$374
GreatAmerica Leasing Receivables 2024-1, A1, 5.55%, 02/18/2025	ASSET BACKED NOTE	5.55	2/18/2025		35,683,171	5.55	\$35,683,171	\$35,685,466	\$2,294
HSBC Securities (USA), Inc. Repo Tri Party Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.31	3/1/2024		100,000,000	5.38	\$100,000,000	\$100,000,000	\$0
HW Hellman Building, LP, Mar 01, 2062	VARIABLE RATE DEMAND NOTE	5.45	3/1/2062	3/7/2024	50,000,000	5.45	\$50,000,000	\$50,000,000	\$0
J.P. Morgan Securities LLC	CALLABLE COMMERCIAL PAPER	5.94	8/21/2024	3/1/2024	50,000,000	6.02	\$50,000,000	\$50,047,514	\$47,514
Jupiter Securitization Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/10/2024	3/1/2024	75,000,000	5.80	\$75,000,000	\$75,013,492	\$13,492
Jupiter Securitization Co. LLC, Nov 06, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.63	11/6/2024	3/1/2024	16,000,000	5.71	\$16,000,000	\$16,000,000	\$0
Jupiter Securitization Co. LLC, Oct 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.66	10/23/2024	3/1/2024	100,000,000	5.74	\$100,000,000	\$100,032,424	\$32,424
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/8/2024		200,000,000	5.53	\$198,836,500	\$198,836,500	-\$0
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/25/2024		75,000,000	5.55	\$74,372,333	\$74,373,500	\$1,167
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/26/2024		60,000,000	5.55	\$59,488,900	\$59,489,850	\$950
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/7/2024		150,000,000	5.50	\$148,487,000	\$148,479,255	-\$7,745
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/8/2024		92,000,000	5.50	\$91,058,380	\$91,053,619	-\$4,761
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/18/2024		50,000,000	5.58	\$49,864,250	\$49,865,525	\$1,275

See notes at end of table.

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LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		50,000,000	5.54	\$49,550,000	\$49,550,834	\$834
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/30/2024		30,300,000	5.54	\$30,022,755	\$30,023,320	\$565
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/23/2024		13,000,000	5.50	\$12,838,323	\$12,837,231	-\$1,092
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/1/2024		65,000,000	5.42	\$64,990,394	\$64,990,407	\$13
MUFG Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.50	3/28/2024		100,000,000	5.58	\$100,000,000	\$100,010,758	\$10,758
MUFG Bank Ltd. CP	COMMERCIAL PAPER		3/6/2024		50,000,000	5.69	\$49,953,917	\$49,955,834	\$1,917
MUFG Bank Ltd. CP	COMMERCIAL PAPER		6/13/2024		260,000,000	5.51	\$255,950,500	\$255,961,116	\$10,616
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.46	5/2/2024		90,000,000	5.55	\$90,000,000	\$89,990,090	-\$9,910
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.49	6/3/2024		100,000,000	5.58	\$100,000,000	\$100,000,000	\$0
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.50	4/23/2024		100,000,000	5.59	\$100,000,000	\$99,996,871	-\$3,129
Manhattan Asset Funding Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/4/2024		40,000,000	5.57	\$39,790,000	\$39,791,167	\$1,167
Matchpoint Finance plc CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		45,000,000	5.55	\$44,777,663	\$44,778,488	\$825
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.60	3/1/2024		125,000,000	5.68	\$125,000,000	\$125,007,653	\$7,653
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.60	3/13/2024		150,000,000	5.68	\$150,000,000	\$150,010,898	\$10,898
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.58	3/19/2024		195,000,000	5.66	\$195,000,000	\$195,018,899	\$18,899
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.40	5/16/2024		75,000,000	5.49	\$75,000,000	\$74,991,703	-\$8,297
Mizuho Bank Ltd., Canada Branch TD	TIME DEPOSIT	5.33	3/1/2024		845,000,000	5.42	\$845,000,000	\$845,000,000	\$0
Mizuho Securities USA, Inc. - REPO TRIPARTY OVERNIGHT FIXED	REPO TRIPARTY OVERNIGHT FIXED	5.32	3/1/2024		150,000,000	5.39	\$150,000,000	\$150,000,000	\$0
National Australia Bank Ltd., Melbourne CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		110,000,000	5.88	\$108,932,481	\$108,983,694	\$51,213
National Australia Bank Ltd., Melbourne CP4-2	COMMERCIAL PAPER - 4-2		2/10/2025		50,000,000	5.16	\$47,643,292	\$47,590,595	-\$52,697
National Australia Bank Ltd., Melbourne, Dec 09, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.76	12/9/2024	3/1/2024	100,000,000	5.84	\$100,000,000	\$100,176,058	\$176,058
National Australia Bank Ltd., Melbourne, Sep 24, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.85	9/24/2024	3/1/2024	100,000,000	5.93	\$100,000,000	\$100,203,408	\$203,408
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		5/24/2024		130,000,000	5.77	\$128,302,597	\$128,352,731	\$50,134
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		6/17/2024		200,000,000	5.77	\$196,660,361	\$196,761,368	\$101,007
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/22/2025		30,000,000	5.10	\$28,679,800	\$28,598,748	-\$81,052
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/27/2025		120,000,000	5.10	\$114,638,700	\$114,318,449	-\$320,251
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/31/2025		115,000,000	5.08	\$109,821,901	\$109,497,651	-\$324,250
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		2/5/2025		65,000,000	5.19	\$61,968,075	\$61,849,480	-\$118,595
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		2/3/2025		90,000,000	5.19	\$85,826,500	\$85,660,143	-\$166,357
National Bank of Canada, Montreal, Jan 16, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.68	1/16/2025	3/1/2024	200,000,000	5.76	\$200,000,000	\$200,172,236	\$172,236
National Bank of Canada, Montreal, Jan 17, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.68	1/17/2025	3/1/2024	100,000,000	5.76	\$100,000,000	\$100,086,879	\$86,879
National Bank of Canada, Montreal, Mar 06, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.56	3/6/2024	3/1/2024	50,000,000	5.64	\$50,000,000	\$50,001,256	\$1,256
Nordea Bank Abp CP4-2	COMMERCIAL PAPER - 4-2		4/19/2024		130,000,000	5.87	\$128,984,375	\$129,045,885	\$61,510
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		100,000,000	5.58	\$99,623,611	\$99,628,395	\$4,784
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		40,000,000	5.58	\$39,843,422	\$39,845,361	\$1,939
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		48,750,000	5.90	\$48,290,938	\$48,309,625	\$18,688
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		48,600,000	5.89	\$48,120,318	\$48,139,454	\$19,136
Old Line Funding, LLC, Aug 20, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.58	8/20/2024	3/1/2024	50,000,000	5.66	\$50,000,000	\$50,012,266	\$12,266
Old Line Funding, LLC, Aug 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.58	8/23/2024	3/1/2024	100,000,000	5.66	\$100,000,000	\$100,037,365	\$37,365
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	7/8/2024	3/1/2024	50,000,000	5.79	\$50,000,000	\$50,000,000	\$0
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	7/8/2024	3/1/2024	75,000,000	5.79	\$75,000,000	\$75,051,325	\$51,325

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Old Line Funding, LLC, Oct 28, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.60	10/28/2024	3/1/2024	75,000,000	5.68	\$75,000,000	\$75,000,000	\$0
Old Line Funding, LLC, Sep 04, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.53	9/4/2024	3/1/2024	90,000,000	5.61	\$90,000,000	\$90,000,000	\$0
Overbaugh Family (2016) Survivorship Trust, Apr 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	4/1/2042	3/7/2024	7,015,000	5.45	\$7,015,000	\$7,015,000	\$0
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		3/6/2024		20,000,000	5.53	\$19,982,033	\$19,982,243	\$209
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		3/8/2024		50,000,000	5.53	\$49,940,111	\$49,940,774	\$662
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		5/15/2024		25,000,000	5.49	\$24,718,694	\$24,717,920	-\$774
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		6/5/2024		100,000,000	5.69	\$98,528,833	\$98,562,047	\$33,214
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		40,000,000	5.50	\$39,632,133	\$39,630,021	-\$2,113
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		22,692,000	5.49	\$22,480,340	\$22,478,712	-\$1,628
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		3/20/2024		45,000,000	5.53	\$44,868,750	\$44,866,863	-\$1,887
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/11/2024		150,000,000	6.00	\$144,693,750	\$145,064,063	\$370,313
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/16/2024		47,000,000	6.00	\$45,300,428	\$45,420,839	\$120,411
Scheel Investments, LLC, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	3/7/2024	6,720,000	5.45	\$6,720,000	\$6,720,000	\$0
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/11/2024		100,000,000	5.61	\$99,833,472	\$99,836,314	\$2,842
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/12/2024		90,000,000	5.61	\$89,836,500	\$89,839,087	\$2,587
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/25/2024		100,000,000	5.61	\$99,621,528	\$99,624,306	\$2,778
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/26/2024		20,000,000	5.61	\$19,921,278	\$19,921,798	\$520
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/13/2024		90,000,000	5.49	\$89,015,800	\$88,998,533	-\$17,267
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/29/2024		50,000,000	5.51	\$49,332,500	\$49,330,000	-\$2,500
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		80,000,000	5.51	\$78,908,267	\$78,904,042	-\$4,225
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		50,000,000	5.51	\$49,317,667	\$49,315,026	-\$2,641
Sumitomo Mitsui Banking Corp., Mar 28, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.51	3/28/2024	3/1/2024	200,000,000	5.59	\$200,000,000	\$200,012,048	\$12,048
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.55	3/26/2024		200,000,000	5.63	\$200,000,000	\$200,020,684	\$20,684
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.55	3/27/2024		125,000,000	5.63	\$125,000,000	\$125,013,291	\$13,291
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/18/2024		240,000,000	5.54	\$240,000,000	\$240,011,770	\$11,770
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/5/2024		205,000,000	5.54	\$205,000,000	\$205,010,570	\$10,570
Sumitomo Mitsui Trust Bank Ltd. CP4-2	COMMERCIAL PAPER - 4-2		4/8/2024		100,000,000	5.55	\$99,417,167	\$99,423,797	\$6,630
Sumitomo Mitsui Trust Bank Ltd.(London) ECD	EURO CERTIFICATE OF DEPOSIT	0.00	3/7/2024		200,000,000	5.69	\$199,784,884	\$199,815,614	\$30,731
Svenska Handelsbanken, Stockholm CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/4/2024		10,000,000	5.88	\$10,000,000	\$10,003,416	\$3,416
Taxable Tender Option Bond Trust 2021-MIZ9064TX, (Series 2021-MIZ9064TX), 11/01/2056	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	11/1/2056	3/7/2024	6,500,000	5.73	\$6,500,000	\$6,500,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9084TX, (Series 2022-MIZ9084TX), 02/01/2027	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	2/1/2027	3/7/2024	5,150,000	5.73	\$5,150,000	\$5,150,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9094TX, (Series 2022-MIZ9094TX), 12/01/2059	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	12/1/2059	3/7/2024	3,200,000	5.73	\$3,200,000	\$3,200,000	\$0
Texas State, Veterans Bonds (Taxable Series 2023A), 12/01/2054	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.40	12/1/2054	3/6/2024	18,000,000	5.40	\$18,000,000	\$18,000,000	\$0
The Greathouse 2021 Children's Trust, Dec 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	12/1/2046	3/7/2024	13,625,000	5.45	\$13,625,000	\$13,625,000	\$0

See notes at end of table.

# INVENTORY OF HOLDINGS FOR FEBRUARY 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		35,250,000	5.90	\$34,918,063	\$34,935,687	\$17,625
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/6/2024		40,000,000	5.89	\$39,580,133	\$39,601,896	\$21,763
Thunder Bay Funding, LLC, May 06, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	5/6/2024	3/1/2024	75,000,000	5.79	\$75,000,000	\$75,029,653	\$29,653
Thunder Bay Funding, LLC, May 29, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.71	5/29/2024	3/1/2024	100,000,000	5.79	\$100,000,000	\$100,042,839	\$42,839
Thunder Bay Funding, LLC, Oct 17, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.60	10/17/2024	3/1/2024	50,000,000	5.68	\$50,000,000	\$50,000,000	\$0
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	9/6/2024		25,000,000	5.99	\$25,000,000	\$25,063,580	\$63,580
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/3/2024		118,500,000	6.04	\$118,500,000	\$118,667,814	\$167,814
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/10/2024		97,000,000	6.04	\$97,000,000	\$97,144,061	\$144,061
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.02	7/3/2024		100,000,000	6.01	\$100,000,000	\$100,133,001	\$133,001
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.15	2/12/2025		100,000,000	5.17	\$100,000,000	\$100,000,000	\$0
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		5/16/2024		60,000,000	5.80	\$59,296,092	\$59,318,456	\$22,364
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		8/23/2024		50,000,000	6.00	\$48,616,444	\$48,725,956	\$109,511
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		2/21/2025		150,000,000	5.32	\$142,496,917	\$142,498,707	\$1,790
Toronto Dominion Bank, Apr 29, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	4/29/2024	3/1/2024	100,000,000	5.99	\$100,000,000	\$100,081,218	\$81,218
Toronto Dominion Bank, Jan 16, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.66	1/16/2025	3/1/2024	235,000,000	5.74	\$235,000,000	\$235,141,212	\$141,212
TotalEnergies Capital S.A. CP4-2	COMMERCIAL PAPER - 4-2		3/4/2024		50,000,000	5.41	\$49,970,500	\$49,970,381	-\$119
Toyota Credit Canada Inc. CP	COMMERCIAL PAPER		7/18/2024		40,000,000	5.99	\$39,113,333	\$39,168,970	\$55,637
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		4/25/2024		13,000,000	5.91	\$12,885,542	\$12,891,002	\$5,460
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		5/23/2024		50,000,000	5.73	\$49,357,167	\$49,364,167	\$7,000
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		6/17/2024		30,000,000	5.74	\$29,500,417	\$29,510,414	\$9,998
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		7/17/2024		55,000,000	5.61	\$53,861,744	\$53,848,182	-\$13,563
Toyota Lease Owner Trust 2024-A, A1, 5.524%, 02/20/2025	ASSET BACKED NOTE	5.52	2/20/2025		30,000,000	5.52	\$30,000,000	\$30,000,000	\$0
Toyota Motor Credit Corp., Dec 09, 2024	VARIABLE MEDIUM TERM NOTE	5.81	12/9/2024	3/1/2024	95,000,000	5.89	\$95,000,000	\$95,216,686	\$216,686
U.S. Treasury Bill 04/04/2024	US TREASURY BILL	0.00	4/4/2024		400,000,000	5.40	\$397,947,639	\$398,002,876	\$55,237
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		3/28/2024		100,000,000	5.49	\$99,583,889	\$99,581,400	-\$2,489
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/7/2024		95,000,000	5.51	\$94,039,972	\$94,036,862	-\$3,111
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/16/2024		50,000,000	5.51	\$49,427,847	\$49,426,315	-\$1,533
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/24/2024		100,000,000	5.51	\$98,736,806	\$98,734,051	-\$2,755
Wells Fargo Bank, N.A. CD	CERTIFICATE OF DEPOSIT	5.15	2/13/2025		200,000,000	5.17	\$200,000,000	\$200,000,000	\$0
Wells Fargo Bank, N.A. CD	CERTIFICATE OF DEPOSIT	5.21	2/14/2025		10,000,000	5.23	\$10,000,000	\$9,993,257	-\$6,744
Wells Fargo Bank, N.A., Jul 31, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	7/31/2024	3/1/2024	100,000,000	5.99	\$100,000,000	\$100,172,393	\$172,393
Wells Fargo Bank, N.A., Nov 07, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	11/7/2024	3/1/2024	100,000,000	5.99	\$100,000,000	\$100,236,600	\$236,600
Wells Fargo Bank, N.A., Nov 13, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	11/13/2024	3/1/2024	50,000,000	5.99	\$50,000,000	\$50,122,413	\$122,413
Wells Fargo Bank, N.A., Sep 12, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.91	9/12/2024	3/1/2024	225,000,000	5.99	\$225,000,000	\$225,462,013	\$462,013
Westpac Banking Corp. Ltd., Sydney CP4-2	COMMERCIAL PAPER - 4-2		2/7/2025		100,000,000	5.17	\$95,317,778	\$95,161,640	-\$156,138
Wylie Bice Life Insurance Trust, Aug 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	8/1/2046	3/7/2024	7,625,000	5.45	\$7,625,000	\$7,625,000	\$0
Total Value of Assets					28,186,591,158		\$28,085,106,784	\$28,091,469,590	\$6,362,806

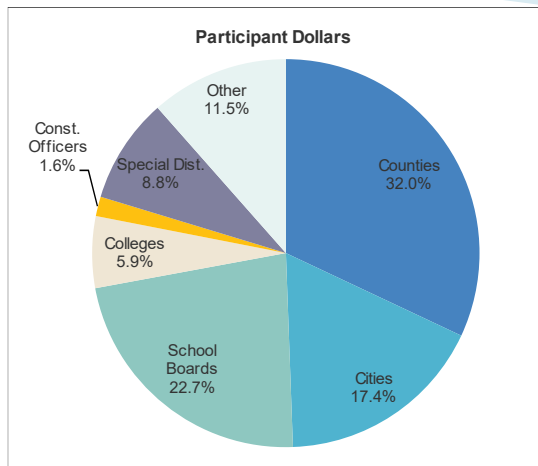
**Notes:** The data included in this report is unaudited. Amounts above are the value of investments. Income accruals, payables and uninvested cash are not included. Amortizations/accretions are reported with a one-day lag in the above valuations.

<sup>1</sup> Market values of the portfolio securities are provided by the custodian, BNY Mellon. The portfolio manager, Federated Hermes, is the source for other data shown above.

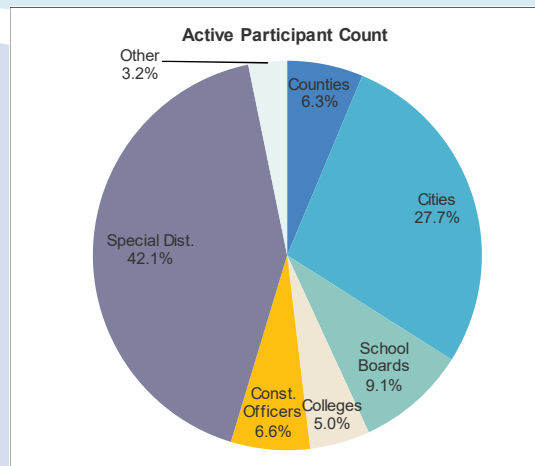
<sup>2</sup> Amortized cost is calculated using a straight line method.

## PARTICIPANT CONCENTRATION DATA - AS OF FEBRUARY 2024

Participant Balance	Share of Total Fund	Share of Participant Count	Participant Balance	Share of Total Fund	Share of Participant Count
<b>All Participants</b>	<b>100.0%</b>	<b>100.0%</b>	<b>Colleges &amp; Universities</b>	<b>5.9%</b>	<b>5.0%</b>
Top 10	33.0%	1.3%	Top 10	5.2%	1.3%
\$100 million or more	77.0%	9.3%	\$100 million or more	3.9%	0.5%
\$10 million up to \$100 million	20.6%	20.8%	\$10 million up to \$100 million	2.0%	2.1%
\$1 million up to \$10 million	2.1%	19.4%	\$1 million up to \$10 million	0.1%	0.6%
Under \$1 million	0.3%	50.5%	Under \$1 million	0.01%	1.8%
<b>Counties</b>	<b>32.0%</b>	<b>6.3%</b>	<b>Constitutional Officers</b>	<b>1.6%</b>	<b>6.6%</b>
Top 10	25.7%	1.3%	Top 10	0.8%	1.3%
\$100 million or more	30.8%	2.4%	\$100 million or more	0.0%	0.0%
\$10 million up to \$100 million	1.0%	1.2%	\$10 million up to \$100 million	1.3%	1.2%
\$1 million up to \$10 million	0.1%	1.2%	\$1 million up to \$10 million	0.3%	2.1%
Under \$1 million	0.0%	1.5%	Under \$1 million	0.0%	3.3%
<b>Municipalities</b>	<b>17.4%</b>	<b>27.7%</b>	<b>Special Districts</b>	<b>8.8%</b>	<b>42.1%</b>
Top 10	6.0%	1.3%	Top 10	5.2%	1.3%
\$100 million or more	6.7%	1.5%	\$100 million or more	5.2%	1.3%
\$10 million up to \$100 million	10.0%	9.5%	\$10 million up to \$100 million	2.7%	3.6%
\$1 million up to \$10 million	0.6%	5.5%	\$1 million up to \$10 million	0.7%	7.9%
Under \$1 million	0.1%	11.1%	Under \$1 million	0.2%	29.3%
<b>School Boards</b>	<b>22.7%</b>	<b>9.1%</b>	<b>Other</b>	<b>11.5%</b>	<b>3.2%</b>
Top 10	14.2%	1.3%	Top 10	10.3%	1.3%
\$100 million or more	19.3%	2.4%	\$100 million or more	11.1%	1.0%
\$10 million up to \$100 million	3.3%	3.0%	\$10 million up to \$100 million	0.3%	0.4%
\$1 million up to \$10 million	0.2%	1.3%	\$1 million up to \$10 million	0.1%	0.9%
Under \$1 million	0.0%	2.4%	Under \$1 million	0.0%	0.9%



Total Fund Value: \$28,086,450,657



Total Active Participant Count: 777

Note: Active accounts include only those participant accounts valued above zero.

## COMPLIANCE WITH INVESTMENT POLICY FOR FEBRUARY 2024

As investment manager, Federated monitors compliance daily on Florida PRIME to ensure that investment practices comply with the requirements of the Investment Policy Statement (IPS). Federated provides a monthly compliance report to the SBA and is required to notify the Investment Oversight Group (IOG) of compliance exceptions within 24 hours of identification. The IOG will meet as necessary based on the occurrence and resolution of compliance exceptions or upon the occurrence of a material event. Minutes from the IOG meetings are posted to the Florida PRIME website.

In addition to the compliance testing performed by Federated, SBA Risk Management and Compliance conducts daily independent testing on Florida PRIME using a risk-based approach. Under this approach, each IPS parameter is ranked as “High” or “Low” with respect to the level of risk associated with a potential guideline breach. Negative test results are subject to independent verification and review for possible escalation. These rankings, along with the frequency for testing, are reviewed and approved by the IOG on an annual basis or more often if market conditions dictate. Additionally, any parameter reported in “Fail” status on the Federated compliance report, regardless of risk ranking, is also independently verified and escalated accordingly. The results of independent testing are currently reported monthly to the IOG.

Test by Source	Pass/Fail
Securities must be USD denominated	Pass
<u>Ratings requirements</u>	
First Tier Securities	Pass
Long-term securities must have long-term ratings in the three highest categories	Pass
Commercial Paper must have short-term ratings from at least one NRSRO	Pass
Securities in Highest Rating Category (A-1+ or equivalent)	Pass
Repurchase Agreement Counterparties must be rated by S&P	Pass
S&P Weighted Average Life	Pass
<u>Maturity</u>	
Individual Security	Pass
Government floating rate notes/variable rate notes	Pass
Dollar Weighted Average Maturity	Pass
Weighted Average Life	Pass
<u>Issuer Diversification</u>	
First tier issuer (limit does not apply to cash, cash items, U.S. Government securities and repo collateralized by these securities)	Pass
 Demand Feature and Guarantor Diversification	
First Tier securities issued by or subject to demand features and guarantees of a non-controlled person	Pass
First Tier securities issued by or subject to demand features and guarantees of a controlled person	Pass

Test by Source	Pass/Fail
<u>Money Market Mutual Funds</u>	
Invested in any one Money Market Mutual Fund	Pass
<u>Repurchase Agreements</u>	
Repurchase Agreement Counterparty Rating	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (More than 5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (More than 5 business days)	Pass
Repurchase Agreements with any single dealer - Counterparty Rating A-1	Pass
<u>Concentration Tests</u>	
Industry Concentration, excluding financial services industry	Pass
Any Single Government Agency	Pass
Illiquid Securities	Pass
Assets invested in securities accessible within 1 business day	Pass
Assets invested in securities accessible within 5 business days	Pass





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## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/29/24	02/28/24	02/28/24	50,000,000	49,992,625	0	49,992,625	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/29/24	02/28/24	02/28/24	50,000,000	49,992,625	0	49,992,625	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/29/24	02/28/24	02/28/24	3,000,000	2,999,558	0	2,999,558	0
MUFG BANK LTD, ECD ECD	06/03/24	02/28/24	03/01/24	100,000,000	100,000,000	0	100,000,000	0
FAIRWAY FINANCE CO,CPABS4	02/23/24	02/09/24	02/09/24	15,000,000	14,968,967	0	14,968,967	0
GREAT BEAR FUNDING CPABS4	02/21/24	02/14/24	02/14/24	50,000,000	49,948,181	0	49,948,181	0
GREAT BEAR FUNDING CPABS4	03/14/24	02/21/24	02/21/24	25,000,000	24,918,417	0	24,918,417	0
JUPITER SECURITIZATION CO LLC	11/06/24	02/06/24	02/06/24	16,000,000	16,000,000	0	16,000,000	0
JUPITER SECURITIZATCPABS4	05/07/24	02/06/24	02/06/24	50,000,000	49,325,083	0	49,325,083	0
JUPITER SECURITIZATCPABS4	05/07/24	02/06/24	02/06/24	50,000,000	49,325,083	0	49,325,083	0
JUPITER SECURITIZATCPABS4	05/07/24	02/06/24	02/06/24	50,000,000	49,325,083	0	49,325,083	0
JUPITER SECURITIZATCPABS4	05/08/24	02/06/24	02/06/24	50,000,000	49,317,667	0	49,317,667	0
JUPITER SECURITIZATCPABS4	05/08/24	02/06/24	02/06/24	42,000,000	41,426,840	0	41,426,840	0
LMA-AMERICAS LLC CPCPABS4	04/29/24	02/29/24	02/29/24	50,000,000	49,550,000	0	49,550,000	0
LMA-AMERICAS LLC CPCPABS4	04/30/24	02/29/24	02/29/24	30,300,000	30,022,755	0	30,022,755	0
LMA-AMERICAS LLC CPCPABS4	05/23/24	02/15/24	02/15/24	13,000,000	12,811,377	0	12,811,377	0
LONGSHIP FUNDING LLCPCABS4	02/08/24	02/01/24	02/01/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCPCABS4	02/08/24	02/01/24	02/01/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCPCABS4	02/08/24	02/01/24	02/01/24	50,000,000	49,948,278	0	49,948,278	0
LONGSHIP FUNDING LLCPCABS4	02/14/24	02/06/24	02/06/24	50,000,000	49,940,889	0	49,940,889	0
LONGSHIP FUNDING LLCPCABS4	02/14/24	02/06/24	02/06/24	30,000,000	29,964,533	0	29,964,533	0
LONGSHIP FUNDING LLCPCABS4	02/22/24	02/14/24	02/14/24	50,000,000	49,940,889	0	49,940,889	0
LONGSHIP FUNDING LLCPCABS4	03/01/24	02/22/24	02/22/24	50,000,000	49,940,889	0	49,940,889	0
LONGSHIP FUNDING LLCPCABS4	03/01/24	02/22/24	02/22/24	15,000,000	14,982,267	0	14,982,267	0
MIZUHO BANK LTD, CDCDYAN	05/16/24	02/02/24	02/02/24	50,000,000	50,000,000	0	50,000,000	0
MIZUHO BANK LTD, CDCDYAN	05/16/24	02/02/24	02/02/24	25,000,000	25,000,000	0	25,000,000	0
MUFG BANK LTD, CPCP	06/13/24	02/29/24	02/29/24	50,000,000	49,221,250	0	49,221,250	0
MUFG BANK LTD, CPCP	06/13/24	02/29/24	02/29/24	50,000,000	49,221,250	0	49,221,250	0
MUFG BANK LTD, CPCP	06/13/24	02/29/24	02/29/24	50,000,000	49,221,250	0	49,221,250	0
MUFG BANK LTD, CPCP	06/13/24	02/29/24	02/29/24	50,000,000	49,221,250	0	49,221,250	0
MUFG BANK LTD, CPCP	06/13/24	02/29/24	02/29/24	50,000,000	49,221,250	0	49,221,250	0
NATIONAL AUSTRALIA CP4-2	02/10/25	02/12/24	02/12/24	50,000,000	47,527,833	0	47,527,833	0
NATIONAL BANK OF CACP4-2	01/22/25	02/01/24	02/02/24	30,000,000	28,571,125	0	28,571,125	0
NATIONAL BANK OF CACP4-2	01/27/25	02/01/24	02/01/24	50,000,000	47,578,292	0	47,578,292	0
NATIONAL BANK OF CACP4-2	01/27/25	02/01/24	02/01/24	20,000,000	19,031,317	0	19,031,317	0
NATIONAL BANK OF CACP4-2	01/27/25	02/01/24	02/01/24	50,000,000	47,578,292	0	47,578,292	0
NATIONAL BANK OF CACP4-2	01/31/25	02/02/24	02/02/24	50,000,000	47,568,278	0	47,568,278	0
NATIONAL BANK OF CACP4-2	01/31/25	02/02/24	02/02/24	50,000,000	47,568,278	0	47,568,278	0
NATIONAL BANK OF CACP4-2	01/31/25	02/02/24	02/02/24	15,000,000	14,270,483	0	14,270,483	0
NATIONAL BANK OF CACP4-2	02/05/25	02/07/24	02/07/24	50,000,000	47,517,722	0	47,517,722	0
NATIONAL BANK OF CACP4-2	02/05/25	02/07/24	02/07/24	15,000,000	14,255,317	0	14,255,317	0
NATIONAL BANK OF CACP4-2	02/03/25	02/02/24	02/02/24	50,000,000	47,497,264	0	47,497,264	0
NATIONAL BANK OF CACP4-2	02/03/25	02/02/24	02/02/24	40,000,000	37,997,811	0	37,997,811	0
OLD LINE FUNDING LLC	09/04/24	02/02/24	02/02/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING LLC	09/04/24	02/02/24	02/02/24	40,000,000	40,000,000	0	40,000,000	0
PODIUM FUNDING TRUSCPABS3	05/15/24	02/13/24	02/13/24	25,000,000	24,659,472	0	24,659,472	0
RIDGEFIELD FUNDING CPABS4	05/01/24	02/02/24	02/02/24	40,000,000	39,471,933	0	39,471,933	0
RIDGEFIELD FUNDING CPABS4	05/02/24	02/02/24	02/02/24	22,692,000	22,389,629	0	22,389,629	0
SHEFFIELD RECEIVABLECPABS4	05/13/24	02/02/24	02/02/24	50,000,000	49,253,722	0	49,253,722	0
SHEFFIELD RECEIVABLECPABS4	05/13/24	02/02/24	02/02/24	40,000,000	39,402,978	0	39,402,978	0
SHEFFIELD RECEIVABLECPABS4	05/29/24	02/23/24	02/23/24	50,000,000	49,288,000	0	49,288,000	0
SHEFFIELD RECEIVABLECPABS4	05/31/24	02/22/24	02/22/24	50,000,000	49,265,750	0	49,265,750	0
SHEFFIELD RECEIVABLECPABS4	05/31/24	02/26/24	02/27/24	30,000,000	29,581,700	0	29,581,700	0
SHEFFIELD RECEIVABLECPABS4	05/31/24	02/26/24	02/27/24	50,000,000	49,302,833	0	49,302,833	0
TORONTO DOMINION BACDYAN	02/12/25	02/13/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO DOMINION BACDYAN	02/12/25	02/13/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO DOMINION BACP4-2	02/21/25	02/22/24	02/22/24	50,000,000	47,450,069	0	47,450,069	0
TORONTO DOMINION BACP4-2	02/21/25	02/22/24	02/22/24	50,000,000	47,450,069	0	47,450,069	0
TORONTO DOMINION BACP4-2	02/21/25	02/22/24	02/22/24	50,000,000	47,450,069	0	47,450,069	0
TOTALENERGIES CAPITAL SA	03/04/24	02/23/24	02/23/24	50,000,000	49,926,250	0	49,926,250	0
TLOT 2024-A AI	02/20/25	02/21/24	02/27/24	30,000,000	30,000,000	0	30,000,000	0
UNITEDHEALTH GROUPCP4-2	02/20/24	02/14/24	02/14/24	50,000,000	49,955,667	0	49,955,667	0
UNITEDHEALTH GROUPCP4-2	02/20/24	02/14/24	02/14/24	25,000,000	24,977,833	0	24,977,833	0
UNITEDHEALTH GROUPCP4-2	02/23/24	02/16/24	02/16/24	25,000,000	24,974,139	0	24,974,139	0
UNITEDHEALTH GROUPCP4-2	02/26/24	02/20/24	02/20/24	50,000,000	49,955,667	0	49,955,667	0
UNITEDHEALTH GROUPCP4-2	02/27/24	02/20/24	02/20/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	02/27/24	02/20/24	02/20/24	50,000,000	49,948,278	0	49,948,278	0
UNITEDHEALTH GROUPCP4-2	02/28/24	02/23/24	02/23/24	50,000,000	49,963,056	0	49,963,056	0
UNITEDHEALTH GROUPCP4-2	02/28/24	02/23/24	02/23/24	10,000,000	9,992,611	0	9,992,611	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
UNITED STATES TREASURY BILL	04/04/24	02/20/24	02/22/24	50,000,000	49,692,146	0	49,692,146	0
VICTORY RECEIVABLESCPABS4	05/07/24	02/13/24	02/14/24	50,000,000	49,383,264	0	49,383,264	0
VICTORY RECEIVABLESCPABS4	05/07/24	02/13/24	02/14/24	45,000,000	44,444,938	0	44,444,938	0
VICTORY RECEIVABLESCPABS4	05/16/24	02/23/24	02/23/24	50,000,000	49,383,264	0	49,383,264	0



## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
VICTORY RECEIVABLESCPAB54	05/24/24	02/28/24	02/28/24	50,000,000	49,360,972	0	49,360,972	0
VICTORY RECEIVABLESCPAB54	05/24/24	02/28/24	02/28/24	50,000,000	49,360,972	0	49,360,972	0
WELLS FARGO BANK, NCD	02/13/25	02/12/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
WELLS FARGO BANK, NCD	02/13/25	02/12/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
WELLS FARGO BANK, NCD	02/13/25	02/12/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
WELLS FARGO BANK, NCD	02/13/25	02/12/24	02/13/24	50,000,000	50,000,000	0	50,000,000	0
WELLS FARGO BANK, NCD	02/14/25	02/15/24	02/16/24	10,000,000	10,000,000	0	10,000,000	0
WESTPAC BANKING CORCP4-2	02/07/25	02/13/24	02/13/24	50,000,000	47,550,000	0	47,550,000	0
WESTPAC BANKING CORCP4-2	02/07/25	02/13/24	02/13/24	50,000,000	47,550,000	0	47,550,000	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/01/24	02/01/24	5,255,971	5,255,971	0	5,255,971	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/05/24	02/05/24	2,315,846	2,315,846	0	2,315,846	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/08/24	02/08/24	3,478,304	3,478,304	0	3,478,304	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/14/24	02/14/24	6,397,715	6,397,715	0	6,397,715	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/16/24	02/16/24	4,264,140	4,264,140	0	4,264,140	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/23/24	02/23/24	2,153,439	2,153,439	0	2,153,439	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/26/24	02/26/24	1,568,759	1,568,759	0	1,568,759	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/27/24	02/27/24	3,212	3,212	0	3,212	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/29/24	02/29/24	3,189,433	3,189,433	0	3,189,433	0
MIZUHO TRIPARTY	02/02/24	02/01/24	02/01/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/02/24	02/01/24	02/01/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/02/24	02/01/24	02/01/24	642,000,000	642,000,000	0	642,000,000	0
MIZUHO TRIPARTY	02/05/24	02/02/24	02/02/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/05/24	02/02/24	02/02/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/05/24	02/02/24	02/02/24	772,000,000	772,000,000	0	772,000,000	0
MIZUHO TRIPARTY	02/06/24	02/05/24	02/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/06/24	02/05/24	02/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/06/24	02/05/24	02/05/24	414,000,000	414,000,000	0	414,000,000	0
MIZUHO TRIPARTY	02/07/24	02/06/24	02/06/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/07/24	02/06/24	02/06/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/07/24	02/06/24	02/06/24	288,000,000	288,000,000	0	288,000,000	0
MIZUHO TRIPARTY	02/08/24	02/07/24	02/07/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/08/24	02/07/24	02/07/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/08/24	02/07/24	02/07/24	442,000,000	442,000,000	0	442,000,000	0
MIZUHO TRIPARTY	02/09/24	02/08/24	02/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/09/24	02/08/24	02/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/09/24	02/08/24	02/08/24	659,000,000	659,000,000	0	659,000,000	0
MIZUHO TRIPARTY	02/12/24	02/09/24	02/09/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/12/24	02/09/24	02/09/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/12/24	02/09/24	02/09/24	492,000,000	492,000,000	0	492,000,000	0
MIZUHO TRIPARTY	02/13/24	02/12/24	02/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/13/24	02/12/24	02/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/13/24	02/12/24	02/12/24	404,000,000	404,000,000	0	404,000,000	0
MIZUHO TRIPARTY	02/14/24	02/13/24	02/13/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/14/24	02/13/24	02/13/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/14/24	02/13/24	02/13/24	309,000,000	309,000,000	0	309,000,000	0
MIZUHO TRIPARTY	02/15/24	02/14/24	02/14/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/15/24	02/14/24	02/14/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/15/24	02/14/24	02/14/24	407,000,000	407,000,000	0	407,000,000	0
MIZUHO TRIPARTY	02/16/24	02/15/24	02/15/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/16/24	02/15/24	02/15/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/16/24	02/15/24	02/15/24	72,000,000	72,000,000	0	72,000,000	0
MIZUHO TRIPARTY	02/20/24	02/16/24	02/16/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/20/24	02/16/24	02/16/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/20/24	02/16/24	02/16/24	355,000,000	355,000,000	0	355,000,000	0
MIZUHO TRIPARTY	02/21/24	02/20/24	02/20/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/21/24	02/20/24	02/20/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/21/24	02/20/24	02/20/24	342,000,000	342,000,000	0	342,000,000	0
MIZUHO TRIPARTY	02/22/24	02/21/24	02/21/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/22/24	02/21/24	02/21/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/22/24	02/21/24	02/21/24	483,000,000	483,000,000	0	483,000,000	0
MIZUHO TRIPARTY	02/23/24	02/22/24	02/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/23/24	02/22/24	02/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/23/24	02/22/24	02/22/24	178,000,000	178,000,000	0	178,000,000	0
MIZUHO TRIPARTY	02/26/24	02/23/24	02/23/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/26/24	02/23/24	02/23/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/26/24	02/23/24	02/23/24	220,000,000	220,000,000	0	220,000,000	0
MIZUHO TRIPARTY	02/27/24	02/26/24	02/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/27/24	02/26/24	02/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/27/24	02/26/24	02/26/24	306,000,000	306,000,000	0	306,000,000	0
MIZUHO TRIPARTY	02/28/24	02/27/24	02/27/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/28/24	02/27/24	02/27/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/28/24	02/27/24	02/27/24	506,000,000	506,000,000	0	506,000,000	0
MIZUHO TRIPARTY	02/29/24	02/28/24	02/28/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/29/24	02/28/24	02/28/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/29/24	02/28/24	02/28/24	276,000,000	276,000,000	0	276,000,000	0
MIZUHO TRIPARTY	03/01/24	02/29/24	02/29/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/01/24	02/29/24	02/29/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/01/24	02/29/24	02/29/24	767,000,000	767,000,000	0	767,000,000	0
Total Buys				51,822,678,820	51,753,356,327	0	51,753,356,327	0

## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
Cash Closes								
OLD LINE FUNDING LLC	03/18/24	02/02/24	02/02/24	90,000,000	90,000,000	214,275	90,214,275	0
Total Cash Closes				90,000,000	90,000,000	214,275	90,214,275	0
Deposits								
RABOBANK NEW YORK	02/08/24	02/01/24	02/01/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	02/02/24	02/01/24	02/01/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/02/24	02/01/24	02/01/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/05/24	02/02/24	02/02/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/05/24	02/02/24	02/02/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/06/24	02/05/24	02/05/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/06/24	02/05/24	02/05/24	875,000,000	875,000,000	0	875,000,000	0
DNB BANK ASA NEW YORK	02/07/24	02/06/24	02/06/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/07/24	02/06/24	02/06/24	877,000,000	877,000,000	0	877,000,000	0
RABOBANK NEW YORK	02/14/24	02/07/24	02/07/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/14/24	02/07/24	02/07/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	02/14/24	02/07/24	02/07/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/08/24	02/07/24	02/07/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/08/24	02/07/24	02/07/24	870,000,000	870,000,000	0	870,000,000	0
RABOBANK NEW YORK	02/15/24	02/08/24	02/08/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	02/09/24	02/08/24	02/08/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/09/24	02/08/24	02/08/24	875,000,000	875,000,000	0	875,000,000	0
DNB BANK ASA NEW YORK	02/12/24	02/09/24	02/09/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/12/24	02/09/24	02/09/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/13/24	02/12/24	02/12/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/13/24	02/12/24	02/12/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/14/24	02/13/24	02/13/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/14/24	02/13/24	02/13/24	865,000,000	865,000,000	0	865,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/21/24	02/14/24	02/14/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	02/21/24	02/14/24	02/14/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	02/21/24	02/14/24	02/14/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/15/24	02/14/24	02/14/24	600,000,000	600,000,000	0	600,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/15/24	02/14/24	02/14/24	870,000,000	870,000,000	0	870,000,000	0
RABOBANK NEW YORK	02/22/24	02/15/24	02/15/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/16/24	02/15/24	02/15/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/16/24	02/15/24	02/15/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	02/20/24	02/16/24	02/16/24	600,000,000	600,000,000	0	600,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/20/24	02/16/24	02/16/24	845,000,000	845,000,000	0	845,000,000	0
DNB BANK ASA NEW YORK	02/21/24	02/20/24	02/20/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/21/24	02/20/24	02/20/24	845,000,000	845,000,000	0	845,000,000	0
RABOBANK NEW YORK	02/28/24	02/21/24	02/21/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	02/28/24	02/21/24	02/21/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/28/24	02/21/24	02/21/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/22/24	02/21/24	02/21/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/22/24	02/21/24	02/21/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	02/29/24	02/22/24	02/22/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/23/24	02/22/24	02/22/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/23/24	02/22/24	02/22/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/26/24	02/23/24	02/23/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/26/24	02/23/24	02/23/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/27/24	02/26/24	02/26/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/27/24	02/26/24	02/26/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/28/24	02/27/24	02/27/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/28/24	02/27/24	02/27/24	840,000,000	840,000,000	0	840,000,000	0
ABN AMRO BANK N.V.	03/06/24	02/28/24	02/28/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/06/24	02/28/24	02/28/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	03/06/24	02/28/24	02/28/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/29/24	02/28/24	02/28/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/29/24	02/28/24	02/28/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	03/07/24	02/29/24	02/29/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	03/01/24	02/29/24	02/29/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/01/24	02/29/24	02/29/24	845,000,000	845,000,000	0	845,000,000	0
Total Deposits				49,637,000,000	49,637,000,000	0	49,637,000,000	0
Maturities								
ALBION CAPITAL LLC CPAB54	02/21/24	02/21/24	02/21/24	25,367,000	25,367,000	0	25,367,000	0
ANGLESEA FUNDING LLC PAB54	02/01/24	02/01/24	02/01/24	304,500,000	304,500,000	0	304,500,000	0
ANGLESEA FUNDING LLC PAB54	02/02/24	02/02/24	02/02/24	150,000,000	150,000,000	0	150,000,000	0
ANGLESEA FUNDING LLC PAB54	02/05/24	02/05/24	02/05/24	180,000,000	180,000,000	0	180,000,000	0
ANGLESEA FUNDING LLC PAB54	02/06/24	02/06/24	02/06/24	110,000,000	110,000,000	0	110,000,000	0
ANGLESEA FUNDING LLC PAB54	02/07/24	02/07/24	02/07/24	270,000,000	270,000,000	0	270,000,000	0
ANGLESEA FUNDING LLC PAB54	02/08/24	02/08/24	02/08/24	275,000,000	275,000,000	0	275,000,000	0
ANGLESEA FUNDING LLC PAB54	02/09/24	02/09/24	02/09/24	175,000,000	175,000,000	0	175,000,000	0
ANGLESEA FUNDING LLC PAB54	02/12/24	02/12/24	02/12/24	170,000,000	170,000,000	0	170,000,000	0
ANGLESEA FUNDING LLC PAB54	02/13/24	02/13/24	02/13/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/14/24	02/14/24	02/14/24	130,000,000	130,000,000	0	130,000,000	0
ANGLESEA FUNDING LLC PAB54	02/15/24	02/15/24	02/15/24	125,000,000	125,000,000	0	125,000,000	0
ANGLESEA FUNDING LLC PAB54	02/16/24	02/16/24	02/16/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/20/24	02/20/24	02/20/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/21/24	02/21/24	02/21/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/22/24	02/22/24	02/22/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/23/24	02/23/24	02/23/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	02/26/24	02/26/24	02/26/24	200,000,000	200,000,000	0	200,000,000	0

## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
ANGLESEA FUNDING LLC PABS4	02/27/24	02/27/24	02/27/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	02/28/24	02/28/24	02/28/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PABS4	02/29/24	02/29/24	02/29/24	200,000,000	200,000,000	0	200,000,000	0
BANK OF AMERICA, N.C.D	02/07/24	02/07/24	02/07/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF NOVA SCOTIA, TORO	02/13/24	02/13/24	02/13/24	30,000,000	30,000,000	0	30,000,000	0
BARTON CAPITAL S.A, CPABS4	02/06/24	02/06/24	02/06/24	32,000,000	32,000,000	0	32,000,000	0
BARTON CAPITAL S.A, CPABS4	02/09/24	02/09/24	02/09/24	50,000,000	50,000,000	0	50,000,000	0
BEDFORD ROW FUNDINGCPABS4	02/05/24	02/05/24	02/05/24	50,000,000	50,000,000	0	50,000,000	0
BENNINGTON STARK CAC PABS4	02/09/24	02/09/24	02/09/24	46,778,000	46,778,000	0	46,778,000	0
BENNINGTON STARK CAC PABS4	02/16/24	02/16/24	02/16/24	46,903,000	46,903,000	0	46,903,000	0
BNG BANK N.V, CP4-2CP4-2	02/01/24	02/01/24	02/01/24	50,000,000	50,000,000	0	50,000,000	0
CANADIAN IMPERIAL BCDYAN	02/05/24	02/05/24	02/05/24	75,000,000	75,000,000	0	75,000,000	0
CHARIOT FUNDING LLC PABS4	02/14/24	02/14/24	02/14/24	65,000,000	65,000,000	0	65,000,000	0
CHARIOT FUNDING LLC PABS4	02/16/24	02/16/24	02/16/24	50,000,000	50,000,000	0	50,000,000	0
CHESHAM FINANCE LLC PABS4	02/07/24	02/07/24	02/07/24	45,000,000	45,000,000	0	45,000,000	0
CHESHAM FINANCE LLC PABS4	02/16/24	02/16/24	02/16/24	25,000,000	25,000,000	0	25,000,000	0
CHESHAM FINANCE LLC PABS4	02/20/24	02/20/24	02/20/24	50,000,000	50,000,000	0	50,000,000	0
CHESHAM FINANCE LLC PABS4	02/28/24	02/28/24	02/28/24	20,000,000	20,000,000	0	20,000,000	0
CIESCO, LLC CPABS4-CPABS4	02/05/24	02/05/24	02/05/24	100,000,000	100,000,000	0	100,000,000	0
CREDIT AGRICOLE CORCDYAN	02/01/24	02/01/24	02/01/24	58,500,000	58,500,000	0	58,500,000	0
CREDIT AGRICOLE CORCDYAN	02/02/24	02/02/24	02/02/24	350,000,000	350,000,000	0	350,000,000	0
CREDIT AGRICOLE CORCDYAN	02/06/24	02/06/24	02/06/24	600,000,000	600,000,000	0	600,000,000	0
CREDIT AGRICOLE CORCDYAN	02/07/24	02/07/24	02/07/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	02/12/24	02/12/24	02/12/24	400,000,000	400,000,000	0	400,000,000	0
CREDIT AGRICOLE CORCDYAN	02/13/24	02/13/24	02/13/24	600,000,000	600,000,000	0	600,000,000	0
CREDIT AGRICOLE CORCDYAN	02/14/24	02/14/24	02/14/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	02/20/24	02/20/24	02/20/24	400,000,000	400,000,000	0	400,000,000	0
CREDIT AGRICOLE CORCDYAN	02/20/24	02/20/24	02/20/24	600,000,000	600,000,000	0	600,000,000	0
CREDIT AGRICOLE CORCDYAN	02/21/24	02/21/24	02/21/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT AGRICOLE CORCDYAN	02/27/24	02/27/24	02/27/24	950,000,000	950,000,000	0	950,000,000	0
CREDIT AGRICOLE CORCDYAN	02/28/24	02/28/24	02/28/24	300,000,000	300,000,000	0	300,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/02/24	02/02/24	02/02/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/05/24	02/05/24	02/05/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/06/24	02/06/24	02/06/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/07/24	02/07/24	02/07/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/08/24	02/08/24	02/08/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/09/24	02/09/24	02/09/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/11/24	02/11/24	02/11/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/13/24	02/13/24	02/13/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/14/24	02/14/24	02/14/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/15/24	02/15/24	02/15/24	1,396,000,000	1,396,000,000	0	1,396,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/16/24	02/16/24	02/16/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/20/24	02/20/24	02/20/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/21/24	02/21/24	02/21/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/22/24	02/22/24	02/22/24	1,100,000,000	1,100,000,000	0	1,100,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/23/24	02/23/24	02/23/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/26/24	02/26/24	02/26/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
CREDIT INDUSTRIEL ECP4-2	02/27/24	02/27/24	02/27/24	804,000,000	804,000,000	0	804,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/28/24	02/28/24	02/28/24	807,000,000	807,000,000	0	807,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	02/29/24	02/29/24	02/29/24	1,203,000,000	1,203,000,000	0	1,203,000,000	0
FAIRWAY FINANCE CO, CPABS4	02/23/24	02/23/24	02/23/24	15,000,000	15,000,000	0	15,000,000	0
GREAT BEAR FUNDING CPABS4	02/07/24	02/07/24	02/07/24	52,000,000	52,000,000	0	52,000,000	0
GREAT BEAR FUNDING CPABS4	02/14/24	02/14/24	02/14/24	50,000,000	50,000,000	0	50,000,000	0
GREAT BEAR FUNDING CPABS4	02/21/24	02/21/24	02/21/24	50,000,000	50,000,000	0	50,000,000	0
JUPITER SECURITIZATCPABS4	02/06/24	02/06/24	02/06/24	350,000,000	350,000,000	0	350,000,000	0
LMA-AMERICAS LLC CPC PABS4	02/27/24	02/27/24	02/27/24	51,250,000	51,250,000	0	51,250,000	0
LONGSHIP FUNDING LLC PABS4	02/01/24	02/01/24	02/01/24	225,000,000	225,000,000	0	225,000,000	0
LONGSHIP FUNDING LLC PABS4	02/06/24	02/06/24	02/06/24	80,000,000	80,000,000	0	80,000,000	0
LONGSHIP FUNDING LLC PABS4	02/08/24	02/08/24	02/08/24	225,000,000	225,000,000	0	225,000,000	0
LONGSHIP FUNDING LLC PABS4	02/14/24	02/14/24	02/14/24	80,000,000	80,000,000	0	80,000,000	0
LONGSHIP FUNDING LLC PABS4	02/22/24	02/22/24	02/22/24	50,000,000	50,000,000	0	50,000,000	0
MUFG BANK LTD, CDYACDYAN	02/16/24	02/16/24	02/16/24	50,000,000	50,000,000	0	50,000,000	0
MICROSOFT CORP, CP4CP4-2	02/02/24	02/02/24	02/02/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK LTD, CDYACDYAN	02/02/24	02/02/24	02/02/24	75,000,000	75,000,000	0	75,000,000	0
MUFG BANK LTD, CPCP	02/13/24	02/13/24	02/13/24	100,000,000	100,000,000	0	100,000,000	0
MUFG BANK LTD, CPCP	02/20/24	02/20/24	02/20/24	300,000,000	300,000,000	0	300,000,000	0
MUFG BANK LTD, CPCP	02/28/24	02/28/24	02/28/24	180,000,000	180,000,000	0	180,000,000	0
RIDGEFIELD FUNDING CO LLC	02/02/24	02/02/24	02/02/24	40,000,000	40,000,000	0	40,000,000	0
RIDGEFIELD FUNDING CPABS4	02/06/24	02/06/24	02/06/24	45,000,000	45,000,000	0	45,000,000	0
SHEFFIELD RECEIVABLECPABS4	02/27/24	02/27/24	02/27/24	80,000,000	80,000,000	0	80,000,000	0
SHEFFIELD RECEIVABLES CO LLC	02/02/24	02/02/24	02/02/24	95,000,000	95,000,000	0	95,000,000	0
SHEFFIELD RECEIVABLES CO LLC	02/22/24	02/22/24	02/22/24	50,000,000	50,000,000	0	50,000,000	0
SHEFFIELD RECEIVABLES CO LLC	02/23/24	02/23/24	02/23/24	48,000,000	48,000,000	0	48,000,000	0
SHEFFIELD RECEIVABLES CO LLC	02/26/24	02/26/24	02/26/24	52,000,000	52,000,000	0	52,000,000	0
STARBIRD FUNDING COCPABS4	02/01/24	02/01/24	02/01/24	125,000,000	125,000,000	0	125,000,000	0
SUMITOMO MITSUI TRUCDYAN	02/22/24	02/22/24	02/22/24	80,000,000	80,000,000	0	80,000,000	0
SUMITOMO MITSUI TRUCDYAN	02/14/24	02/14/24	02/14/24	100,000,000	100,000,000	0	100,000,000	0
SUMITOMO MITSUI TRUCDYAN	02/05/24	02/05/24	02/05/24	100,000,000	100,000,000	0	100,000,000	0
TORONTO DOMINION BACDYAN	02/13/24	02/13/24	02/13/24	80,000,000	80,000,000	0	80,000,000	0
TOTALENERGIES CAPITCP4-2	02/23/24	02/23/24	02/23/24	50,000,000	50,000,000	0	50,000,000	0
UNITEDHEALTH GROUP, CP4-2	02/01/24	02/01/24	02/01/24	200,000,000	200,000,000	0	200,000,000	0



## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
UNITEDHEALTH GROUPCP4-2	02/20/24	02/20/24	02/20/24	75,000,000	75,000,000	0	75,000,000	0
UNITEDHEALTH GROUPCP4-2	02/23/24	02/23/24	02/23/24	25,000,000	25,000,000	0	25,000,000	0
UNITEDHEALTH GROUPCP4-2	02/26/24	02/26/24	02/26/24	50,000,000	50,000,000	0	50,000,000	0
UNITEDHEALTH GROUPCP4-2	02/27/24	02/27/24	02/27/24	100,000,000	100,000,000	0	100,000,000	0
UNITEDHEALTH GROUPCP4-2	02/28/24	02/28/24	02/28/24	60,000,000	60,000,000	0	60,000,000	0
UNITED STATES TREASURY BILL	02/01/24	02/01/24	02/01/24	462,000,000	462,000,000	0	462,000,000	0
UNITED STATES TREASURY BILL	02/08/24	02/08/24	02/08/24	400,000,000	400,000,000	0	400,000,000	0
VICTORY RECEIVABLESCPABS4	02/28/24	02/28/24	02/28/24	50,000,000	50,000,000	0	50,000,000	0
MIZUHO TRIPARTY	02/01/24	02/01/24	02/01/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/01/24	02/01/24	02/01/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/01/24	02/01/24	02/01/24	594,000,000	594,000,000	0	594,000,000	0
MIZUHO TRIPARTY	02/02/24	02/02/24	02/02/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/02/24	02/02/24	02/02/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/02/24	02/02/24	02/02/24	642,000,000	642,000,000	0	642,000,000	0
MIZUHO TRIPARTY	02/05/24	02/05/24	02/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/05/24	02/05/24	02/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/05/24	02/05/24	02/05/24	772,000,000	772,000,000	0	772,000,000	0
MIZUHO TRIPARTY	02/06/24	02/06/24	02/06/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/06/24	02/06/24	02/06/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/06/24	02/06/24	02/06/24	414,000,000	414,000,000	0	414,000,000	0
MIZUHO TRIPARTY	02/07/24	02/07/24	02/07/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/07/24	02/07/24	02/07/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/07/24	02/07/24	02/07/24	288,000,000	288,000,000	0	288,000,000	0
MIZUHO TRIPARTY	02/08/24	02/08/24	02/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/08/24	02/08/24	02/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/08/24	02/08/24	02/08/24	442,000,000	442,000,000	0	442,000,000	0
MIZUHO TRIPARTY	02/09/24	02/09/24	02/09/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/09/24	02/09/24	02/09/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/09/24	02/09/24	02/09/24	659,000,000	659,000,000	0	659,000,000	0
MIZUHO TRIPARTY	02/12/24	02/12/24	02/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/12/24	02/12/24	02/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/12/24	02/12/24	02/12/24	492,000,000	492,000,000	0	492,000,000	0
MIZUHO TRIPARTY	02/13/24	02/13/24	02/13/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/13/24	02/13/24	02/13/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/13/24	02/13/24	02/13/24	404,000,000	404,000,000	0	404,000,000	0
MIZUHO TRIPARTY	02/14/24	02/14/24	02/14/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/14/24	02/14/24	02/14/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/14/24	02/14/24	02/14/24	309,000,000	309,000,000	0	309,000,000	0
MIZUHO TRIPARTY	02/15/24	02/15/24	02/15/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/15/24	02/15/24	02/15/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/15/24	02/15/24	02/15/24	407,000,000	407,000,000	0	407,000,000	0
MIZUHO TRIPARTY	02/16/24	02/16/24	02/16/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/16/24	02/16/24	02/16/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/16/24	02/16/24	02/16/24	72,000,000	72,000,000	0	72,000,000	0
MIZUHO TRIPARTY	02/20/24	02/20/24	02/20/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/20/24	02/20/24	02/20/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/20/24	02/20/24	02/20/24	355,000,000	355,000,000	0	355,000,000	0
MIZUHO TRIPARTY	02/21/24	02/21/24	02/21/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/21/24	02/21/24	02/21/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/21/24	02/21/24	02/21/24	342,000,000	342,000,000	0	342,000,000	0
MIZUHO TRIPARTY	02/22/24	02/22/24	02/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/22/24	02/22/24	02/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/22/24	02/22/24	02/22/24	483,000,000	483,000,000	0	483,000,000	0
MIZUHO TRIPARTY	02/23/24	02/23/24	02/23/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/23/24	02/23/24	02/23/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/23/24	02/23/24	02/23/24	178,000,000	178,000,000	0	178,000,000	0
MIZUHO TRIPARTY	02/26/24	02/26/24	02/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/26/24	02/26/24	02/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/26/24	02/26/24	02/26/24	220,000,000	220,000,000	0	220,000,000	0
MIZUHO TRIPARTY	02/27/24	02/27/24	02/27/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/27/24	02/27/24	02/27/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/27/24	02/27/24	02/27/24	306,000,000	306,000,000	0	306,000,000	0
MIZUHO TRIPARTY	02/28/24	02/28/24	02/28/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/28/24	02/28/24	02/28/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/28/24	02/28/24	02/28/24	506,000,000	506,000,000	0	506,000,000	0
MIZUHO TRIPARTY	02/29/24	02/29/24	02/29/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	02/29/24	02/29/24	02/29/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	02/29/24	02/29/24	02/29/24	276,000,000	276,000,000	0	276,000,000	0
RABOBANK NEW YORK	02/01/24	02/01/24	02/01/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/07/24	02/07/24	02/07/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	02/07/24	02/07/24	02/07/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	02/07/24	02/07/24	02/07/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/01/24	02/01/24	02/01/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/01/24	02/01/24	02/01/24	415,000,000	415,000,000	0	415,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	02/01/24	02/01/24	02/01/24	440,000,000	440,000,000	0	440,000,000	0
RABOBANK NEW YORK	02/08/24	02/08/24	02/08/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	02/02/24	02/02/24	02/02/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/02/24	02/02/24	02/02/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/05/24	02/05/24	02/05/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/05/24	02/05/24	02/05/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/06/24	02/06/24	02/06/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/06/24	02/06/24	02/06/24	875,000,000	875,000,000	0	875,000,000	0
DNB BANK ASA NEW YORK	02/07/24	02/07/24	02/07/24	500,000,000	500,000,000	0	500,000,000	0

## TRADING ACTIVITY FOR FEBRUARY 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
MIZUHO BANK, LTD., CANADA BRANCH	02/07/24	02/07/24	02/07/24	877,000,000	877,000,000	0	877,000,000	0
RABOBANK NEW YORK	02/14/24	02/14/24	02/14/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/14/24	02/14/24	02/14/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	02/14/24	02/14/24	02/14/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/08/24	02/08/24	02/08/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/08/24	02/08/24	02/08/24	870,000,000	870,000,000	0	870,000,000	0
RABOBANK NEW YORK	02/15/24	02/15/24	02/15/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	02/09/24	02/09/24	02/09/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/09/24	02/09/24	02/09/24	875,000,000	875,000,000	0	875,000,000	0
DNB BANK ASA NEW YORK	02/12/24	02/12/24	02/12/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/12/24	02/12/24	02/12/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/13/24	02/13/24	02/13/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/13/24	02/13/24	02/13/24	870,000,000	870,000,000	0	870,000,000	0
DNB BANK ASA NEW YORK	02/14/24	02/14/24	02/14/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/14/24	02/14/24	02/14/24	865,000,000	865,000,000	0	865,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/21/24	02/21/24	02/21/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	02/21/24	02/21/24	02/21/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	02/21/24	02/21/24	02/21/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/15/24	02/15/24	02/15/24	600,000,000	600,000,000	0	600,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/15/24	02/15/24	02/15/24	870,000,000	870,000,000	0	870,000,000	0
RABOBANK NEW YORK	02/22/24	02/22/24	02/22/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/16/24	02/16/24	02/16/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/16/24	02/16/24	02/16/24	850,000,000	850,000,000	0	850,000,000	0
DNB BANK ASA NEW YORK	02/20/24	02/20/24	02/20/24	600,000,000	600,000,000	0	600,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/20/24	02/20/24	02/20/24	845,000,000	845,000,000	0	845,000,000	0
DNB BANK ASA NEW YORK	02/21/24	02/21/24	02/21/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/21/24	02/21/24	02/21/24	845,000,000	845,000,000	0	845,000,000	0
RABOBANK NEW YORK	02/28/24	02/28/24	02/28/24	700,000,000	700,000,000	0	700,000,000	0
ABN AMRO BANK N.V.	02/28/24	02/28/24	02/28/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	02/28/24	02/28/24	02/28/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	02/22/24	02/22/24	02/22/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/22/24	02/22/24	02/22/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	02/29/24	02/29/24	02/29/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	02/23/24	02/23/24	02/23/24	500,000,000	500,000,000	0	500,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/23/24	02/23/24	02/23/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/26/24	02/26/24	02/26/24	250,000,000	250,000,000	0	250,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/26/24	02/26/24	02/26/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/27/24	02/27/24	02/27/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/27/24	02/27/24	02/27/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/28/24	02/28/24	02/28/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/28/24	02/28/24	02/28/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	02/29/24	02/29/24	02/29/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	02/29/24	02/29/24	02/29/24	840,000,000	840,000,000	0	840,000,000	0
Total Maturities				101,827,298,000	101,827,298,000	0	101,827,298,000	0
Paydowns								
EFF 2023-3 A I	10/21/24	02/20/24	02/20/24	1,260,676	1,260,676	0	1,260,676	0
EFF 2024-1 A I	02/20/25	02/20/24	02/20/24	6,703,108	6,703,108	0	6,703,108	0
GALC 2024-1 A I	02/18/25	02/15/24	02/15/24	4,316,829	4,316,829	0	4,316,829	0
Total Paydowns				12,280,613	12,280,613	0	12,280,613	0
Sells								
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/02/24	02/02/24	8,214,677	8,214,677	0	8,214,677	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/06/24	02/06/24	1,810,063	1,810,063	0	1,810,063	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/07/24	02/07/24	3,651,977	3,651,977	0	3,651,977	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/09/24	02/09/24	3,478,304	3,478,304	0	3,478,304	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/15/24	02/15/24	3,078,847	3,078,847	0	3,078,847	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/20/24	02/20/24	4,171,862	4,171,862	0	4,171,862	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/21/24	02/21/24	3,411,146	3,411,146	0	3,411,146	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	02/28/24	02/28/24	3,725,410	3,725,410	0	3,725,410	0
Total Sells				31,542,286	31,542,286	0	31,542,286	0



1801 Hermitage Boulevard, Suite 100  
Tallahassee, Florida 32308  
(850) 488-4406

[www.sbafla.com/prime](http://www.sbafla.com/prime)

## **Our Mission**

Our mission is to provide superior investment management and trust services by proactively and comprehensively managing risk and adhering to the highest ethical, fiduciary, and professional standards.

# **Federated Hermes**





## **MONTHLY SUMMARY REPORT**

**State Board of Administration of Florida**

**March 2024**

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## **Past performance is no guarantee of future results.**

Views are as of the issue date and are subject to change based on market conditions and other factors. These views should not be construed as a recommendation for any specific security.

An investment in Florida PRIME is neither insured nor guaranteed by the Federal Deposit Insurance Corporation or any other government agency.

Although money market funds seek to preserve the value of your investment at \$1.00 per share, it is possible to lose money by investing in this fund.



## INTRODUCTION

This report is prepared for stakeholders in Florida PRIME in accordance with Section 218.409(6)(a), Florida Statutes. The statute requires:

- (1) Reporting of any material impacts on the funds and any actions or escalations taken by staff to address such impacts;
- (2) Presentation of a management summary that provides an analysis of the status of the current investment portfolio and the individual transactions executed over the last month; and
- (3) Preparation of the management summary “in a manner that will allow anyone to ascertain whether the investment activities during the reporting period have conformed to investment policies.”

This report, which covers the period from March 1, 2024, through March 31, 2024, has been prepared by the SBA with input from Federated Hermes (“Federated”), investment advisor for Florida PRIME in a format intended to comply with the statute.

## DISCLOSURE OF MATERIAL IMPACTS

During the reporting period, Florida PRIME was in material compliance with investment policy. There were no developments that had a material impact on the liquidity or operation of Florida PRIME. Details are available in the PRIME policy compliance table. This report also includes details on market conditions; fees; fund holdings, transactions and performance; and client composition.

### PRIME™ STATISTICS

(As of March 31, 2024)

Total Participants  
**792**

Florida PRIME™  
Total Participant Balance  
**\$27,430,299,134**

Total Number of Accounts  
**1,468**

**FACTS-AT-A-GLANCE** PRIME is an exclusive service for Florida governmental organizations, providing a cost-effective investment vehicle for their surplus funds. Florida PRIME, the Local Government Surplus Funds Trust Fund, is utilized by hundreds of governmental investors including state agencies, state universities and colleges, counties, cities, special districts, school boards, and other direct support organizations of the State of Florida.

Florida PRIME is a government investment pool that offers management by an industry leader in professional money management, conservative investment policies, an extensive governance framework, a Standard & Poor’s “AAAm” rating, full transparency, and best-in-class financial reporting.

## PORTFOLIO MANAGER COMMENTARY

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It is hard to live in the present in general, but that is particularly true in business and finance as so much is predicated on what comes next. Whether it is the big “E” in the equation for determining future value or the lower-case “e” of the word itself, expectations rule.

But in the case of liquidity products, the here & now is attractive and the near & future looks good, too. For one, rates continue to be at historic highs. As expected, Federal Reserve’s Federal Open Market Committee meeting mid-March left the target federal fund range at 5.25% to 5.5%, the more than two-decade high at which it has sat since July of last year.

The Fed will eventually lower rates but based on the additional materials of the FOMC meeting rather than the statement, that action seems to be down the road. While the new Summary of Economic Projections (SEP) did not change its call for three quarter-point cuts this year that it had forecast in December, we think the first ease will not arrive until July. And it is within the realm of possibility that the June SEP will indicate just two will come by the end of 2024. The Fed is loath to alter monetary policy near a presidential election, and inflation’s recent back-up reminds us that the last mile is the hardest. Retail sales show the economy is steady and the labor market remains robust. In fact, the SEP reflected slight upticks to growth and inflation projections. But they still are consistent with a picture of inflation eventually moving back to 2% amid solid 2% economic growth, the “soft landing” holy grail. So, having reeled in market expectations for aggressive easing, the Fed might need to hold the line taut to keep them hooked even though it has penciled in 75 basis points of cuts.

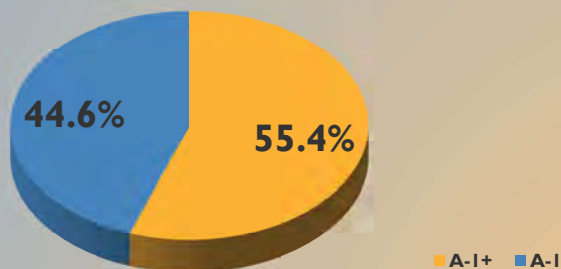
As promised, quantitative tightening was a major topic of discussion during the FOMC meeting. In his press conference following the release of the statement and SEP, Fed Chair Jerome Powell said policymakers discussed tapering the pace of the balance sheet runoff. He said that might begin “fairly soon,” which in Fedpeak translates to as early as the May FOMC meeting. Unprompted, he made the point slowing the pace might allow the Fed to get to a lower balance sheet. He also commented that the Fed would be watching money market conditions as one means of judging if bank reserves are declining too much as the balance sheet continues to shrink. The situation means this remarkable period in cash management history could stretch for many more months, keeping yields attractive and assets growing. Supply of Treasuries might be a little tighter in the second quarter as the U.S. Treasury receives tax payments, but that should not have a material impact. The tax-collecting season concluded for many participants in March, with many now withdrawing assets to pay expenses. That resulted in a decline in Pool assets of \$600 million, taking total assets down to \$27.48 billion.

The Pool’s manager did not alter the portfolio’s Weighted Average Maturity (WAM) from 43 days, but extended its Weighted Average Life (WAL) by 5 days to 85 days.

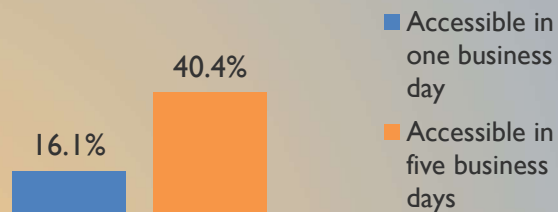
The yield of the portfolio remained at 5.59%. The Pool continued to favor both fixed- and floating-rate commercial and bank paper, finding value in instruments maturing across a wide range of 1 to 12 months. At the end of the March, yields on 1-, 3-, 6- and 12-month U.S. Treasuries were 5.40%, 5.40%, 5.33% and 5.00%, respectively.

## PORTFOLIO COMPOSITION FOR MARCH 2024

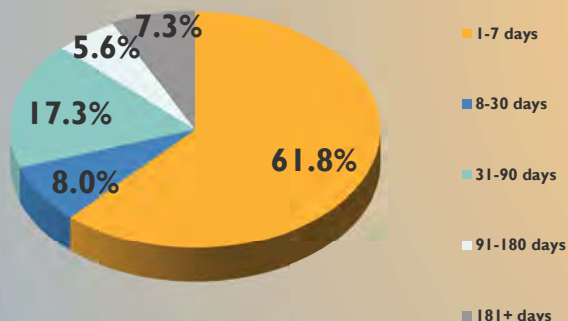
### CREDIT QUALITY COMPOSITION



### HIGHLY LIQUID HOLDINGS



### EFFECTIVE MATURITY SCHEDULE



### TOP HOLDINGS & AVG. MATURITY

1. Cooperatieve Rabobank UA	5.0%
2. Australia & New Zealand Banking Group, Melbourne	5.0%
3. ABN Amro Bank NV	5.0%
4. Bank of Montreal	5.0%
5. National Bank of Canada, Montreal	4.8%
6. Mitsubishi UFJ Financial Group, Inc.	4.2%
7. Toronto Dominion Bank	4.1%
8. Bank of America Corp.	3.8%
9. Mizuho Financial Group, Inc.	3.6%
10. Credit Agricole Group	3.6%

#### SEC Weighted Average Maturity (WAM) 3/28/24

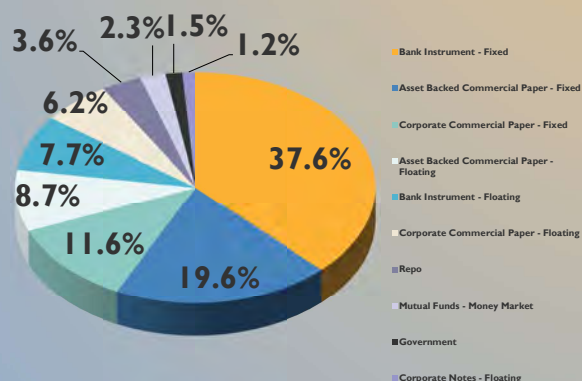
43 Days

#### Weighted Average Life (Spread WAL) 3/28/24

85 Days

Percentages based on total value of investments

### PORTFOLIO COMPOSITION



## FUND PERFORMANCE THROUGH MARCH 2024

Florida PRIME Performance Data			
	Annualized Net Participant Yield <sup>1</sup>	Net-of-Fee Benchmark <sup>2</sup>	Above (Below) Benchmark
One Month	5.66%	5.25%	0.41%
Three Months	5.69%	5.39%	0.30%
One Year	5.62%	5.25%	0.38%
Three Years	2.87%	2.58%	0.29%
Five Years	2.23%	1.99%	0.24%
Ten Years	1.62%	1.38%	0.24%
Since 1/96	2.52%	2.30%	0.22%

Note: Net asset value at month end: \$27,428.5 million, which includes investments at market value, plus all cash, accrued interest receivable and payables.,

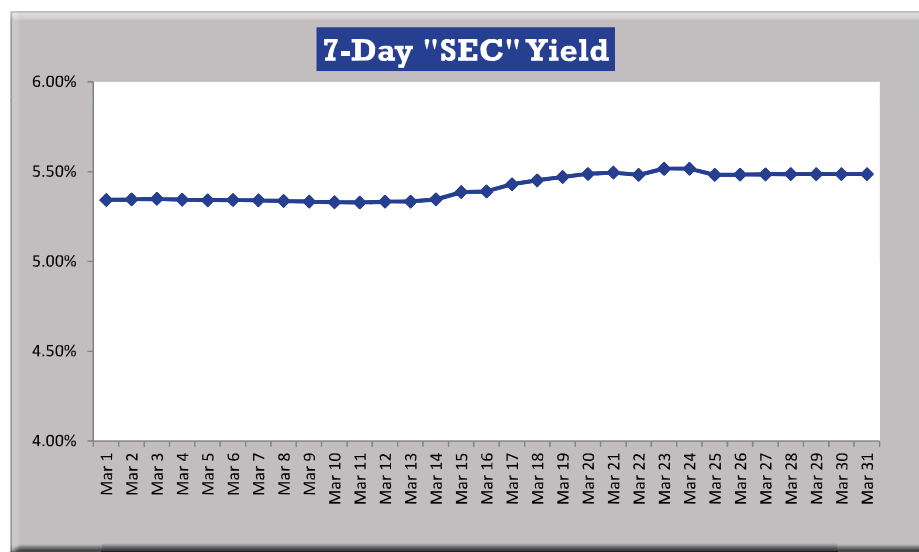
<sup>1</sup>Net of fees. Participant yield is calculated on a 365-day basis and includes adjustments for expenses and other accounting items to reflect realized earnings by participants.

<sup>2</sup>The net-of-fee benchmark is the S&P AAA/AA Rated GIP All 30-Day Net Index for all time periods.

### ABOUT ANNUALIZED YIELDS:

Performance data in the table and chart is annualized, meaning that the amounts are based on yields for the periods indicated, converted to their equivalent if obtained for a 12-month period.

For example, ignoring the effects of compounding, an investment that earns 0.10% over a 1-month period yields 1.20% on an annualized basis. Likewise, an investment that earns a total of 3.60% over three years yields 1.20% on an annualized basis, ignoring compounding.



The 7-Day "SEC" Yield in the chart is calculated in accordance with the yield methodology set forth by SEC Rule 2a-7 for money market funds. The 7-day yield = net income earned over a 7-day period / average units outstanding over the period / 7 times 365. Note that unlike other performance measures, the SEC yield does not include realized gains and losses from sales of securities.

## PRIME ACCOUNT SUMMARY FOR MARCH 2024

Summary of Cash Flows		
Opening Balance (03/01/24)	\$	28,086,450,657
Participant Deposits		1,861,899,070
Gross Earnings		130,832,773
Participant Withdrawals		(2,648,167,174)
Fees		(716,192)
Closing Balance (03/31/24)	\$	27,430,299,134
<b>Net Change over Month</b>	<b>\$</b>	<b>(656,151,523)</b>

Detailed Fee Disclosure			
March		Amount	Basis Point Equivalent*
SBA Client Service, Account Mgt. & Fiduciary Oversight Fee	\$	234,994.97	1.02
Federated Investment Management Fee		453,577.12	1.96
BNY Mellon Custodial Fee**		5,257.39	0.02
Bank of America Transfer Agent Fee		9,992.78	0.04
S&P Rating Maintenance Fee		4,562.84	0.02
Audit/External Review Fees		7,806.67	0.03
<b>Total Fees</b>	<b>\$</b>	<b>716,191.77</b>	<b>3.10</b>

\*The basis point equivalent is an annualized rate based on the dollar amount of fees charged for the month times 12, divided by an average of the fund's beginning and ending total value (amortized cost) for the month which was \$27,758,374,897.

\*\*All custodian banking fees are allocated based on both market value (size) and level of service accurately passing through all charges to pool participants. Charges may fluctuate month-to-month.

The data included in this report is unaudited.

## INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
I320 VV Jefferson LLC, Sep 01, 2060	VARIABLE RATE DEMAND NOTE	5.45	9/1/2060	4/3/2024	5,500,000	5.53	\$5,500,000	\$5,500,000	\$0
ABN Amro Bank NV, Amsterdam TD	TIME DEPOSIT	5.33	4/3/2024		1,380,000,000	5.42	\$1,380,000,000	\$1,380,000,000	\$0
AJC Capital, LLC, Jan 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	1/1/2042	4/4/2024	5,530,000	5.45	\$5,530,000	\$5,530,000	\$0
ARI Fleet Lease Trust 2024-A, A1, 5.568%, 03/14/2025	ASSET BACKED NOTE	5.57	3/14/2025		37,700,000	5.57	\$37,700,000	\$37,705,512	\$5,512
Albion Capital LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/21/2024		25,347,000	5.54	\$25,142,450	\$25,140,929	-\$1,521
Albion Capital LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/17/2024		80,999,000	5.56	\$80,014,862	\$80,017,596	\$2,734
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		100,000,000	5.44	\$99,925,833	\$99,926,012	\$179
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		200,000,000	5.44	\$199,851,389	\$199,852,024	\$635
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		150,000,000	5.48	\$149,888,750	\$149,889,018	\$268
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/9/2024		200,000,000	5.45	\$199,644,000	\$199,644,084	\$84
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/17/2024		100,000,000	5.47	\$99,702,778	\$99,702,648	-\$130
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		75,000,000	5.49	\$74,611,354	\$74,608,438	-\$2,916
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/4/2024		80,000,000	5.50	\$79,193,067	\$79,188,130	-\$4,936
Anglesea Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/8/2024		105,000,000	5.53	\$103,405,400	\$103,405,400	-\$0
Anglesea Funding LLC, Aug 02, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.55	8/2/2024	3/29/2024	65,000,000	5.63	\$65,000,000	\$65,008,581	\$8,581
Anglesea Funding LLC, Aug 30, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.49	8/30/2024	3/29/2024	205,000,000	5.57	\$205,000,000	\$205,000,000	\$0
Archer I LLC, Jun 01, 2060	VARIABLE RATE DEMAND NOTE	5.45	6/1/2060	4/4/2024	18,000,000	5.53	\$18,000,000	\$18,000,000	\$0
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		20,000,000	5.48	\$19,899,511	\$19,898,315	-\$1,196
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/30/2024		62,000,000	5.51	\$61,419,525	\$61,412,256	-\$7,270
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		5,332,000	5.52	\$5,281,287	\$5,280,661	-\$626
Atlantic Asset Securitization LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/26/2024		75,000,000	5.53	\$73,995,000	\$73,989,375	-\$5,625
Australia & New Zealand Banking Group, Melbourne TD	TIME DEPOSIT	5.33	4/3/2024		1,380,000,000	5.42	\$1,380,000,000	\$1,380,000,000	\$0
BNG Bank N.V. CP4-2	COMMERCIAL PAPER - 4-2		4/5/2024		100,000,000	5.42	\$99,881,778	\$99,882,147	\$369
BWF Forge TL Properties Owner LLC, May 01, 2059	VARIABLE RATE DEMAND NOTE	5.45	5/1/2059	4/4/2024	28,500,000	5.45	\$28,500,000	\$28,500,000	\$0
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.92	8/9/2024		100,000,000	5.92	\$100,000,000	\$100,111,679	\$111,679
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	6.00	7/31/2024		100,000,000	6.00	\$100,000,000	\$100,136,449	\$136,449
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.18	1/24/2025		114,000,000	5.20	\$114,000,000	\$113,770,339	-\$229,661
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.22	2/5/2025		95,000,000	5.24	\$95,000,000	\$94,848,105	-\$151,895
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.20	2/10/2025		50,000,000	5.22	\$50,000,000	\$49,912,690	-\$87,311
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	5/28/2024		100,000,000	5.80	\$100,000,000	\$100,015,443	\$15,443
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.80	6/7/2024		104,000,000	5.80	\$104,000,000	\$104,023,281	\$23,281
Bank of America N.A. CD	CERTIFICATE OF DEPOSIT	5.83	6/17/2024		125,000,000	5.82	\$125,000,000	\$125,043,486	\$43,486
Bank of America N.A. Triparty Repo Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.34	4/1/2024		728,000,000	5.41	\$728,000,000	\$728,000,000	\$0
Bank of America N.A., Apr 19, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.04	4/19/2024	3/29/2024	101,000,000	6.12	\$101,000,000	\$101,028,220	\$28,220
Bank of America, N.A. CD	CERTIFICATE OF DEPOSIT	6.00	9/23/2024		50,000,000	5.99	\$50,000,000	\$50,101,716	\$101,716
Bank of Montreal CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.82	5/28/2024		100,000,000	5.81	\$100,000,000	\$100,030,809	\$30,809
Bank of Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/27/2025		35,000,000	5.15	\$33,552,944	\$33,486,423	-\$66,521
Bank of Montreal, Apr 12, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	6.01	4/12/2024	3/29/2024	100,000,000	6.09	\$100,000,000	\$100,024,598	\$24,598
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.84	1/6/2025	3/29/2024	165,000,000	5.92	\$165,000,000	\$165,312,736	\$312,736
Bank of Montreal, Jan 06, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.71	1/6/2025	3/29/2024	135,000,000	5.79	\$135,000,000	\$135,123,325	\$123,325
Bank of Montreal, Jan 06, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.71	1/6/2025	3/29/2024	175,000,000	5.79	\$175,000,000	\$175,158,774	\$158,774
Bank of Montreal, Jun 14, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.98	6/14/2024	3/29/2024	100,000,000	6.06	\$100,000,000	\$100,106,188	\$106,188
Bank of Montreal, Mar 07, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.63	3/7/2025	3/29/2024	100,000,000	5.71	\$100,000,000	\$100,000,000	\$0
Bank of Montreal, Mar 12, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.63	3/12/2025	3/29/2024	200,000,000	5.71	\$200,000,000	\$199,953,262	-\$46,738
Bank of Montreal, May 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.93	5/3/2024	3/29/2024	100,000,000	6.01	\$100,000,000	\$100,043,710	\$43,710

See notes at end of table.



# INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Bank of Montreal, Sep 16, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.90	9/16/2024	3/29/2024	40,200,000	5.98	\$40,200,000	\$40,278,341	\$78,341
Bank of Nova Scotia, Toronto CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/18/2024		52,000,000	5.99	\$52,000,000	\$52,130,827	\$130,827
Bank of Nova Scotia, Toronto, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.71	1/3/2025	3/29/2024	170,000,000	5.79	\$170,000,000	\$170,151,315	\$151,315
Bank of Nova Scotia, Toronto, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.97	7/3/2024	3/29/2024	75,000,000	6.05	\$75,000,000	\$75,105,139	\$105,139
Bank of Nova Scotia, Toronto, Jul 10, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.98	7/10/2024	3/29/2024	50,000,000	6.06	\$50,000,000	\$50,074,629	\$74,629
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		50,000,000	5.89	\$49,733,667	\$49,746,637	\$12,970
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/20/2024		70,000,000	5.86	\$69,421,858	\$69,446,661	\$24,802
Bedford Row Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/28/2024		50,000,000	5.89	\$49,523,014	\$49,545,917	\$22,903
Bedford Row Funding Corp., Jun 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.73	6/3/2024	3/29/2024	50,000,000	5.81	\$50,000,000	\$50,023,782	\$23,782
Bedford Row Funding Corp., Oct 16, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.62	10/16/2024	3/29/2024	80,000,000	5.70	\$80,000,000	\$80,027,126	\$27,126
Bedford Row Funding Corp., Sep 23, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.53	9/23/2024	3/29/2024	100,000,000	5.61	\$100,000,000	\$99,989,901	-\$10,099
Bennington Stark Capital Co., LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/1/2024		55,000,000	5.45	\$54,967,306	\$54,967,349	\$44
BofA Securities, Inc. CP4-2	COMMERCIAL PAPER - 4-2		6/13/2024		100,000,000	5.51	\$98,855,694	\$98,844,073	-\$11,621
CAFCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		75,000,000	5.63	\$74,795,625	\$74,799,413	\$3,788
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$99,727,500	\$99,730,550	\$3,050
CHARTA, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/30/2024		50,000,000	5.70	\$49,748,375	\$49,753,142	\$4,767
CIESCO, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/14/2024		30,000,000	5.67	\$29,646,400	\$29,651,340	\$4,940
CRC Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/15/2024		100,000,000	5.63	\$99,727,500	\$99,732,550	\$5,050
Canadian Imperial Bank of Commerce CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	10/17/2024		25,000,000	5.99	\$25,000,000	\$25,063,969	\$63,969
Canadian Imperial Bank of Commerce CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		75,000,000	5.56	\$74,769,700	\$74,766,681	-\$3,019
Canadian Imperial Bank of Commerce CP4-2	COMMERCIAL PAPER - 4-2		2/4/2025		50,000,000	5.20	\$47,861,167	\$47,793,828	-\$67,339
Canadian Imperial Bank of Commerce, Apr 01, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	6.03	4/1/2024	3/29/2024	150,000,000	6.11	\$150,000,000	\$150,010,214	\$10,214
Canadian Imperial Bank of Commerce, Apr 11, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.98	4/11/2024	3/29/2024	208,000,000	6.06	\$208,000,000	\$208,046,342	\$46,342
Canadian Imperial Bank of Commerce, Jan 03, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.84	1/3/2025	3/29/2024	110,000,000	5.92	\$110,000,000	\$110,227,212	\$227,212
Chariot Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/10/2024		20,000,000	5.50	\$19,780,467	\$19,778,767	-\$1,699
Chariot Funding LLC, Aug 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.55	8/1/2024	3/29/2024	50,000,000	5.63	\$50,000,000	\$50,004,691	\$4,691
Chariot Funding LLC, Sep 20, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.57	9/20/2024	3/29/2024	130,000,000	5.65	\$130,000,000	\$130,000,000	\$0
Chesham Finance LLC Series IV CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/4/2024		100,000,000	5.43	\$99,896,167	\$99,896,361	\$194
Chesham Finance LLC Series VII CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/22/2024		40,000,000	5.48	\$39,851,111	\$39,851,080	-\$31
Citibank N.A., New York, Jan 10, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.70	1/10/2025	3/29/2024	220,000,000	5.78	\$220,000,000	\$220,108,528	\$108,528
Citibank N.A., New York, Oct 28, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.93	10/28/2024	3/29/2024	100,000,000	6.01	\$100,000,000	\$100,208,703	\$208,703
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	6.01	9/18/2024		130,000,000	6.00	\$130,000,000	\$130,269,200	\$269,200
Citibank NA, New York CD	CERTIFICATE OF DEPOSIT	5.92	7/22/2024		150,000,000	5.96	\$150,000,000	\$150,168,486	\$168,486
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/3/2024		75,000,000	5.92	\$74,929,125	\$74,933,411	\$4,286
Citigroup Global Markets, Inc. CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		75,000,000	5.97	\$74,596,250	\$74,617,500	\$21,250
City Furniture, Inc., Aug 01, 2044	VARIABLE RATE DEMAND NOTE	5.46	8/1/2044	4/4/2024	77,000,000	5.46	\$77,000,000	\$77,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.87	7/1/2024	3/29/2024	100,000,000	5.95	\$100,000,000	\$100,102,863	\$102,863
Collateralized Commercial Paper FLEX Co., LLC, Jul 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.75	7/1/2024	3/29/2024	140,000,000	5.83	\$140,000,000	\$140,099,956	\$99,956
Collateralized Commercial Paper FLEX Co., LLC, Jul 03, 2024	VARIABLE RATE COMMERCIAL PAPER-ABS-4(2)	5.65	7/3/2024	3/29/2024	155,000,000	5.73	\$155,000,000	\$155,000,000	\$0
Collateralized Commercial Paper FLEX Co., LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.87	7/8/2024	3/29/2024	115,000,000	5.95	\$115,000,000	\$115,031,057	\$31,057
Collateralized Commercial Paper FLEX Co., LLC, Jul 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.74	7/23/2024	3/29/2024	70,000,000	5.82	\$70,000,000	\$70,047,008	\$47,008

See notes at end of table.

## INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Collateralized Commercial Paper V Co. LLC, Dec 02, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.63	12/2/2024	3/29/2024	100,000,000	5.71	\$100,000,000	\$100,000,000	\$0
Collateralized Commercial Paper V Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.88	7/10/2024	3/29/2024	100,000,000	5.96	\$100,000,000	\$100,111,632	\$111,632
Collateralized Commercial Paper V Co. LLC, Jul 22, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.74	7/22/2024	3/29/2024	50,000,000	5.82	\$50,000,000	\$50,008,671	\$8,671
Cooperative Rabobank UA TD	TIME DEPOSIT	5.33	4/3/2024		680,000,000	5.42	\$680,000,000	\$680,000,000	\$0
Cooperative Rabobank UA TD	TIME DEPOSIT	5.33	4/4/2024		700,000,000	5.42	\$700,000,000	\$700,000,000	\$0
Credit Agricole Corporate and Investment Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.32	4/2/2024		840,000,000	5.41	\$840,000,000	\$840,000,000	\$0
DNB Bank ASA CP4-2	COMMERCIAL PAPER - 4-2		4/18/2024		190,000,000	5.88	\$189,375,454	\$189,414,245	\$38,791
DNB Bank ASA TD	TIME DEPOSIT	5.31	4/1/2024		750,000,000	5.40	\$750,000,000	\$750,000,000	\$0
DZ Bank AG Deutsche Zentral-Genossenschaftsbank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/24/2024		100,000,000	5.88	\$100,000,000	\$100,023,954	\$23,954
Dino P. Kanelos Irrevocable Trust, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	4/4/2024	4,515,000	5.45	\$4,515,000	\$4,515,000	\$0
Dreyfus Government Cash Management Fund	OVERNIGHT MUTUAL FUND	5.13	4/1/2024		5,022,983	5.22	\$5,022,983	\$5,022,983	\$0
Enterprise Fleet Financing, LLC 2023-3, A1, 5.906%, 10/21/2024	ASSET BACKED NOTE	5.91	10/21/2024		4,562,554	5.91	\$4,562,554	\$4,565,725	\$3,171
Enterprise Fleet Financing, LLC 2024-1, A1, 5.548%, 02/20/2025	ASSET BACKED NOTE	5.55	2/20/2025		20,693,325	5.55	\$20,693,325	\$20,696,644	\$3,319
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/7/2024		35,000,000	5.68	\$34,623,799	\$34,628,884	\$5,085
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/17/2024		50,000,000	5.69	\$49,386,875	\$49,395,538	\$8,663
Fairway Finance Co. LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/21/2024		100,000,000	5.69	\$98,713,194	\$98,731,690	\$18,496
Federated Hermes Institutional Prime Value Obligations Fund - Class IS	MUTUAL FUND MONEY MARKET	5.47	4/1/2024	3/29/2024	630,872,087	5.47	\$631,124,436	\$630,935,175	-\$189,262
Fiore Capital LLC, Series 2005-A, Aug 01, 2045	VARIABLE RATE DEMAND NOTE	5.45	8/1/2045	4/4/2024	8,690,000	5.45	\$8,690,000	\$8,690,000	\$0
GTA Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/13/2024		90,000,000	5.81	\$89,359,450	\$89,382,450	\$23,000
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/1/2024		100,000,000	5.58	\$99,939,778	\$99,940,825	\$1,047
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/3/2024		44,500,000	5.54	\$44,460,098	\$44,460,480	\$381
Gotham Funding Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/21/2024		70,000,000	5.50	\$69,438,250	\$69,435,730	-\$2,520
Great Bear Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/4/2024		50,000,000	5.42	\$49,948,181	\$49,948,084	-\$97
GreatAmerica Leasing Receivables 2024-1, A1, 5.55%, 02/18/2025	ASSET BACKED NOTE	5.55	2/18/2025		31,437,342	5.55	\$31,437,342	\$31,440,278	\$2,936
HSBC Securities (USA), Inc. Repo Tri Party Overnight Fixed	REPO TRIPARTY OVERNIGHT FIXED	5.33	4/1/2024		100,000,000	5.40	\$100,000,000	\$100,000,000	\$0
HW Hellman Building, LP, Mar 01, 2062	VARIABLE RATE DEMAND NOTE	5.45	3/1/2062	4/4/2024	50,000,000	5.45	\$50,000,000	\$50,000,000	\$0
J.P. Morgan Securities LLC	CALLABLE COMMERCIAL PAPER	5.95	8/21/2024	3/29/2024	50,000,000	6.03	\$50,000,000	\$50,031,813	\$31,813
Jupiter Securitization Co. LLC, Jul 10, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.73	7/10/2024	3/29/2024	75,000,000	5.81	\$75,000,000	\$75,013,292	\$13,292
Jupiter Securitization Co. LLC, Nov 06, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.64	11/6/2024	3/29/2024	16,000,000	5.72	\$16,000,000	\$16,000,000	\$0
Jupiter Securitization Co. LLC, Oct 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.67	10/23/2024	3/29/2024	100,000,000	5.75	\$100,000,000	\$100,034,925	\$34,925
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/8/2024		200,000,000	5.53	\$199,671,833	\$199,673,850	\$2,017
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/25/2024		75,000,000	5.55	\$74,686,167	\$74,686,958	\$791
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/26/2024		60,000,000	5.55	\$59,739,967	\$59,740,536	\$569
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/7/2024		150,000,000	5.50	\$149,110,000	\$149,097,542	-\$12,459
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/8/2024		92,000,000	5.50	\$91,440,487	\$91,444,802	\$4,315
Jupiter Securitization Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/5/2024		73,650,000	5.51	\$72,894,781	\$72,892,381	-\$2,400
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		50,000,000	5.54	\$49,760,000	\$49,760,000	\$0
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/30/2024		30,300,000	5.54	\$30,150,015	\$30,150,015	\$0
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/23/2024		13,000,000	5.50	\$12,892,216	\$12,890,948	-\$1,267
LMA-Americas LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/26/2024		50,000,000	5.53	\$49,330,000	\$49,330,000	\$0
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		115,000,000	5.40	\$114,915,188	\$114,914,960	-\$228
Longship Funding LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		200,000,000	5.41	\$199,852,222	\$199,852,104	-\$118
MUFG Bank Ltd. CP	COMMERCIAL PAPER		6/13/2024		260,000,000	5.51	\$257,030,367	\$257,038,374	\$8,007
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.46	5/2/2024		90,000,000	5.55	\$90,000,000	\$90,000,000	\$0
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.49	6/3/2024		100,000,000	5.58	\$100,000,000	\$100,000,000	\$0
MUFG Bank Ltd. ECD (USD)	EURO CERTIFICATE OF DEPOSIT	5.50	4/23/2024		100,000,000	5.59	\$100,000,000	\$100,000,592	\$592

See notes at end of table.

# INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Manhattan Asset Funding Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/4/2024		40,000,000	5.57	\$39,958,000	\$39,958,544	\$544
Manhattan Asset Funding Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/3/2024		75,000,000	5.53	\$73,916,833	\$73,913,452	-\$3,382
Matchpoint Finance plc CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		45,000,000	5.55	\$44,966,313	\$44,966,670	\$357
Mizuho Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.40	5/16/2024		75,000,000	5.49	\$75,000,000	\$74,993,579	-\$6,422
Mizuho Bank Ltd. TD	TIME DEPOSIT	5.32	4/1/2024		750,000,000	5.41	\$750,000,000	\$750,000,000	\$0
Mizuho Bank Ltd., Canada Branch TD	TIME DEPOSIT	5.33	4/1/2024		150,000,000	5.42	\$150,000,000	\$150,000,000	\$0
Mizuho Securities USA, Inc. - REPO TRIPARTY OVERNIGHT FIXED	REPO TRIPARTY OVERNIGHT FIXED	5.33	4/1/2024		150,000,000	5.40	\$150,000,000	\$150,000,000	\$0
National Australia Bank Ltd., Melbourne CP4-2	COMMERCIAL PAPER - 4-2		5/1/2024		110,000,000	5.88	\$109,414,586	\$109,446,619	\$32,032
National Australia Bank Ltd., Melbourne CP4-2	COMMERCIAL PAPER - 4-2		2/10/2025		50,000,000	5.16	\$47,833,458	\$47,764,593	-\$68,866
National Australia Bank Ltd., Melbourne, Dec 09, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.78	12/9/2024	3/29/2024	100,000,000	5.86	\$100,000,000	\$100,138,267	\$138,267
National Australia Bank Ltd., Melbourne, Sep 24, 2024	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.87	9/24/2024	3/29/2024	100,000,000	5.95	\$100,000,000	\$100,166,251	\$166,251
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		5/24/2024		130,000,000	5.77	\$128,861,742	\$128,898,792	\$37,050
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		6/17/2024		200,000,000	5.77	\$197,518,250	\$197,586,200	\$67,950
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/22/2025		30,000,000	5.10	\$28,792,500	\$28,709,500	-\$83,000
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/27/2025		120,000,000	5.10	\$115,089,500	\$114,758,406	-\$331,094
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		1/31/2025		115,000,000	5.08	\$110,252,129	\$109,896,114	-\$356,015
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		2/5/2025		65,000,000	5.19	\$62,216,303	\$62,083,486	-\$132,816
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		3/18/2025		150,000,000	5.41	\$142,441,458	\$142,456,673	\$15,214
National Bank of Canada, Montreal CP4-2	COMMERCIAL PAPER - 4-2		2/3/2025		90,000,000	5.19	\$86,170,200	\$86,005,310	-\$164,890
National Bank of Canada, Montreal, Jan 16, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.70	1/16/2025	4/1/2024	200,000,000	5.78	\$200,000,000	\$200,170,268	\$170,268
National Bank of Canada, Montreal, Jan 17, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.70	1/17/2025	3/29/2024	100,000,000	5.78	\$100,000,000	\$100,084,765	\$84,765
National Bank of Canada, Montreal, Mar 13, 2025	VARIABLE RATE COMMERCIAL PAPER - 4-2	5.63	3/13/2025	3/29/2024	160,000,000	5.71	\$160,000,000	\$159,988,117	-\$11,883
Nordea Bank Abp CP4-2	COMMERCIAL PAPER - 4-2		4/19/2024		130,000,000	5.87	\$129,553,125	\$129,578,821	\$25,696
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		48,750,000	5.90	\$48,505,167	\$48,517,386	\$12,220
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		48,600,000	5.89	\$48,333,510	\$48,345,795	\$12,285
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/9/2024		100,000,000	5.53	\$98,526,000	\$98,465,319	-\$60,681
Old Line Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/11/2024		100,000,000	5.53	\$98,511,111	\$98,435,792	-\$75,319
Old Line Funding, LLC, Aug 20, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.59	8/20/2024	3/29/2024	50,000,000	5.67	\$50,000,000	\$50,013,416	\$13,416
Old Line Funding, LLC, Aug 23, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.59	8/23/2024	3/29/2024	100,000,000	5.67	\$100,000,000	\$100,027,736	\$27,736
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/8/2024	3/29/2024	50,000,000	5.80	\$50,000,000	\$50,029,827	\$29,827
Old Line Funding, LLC, Jul 08, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	7/8/2024	3/29/2024	75,000,000	5.80	\$75,000,000	\$75,044,741	\$44,741
Old Line Funding, LLC, Oct 28, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.61	10/28/2024	3/29/2024	75,000,000	5.69	\$75,000,000	\$75,000,000	\$0
Old Line Funding, LLC, Sep 04, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.54	9/4/2024	3/29/2024	90,000,000	5.62	\$90,000,000	\$90,000,000	\$0
Overbaugh Family (2016) Survivorship Trust, Apr 01, 2042	VARIABLE RATE DEMAND NOTE	5.45	4/1/2042	4/4/2024	7,015,000	5.45	\$7,015,000	\$7,015,000	\$0
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		5/15/2024		25,000,000	5.49	\$24,822,333	\$24,821,667	-\$667
Podium Funding Trust CPABS3A3	COMMERCIAL PAPER - ABS 3A3		6/5/2024		100,000,000	5.69	\$98,953,500	\$98,975,158	\$21,658
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/1/2024		40,000,000	5.50	\$39,798,267	\$39,797,133	-\$1,133
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/2/2024		22,692,000	5.49	\$22,574,411	\$22,573,529	-\$882
Ridgefield Funding Company, LLC Series A CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/18/2024		118,878,000	5.52	\$117,426,632	\$117,421,938	-\$4,693
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/11/2024		150,000,000	6.00	\$145,354,083	\$145,713,882	\$359,799
Royal Bank of Canada CP4-2	COMMERCIAL PAPER - 4-2		10/16/2024		47,000,000	6.00	\$45,507,332	\$45,625,128	\$117,796
Scheel Investments, LLC, Sep 01, 2041	VARIABLE RATE DEMAND NOTE	5.45	9/1/2041	4/4/2024	6,720,000	5.45	\$6,720,000	\$6,720,000	\$0

See notes at end of table.

## INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/13/2024		90,000,000	5.49	\$89,388,200	\$89,373,173	-\$15,027
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/29/2024		50,000,000	5.51	\$49,540,167	\$49,530,408	-\$9,759
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		80,000,000	5.51	\$79,240,533	\$79,225,363	-\$15,170
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/31/2024		50,000,000	5.51	\$49,525,333	\$49,515,852	-\$9,481
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/10/2024		90,000,000	5.50	\$89,012,100	\$88,998,533	-\$13,567
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/11/2024		100,000,000	5.50	\$98,887,500	\$98,872,917	-\$14,583
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		6/24/2024		125,000,000	5.50	\$123,368,333	\$123,360,185	-\$8,148
Sheffield Receivables Company LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/2/2024		40,000,000	5.53	\$39,428,267	\$39,427,712	-\$555
Societe Generale, New York CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.31	4/1/2024		200,000,000	5.40	\$200,000,000	\$200,000,000	\$0
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/18/2024		240,000,000	5.54	\$240,000,000	\$240,008,191	\$8,191
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.45	4/5/2024		205,000,000	5.54	\$205,000,000	\$205,003,823	\$3,823
Sumitomo Mitsui Trust Bank Ltd. CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.42	7/2/2024		100,000,000	5.51	\$100,000,000	\$100,000,000	\$0
Sumitomo Mitsui Trust Bank Ltd. CP4-2	COMMERCIAL PAPER - 4-2		4/8/2024		100,000,000	5.55	\$99,835,611	\$99,838,407	\$2,796
Sumitomo Mitsui Trust Bank Ltd.(London) ECD	EURO CERTIFICATE OF DEPOSIT	0.00	6/7/2024		200,000,000	5.57	\$197,868,298	\$197,237,794	-\$630,504
Svenska Handelsbanken, Stockholm CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.80	4/4/2024		10,000,000	5.88	\$10,000,000	\$10,000,719	\$719
Taxable Tender Option Bond Trust 2021-MIZ9064TX, (Series 2021-MIZ9064TX), 11/01/2056	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	11/1/2056	4/4/2024	6,500,000	5.73	\$6,500,000	\$6,500,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9084TX, (Series 2022-MIZ9084TX), 02/01/2027	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	2/1/2027	4/4/2024	5,150,000	5.73	\$5,150,000	\$5,150,000	\$0
Taxable Tender Option Bond Trust 2022-MIZ9094TX, (Series 2022-MIZ9094TX), 12/01/2059	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.73	12/1/2059	4/4/2024	3,200,000	5.73	\$3,200,000	\$3,200,000	\$0
Texas State, Veterans Bonds (Taxable Series 2023A), 12/01/2054	MUNICIPAL VARIABLE RATE DEMAND NOTE	5.40	12/1/2054	4/3/2024	18,000,000	5.40	\$18,000,000	\$18,000,000	\$0
The Greathouse 2021 Children's Trust, Dec 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	12/1/2046	4/4/2024	13,625,000	5.45	\$13,625,000	\$13,625,000	\$0
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/29/2024		35,250,000	5.90	\$35,072,967	\$35,082,367	\$9,400
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/6/2024		40,000,000	5.89	\$39,755,600	\$39,768,167	\$12,567
Thunder Bay Funding, LLC CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		7/9/2024		15,000,000	5.53	\$14,778,900	\$14,778,900	\$0
Thunder Bay Funding, LLC, May 29, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.72	5/29/2024	3/29/2024	100,000,000	5.80	\$100,000,000	\$100,024,352	\$24,352
Thunder Bay Funding, LLC, Oct 01, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.54	10/1/2024	3/29/2024	100,000,000	5.62	\$100,000,000	\$100,000,000	\$0
Thunder Bay Funding, LLC, Oct 17, 2024	COMMERCIAL PAPER ASSET BACKED CALLABLE	5.61	10/17/2024	3/29/2024	50,000,000	5.69	\$50,000,000	\$50,011,951	\$11,951
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.00	9/6/2024		25,000,000	5.99	\$25,000,000	\$25,042,776	\$42,776
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/3/2024		118,500,000	6.04	\$118,500,000	\$118,616,816	\$116,816
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.05	7/10/2024		97,000,000	6.04	\$97,000,000	\$97,096,035	\$96,035
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	6.02	7/3/2024		100,000,000	6.01	\$100,000,000	\$100,089,038	\$89,038
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.15	2/12/2025		100,000,000	5.17	\$100,000,000	\$99,776,260	-\$223,740
Toronto Dominion Bank CDYAN	CERTIFICATE OF DEPOSIT - YANKEE	5.40	3/28/2025		95,000,000	5.42	\$95,000,000	\$95,000,000	\$0
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		5/16/2024		60,000,000	5.80	\$59,552,058	\$59,566,965	\$14,907
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		8/23/2024		50,000,000	6.00	\$48,836,556	\$48,910,501	\$73,945
Toronto Dominion Bank CP4-2	COMMERCIAL PAPER - 4-2		2/21/2025		150,000,000	5.32	\$143,083,750	\$142,965,500	-\$118,251
Toronto Dominion Bank, Apr 29, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.92	4/29/2024	3/29/2024	100,000,000	6.00	\$100,000,000	\$100,042,909	\$42,909
Toronto Dominion Bank, Jan 16, 2025	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.67	1/16/2025	3/29/2024	235,000,000	5.75	\$235,000,000	\$235,159,257	\$159,257
Toyota Credit Canada Inc. CP	COMMERCIAL PAPER		7/18/2024		40,000,000	5.99	\$39,290,667	\$39,340,362	\$49,695
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		4/25/2024		13,000,000	5.91	\$12,942,771	\$12,946,328	\$3,557
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		5/23/2024		50,000,000	5.73	\$49,571,444	\$49,582,904	\$11,459
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		6/17/2024		30,000,000	5.74	\$29,628,750	\$29,633,543	\$4,793
Toyota Credit De Puerto Rico Corp. CP	COMMERCIAL PAPER		7/17/2024		55,000,000	5.61	\$54,091,033	\$54,087,303	-\$3,731
Toyota Lease Owner Trust 2024-A,A1, 5.524%, 02/20/2025	ASSET BACKED NOTE	5.52	2/20/2025		20,960,986	5.52	\$20,960,986	\$20,965,614	\$4,628
Toyota Motor Credit Corp., Dec 09, 2024	VARIABLE MEDIUM TERM NOTE	5.82	12/9/2024	3/29/2024	95,000,000	5.90	\$95,000,000	\$95,193,905	\$193,905
Truist Bank CD	CERTIFICATE OF DEPOSIT	5.45	6/3/2024		75,000,000	5.54	\$75,000,000	\$75,000,000	\$0

See notes at end of table.

## INVENTORY OF HOLDINGS FOR MARCH 28, 2024

Security Name	Security Classification	Cpn	Maturity	Rate Reset	Par	Current Yield	Amort Cost (2)	Mkt Value (1)	Unrealized Gain/Loss
U.S. Treasury Bill 04/04/2024	US TREASURY BILL	0.00	4/4/2024		400,000,000	5.40	\$399,589,528	\$399,826,956	\$237,428
UnitedHealth Group, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/1/2024		100,000,000	5.41	\$99,940,889	\$99,940,873	-\$16
UnitedHealth Group, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/1/2024		64,200,000	5.41	\$64,162,051	\$64,162,040	-\$10
UnitedHealth Group, Inc. CP4-2	COMMERCIAL PAPER - 4-2		4/1/2024		100,000,000	5.41	\$99,940,889	\$99,940,873	-\$16
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		4/2/2024		50,000,000	5.41	\$49,963,056	\$49,963,006	-\$50
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/7/2024		95,000,000	5.51	\$94,435,278	\$94,431,759	-\$3,518
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/16/2024		50,000,000	5.51	\$49,635,903	\$49,634,043	-\$1,860
Victory Receivables Corp. CPABS4-2	COMMERCIAL PAPER - ABS- 4(2)		5/24/2024		100,000,000	5.51	\$99,152,917	\$99,149,433	-\$3,484
Wells Fargo Bank, N.A. CD	CERTIFICATE OF DEPOSIT	5.15	2/13/2025		200,000,000	5.17	\$200,000,000	\$199,587,012	-\$412,988
Wells Fargo Bank, N.A. CD	CERTIFICATE OF DEPOSIT	5.21	2/14/2025		10,000,000	5.23	\$10,000,000	\$9,984,497	-\$15,503
Wells Fargo Bank, N.A., Jul 31, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.93	7/31/2024	3/29/2024	100,000,000	6.01	\$100,000,000	\$100,145,883	\$145,883
Wells Fargo Bank, N.A., Nov 07, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.93	11/7/2024	3/29/2024	100,000,000	6.01	\$100,000,000	\$100,209,281	\$209,281
Wells Fargo Bank, N.A., Nov 13, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.93	11/13/2024	3/29/2024	50,000,000	6.01	\$50,000,000	\$50,106,752	\$106,752
Wells Fargo Bank, N.A., Sep 12, 2024	VARIABLE RATE CERTIFICATE OF DEPOSIT	5.93	9/12/2024	3/29/2024	225,000,000	6.01	\$225,000,000	\$225,432,997	\$432,997
Westlake Automobile Receivables Trust 2024-I, A1, 5.629%, 03/17/2025	ASSET BACKED NOTE	5.63	3/17/2025		55,000,000	5.63	\$55,000,000	\$55,009,312	\$9,312
Westpac Banking Corp. Ltd., Sydney CP4-2	COMMERCIAL PAPER - 4-2		2/7/2025		100,000,000	5.17	\$95,698,889	\$95,543,581	-\$155,308
Wylie Bice Life Insurance Trust, Aug 01, 2046	VARIABLE RATE DEMAND NOTE	5.45	8/1/2046	4/4/2024	7,625,000	5.45	\$7,625,000	\$7,625,000	\$0
Total Value of Assets					27,621,017,277		\$27,521,245,778	\$27,524,588,977	\$3,343,199

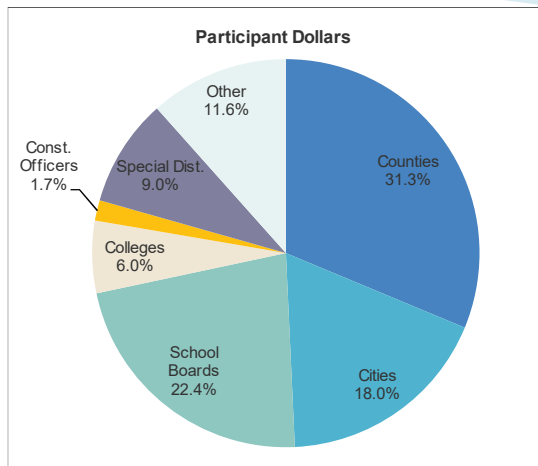
**Notes:** The data included in this report is unaudited. Amounts above are the value of investments. Income accruals, payables and uninvested cash are not included. Amortizations/accretions are reported with a one-day lag in the above valuations.

<sup>1</sup> Market values of the portfolio securities are provided by the custodian, BNY Mellon. The portfolio manager, Federated Hermes, is the source for other data shown above.

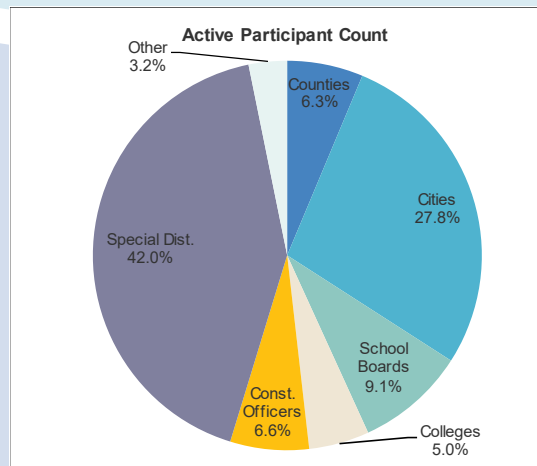
<sup>2</sup> Amortized cost is calculated using a straight line method.

## PARTICIPANT CONCENTRATION DATA - AS OF MARCH 2024

Participant Balance	Share of Total Fund	Share of Participant Count	Participant Balance	Share of Total Fund	Share of Participant Count
<b>All Participants</b>	<b>100.0%</b>	<b>100.0%</b>	<b>Colleges &amp; Universities</b>	<b>6.0%</b>	<b>5.0%</b>
Top 10	32.2%	1.3%	Top 10	5.2%	1.3%
\$100 million or more	75.9%	9.1%	\$100 million or more	3.9%	0.5%
\$10 million up to \$100 million	21.5%	20.4%	\$10 million up to \$100 million	2.0%	2.1%
\$1 million up to \$10 million	2.3%	20.3%	\$1 million up to \$10 million	0.1%	0.6%
Under \$1 million	0.3%	50.1%	Under \$1 million	0.01%	1.8%
<b>Counties</b>	<b>31.3%</b>	<b>6.3%</b>	<b>Constitutional Officers</b>	<b>1.7%</b>	<b>6.6%</b>
Top 10	25.4%	1.3%	Top 10	0.7%	1.3%
\$100 million or more	29.1%	2.1%	\$100 million or more	0.4%	0.1%
\$10 million up to \$100 million	2.0%	1.5%	\$10 million up to \$100 million	1.0%	0.9%
\$1 million up to \$10 million	0.1%	1.2%	\$1 million up to \$10 million	0.3%	2.2%
Under \$1 million	0.0%	1.5%	Under \$1 million	0.0%	3.3%
<b>Municipalities</b>	<b>18.0%</b>	<b>27.8%</b>	<b>Special Districts</b>	<b>9.0%</b>	<b>42.0%</b>
Top 10	6.0%	1.3%	Top 10	5.2%	1.3%
\$100 million or more	7.5%	1.8%	\$100 million or more	4.9%	1.2%
\$10 million up to \$100 million	9.8%	9.1%	\$10 million up to \$100 million	3.1%	3.6%
\$1 million up to \$10 million	0.7%	5.8%	\$1 million up to \$10 million	0.8%	8.2%
Under \$1 million	0.1%	11.1%	Under \$1 million	0.2%	29.0%
<b>School Boards</b>	<b>22.4%</b>	<b>9.1%</b>	<b>Other</b>	<b>11.6%</b>	<b>3.2%</b>
Top 10	13.5%	1.3%	Top 10	10.4%	1.3%
\$100 million or more	18.9%	2.4%	\$100 million or more	11.2%	1.0%
\$10 million up to \$100 million	3.3%	2.8%	\$10 million up to \$100 million	0.2%	0.4%
\$1 million up to \$10 million	0.2%	1.4%	\$1 million up to \$10 million	0.1%	0.9%
Under \$1 million	0.0%	2.4%	Under \$1 million	0.0%	0.9%



Total Fund Value: \$27,430,299,134



Total Active Participant Count: 778

Note: Active accounts include only those participant accounts valued above zero.



## COMPLIANCE WITH INVESTMENT POLICY FOR MARCH 2024

As investment manager, Federated monitors compliance daily on Florida PRIME to ensure that investment practices comply with the requirements of the Investment Policy Statement (IPS). Federated provides a monthly compliance report to the SBA and is required to notify the Investment Oversight Group (IOG) of compliance exceptions within 24 hours of identification. The IOG will meet as necessary based on the occurrence and resolution of compliance exceptions or upon the occurrence of a material event. Minutes from the IOG meetings are posted to the Florida PRIME website.

In addition to the compliance testing performed by Federated, SBA Risk Management and Compliance conducts daily independent testing on Florida PRIME using a risk-based approach. Under this approach, each IPS parameter is ranked as “High” or “Low” with respect to the level of risk associated with a potential guideline breach. Negative test results are subject to independent verification and review for possible escalation. These rankings, along with the frequency for testing, are reviewed and approved by the IOG on an annual basis or more often if market conditions dictate. Additionally, any parameter reported in “Fail” status on the Federated compliance report, regardless of risk ranking, is also independently verified and escalated accordingly. The results of independent testing are currently reported monthly to the IOG.

Test by Source	Pass/Fail
Securities must be USD denominated	Pass
<u>Ratings requirements</u>	
First Tier Securities	Pass
Long-term securities must have long-term ratings in the three highest categories	Pass
Commercial Paper must have short-term ratings from at least one NRSRO	Pass
Securities in Highest Rating Category (A-1+ or equivalent)	Pass
Repurchase Agreement Counterparties must be rated by S&P	Pass
S&P Weighted Average Life	Pass
<u>Maturity</u>	
Individual Security	Pass
Government floating rate notes/variable rate notes	Pass
Dollar Weighted Average Maturity	Pass
Weighted Average Life	Pass
<u>Issuer Diversification</u>	
First tier issuer (limit does not apply to cash, cash items, U.S. Government securities and repo collateralized by these securities)	Pass
 Demand Feature and Guarantor Diversification	
First Tier securities issued by or subject to demand features and guarantees of a non-controlled person	Pass
First Tier securities issued by or subject to demand features and guarantees of a controlled person	Pass

Test by Source	Pass/Fail
<u>Money Market Mutual Funds</u>	
Invested in any one Money Market Mutual Fund	Pass
<u>Repurchase Agreements</u>	
Repurchase Agreement Counterparty Rating	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (2-5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1+ (More than 5 business days)	Pass
Term Repurchase Agreements with any single dealer - Counterparty Rating A-1 (More than 5 business days)	Pass
Repurchase Agreements with any single dealer - Counterparty Rating A-1	Pass
<u>Concentration Tests</u>	
Industry Concentration, excluding financial services industry	Pass
Any Single Government Agency	Pass
Illiquid Securities	Pass
Assets invested in securities accessible within 1 business day	Pass
Assets invested in securities accessible within 5 business days	Pass

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# TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
ANGLESEA FUNDING LLC PABS4	03/25/24	03/22/24	03/22/24	50,000,000	49,977,833	0	49,977,833	0
ANGLESEA FUNDING LLC PABS4	03/25/24	03/22/24	03/22/24	50,000,000	49,977,833	0	49,977,833	0
ANGLESEA FUNDING LLC PABS4	03/25/24	03/22/24	03/22/24	50,000,000	49,977,833	0	49,977,833	0
ANGLESEA FUNDING LLC PABS4	03/25/24	03/22/24	03/22/24	50,000,000	49,977,833	0	49,977,833	0
ANGLESEA FUNDING LLC PABS4	03/26/24	03/25/24	03/25/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/26/24	03/25/24	03/25/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/26/24	03/25/24	03/25/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/26/24	03/25/24	03/25/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/27/24	03/26/24	03/26/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/27/24	03/26/24	03/26/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/27/24	03/26/24	03/26/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/28/24	03/27/24	03/27/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/28/24	03/27/24	03/27/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	03/28/24	03/27/24	03/27/24	50,000,000	49,992,611	0	49,992,611	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/25/24	03/25/24	50,000,000	49,940,667	0	49,940,667	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/25/24	03/25/24	50,000,000	49,940,667	0	49,940,667	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/28/24	03/28/24	50,000,000	49,962,847	0	49,962,847	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/28/24	03/28/24	50,000,000	49,962,847	0	49,962,847	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/28/24	03/28/24	50,000,000	49,962,847	0	49,962,847	0
ANGLESEA FUNDING LLC PABS4	04/02/24	03/28/24	03/28/24	50,000,000	49,962,847	0	49,962,847	0
ANGLESEA FUNDING LLC PABS4	04/09/24	03/19/24	03/19/24	50,000,000	49,844,250	0	49,844,250	0
ANGLESEA FUNDING LLC PABS4	04/09/24	03/19/24	03/19/24	50,000,000	49,844,250	0	49,844,250	0
ANGLESEA FUNDING LLC PABS4	04/09/24	03/19/24	03/19/24	50,000,000	49,844,250	0	49,844,250	0
ANGLESEA FUNDING LLC PABS4	04/17/24	03/14/24	03/14/24	50,000,000	49,747,361	0	49,747,361	0
ANGLESEA FUNDING LLC PABS4	04/17/24	03/14/24	03/14/24	50,000,000	49,747,361	0	49,747,361	0
ANGLESEA FUNDING LLC PABS4	06/04/24	03/04/24	03/04/24	50,000,000	49,317,667	0	49,317,667	0
ANGLESEA FUNDING LLC PABS4	06/04/24	03/04/24	03/04/24	30,000,000	29,590,600	0	29,590,600	0
ANGLESEA FUNDING LLC PABS4	07/08/24	03/28/24	03/28/24	50,000,000	49,240,667	0	49,240,667	0
ANGLESEA FUNDING LLC PABS4	07/08/24	03/28/24	03/28/24	50,000,000	49,240,667	0	49,240,667	0
ANGLESEA FUNDING LLC PABS4	07/08/24	03/28/24	03/28/24	5,000,000	4,924,067	0	4,924,067	0
ANGLESEA FUNDING LLC	08/30/24	03/05/24	03/05/24	50,000,000	50,000,000	0	50,000,000	0
ANGLESEA FUNDING LLC	08/30/24	03/05/24	03/05/24	50,000,000	50,000,000	0	50,000,000	0
ANGLESEA FUNDING LLC	08/30/24	03/05/24	03/05/24	50,000,000	50,000,000	0	50,000,000	0
ANGLESEA FUNDING LLC	08/30/24	03/05/24	03/05/24	5,000,000	5,000,000	0	5,000,000	0
ATLANTIC ASSET SECUCPABS4	06/26/24	03/26/24	03/26/24	50,000,000	49,315,111	0	49,315,111	0
ATLANTIC ASSET SECUCPABS4	06/26/24	03/26/24	03/26/24	25,000,000	24,657,556	0	24,657,556	0
BOFA SECURITIES, INCP4-2	06/13/24	03/13/24	03/13/24	50,000,000	49,316,389	0	49,316,389	0
BOFA SECURITIES, INCP4-2	06/13/24	03/13/24	03/13/24	50,000,000	49,316,389	0	49,316,389	0
BANK OF MONTREAL	03/07/25	03/07/24	03/08/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL	03/07/25	03/07/24	03/08/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL	03/12/25	03/12/24	03/12/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL	03/12/25	03/12/24	03/12/24	50,000,000	50,000,000	0	50,000,000	0
BANK OF MONTREAL	03/12/25	03/12/24	03/12/24	50,000,000	50,000,000	0	50,000,000	0
BARTON CAPITAL S.A. CPABS4	03/11/24	03/04/24	03/04/24	50,000,000	49,948,278	0	49,948,278	0
BARTON CAPITAL S.A. CPABS4	03/11/24	03/04/24	03/04/24	25,000,000	24,974,139	0	24,974,139	0
BEDFORD ROW FUNDING CORP	09/23/24	03/15/24	03/18/24	50,000,000	50,000,000	0	50,000,000	0
BEDFORD ROW FUNDING CORP	09/23/24	03/15/24	03/18/24	50,000,000	50,000,000	0	50,000,000	0
BENNINGTON STARK CACPABS4	03/08/24	03/01/24	03/01/24	50,000,000	49,947,986	0	49,947,986	0
BENNINGTON STARK CACPABS4	03/08/24	03/01/24	03/01/24	50,000,000	49,947,986	0	49,947,986	0
BENNINGTON STARK CACPABS4	03/15/24	03/08/24	03/08/24	50,000,000	49,947,986	0	49,947,986	0
BENNINGTON STARK CACPABS4	03/22/24	03/15/24	03/15/24	50,000,000	49,947,986	0	49,947,986	0
BENNINGTON STARK CACPABS4	04/01/24	03/22/24	03/22/24	50,000,000	49,925,694	0	49,925,694	0
BENNINGTON STARK CACPABS4	04/01/24	03/22/24	03/22/24	5,000,000	4,992,569	0	4,992,569	0
BNG BANK N.V. CP4-2CP4-2	03/13/24	03/06/24	03/06/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	03/15/24	03/08/24	03/08/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	03/15/24	03/08/24	03/08/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	03/20/24	03/13/24	03/13/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	03/22/24	03/15/24	03/15/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	03/22/24	03/15/24	03/15/24	50,000,000	49,948,375	0	49,948,375	0
BNG BANK N.V. CP4-2CP4-2	04/05/24	03/22/24	03/22/24	50,000,000	49,896,556	0	49,896,556	0
BNG BANK N.V. CP4-2CP4-2	04/05/24	03/22/24	03/22/24	50,000,000	49,896,556	0	49,896,556	0
CHARIOT FUNDING LLC CPABS4	06/10/24	03/13/24	03/13/24	20,000,000	19,735,967	0	19,735,967	0
CHARIOT FUNDING LLC	09/20/24	03/19/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
CHARIOT FUNDING LLC	09/20/24	03/19/24	03/20/24	30,000,000	30,000,000	0	30,000,000	0
CHARIOT FUNDING LLC	09/20/24	03/19/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
CHARTA, LLC CPABS4-CPABS4	03/21/24	03/18/24	03/18/24	24,000,000	23,989,360	0	23,989,360	0
CHESHAM FINANCE LLC CPABS4	03/14/24	03/12/24	03/13/24	50,000,000	49,992,597	0	49,992,597	0
CHESHAM FINANCE LLC CPABS4	03/14/24	03/12/24	03/13/24	50,000,000	49,992,597	0	49,992,597	0
CHESHAM FINANCE LLC CPABS4	03/21/24	03/13/24	03/14/24	50,000,000	49,948,083	0	49,948,083	0
CHESHAM FINANCE LLC CPABS4	03/21/24	03/13/24	03/14/24	50,000,000	49,948,083	0	49,948,083	0
CHESHAM FINANCE LLC CPABS4	03/28/24	03/20/24	03/21/24	50,000,000	49,948,083	0	49,948,083	0
CHESHAM FINANCE LLC CPABS4	03/28/24	03/20/24	03/21/24	50,000,000	49,948,083	0	49,948,083	0
CHESHAM FINANCE LLC CPABS4	04/04/24	03/28/24	03/28/24	50,000,000	49,948,083	0	49,948,083	0







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## TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
SOCIETE GENERALE, NCDYAN	04/01/24	03/25/24	03/25/24	50,000,000	50,000,000	0	50,000,000	0
SOCIETE GENERALE, NCDYAN	04/01/24	03/25/24	03/25/24	50,000,000	50,000,000	0	50,000,000	0
SOCIETE GENERALE, NCDYAN	04/01/24	03/25/24	03/25/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	07/02/24	03/19/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
SUMITOMO MITSUI TRUCDYAN	07/02/24	03/19/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
THUNDER BAY FUNDINGCPAB54	07/09/24	03/27/24	04/01/24	15,000,000	14,778,900	0	14,778,900	0
THUNDER BAY FUNDING LLC	10/01/24	03/25/24	03/25/24	50,000,000	50,000,000	0	50,000,000	0
THUNDER BAY FUNDING LLC	10/01/24	03/25/24	03/25/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO DOMINION BACDYAN	03/28/25	03/28/24	03/28/24	50,000,000	50,000,000	0	50,000,000	0
TORONTO DOMINION BACDYAN	03/28/25	03/28/24	03/28/24	45,000,000	45,000,000	0	45,000,000	0
TRUIST BANK CDCD	06/03/24	03/20/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
TRUIST BANK CDCD	06/03/24	03/20/24	03/20/24	25,000,000	25,000,000	0	25,000,000	0
UNITEDHEALTH GROUP,CP4-2	03/07/24	03/06/24	03/06/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/07/24	03/06/24	03/06/24	25,000,000	24,996,313	0	24,996,313	0
UNITEDHEALTH GROUP,CP4-2	03/08/24	03/05/24	03/05/24	25,000,000	24,988,938	0	24,988,938	0
UNITEDHEALTH GROUP,CP4-2	03/12/24	03/11/24	03/11/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/12/24	03/11/24	03/11/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/12/24	03/11/24	03/11/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/07/24	03/07/24	15,000,000	14,984,483	0	14,984,483	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/13/24	03/13/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/13/24	03/13/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/13/24	03/13/24	25,000,000	24,996,313	0	24,996,313	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/13/24	03/13/24	50,000,000	49,992,625	0	49,992,625	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/26/24	03/26/24	50,000,000	49,955,667	0	49,955,667	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/26/24	03/26/24	50,000,000	49,955,667	0	49,955,667	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/27/24	03/27/24	50,000,000	49,963,056	0	49,963,056	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/27/24	03/27/24	14,200,000	14,189,508	0	14,189,508	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/28/24	03/28/24	50,000,000	49,970,444	0	49,970,444	0
UNITEDHEALTH GROUP,CP4-2	04/01/24	03/28/24	03/28/24	50,000,000	49,970,444	0	49,970,444	0
VICTORY RECEIVABLESCPAB54	04/02/24	03/26/24	03/26/24	50,000,000	49,948,278	0	49,948,278	0
WLAKE 2024-1A A1	03/17/25	03/05/24	03/14/24	55,000,000	55,000,000	0	55,000,000	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/04/24	03/04/24	3,871,265	3,871,265	0	3,871,265	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/07/24	03/07/24	81,743,422	81,743,422	0	81,743,422	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/11/24	03/11/24	2,722,199	2,722,199	0	2,722,199	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/14/24	03/14/24	3,670,470	3,670,470	0	3,670,470	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/15/24	03/15/24	4,086,563	4,086,563	0	4,086,563	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/22/24	03/22/24	2,775,347	2,775,347	0	2,775,347	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/25/24	03/25/24	1,137,979	1,137,979	0	1,137,979	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/28/24	03/28/24	5,022,983	5,022,983	0	5,022,983	0
MIZUHO TRIPARTY	03/04/24	03/01/24	03/01/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/04/24	03/01/24	03/01/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/04/24	03/01/24	03/01/24	270,000,000	270,000,000	0	270,000,000	0
MIZUHO TRIPARTY	03/05/24	03/04/24	03/04/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/05/24	03/04/24	03/04/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/05/24	03/04/24	03/04/24	354,000,000	354,000,000	0	354,000,000	0
MIZUHO TRIPARTY	03/06/24	03/05/24	03/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/06/24	03/05/24	03/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/06/24	03/05/24	03/05/24	390,000,000	390,000,000	0	390,000,000	0
MIZUHO TRIPARTY	03/07/24	03/06/24	03/06/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/07/24	03/06/24	03/06/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/07/24	03/06/24	03/06/24	194,000,000	194,000,000	0	194,000,000	0
MIZUHO TRIPARTY	03/08/24	03/07/24	03/07/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/08/24	03/07/24	03/07/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/08/24	03/07/24	03/07/24	325,000,000	325,000,000	0	325,000,000	0
MIZUHO TRIPARTY	03/11/24	03/08/24	03/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/11/24	03/08/24	03/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/11/24	03/08/24	03/08/24	268,000,000	268,000,000	0	268,000,000	0
MIZUHO TRIPARTY	03/12/24	03/11/24	03/11/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/12/24	03/11/24	03/11/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/12/24	03/11/24	03/11/24	300,000,000	300,000,000	0	300,000,000	0
MIZUHO TRIPARTY	03/13/24	03/12/24	03/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/13/24	03/12/24	03/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/13/24	03/12/24	03/12/24	445,000,000	445,000,000	0	445,000,000	0
MIZUHO TRIPARTY	03/14/24	03/13/24	03/13/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/14/24	03/13/24	03/13/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/14/24	03/13/24	03/13/24	275,000,000	275,000,000	0	275,000,000	0
MIZUHO TRIPARTY	03/15/24	03/14/24	03/14/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/15/24	03/14/24	03/14/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/15/24	03/14/24	03/14/24	237,000,000	237,000,000	0	237,000,000	0
MIZUHO TRIPARTY	03/18/24	03/15/24	03/15/24	150,000,000	150,000,000	0	150,000,000	0

## TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
HSBC TRIPARTY	03/18/24	03/15/24	03/15/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/18/24	03/15/24	03/15/24	305,000,000	305,000,000	0	305,000,000	0
MIZUHO TRIPARTY	03/19/24	03/18/24	03/18/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/19/24	03/18/24	03/18/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/19/24	03/18/24	03/18/24	215,000,000	215,000,000	0	215,000,000	0
MIZUHO TRIPARTY	03/20/24	03/19/24	03/19/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/20/24	03/19/24	03/19/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/20/24	03/19/24	03/19/24	274,000,000	274,000,000	0	274,000,000	0
MIZUHO TRIPARTY	03/21/24	03/20/24	03/20/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/21/24	03/20/24	03/20/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/21/24	03/20/24	03/20/24	203,000,000	203,000,000	0	203,000,000	0
MIZUHO TRIPARTY	03/22/24	03/21/24	03/21/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/22/24	03/21/24	03/21/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/22/24	03/21/24	03/21/24	196,000,000	196,000,000	0	196,000,000	0
MIZUHO TRIPARTY	03/25/24	03/22/24	03/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/25/24	03/22/24	03/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/25/24	03/22/24	03/22/24	203,000,000	203,000,000	0	203,000,000	0
MIZUHO TRIPARTY	03/26/24	03/25/24	03/25/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/26/24	03/25/24	03/25/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/26/24	03/25/24	03/25/24	161,000,000	161,000,000	0	161,000,000	0
MIZUHO TRIPARTY	03/27/24	03/26/24	03/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/27/24	03/26/24	03/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/27/24	03/26/24	03/26/24	257,000,000	257,000,000	0	257,000,000	0
MIZUHO TRIPARTY	03/28/24	03/27/24	03/27/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/28/24	03/27/24	03/27/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/28/24	03/27/24	03/27/24	237,000,000	237,000,000	0	237,000,000	0
MIZUHO TRIPARTY	04/01/24	03/28/24	03/28/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	04/01/24	03/28/24	03/28/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	04/01/24	03/28/24	03/28/24	728,000,000	728,000,000	0	728,000,000	0
Total Buys				42,040,685,227	42,002,764,659	0	42,002,764,659	0
Cash Closes								
THUNDER BAY FUNDING LLC	05/06/24	03/25/24	03/25/24	75,000,000	75,000,000	226,021	75,226,021	0
Total Cash Closes				75,000,000	75,000,000	226,021	75,226,021	0
Deposits								
DNB BANK ASA NEW YORK	03/25/24	03/22/24	03/22/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/25/24	03/22/24	03/22/24	900,000,000	900,000,000	0	900,000,000	0
DNB BANK ASA NEW YORK	03/26/24	03/25/24	03/25/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/26/24	03/25/24	03/25/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	03/27/24	03/26/24	03/26/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/27/24	03/26/24	03/26/24	600,000,000	600,000,000	0	600,000,000	0
RABOBANK NEW YORK	04/03/24	03/27/24	03/27/24	680,000,000	680,000,000	0	680,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	04/03/24	03/27/24	03/27/24	1,380,000,000	1,380,000,000	0	1,380,000,000	0
ABN AMRO BANK N.V.	04/03/24	03/27/24	03/27/24	1,380,000,000	1,380,000,000	0	1,380,000,000	0
DNB BANK ASA NEW YORK	03/28/24	03/27/24	03/27/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/28/24	03/27/24	03/27/24	900,000,000	900,000,000	0	900,000,000	0
RABOBANK NEW YORK	04/04/24	03/28/24	03/28/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	04/01/24	03/28/24	03/28/24	750,000,000	750,000,000	0	750,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	04/01/24	03/28/24	03/28/24	150,000,000	150,000,000	0	150,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	04/01/24	03/28/24	03/28/24	750,000,000	750,000,000	0	750,000,000	0
DNB BANK ASA NEW YORK	03/04/24	03/01/24	03/01/24	750,000,000	750,000,000	0	750,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/04/24	03/01/24	03/01/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/05/24	03/04/24	03/04/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/05/24	03/04/24	03/04/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/06/24	03/05/24	03/05/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/06/24	03/05/24	03/05/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	03/13/24	03/06/24	03/06/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/13/24	03/06/24	03/06/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	03/13/24	03/06/24	03/06/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	03/07/24	03/06/24	03/06/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/07/24	03/06/24	03/06/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	03/14/24	03/07/24	03/07/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	03/08/24	03/07/24	03/07/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/08/24	03/07/24	03/07/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/11/24	03/08/24	03/08/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/11/24	03/08/24	03/08/24	835,000,000	835,000,000	0	835,000,000	0
DNB BANK ASA NEW YORK	03/12/24	03/11/24	03/11/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/12/24	03/11/24	03/11/24	945,000,000	945,000,000	0	945,000,000	0
DNB BANK ASA NEW YORK	03/13/24	03/12/24	03/12/24	900,000,000	900,000,000	0	900,000,000	0

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MIZUHO BANK, LTD., CANADA BRANCH	03/13/24	03/12/24	03/12/24	960,000,000	960,000,000	0	960,000,000	0
RABOBANK NEW YORK	03/20/24	03/13/24	03/13/24	695,000,000	695,000,000	0	695,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/20/24	03/13/24	03/13/24	1,395,000,000	1,395,000,000	0	1,395,000,000	0
ABN AMRO BANK N.V.	03/20/24	03/13/24	03/13/24	1,395,000,000	1,395,000,000	0	1,395,000,000	0
DNB BANK ASA NEW YORK	03/14/24	03/13/24	03/13/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/14/24	03/13/24	03/13/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/14/24	03/13/24	03/13/24	800,000,000	800,000,000	0	800,000,000	0
RABOBANK NEW YORK	03/21/24	03/14/24	03/14/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	03/15/24	03/14/24	03/14/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/15/24	03/14/24	03/14/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/15/24	03/14/24	03/14/24	800,000,000	800,000,000	0	800,000,000	0
DNB BANK ASA NEW YORK	03/18/24	03/15/24	03/15/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/18/24	03/15/24	03/15/24	125,000,000	125,000,000	0	125,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/18/24	03/15/24	03/15/24	775,000,000	775,000,000	0	775,000,000	0
DNB BANK ASA NEW YORK	03/19/24	03/18/24	03/18/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/19/24	03/18/24	03/18/24	900,000,000	900,000,000	0	900,000,000	0
DNB BANK ASA NEW YORK	03/20/24	03/19/24	03/19/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/20/24	03/19/24	03/19/24	900,000,000	900,000,000	0	900,000,000	0
ABN AMRO BANK N.V.	03/27/24	03/20/24	03/20/24	1,390,000,000	1,390,000,000	0	1,390,000,000	0
RABOBANK NEW YORK	03/27/24	03/20/24	03/20/24	690,000,000	690,000,000	0	690,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/27/24	03/20/24	03/20/24	1,390,000,000	1,390,000,000	0	1,390,000,000	0
DNB BANK ASA NEW YORK	03/21/24	03/20/24	03/20/24	750,000,000	750,000,000	0	750,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/21/24	03/20/24	03/20/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	03/28/24	03/21/24	03/21/24	695,000,000	695,000,000	0	695,000,000	0
DNB BANK ASA NEW YORK	03/22/24	03/21/24	03/21/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/22/24	03/21/24	03/21/24	900,000,000	900,000,000	0	900,000,000	0
Total Deposits				50,255,000,000	50,255,000,000	0	50,255,000,000	0
Maturities								
ALBION CAPITAL LLC CPAB54	03/25/24	03/25/24	03/25/24	129,064,000	129,064,000	0	129,064,000	0
ANGLESEA FUNDING LLC PAB54	03/01/24	03/01/24	03/01/24	410,000,000	410,000,000	0	410,000,000	0
ANGLESEA FUNDING LLC PAB54	03/04/24	03/04/24	03/04/24	570,000,000	570,000,000	0	570,000,000	0
ANGLESEA FUNDING LLC PAB54	03/05/24	03/05/24	03/05/24	435,000,000	435,000,000	0	435,000,000	0
ANGLESEA FUNDING LLC PAB54	03/06/24	03/06/24	03/06/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/07/24	03/07/24	03/07/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/08/24	03/08/24	03/08/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/11/24	03/11/24	03/11/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/12/24	03/12/24	03/12/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/13/24	03/13/24	03/13/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/14/24	03/14/24	03/14/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/15/24	03/15/24	03/15/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/18/24	03/18/24	03/18/24	400,000,000	400,000,000	0	400,000,000	0
ANGLESEA FUNDING LLC PAB54	03/19/24	03/19/24	03/19/24	400,000,000	400,000,000	0	400,000,000	0
ANGLESEA FUNDING LLC PAB54	03/20/24	03/20/24	03/20/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/21/24	03/21/24	03/21/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/22/24	03/22/24	03/22/24	300,000,000	300,000,000	0	300,000,000	0
ANGLESEA FUNDING LLC PAB54	03/25/24	03/25/24	03/25/24	300,000,000	300,000,000	0	300,000,000	0
ANGLESEA FUNDING LLC PAB54	03/26/24	03/26/24	03/26/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/27/24	03/27/24	03/27/24	200,000,000	200,000,000	0	200,000,000	0
ANGLESEA FUNDING LLC PAB54	03/28/24	03/28/24	03/28/24	200,000,000	200,000,000	0	200,000,000	0
ATLANTIC ASSET SECUCPAB54	03/13/24	03/13/24	03/13/24	50,000,000	50,000,000	0	50,000,000	0
ATLANTIC ASSET SECUCPAB54	03/26/24	03/26/24	03/26/24	120,000,000	120,000,000	0	120,000,000	0
BPCE SA CP4-2CP4-2	03/07/24	03/07/24	03/07/24	200,000,000	200,000,000	0	200,000,000	0
BPCE SA CP4-2CP4-2	03/12/24	03/12/24	03/12/24	200,000,000	200,000,000	0	200,000,000	0
BARTON CAPITAL S.A.CPAB54	03/04/24	03/04/24	03/04/24	35,000,000	35,000,000	0	35,000,000	0
BARTON CAPITAL S.A.CPAB54	03/11/24	03/11/24	03/11/24	75,000,000	75,000,000	0	75,000,000	0
BEDFORD ROW FUNDINGCPAB54	03/07/24	03/07/24	03/07/24	110,000,000	110,000,000	0	110,000,000	0
BEDFORD ROW FUNDINGCPAB54	03/12/24	03/12/24	03/12/24	50,000,000	50,000,000	0	50,000,000	0
BENNINGTON STARK CACPAB54	03/01/24	03/01/24	03/01/24	60,000,000	60,000,000	0	60,000,000	0
BENNINGTON STARK CACPAB54	03/08/24	03/08/24	03/08/24	100,000,000	100,000,000	0	100,000,000	0
BENNINGTON STARK CACPAB54	03/15/24	03/15/24	03/15/24	50,000,000	50,000,000	0	50,000,000	0
BENNINGTON STARK CACPAB54	03/22/24	03/22/24	03/22/24	50,000,000	50,000,000	0	50,000,000	0
BNG BANK N.V. CP4-2CP4-2	03/06/24	03/06/24	03/06/24	50,000,000	50,000,000	0	50,000,000	0
BNG BANK N.V. CP4-2CP4-2	03/13/24	03/13/24	03/13/24	50,000,000	50,000,000	0	50,000,000	0
BNG BANK N.V. CP4-2CP4-2	03/15/24	03/15/24	03/15/24	100,000,000	100,000,000	0	100,000,000	0
BNG BANK N.V. CP4-2CP4-2	03/20/24	03/20/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
BNG BANK N.V. CP4-2CP4-2	03/22/24	03/22/24	03/22/24	100,000,000	100,000,000	0	100,000,000	0
CANADIAN IMPERIAL BANK OF COMMERCE/NEW YORK NY	03/06/24	03/06/24	03/06/24	100,000,000	100,000,000	0	100,000,000	0



## TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
CANADIAN IMPERIAL BANK OF COMMERCE	03/27/24	03/27/24	03/27/24	100,000,000	100,000,000	0	100,000,000	0
CHARIOT FUNDING LLCPCABS4	03/19/24	03/19/24	03/19/24	125,000,000	125,000,000	0	125,000,000	0
CHARIOT FUNDING LLCPCABS4	03/20/24	03/20/24	03/20/24	50,000,000	50,000,000	0	50,000,000	0
CHARTA, LLC CPABS4-CPABS4	03/21/24	03/21/24	03/21/24	24,000,000	24,000,000	0	24,000,000	0
CHESHAM FINANCE LLCPCABS4	03/14/24	03/14/24	03/14/24	100,000,000	100,000,000	0	100,000,000	0
CHESHAM FINANCE LLCPCABS4	03/21/24	03/21/24	03/21/24	100,000,000	100,000,000	0	100,000,000	0
CHESHAM FINANCE LLCPCABS4	03/28/24	03/28/24	03/28/24	100,000,000	100,000,000	0	100,000,000	0
CHESHAM FINANCE LLCPCABS4	03/20/24	03/20/24	03/20/24	40,000,000	40,000,000	0	40,000,000	0
CHESHAM FINANCE LLCPCABS4	03/27/24	03/27/24	03/27/24	80,000,000	80,000,000	0	80,000,000	0
CHESHAM FINANCE LLCPCABS4	03/28/24	03/28/24	03/28/24	10,000,000	10,000,000	0	10,000,000	0
CIESCO, LLC CPABS4-CPABS4	03/20/24	03/20/24	03/20/24	24,500,000	24,500,000	0	24,500,000	0
CIESCO, LLC CPABS4-CPABS4	03/26/24	03/26/24	03/26/24	22,428,000	22,428,000	0	22,428,000	0
COMMONWEALTH BANK OF AUSTRALIA	03/21/24	03/21/24	03/21/24	50,000,000	50,000,000	0	50,000,000	0
CREDIT AGRICOLE CORCDYAN	03/05/24	03/05/24	03/05/24	955,000,000	955,000,000	0	955,000,000	0
CREDIT AGRICOLE CORCDYAN	03/06/24	03/06/24	03/06/24	200,000,000	200,000,000	0	200,000,000	0
CREDIT AGRICOLE CORCDYAN	03/12/24	03/12/24	03/12/24	950,000,000	950,000,000	0	950,000,000	0
CREDIT AGRICOLE CORCDYAN	03/13/24	03/13/24	03/13/24	200,000,000	200,000,000	0	200,000,000	0
CREDIT AGRICOLE CORCDYAN	03/19/24	03/19/24	03/19/24	925,000,000	925,000,000	0	925,000,000	0
CREDIT AGRICOLE CORCDYAN	03/20/24	03/20/24	03/20/24	200,000,000	200,000,000	0	200,000,000	0
CREDIT AGRICOLE CORCDYAN	03/26/24	03/26/24	03/26/24	925,000,000	925,000,000	0	925,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/04/24	03/04/24	03/04/24	907,000,000	907,000,000	0	907,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/05/24	03/05/24	03/05/24	800,000,000	800,000,000	0	800,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/06/24	03/06/24	03/06/24	785,000,000	785,000,000	0	785,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/07/24	03/07/24	03/07/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/08/24	03/08/24	03/08/24	900,000,000	900,000,000	0	900,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	03/11/24	03/11/24	03/11/24	900,000,000	900,000,000	0	900,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/12/24	03/12/24	03/12/24	903,000,000	903,000,000	0	903,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/13/24	03/13/24	03/13/24	992,000,000	992,000,000	0	992,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/14/24	03/14/24	03/14/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/15/24	03/15/24	03/15/24	800,000,000	800,000,000	0	800,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	03/18/24	03/18/24	03/18/24	800,000,000	800,000,000	0	800,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/19/24	03/19/24	03/19/24	900,000,000	900,000,000	0	900,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/20/24	03/20/24	03/20/24	701,000,000	701,000,000	0	701,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/21/24	03/21/24	03/21/24	908,000,000	908,000,000	0	908,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	03/22/24	03/22/24	03/22/24	798,000,000	798,000,000	0	798,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/25/24	03/25/24	03/25/24	821,000,000	821,000,000	0	821,000,000	0
CREDIT INDUSTRIEL ECP4-2	03/26/24	03/26/24	03/26/24	750,000,000	750,000,000	0	750,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	03/27/24	03/27/24	03/27/24	800,000,000	800,000,000	0	800,000,000	0
CREDIT INDUSTRIEL ET COMMERCIAL/NEW YORK	03/28/24	03/28/24	03/28/24	600,000,000	600,000,000	0	600,000,000	0
SUMITOMO MITSUI TRUCD	03/07/24	03/07/24	03/07/24	200,000,000	200,000,000	0	200,000,000	0
GREAT BEAR FUNDING CPABS4	03/14/24	03/14/24	03/14/24	25,000,000	25,000,000	0	25,000,000	0
GREAT BEAR FUNDING CPABS4	03/21/24	03/21/24	03/21/24	25,000,000	25,000,000	0	25,000,000	0
GREAT BEAR FUNDING CPABS4	03/28/24	03/28/24	03/28/24	25,000,000	25,000,000	0	25,000,000	0
LMA-AMERICAS LLC CPCPABS4	03/18/24	03/18/24	03/18/24	50,000,000	50,000,000	0	50,000,000	0
LONGSHIP FUNDING LLCPCABS4	03/01/24	03/01/24	03/01/24	65,000,000	65,000,000	0	65,000,000	0
MUFG BANK LTD, CDYACDYAN	03/28/24	03/28/24	03/28/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK LTD, CDCDYAN	03/11/24	03/11/24	03/11/24	125,000,000	125,000,000	0	125,000,000	0
MIZUHO BANK LTD, CDCDYAN	03/13/24	03/13/24	03/13/24	150,000,000	150,000,000	0	150,000,000	0
MIZUHO BANK LTD, CDCDYAN	03/19/24	03/19/24	03/19/24	195,000,000	195,000,000	0	195,000,000	0
MUFG BANK LTD, CPCP	03/06/24	03/06/24	03/06/24	50,000,000	50,000,000	0	50,000,000	0
NATIONAL BANK OF CANADA	03/06/24	03/06/24	03/06/24	50,000,000	50,000,000	0	50,000,000	0
OLD LINE FUNDING, LCPABS4	03/25/24	03/25/24	03/25/24	100,000,000	100,000,000	0	100,000,000	0
OLD LINE FUNDING, LCPABS4	03/26/24	03/26/24	03/26/24	40,000,000	40,000,000	0	40,000,000	0
PODIUM FUNDING TRUSCPABS3	03/06/24	03/06/24	03/06/24	20,000,000	20,000,000	0	20,000,000	0
PODIUM FUNDING TRUSCPABS3	03/08/24	03/08/24	03/08/24	50,000,000	50,000,000	0	50,000,000	0
ROYAL BANK OF CANADCP4-2	03/20/24	03/20/24	03/20/24	45,000,000	45,000,000	0	45,000,000	0
SHEFFIELD RECEIVABLECPABS4	03/11/24	03/11/24	03/11/24	100,000,000	100,000,000	0	100,000,000	0
SHEFFIELD RECEIVABLECPABS4	03/12/24	03/12/24	03/12/24	90,000,000	90,000,000	0	90,000,000	0
SHEFFIELD RECEIVABLECPABS4	03/25/24	03/25/24	03/25/24	100,000,000	100,000,000	0	100,000,000	0
SHEFFIELD RECEIVABLECPABS4	03/26/24	03/26/24	03/26/24	20,000,000	20,000,000	0	20,000,000	0
SUMITOMO MITSUI TRUCDYAN	03/26/24	03/26/24	03/26/24	200,000,000	200,000,000	0	200,000,000	0
SUMITOMO MITSUI TRUCDYAN	03/27/24	03/27/24	03/27/24	125,000,000	125,000,000	0	125,000,000	0
SUMITOMO MITSUI BANKING CORP/NEW YORK	03/28/24	03/28/24	03/28/24	200,000,000	200,000,000	0	200,000,000	0
TOTALENERGIES CAPITAL SA	03/04/24	03/04/24	03/04/24	50,000,000	50,000,000	0	50,000,000	0
UNITEDHEALTH GROUP,CP4-2	03/07/24	03/07/24	03/07/24	75,000,000	75,000,000	0	75,000,000	0
UNITEDHEALTH GROUP,CP4-2	03/08/24	03/08/24	03/08/24	25,000,000	25,000,000	0	25,000,000	0
UNITEDHEALTH GROUP,CP4-2	03/12/24	03/12/24	03/12/24	150,000,000	150,000,000	0	150,000,000	0
UNITEDHEALTH GROUP,CP4-2	03/14/24	03/14/24	03/14/24	190,000,000	190,000,000	0	190,000,000	0
VICTORY RECEIVABLESCPABS4	03/28/24	03/28/24	03/28/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO TRIPARTY	03/01/24	03/01/24	03/01/24	150,000,000	150,000,000	0	150,000,000	0

## TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
HSBC TRIPARTY	03/01/24	03/01/24	03/01/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/01/24	03/01/24	03/01/24	767,000,000	767,000,000	0	767,000,000	0
MIZUHO TRIPARTY	03/04/24	03/04/24	03/04/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/04/24	03/04/24	03/04/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/04/24	03/04/24	03/04/24	270,000,000	270,000,000	0	270,000,000	0
MIZUHO TRIPARTY	03/05/24	03/05/24	03/05/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/05/24	03/05/24	03/05/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/05/24	03/05/24	03/05/24	354,000,000	354,000,000	0	354,000,000	0
MIZUHO TRIPARTY	03/06/24	03/06/24	03/06/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/06/24	03/06/24	03/06/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/06/24	03/06/24	03/06/24	390,000,000	390,000,000	0	390,000,000	0
MIZUHO TRIPARTY	03/07/24	03/07/24	03/07/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/07/24	03/07/24	03/07/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/07/24	03/07/24	03/07/24	194,000,000	194,000,000	0	194,000,000	0
MIZUHO TRIPARTY	03/08/24	03/08/24	03/08/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/08/24	03/08/24	03/08/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/08/24	03/08/24	03/08/24	325,000,000	325,000,000	0	325,000,000	0
MIZUHO TRIPARTY	03/11/24	03/11/24	03/11/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/11/24	03/11/24	03/11/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/11/24	03/11/24	03/11/24	268,000,000	268,000,000	0	268,000,000	0
MIZUHO TRIPARTY	03/12/24	03/12/24	03/12/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/12/24	03/12/24	03/12/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/12/24	03/12/24	03/12/24	300,000,000	300,000,000	0	300,000,000	0
MIZUHO TRIPARTY	03/13/24	03/13/24	03/13/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/13/24	03/13/24	03/13/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/13/24	03/13/24	03/13/24	445,000,000	445,000,000	0	445,000,000	0
MIZUHO TRIPARTY	03/14/24	03/14/24	03/14/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/14/24	03/14/24	03/14/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/14/24	03/14/24	03/14/24	275,000,000	275,000,000	0	275,000,000	0
MIZUHO TRIPARTY	03/15/24	03/15/24	03/15/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/15/24	03/15/24	03/15/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/15/24	03/15/24	03/15/24	237,000,000	237,000,000	0	237,000,000	0
MIZUHO TRIPARTY	03/18/24	03/18/24	03/18/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/18/24	03/18/24	03/18/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/18/24	03/18/24	03/18/24	305,000,000	305,000,000	0	305,000,000	0
MIZUHO TRIPARTY	03/19/24	03/19/24	03/19/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/19/24	03/19/24	03/19/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/19/24	03/19/24	03/19/24	215,000,000	215,000,000	0	215,000,000	0
MIZUHO TRIPARTY	03/20/24	03/20/24	03/20/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/20/24	03/20/24	03/20/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/20/24	03/20/24	03/20/24	274,000,000	274,000,000	0	274,000,000	0
MIZUHO TRIPARTY	03/21/24	03/21/24	03/21/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/21/24	03/21/24	03/21/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/21/24	03/21/24	03/21/24	203,000,000	203,000,000	0	203,000,000	0
MIZUHO TRIPARTY	03/22/24	03/22/24	03/22/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/22/24	03/22/24	03/22/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/22/24	03/22/24	03/22/24	196,000,000	196,000,000	0	196,000,000	0
MIZUHO TRIPARTY	03/25/24	03/25/24	03/25/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/25/24	03/25/24	03/25/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/25/24	03/25/24	03/25/24	203,000,000	203,000,000	0	203,000,000	0
MIZUHO TRIPARTY	03/26/24	03/26/24	03/26/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/26/24	03/26/24	03/26/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/26/24	03/26/24	03/26/24	161,000,000	161,000,000	0	161,000,000	0
MIZUHO TRIPARTY	03/27/24	03/27/24	03/27/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/27/24	03/27/24	03/27/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/27/24	03/27/24	03/27/24	257,000,000	257,000,000	0	257,000,000	0
MIZUHO TRIPARTY	03/28/24	03/28/24	03/28/24	150,000,000	150,000,000	0	150,000,000	0
HSBC TRIPARTY	03/28/24	03/28/24	03/28/24	100,000,000	100,000,000	0	100,000,000	0
BANK OF AMERICA TRIPARTY	03/28/24	03/28/24	03/28/24	237,000,000	237,000,000	0	237,000,000	0
DNB BANK ASA NEW YORK	03/25/24	03/25/24	03/25/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/25/24	03/25/24	03/25/24	900,000,000	900,000,000	0	900,000,000	0
DNB BANK ASA NEW YORK	03/26/24	03/26/24	03/26/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/26/24	03/26/24	03/26/24	725,000,000	725,000,000	0	725,000,000	0
DNB BANK ASA NEW YORK	03/27/24	03/27/24	03/27/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/27/24	03/27/24	03/27/24	600,000,000	600,000,000	0	600,000,000	0
DNB BANK ASA NEW YORK	03/28/24	03/28/24	03/28/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/28/24	03/28/24	03/28/24	900,000,000	900,000,000	0	900,000,000	0
ABN AMRO BANK N.V.	03/06/24	03/06/24	03/06/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/06/24	03/06/24	03/06/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
RABOBANK NEW YORK	03/06/24	03/06/24	03/06/24	700,000,000	700,000,000	0	700,000,000	0
RABOBANK NEW YORK	03/07/24	03/07/24	03/07/24	700,000,000	700,000,000	0	700,000,000	0

## TRADING ACTIVITY FOR MARCH 2024

Description	Maturity Date	Trade Date	Settle Date	Par or Shares	Principal	Traded Interest	Settlement Amount	Realized Gain(Loss)
DNB BANK ASA NEW YORK	03/01/24	03/01/24	03/01/24	1,200,000,000	1,200,000,000	0	1,200,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/01/24	03/01/24	03/01/24	845,000,000	845,000,000	0	845,000,000	0
DNB BANK ASA NEW YORK	03/04/24	03/04/24	03/04/24	750,000,000	750,000,000	0	750,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/04/24	03/04/24	03/04/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/05/24	03/05/24	03/05/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/05/24	03/05/24	03/05/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/06/24	03/06/24	03/06/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/06/24	03/06/24	03/06/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	03/13/24	03/13/24	03/13/24	700,000,000	700,000,000	0	700,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/13/24	03/13/24	03/13/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
ABN AMRO BANK N.V.	03/13/24	03/13/24	03/13/24	1,400,000,000	1,400,000,000	0	1,400,000,000	0
DNB BANK ASA NEW YORK	03/07/24	03/07/24	03/07/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/07/24	03/07/24	03/07/24	840,000,000	840,000,000	0	840,000,000	0
RABOBANK NEW YORK	03/14/24	03/14/24	03/14/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	03/08/24	03/08/24	03/08/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/08/24	03/08/24	03/08/24	840,000,000	840,000,000	0	840,000,000	0
DNB BANK ASA NEW YORK	03/11/24	03/11/24	03/11/24	1,000,000,000	1,000,000,000	0	1,000,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/11/24	03/11/24	03/11/24	835,000,000	835,000,000	0	835,000,000	0
DNB BANK ASA NEW YORK	03/12/24	03/12/24	03/12/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/12/24	03/12/24	03/12/24	945,000,000	945,000,000	0	945,000,000	0
DNB BANK ASA NEW YORK	03/13/24	03/13/24	03/13/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/13/24	03/13/24	03/13/24	960,000,000	960,000,000	0	960,000,000	0
RABOBANK NEW YORK	03/20/24	03/20/24	03/20/24	695,000,000	695,000,000	0	695,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/20/24	03/20/24	03/20/24	1,395,000,000	1,395,000,000	0	1,395,000,000	0
ABN AMRO BANK N.V.	03/20/24	03/20/24	03/20/24	1,395,000,000	1,395,000,000	0	1,395,000,000	0
DNB BANK ASA NEW YORK	03/14/24	03/14/24	03/14/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/14/24	03/14/24	03/14/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/14/24	03/14/24	03/14/24	800,000,000	800,000,000	0	800,000,000	0
RABOBANK NEW YORK	03/21/24	03/21/24	03/21/24	700,000,000	700,000,000	0	700,000,000	0
DNB BANK ASA NEW YORK	03/15/24	03/15/24	03/15/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/15/24	03/15/24	03/15/24	100,000,000	100,000,000	0	100,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/15/24	03/15/24	03/15/24	800,000,000	800,000,000	0	800,000,000	0
DNB BANK ASA NEW YORK	03/18/24	03/18/24	03/18/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD., CANADA BRANCH	03/18/24	03/18/24	03/18/24	125,000,000	125,000,000	0	125,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/18/24	03/18/24	03/18/24	775,000,000	775,000,000	0	775,000,000	0
DNB BANK ASA NEW YORK	03/19/24	03/19/24	03/19/24	700,000,000	700,000,000	0	700,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/19/24	03/19/24	03/19/24	900,000,000	900,000,000	0	900,000,000	0
DNB BANK ASA NEW YORK	03/20/24	03/20/24	03/20/24	900,000,000	900,000,000	0	900,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/20/24	03/20/24	03/20/24	900,000,000	900,000,000	0	900,000,000	0
ABN AMRO BANK N.V.	03/27/24	03/27/24	03/27/24	1,390,000,000	1,390,000,000	0	1,390,000,000	0
RABOBANK NEW YORK	03/27/24	03/27/24	03/27/24	690,000,000	690,000,000	0	690,000,000	0
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD.	03/27/24	03/27/24	03/27/24	1,390,000,000	1,390,000,000	0	1,390,000,000	0
DNB BANK ASA NEW YORK	03/21/24	03/21/24	03/21/24	750,000,000	750,000,000	0	750,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/21/24	03/21/24	03/21/24	850,000,000	850,000,000	0	850,000,000	0
RABOBANK NEW YORK	03/28/24	03/28/24	03/28/24	695,000,000	695,000,000	0	695,000,000	0
DNB BANK ASA NEW YORK	03/22/24	03/22/24	03/22/24	800,000,000	800,000,000	0	800,000,000	0
MIZUHO BANK, LTD. NEW YORK BRANCH	03/22/24	03/22/24	03/22/24	900,000,000	900,000,000	0	900,000,000	0
Total Maturities				92,665,992,000	92,665,992,000	0	92,665,992,000	0
Paydowns								
EFF 2023-3 A I	10/21/24	03/20/24	03/20/24	1,182,021	1,182,021	0	1,182,021	0
EFF 2024-1 A I	02/20/25	03/20/24	03/20/24	2,603,567	2,603,567	0	2,603,567	0
GALC 2024-1 A I	02/18/25	03/15/24	03/15/24	4,245,829	4,245,829	0	4,245,829	0
TLOT 2024-A A I	02/20/25	03/20/24	03/20/24	9,039,014	9,039,014	0	9,039,014	0
Total Paydowns				17,070,432	17,070,432	0	17,070,432	0
Sells								
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/01/24	03/01/24	3,189,433	3,189,433	0	3,189,433	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/05/24	03/05/24	653,298	653,298	0	653,298	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/06/24	03/06/24	3,217,966	3,217,966	0	3,217,966	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/08/24	03/08/24	78,481,087	78,481,087	0	78,481,087	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/12/24	03/12/24	3,385,094	3,385,094	0	3,385,094	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/13/24	03/13/24	2,599,439	2,599,439	0	2,599,439	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/18/24	03/18/24	2,837,560	2,837,560	0	2,837,560	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/19/24	03/19/24	2,219,374	2,219,374	0	2,219,374	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/20/24	03/20/24	2,700,098	2,700,098	0	2,700,098	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/26/24	03/26/24	830,513	830,513	0	830,513	0
DREYFUS GOVT CASH MGMT FUND	02/01/27	03/27/24	03/27/24	3,082,813	3,082,813	0	3,082,813	0
Total Sells				103,196,676	103,196,676	0	103,196,676	0





1801 Hermitage Boulevard, Suite 100  
Tallahassee, Florida 32308  
(850) 488-4406

<https://prime.sbafla.com>

## Our Mission

Our mission is to provide superior investment management and trust services by proactively and comprehensively managing risk and adhering to the highest ethical, fiduciary, and professional standards.

# Federated Hermes



Florida State Board of Administration (SBA)

Risk. Reinsurance. Human Resources.

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## Executive Summary

Aon Investments (Aon) conducts a Best Practices Review of Florida PRIME on an annual basis. In this report, we review the 2024 Participant Survey responses, provide an update on newly approved 2a-7 Reforms, discuss potential risk control and transparency enhancements and review the Investment Policy Statement.

Based on our review, we continue to believe that Florida PRIME is being managed in a manner consistent with best practices and in consideration of participants' best interests. We do not have any recommendations as a result of this review.

## 2024 Participant Survey Highlights

On a regular basis, the SBA conducts a survey of Florida PRIME participants to gain a better understanding of the participant base, current usage of available services, and overall satisfaction. The survey also seeks to gauge interest across several factors and to ensure awareness of participant needs and preferences. The 2024 survey attracted 64 respondents which is in line with the normal rate of response.

A diversified group of governmental units responded to the survey, primarily representing counties, special districts, municipalities, and school boards, with respondents roughly evenly split between investment decision-makers and personnel in account operations and a few back up account operations. Of the respondents, 50% have one account with Florida PRIME and 16% have 2 accounts. The survey indicated that approximately 63% of respondents have a balance of over \$10 million with Florida PRIME, and another 20% indicated having between \$1 million and \$10 million with the pool. These numbers are generally in line with previous surveys.

The survey includes questions that relate to how and why participants utilize other competing and complementary liquidity vehicles. Of the respondents, about 52% indicated that their organization has a policy that dictates a maximum allowable allocation to a single investment pool or money market fund. Of those with a policy limit, approximately 69% are restricted to allocating 50% or less to any single governmental investment pool or money market fund. Relatedly, when asked what prevents an organization from using Florida PRIME as the primary source of cash management, about 22% indicated that investment policy restrictions are a major reason and another 10% indicated it is a moderate reason. The greatest response was 40% of respondents who indicated that diversification needs of the cash portfolio was a major or moderate reason. The aggregated responses did suggest that an unattractive current yield was not much of a reason, which is similar to last year's survey. Inadequate participant disclosures, costs, functionality/operational features, and lack of additional investment product offerings were all highly selected as not reasons at all for not using Florida PRIME as a primary source of cash management.

When asked about other investment vehicles used in the past 12 months for cash management, respondents indicated the most used vehicle aside from Florida PRIME is the Florida Cooperative Liquid Assets Securities System at 44%. The next most common vehicles were peer fund, the Florida Public Assets for Liquidity Management, and SEC-Registered money market funds both at 34% of respondents. These results are different from previous years. The survey also asked respondents to rank how competing investment services have added value to the respondent organizations' investment goals. Slightly different from last year, respondents indicated that risk, defined as perceived risk levels adjusted for the level of return, was the most appealing feature, followed by yield. Ease of use and client service were ranked the lowest in terms of value add from competing investment services, followed closely by cost and available funds.

The survey questions surrounding current services related to Florida PRIME continue to receive strong feedback. Related to the Florida PRIME website, 84% of respondents indicated that they visit the site at least once a month and 97% responded that they find the website functionality as very easy to use. The survey also indicated that the majority of participants continue to utilize the website primarily to access account balances/statements and transactions, and approximately 39% of respondents utilize the website to access the Monthly Summary Reports. When asked about the usefulness of multiple communication pieces, the responses also continue to be favorable. The survey indicated that respondents rated the following communications as very useful: monthly account statements (97%), e-mail notifications of withdrawals (84%) and changes to bank instructions (83%). Further, respondents found the following to be at least somewhat useful: Periodic eNotices (49%), Monthly Summary Reports (32%), and Weekly Market Commentary (53%). Lastly, respondents indicated great satisfaction with the Florida PRIME representatives, with over 88% of respondents indicating the representatives were very courteous, very knowledgeable and very responsive.

Overall, the survey results continue to be positive from both operational and service-related perspectives. Responses related to the use of competing investment vehicles continue to indicate Florida Cooperative Liquid Assets Securities System (FL CLASS) as the primary vehicle, with indications of risk and yield being top of mind, but notably, that a large percentage of respondents' organizations have investment policies limiting available funds to invest in a single entity and/or seek diversification from a single cash management source. Generally, the survey indicates a strong level of satisfaction with the management of the Florida PRIME portfolio. The large majority (92%) of respondents indicated that they are very likely or extremely likely to recommend Florida PRIME to a colleague or other governmental investor. We continue to believe the survey is a great mechanism to obtain feedback from Florida PRIME participants, as well as to express the SBA's awareness and receptiveness to the participant's needs and wants.



# Money Market Reforms

## **Background**

As a result of the global financial crisis and the run on money market funds in 2008, there have been much debated reforms to the Securities and Exchange Commission's (SEC) Rule 2a-7, which is the principal rule covering registered U.S. money market funds. The SEC announced reforms that were approved in 2010 and 2014, and most recently newly approved reforms in July of 2023. The goal of these reforms is to provide additional protection and transparency to industry participants and ultimately avoid another 2008 event.

The SBA manages the Florida PRIME portfolio in accordance with guidelines set forth by the Governmental Accounting Standards Board (GASB), which is the source of generally accepted accounting principles used by state and local governments. The money market reforms are relevant to the Florida PRIME portfolio as the pool has historically been managed as a "2a-7 like" pool, defined by GASB as an external pool that satisfies the requirements of SEC Rule 2a-7, without actually being registered with the SEC. The SBA has been diligent with maintaining the guidelines of Florida PRIME aligned with best practices as communicated by GASB. The most recent guidance from GASB was in December 2015, when it released guidance (GASB 79) for local government investment pools (LGIPs) related to the 2014 reforms. Most notably the guidance removed the direct reference to "2a-7-like" pools in an effort to recognize differences between LGIPs and money market funds and the appropriateness of certain reforms on these investment pools.

## **July 2023 SEC Money Market Reforms**

The most recent reforms announced in July 2023<sup>1</sup> have a similar goal of improving resiliency and transparency of money market funds. Below we provide a high-level overview of the notable approved reforms.

- Increase of the minimum daily liquidity requirements to 25%, up from 10%
- Increase of the minimum weekly liquidity requirements to 50%, up from 30%
- Removal of temporary redemption gates and the tie between the weekly liquid asset threshold and liquidity fees
- Liquidity fee requirement when daily net redemptions exceed 5 percent of net assets, unless the fund's liquidity costs are de minimis
- Modification to certain reporting forms to reflect amendments to the regulatory framework for money market funds

## **Impact on Florida PRIME**

As noted above, Florida PRIME as a local government investment pool (LGIP) follows closely the guidance of GASB and is not legally required to follow SEC Rule 2a-7 requirements. Importantly, the SBA, Federated and Aon have monitored and updated Florida PRIME's investment policies and

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<sup>1</sup> [SEC.gov | SEC Adopts Money Market Fund Reforms and Amendments to Form PF Reporting Requirements for Large Liquidity Fund Advisers](https://www.sec.gov/news/press/2023/20230713.htm)

procedures to maintain compliance with the GASB guidance and best practices for external government investment pools over the course of the past 10+ years and through multiple periods of money market fund reforms. At present, there has been no indication that GASB will announce corresponding guidance for LGIPs which would impact Florida PRIME. Additionally, FL PRIME is governed by a comprehensive investment policy statement (IPS) that is reviewed, at a minimum, annually. FL PRIME has rigorous risk management controls in place, including, among other controls, daily monitoring and monthly IPS compliance testing. Lastly, Florida PRIME is rated as a “AAAm” fund by Standard & Poor’s (S&P), which requires weekly portfolio surveillance and several requirements on various portfolio characteristics. Thus, we do not believe any corresponding guideline changes are needed as a result of the most recent SEC money market reforms. We will continue to monitor the implementation of the reforms as well as guidance from GASB and provide material updates as warranted.

## Risk Management Enhancements

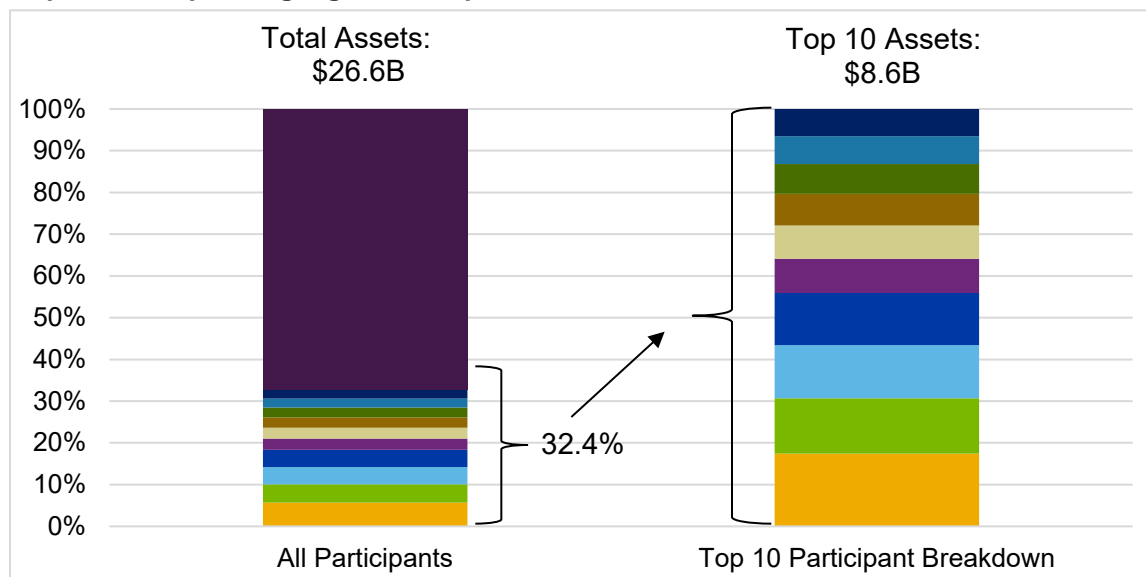
The management of Florida PRIME includes several risk mitigating tools and procedures to ensure the safety of participant assets and prudent investment management of portfolio assets. The compliance policies that govern the Florida PRIME investment pool and corresponding compliance procedures represent a robust, multilayered approach to ensuring the portfolio remains in compliance with the criteria contained in the Investment Policy Statement and applicable industry guidelines and regulations.

The Florida PRIME management and governance processes have been continually updated and improved over time, as the portfolio and industry continue to evolve. The SBA, Federated, Aon and other independent parties have periodically reviewed the entire compliance process to ensure that the procedures and communications remain effective, relevant, and efficient. Most recently, the SBA has begun to evaluate additional risk management considerations as highlighted below.

### Participant Concentration

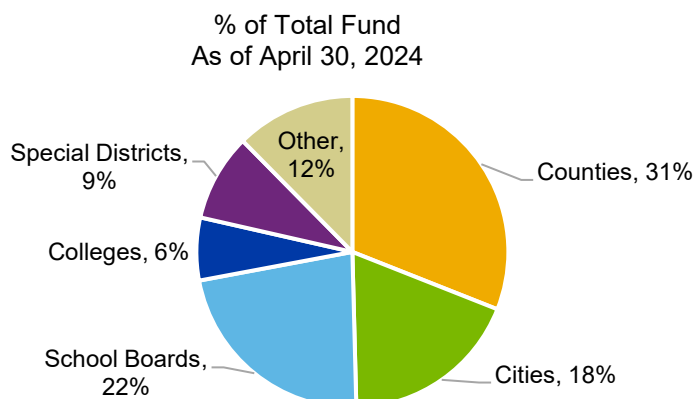
FL PRIME currently has 1,476 accounts across 798 participants. The participant base is diversified across primarily counties, municipalities, school boards, colleges, universities, constitutional officers and special districts. Currently<sup>2</sup>, the top 10 participants represent 32.4% of the \$26.6B in total participant assets invested in Florida PRIME. As shown below, the largest participant represents 5.7% of the total fund and the 10<sup>th</sup> largest participant represents 2.1% of the fund. Not only is the pool diversified across participants, it is also diversified across participant type. The concentration of the Top 10 Participants and the diversification of participant type are included in the Monthly Summary Report that is on the Florida PRIME website and is available to the public.

### Top 10 Participant Highlight as of April 2024



<sup>2</sup> As of April 30, 2024

## Participant Type Diversification



Awareness of participant concentration is important to prevent a single participant (or a similar type of participant) from impacting the pool's ability to manage the portfolio according to its investment guidelines, or negatively impacting the other participants by redeeming from the fund. To this point, FL PRIME has tools to monitor and manage this risk. In addition to the regular monitoring of participant concentration, Federated runs monthly stress tests on the portfolio. One of the stresses evaluated is a 40% redemption from the pool. That scenario is further tested by combining the redemption scenario with other market stress factors, such as interest rate changes, credit events and spread movements. In each of these scenarios and a combined scenario, the tests indicate that the portfolio would be able to absorb the redemptions, maintain a \$1 NAV per unit and maintain sufficient liquidity. Additionally, the SBA and Federated are in regular communication with the participant base of FL PRIME. The strong relationships with the participants result in ongoing communication, which is particularly helpful when there are known meaningful deposits or redemptions. This level of communication assists Federated in optimizing the management of these cash flows.

The SBA has always been at the forefront of risk mitigation. Further enhancements to mitigate participant concentration risks could include:

- Disclosing additional detail on concentration of Top 10 largest participants, for example, reporting the weight of the top 3 participants accounts of 5.7%, 4.3% and 4.2% of the pool.
- Additional outreach with top 3 to 5 participants, gaining a better understanding of their investment plans, anticipated cash flow activity and ensuring they are aware of their position within the Florida PRIME pool. This type of engagement is in the spirit of the Know Your Client reporting that seeks to verify customers and their risk and financial profiles.
- Setting maximum allocation percentage or dollar limits on individual participants to mitigate concentration risk without negatively impacting participants cash investment needs.

Overall, the FL PRIME portfolio has a diversified set of participants and appropriate reporting, stress testing and open communication lines to monitor participant concentration. The consideration of

reasonable participant concentration limits or additional monitoring towards a specified level could offer an additional layer of risk mitigation that any one participant's decisions could impact the remaining investors. Additionally, enhancing the participant concentration disclosures would offer existing and prospective participants additional transparency into the risks of participant concentration. Aon supports consideration of participant concentration monitoring and reporting, with a goal of enhancing risk controls and transparency without negatively impacting existing or prospective participants ability to invest their surplus funds.

### **Investment Disclosures**

Disclosing relevant risks related to investing is a best practice and a risk control for participant decision making. Currently, FL PRIME has several avenues where investment risk disclosures are made. For example, the Monthly Summary Reports and fact sheets posted on the Florida PRIME website include the necessary disclosures related to not being insured and risk of investment losses. In addition, FL PRIME includes several information documents for participants prior to enrolling, including the Information Statement & Operating Procedures documents which houses a wealth of information on investing in FL PRIME.

Currently, the Information Statement highlights the following three principal investment risks related to investing in Florida PRIME:

1. Risk that Florida PRIME will not maintain a Stable Net Asset Value
2. Interest Rate Risks
3. Credit Risks

While FL PRIME is a conservative strategy investing in high-quality, liquid, short-term securities with a Standard & Poor's rating of AAAM, there are still investment risks that exist that investors should be aware of and there may be value in building out additional risk disclosures for participants to understand. Greater disclosures further the transparency of the pool and Florida PRIME has always sought full transparency as it relates to portfolio management, holdings and compliance testing. The addition of investment risk disclosures would add another layer of transparency and education for existing and potential participants.

### **Sample Investment Risk Disclosures**

- Issuer Risk
- Management Risk
- Yield Curve Risk
- Political Risk
- Liquidity Risk
- Regulatory Risk



# Investment Policy Review

As part of Aon's Best Practices Review we conduct a review of the Florida PRIME Investment Policy Statement (IPS). The objective of the IPS is to set forth the objectives, strategy, guidelines, and overall responsibilities for the oversight and prudent investment of Florida PRIME assets. The purpose of the periodic review is to ensure the document reflects the evolving investment portfolio, current legal and regulatory developments, and best practices. A well-written and unambiguous document is critical to the success of any investment program.

Following the 2024 review, Aon continues to find the IPS to be comprehensive and appropriate for the management and oversight of Florida PRIME. The topics covered continue to be relevant and critical to the success of the management of the pool's assets. The investment objective of the pool and the roles and responsibilities are clearly defined. The IPS provides the necessary specifics and supplemental guidelines for a clear understanding of the investment strategy, making direct and clear reference to the appropriate GASB guidelines for appropriate fiduciaries to follow and understand. We believe the IPS thoroughly defines the risks that are associated with investing in Florida PRIME and find the detailed control procedures provide the comfort of prudent safe-keeping and oversight of assets. The SBA has been diligent with staying current with overall best practices in managing the Florida PRIME assets and has consistently ensured the IPS is up to date with the current regulatory, legal, and investment environments.

Overall, we continue to believe the Florida PRIME IPS is robust and in line with the goals and objectives of the investment pool and continue to find the Policy to be an effective guiding document for the management of Florida PRIME.

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Reply to: Tallahassee

May 20, 2024

**LOCAL GOVERNMENT SURPLUS FUNDS TRUST FUND  
2024 STATUTORY COMPLIANCE REVIEW**

The Local Government Surplus Funds Trust Fund (Trust Fund or Fund) is a pooled investment fund created in 1977 by Section 218.405, Florida Statutes, and administered by the State Board of Administration (SBA). F.S. § 218.403(9). The Fund is governed by Part IV of Chapter 218, Florida Statutes, titled Investment of Local Government Surplus Funds, and is now known as “Florida PRIME.”

**THE STATUTE**

The Board of Trustees of the SBA (“Trustees”) constituted per section, consists of the Governor, as Chairman, the Chief Financial Officer, as Treasurer, and the Attorney General, as Secretary. See F.S. § 215.44(1). Section 218.405(3), Florida Statutes, requires the Trustees to annually certify that Florida PRIME is in compliance with the requirements of Part IV, Chapter 218, Florida Statutes, and that the management of Florida PRIME is in accord with best investment practices.

This is the fifteenth annual statutory review of the Fund under section 218.405(3). There were no substantive amendments to Part IV, Chapter 218, Florida Statutes, during the 2024 Legislative session.

**SCOPE OF REVIEW**

This review, which addresses the first part of the annual certification by the Trustees, and examines whether the Trust Fund, defined at section 218.403(9) as “the pooled investment fund created by Section 218.405 and known as the Local Government Surplus Funds Trust Fund,” is in compliance with the requirements of Part IV of Chapter 218, Florida Statutes, which includes sections 218.40 – 218.415, Florida Statutes.

The scope of this review is the Fund’s compliance with sections 218.40 – 218.412, Florida Statutes, during the time period June 1, 2023, through May 31, 2024.

**JACKSONVILLE**  
245 Riverside Ave.  
Suite 510  
Jacksonville, FL 32202  
T: 904.353.6410  
F: 904.353.7619

**ST. PETERSBURG**  
100 Second Ave. South  
Suite 501-S  
St. Petersburg, FL 33701  
T: 727.245.0820  
F: 727.290.4057

**TALLAHASSEE**  
106 East College Ave.  
Suite 1500  
Tallahassee, FL 32301  
T: 850.222.5702  
F: 850.224.9242

**TAMPA**  
301 West Platt St.  
Suite 364  
Tampa, FL 33606  
T: 813.775.2331

**WEST PALM BEACH**  
360 South Rosemary Ave.  
Suite 1100  
West Palm Beach, FL 33401  
T: 561.640.0820  
F: 561.640.8202

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The remainder of Part IV, Chapter 218 – section 218.415 – covers local government investment policies. This section, which is not within the scope of this review, comprises the second part of the certification required by section 218.405(3) – that the Fund is in accord with best investment practices – which is performed separately by Aon Hewitt Investment Consulting, Inc.

## **PURPOSE**

As set out at section 218.401, Florida Statutes, the intent of Part IV of Chapter 218 is:

**[T]o promote, through state assistance, the maximization of net interest earnings on invested surplus funds of local units of government, based on the principles of investor protection, mandated transparency, and proper governance, with the goal of reducing the need for imposing additional taxes.**

The definition of surplus funds, found at section 218.403(8), includes:

**[A]ny funds in any general or special account or fund of a unit of local government, or funds held by an independent trustee on behalf of a unit of local government, which in reasonable contemplation will not be immediately needed for the purposes intended.**

By its terms, participation in the Fund is limited to units of local government, defined at section 218.403(11) as:

**... any governmental entity within the state not part of state government and shall include, but not be limited to, the following and the officers thereof: any county, municipality, school district, special district, clerk of the circuit court, sheriff, property appraiser, tax collector, supervisor of elections, authority, board, public corporations, or any other political subdivision of the state.**

This broad definition of “units of local government” includes authorities, boards and public corporations, in addition to the entities specifically enumerated in the above statutory language.

Section 218.407(2), Florida Statutes, requires each prospective Fund participant to determine whether participation in the Fund is in the entity’s interest. The Florida PRIME enrollment materials require each participant to certify that it is authorized to invest in the Fund. The enrollment materials advise participants that the SBA is not responsible for independently verifying whether a local government entity is authorized to participate in the Fund.

## **CREATION, OBJECTIVES**

The Trust Fund is created at section 218.405, Florida Statutes,

**(1) There is hereby created a Local Government Surplus Funds Trust Fund to be administered by the board and to be composed of local government surplus funds deposited therein by units of local government under the procedures established in this part. The board may contract with a professional money management firm to manage the trust fund.**

The Board has contracted with a professional money management firm, Federated Investment Counseling, Inc. (Federated), to manage the Trust Fund.

**(2) The primary objectives, in priority order, of investment activities shall be safety, liquidity, and competitive returns with minimization of risks.**

**(3) (Certification requirement, cited above)**

**(4) The board may adopt rules to administer the provisions of this section.**

## **RULES**

Sections 218.405(4) and 218.412 permit the Board to promulgate rules as may be needed to administer the Trust Fund. The Board has adopted such rules at Chapter 19-7, Florida Administrative Code. Most of these rules were adopted in 1982, with substantial revisions adopted by rule in 2002 and 2010. The Investment Policy Statement (IPS) is also incorporated into SBA Rules. The current Investment Policy Statement for the Fund was approved by the SBA Trustees on August 22, 2023. No changes were made to Chapter 19-7, Florida Administrative Code during the review period.

## **INTERACTION WITH LOCAL GOVERNMENT AUTHORITIES**

Section 218.407 sets out the requirements that must be met by a unit of local government before surplus funds may be deposited in the Trust Fund:

**(1) Prior to any determination by the governing body that it is in the interest of the unit of local government to deposit surplus funds in the trust fund, the board or a professional money management firm must provide to the governing body enrollment materials, including a trust fund profile containing impartial educational information describing the administration and investment policy of the trust fund, including, but not limited to:**

**(a) All rights and conditions of participation, including potential restrictions on withdrawals.**



- (b) The historical performance, investment holdings, credit quality, and average maturity of the trust fund investments.**
- (c) The applicable administrative rules.**
- (d) The rate determination processes for any deposit or withdrawal.**
- (e) Any fees, charges, penalties, and deductions that apply to the account.**
- (f) The most recently published financial statements or independent audits, if available, prepared under generally accepted accounting principles.**
- (g) A disclosure statement for signature by the appropriate local government official.**

The Board, with Federated, has created enrollment materials which include a Trust Fund profile and education information which appear to be impartial and to accurately describe the administration and investment policies of the Trust Fund and which meet the specific requirements of the above section.

All materials are provided to participants and potential participants at the Board's web site: [www.sbafla.com](http://www.sbafla.com) at the Florida PRIME link, or directly at <https://prime.sbafla.com/>. The New Participant Enrollment Guide, the current Investment Policy Statement, the Earnings Allocation description and the applicable rules are included under the "Enrollment Materials" tab, as are two form documents that must be executed by a new participant: the Disclosure Statement and the Authorizing Resolution. These materials track the statutory information required by section 218.407(1).

**(2) Upon review of the enrollment materials and upon determination by the governing body that it is in the interest of the unit of local government to deposit surplus funds in the trust fund, a resolution by the governing body and the signed acceptance of the disclosure statement by the local government official, who may be the chief financial or administrative officer of the local government, shall be filed with the board and, if appropriate, a copy shall be provided to a professional money management firm authorizing investment of its surplus funds in the trust fund established by this part. The resolution shall name:**

- (a) The local government official, who may be the chief financial or administrative officer of the local government, or**
- (b) An independent trustee holding funds on behalf of the unit of local government, responsible for deposit and withdrawal of such funds.**

The safeguards set forth in paragraphs 218.407(1) and (2) are intended to ensure that participants are fully informed about the nature, purpose, stability and processes of the Fund.

The information included in the Florida PRIME enrollment materials is thorough, and satisfies these requirements. Signed disclosure statements are on file for Fund participants, acknowledging receipt of the information.

**(3) The board or a professional money management firm shall, upon the filing of the resolution, invest the moneys in the trust fund in the same manner and subject to the same restrictions as are set forth in s.215.47. All units of local government that qualify to be participants in the trust fund shall have surplus funds deposited into a pooled investment account.**

Section 215.47, Florida Statutes, details the types of investments permitted for all Board funds, including Florida PRIME. Pursuant to section 218.409(2)(a), the Fund also must be invested in accordance with the current written investment policy, which must be updated annually. Substantive legislative changes to section 215.47, Florida Statutes, under HB 3, took effect July 1, 2023. HB 3 amended section 215.47(10), Florida Statutes, to require the SBA, when deciding to invest and when investing, to make decisions based solely on pecuniary factors and may not subordinate the interests of the participants of the fund to other objectives, including sacrificing investment return or undertaking additional investment risk to promote any nonpecuniary factor. To comply with the 2023 legislative changes, an amendment to the Investment Management Agreement with Federated was executed in September 2023.

The second part to the certification required by section 218.405(3), which is being conducted by Aon Hewitt Investment Consulting, Inc., determines whether the Fund's management is in accord with best investment practices and whether the specific holdings of the Fund are in accord with all statutory requirements including section 215.47 (cross-referenced in 218.405(3)) as implemented in the current PRIME Investment Policy Statement.

## **ADMINISTRATION OF THE TRUST FUND**

### **218.409 Administration of the trust fund.—**

**(1) Upon receipt of the items specified in s. 218.407 from the local governing body, the board or a professional money management firm shall accept all wire transfers of funds into the trust fund. The board or a professional money management firm shall also wire-transfer invested local government funds to the local government upon request of the local government official named in the resolution.**

This requirement is satisfied by a clearing account maintained by Bank of America, which is a qualified public depository. The Bank of America account accepts money transmitted to the Board and transfers to BNY Mellon, as the custodian.

**(2)(a) The trustees shall ensure that the board or a professional money management firm administers the trust fund on behalf of the participants. The board or a professional money management firm shall have the power to invest such funds in accordance with a written investment policy. The investment policy shall be updated annually to conform to best investment practices. The standard of prudence to be used by investment officials shall be the fiduciary standards as set forth in s. 215.47(10), which shall be applied in the context of managing an overall portfolio. Portfolio managers acting in accordance with written procedures and an investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and the liquidity and the sale of securities are carried out in accordance with the terms of this part.**

The Trustees delegate the administrative and investment authority to manage Florida PRIME to the Executive Director of the SBA, subject to applicable Florida Law. The Trustees also appoint an Investment Advisory Council, which, at least annually, reviews the Investment Policy and any proposed changes prior to its presentation to the Trustees. The Investment Policy Statement was last updated by the Trustees effective August 22, 2023. The IPS is posted at the Fund website tab "Risk Management and Oversight," and under the "Enrollment Materials" tab as a separate item and is also included in the New Participant Enrollment Guide.

The Board administers the Trust Fund on behalf of the participants and handles accounting, statements, monthly reporting and compiling and maintaining enrollment materials, and has contracted with professional money management firm Federated to act as the Investment Manager and to invest the Trust Fund funds in accordance with the Investment Policy Statement. Federated interacts with participants to answer inquiries and facilitates Standard and Poor's ratings. BNY Mellon acts as custodian of all assets of the Fund, processes all trades made by Federated, and does valuation and pricing for the Fund.

**(2)(b) Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material interests in financial institutions with which they conduct business on behalf of the trust fund. They shall further disclose any personal financial or investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the board.**

All Board employees are required to complete training to ensure that Board officers and employees involved in the investment process are able to recognize and avoid personal business activity that could conflict with the Trust Fund program or impair their ability to make impartial decisions. Human Relations notifies the Inspector General of any training non-compliance, and the Inspector General ensures that all required employee training for the cycle is completed.

A course cycle sets out when mandatory employee training courses must be completed. Use of Information Technology Resources, Ethics, Harassment Prevention, Incident Management Framework, Insider Trading, and Personal Investment Activity training are required every year; Public Records and Sunshine Law training are required every two years; and Confidential Information and Fiduciary Duties training is required every four years. New SBA employees are required to take all mandatory courses at the time they start working for the SBA. All required courses for the fiscal year rotation were completed for the review period. During the 2023-24 fiscal year, the SBA implemented a requirement that all employees complete in-person fiduciary training. As of the date of this report, all but three employees have completed the training. Risk Management and Compliance Awareness and Training was implemented in 2023 for newer employees. The program familiarizes those employees with Risk Management and Compliance policies and standards at the SBA and provides an understanding of the roles of Risk Management and Compliance, and how those roles support the mission and vision of the SBA. The course also provides an overview of policies governing personal investment activity, material non-public information and insider trading.

SBA Employees and investment officials are required to disclose material interests in financial institutions with which they also conduct Trust Fund business, and any personal financial or investment positions that could be related to performance of the Trust Fund portfolio. The Inspector General ensures that any trading or investment activity by individual employees complies with applicable SBA policies.

Policy 10-041 establishes a set of internal controls governing the personal investment activity of all SBA employees, including OPS employees and interns. Several Amendments to Policy 10-041 took effect in 2023. Private investment offerings and interests in real estate or other assets made through limited partnerships and private investment pools were added to prohibited investments. Donations of Covered Securities are now classified as Covered Trades under the policy. Private Real Estate Funds are now excluded from the private real estate exemption, which excludes ownership of private real estate from the policy, unless the real estate interest is in or with an entity with whom the SBA holds an investment. If a new employee discloses ownership of a prohibited Covered Security, the Chief Risk and Compliance Officer will determine the appropriate next steps based on the facts and circumstances and will document the determination. The policy now provides that final determinations on policy violations will be shared with the employee's supervisor.

Policy 10-041 was also updated in 2021, in conjunction with the implementation of the StarCompliance Personal Investment Compliance (PIC) system. The PIC system provides automated pre-clearance of personal trades and a standardized method to report and certify Covered Accounts and holdings, including private investments. SBA employees are now required to submit pre-clearance requests in the PIC system, and receive approval prior to trading in any securities, as defined by Section 2(a)(1) of the Securities Act of 1933, except certain exempt securities or assets (e.g., FDIC money markets, municipal bonds, insurance products, etc.). (See SBA Policy 10-041, *Definitions*, p. 4-6.) Risk Management & Compliance offered two agency-wide training sessions prior to the implementation of the StarCompliance system. A recording of the training was also made available on SBA's "WorkSmart Portal" for employees who could not attend either of the training sessions in person.

Additional revisions to Policy 10-041 in 2021 include a change to the threshold for disclosing material ownership interests in financial institutions or investment organizations with which they conduct business on behalf of the SBA. Prior to the revision, employees were required to disclose a material ownership interest valued at \$20,000 or greater. Effective December 1, 2021, the ownership interest amount was changed to 5% or greater and must be reported within 15 calendar days of acquisition.

Policy 10-044 addresses insider trading. This policy was also revised in 2021, to include reporting procedures for material nonpublic information. "Material" information, as it relates to securities transactions, is defined generally as information for which there is a substantial likelihood that a reasonable investor would consider it important in making his or her investment decisions, or information that is reasonably certain to have a significant effect on the price of a company's securities. Information is "nonpublic" until it has been effectively communicated to the marketplace and it can be demonstrated that the information is generally public. In addition to the Executive Director and the General Counsel & Chief Ethics Officer, the Chief Risk and Compliance Officer is responsible for consulting and coordinating with the Deputy Chief Investment Officer, as appropriate, to resolve policy questions and interpretations. Policy 10-044 was amended, effective June 26, 2023, to add the Deputy Chief Investment Officer to the list of recipients to receive any determinations by the Chief Risk and Compliance Officer that a policy violation has occurred.

SBA employees must report material nonpublic information through the StarCompliance system. The information is then sent immediately to the Chief Risk & Compliance Officer for review. This information is used to maintain a "Restricted List" of securities, which are ineligible for trading by SBA employees on behalf of SBA funds or personal accounts, without prior written approval from the Chief Risk & Compliance Officer.

**(2)(c) The board or a professional money management firm and all employees have an affirmative duty to immediately disclose any material impact to the trust fund to the participants. To ensure such disclosure, a system of internal**



**controls shall be established by the board, which shall be documented in writing as part of the investment policy. The controls shall be designed to prevent the loss of public funds arising from fraud, employee error, and misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the board or a professional money management firm. The controls shall also include formal escalation reporting guidelines for all employees. The guidelines shall establish procedures to address material impacts on the trust fund that require reporting and action.**

The Board has developed a process and document to be used by professional money manager Federated to certify that it operates in compliance with applicable ethics requirements. Federated Hermes Inc. Chief Compliance Officer, Stephen Van Meter, and Chief Investment Officer for Global Liquidity Markets, Deborah A. Cunningham, executed certifications of Compliance with Ethics Principles on January 4, 2024, and January 5, 2024, respectively.

Policy 10-040 (Ethics) provides comprehensive ethical requirements for all employees of the SBA, including PRIME, which are more stringent than the statutory requirements under Chapter 112, Part III, Florida Statutes. SBA management and staff have an affirmative duty to immediately escalate and report directly to the Executive Director & CIO, the Inspector General, or the General Counsel any “employee or contractual party fraud or misconduct (whether actual or suspected), employee or contractual party material error that adversely affects SBA or client assets or interests, misrepresentation or omission of material information in internal and external reporting and client communications, and violations of laws, rules or SBA policies.” The Inspector General then is required to investigate. Effective June 26, 2023, Policy 10-040 was amended to include the Deputy Chief Investment Officer under Primary Staff.

In compliance with HB 3, the following policies were amended in 2023-24 to ensure that all SBA investment actions are based solely on pecuniary factors and are consistent with fiduciary standards set forth in Florida Statutes: 10-015 Corporate Governance; 10-018 Asset Class Allocation Policies; 10-019 New Investment Vehicles and Programs; and 10-033 Securities Litigation. Several other SBA policies were amended in 2024 to reflect a split in SBA Inspector General duties among the General Counsel & Chief Ethics Officer, the Chief Audit Executive & Inspector General, the Senior Operating Officer-Human Resources, and Risk Management & Compliance.

In order to remain consistent with Policy 10-041, Policy 10-040 was also revised in 2021. The ownership threshold for a material interest in financial institutions and investment organizations was revised from \$20,000 to 5%. The definition of Primary Staff under Policy 10-040 was also revised. The policy requires Primary SBA Staff involved in the selection or disposition of an investment manager/investment fund or the direct acquisition or disposition of a private market real estate investment to execute the appropriate Conflict of Interest

Certification. Primary SBA Staff includes all of the following: individuals participating in the search and making the final evaluation and recommendation of the investment partner or manager, their supervisor, if applicable, the related Senior Investment Officer, the Deputy Chief Investment Officer, and the Executive Director & CIO.

The SBA internet and intranet home pages include an employee toll-free fraud hotline number which allows employees to anonymously report any concerns with regard to any aspect of SBA functions, including the Trust Fund. This number is also included in all contracts with external service providers, in order to report any potential problems in these relationships. The hotline is operated by an independent company and is available 24 hours a day, 7 days a week. The Inspector General receives any reports from the hotline and copies these to the Chief Risk and Compliance Officer. There were no fraud reports to the hotline number during the review period.

The Investment Policy Statement at Section IX, Controls and Escalation Procedures, imposes extensive reporting, monitoring and escalation requirements on the executive director, all employees, the Fund custodian, the Investment Manager, an independent investment consultant and any third party used to materially implement the Fund. The IPS requires the Executive Director to develop policies and procedures to maintain an appropriate and effective risk management and compliance program, which identifies, evaluates and manages risks within business units and at the enterprise level. The Executive Director is required to appoint a Chief Risk and Compliance Officer, whose selection, compensation, and termination are to be affirmed by the Board. This position assists the Executive Director in fulfilling the Controls and Escalation Procedures, and has been staffed in accordance with SBA policy.

Also, in accordance with the IPS, the Executive Director has organized an Investment Oversight Group (IOG) to regularly review, document and formally escalate compliance exceptions and events that might have a material impact on the Trust Fund. The minutes of its meetings, with a list of participants, are posted to the Fund website. The IOG meets and reports monthly to the Executive Director.

As discussed below, the Auditor General conducts an annual Financial Audit of PRIME, and the IPS requires the audit to include testing for compliance with the IPS, pursuant to Florida law. The most recent Financial Audit (Report No. 2024-85, December 2023) is available on the Florida PRIME website under the tab, "Audits."

The IPS also requires the Trustees to review and approve management summaries of material impacts on the Fund and any actions or escalations, along with any required actions thereon. The Monthly Summary Reports, which are provided on the website, constitute these management summaries. (See further discussion on the contents of this Report under section 218.409(6).) As reflected in the quarterly reports to the Joint Legislative Auditing Committee, the Trustees have reviewed and approved the monthly summary reports.

The safeguards summarized above indicate stringent standards of education, review and disclosure designed to prevent the loss of funds from fraud, error, misrepresentation, market changes or imprudent actions by the Board or a money manager, and have ensured the Trust Fund is administered in accordance with what is required by statute.

**(2)(d) The investment policy shall be reviewed and approved annually by the trustees or when market changes dictate, and in each event the investment policy shall be reviewed by the Investment Advisory Council.**

The Investment Policy Statement was approved by the Trustees, without change on August 22, 2023.

**(3) The board or a professional money management firm may purchase such surety or other bonds as may be necessary for its officials in order to protect the trust fund. A reserve fund may be established to fulfill this purpose. However, any reserve must be a portion of the management fee and must be fully disclosed, including its purpose, in the enrollment materials at the time a unit of local government considers participation. Further, any change in the amount to be charged for a reserve must have a reasonable notice period to allow any participant to withdraw from the trust fund prior to the new reserve charge being imposed.**

No surety or other bonds have been purchased to protect the Trust Fund, and there is no reserve fund.

**(4) The board or a professional money management firm shall purchase investments for a pooled investment account in which all participants share pro rata in the capital gain, income, or losses, subject to any penalties for early withdrawal. Any provisions for penalties, including their purpose, must be disclosed in the enrollment materials. Any change in the amount to be charged for a penalty must have a reasonable notice period to allow any participant to withdraw from the trust fund prior to the new penalty charge being imposed. A system shall be developed by the board, and disclosed in the enrollment materials, subject to annual approval by the trustees, to keep account balances current and to apportion pooled investment earnings to individual accounts.**

All participants in the Trust Fund share pro rata in all capital gains, income or losses, as set out in the Description of Investment Pool Earnings Allocation, posted to the website. This system is designed to keep account balances current and to apportion pooled investment earnings to individual accounts.

**(5) The board shall keep a separate account, designated by name and number of each participating local government. A maximum number of accounts allowed for each participant may be established by the board. Individual transactions and totals of all investments, or the share belonging to each participant, shall be recorded in the accounts.**

Separate accounts are kept for each participant. The Board has not established a limit on the number of accounts a participant may have.

**(6)(a)The board or a professional money management firm shall provide a report, at a minimum monthly or upon the occurrence of a material event, to every participant having a beneficial interest in the trust fund, the board's executive director, the trustees, the Joint Legislative Auditing Committee, and the Investment Advisory Council. The report shall include:**

**1. Reports of any material impacts on the trust fund and any actions or escalations taken by staff to address such impacts. The trustees shall provide quarterly a report to the Joint Legislative Auditing Committee that the trustees have reviewed and approved the monthly reports and actions taken, if any, to address any impacts.**

**2. A management summary that provides an analysis of the status of the current investment portfolio and the individual transactions executed over the last month. This management summary shall be prepared in a manner that will allow anyone to ascertain whether investment activities during the reporting period have conformed to investment policies. Such reporting shall be in conformance with best market practices. The board or a professional money management firm shall furnish upon request the details of an investment transaction to any participant, the trustees, and the Investment Advisory Council.**

A document titled "Monthly Summary Report" is produced monthly and made available at the Florida PRIME website to address the above requirements. The Monthly Summary Reports satisfy the requirements of Paragraph (6)(a).

The quarterly reports of the Trustees to the Joint Legislative Auditing Committee indicate that the Trustees have reviewed and approved the monthly reports and taken responsive action, per the above. These actions are memorialized in the transcripts and minutes of the meetings of the Trustees, which are posted to the SBA website.

**(6)(b) The market value of the portfolio shall be calculated daily. Withdrawals from the trust fund shall be based on a process that is transparent to participants and will ensure that advantages or disadvantages do not occur to**

**parties making deposits or withdrawals on any particular day. A statement of the market value and amortized cost of the portfolio shall be issued to participants in conjunction with any deposits or withdrawals. In addition, this information shall be reported monthly with the items in paragraph (a) to participants, the trustees, and the Investment Advisory Council...**

The market value of the Fund portfolio is calculated daily by BNY Mellon and posted on the website the next day. The Information Statement and Operating Procedures, posted to the website as part of the New Participant Enrollment Guide, sets out the operating procedures for the Fund, including hours of operation, holidays and timing of transactions. These procedures are transparent and appear to ensure, to the extent possible, that disadvantages do not occur to parties making deposits or withdrawals on particular days, as each participant has equal access to the transaction system. A statement of the market value and amortized cost of the portfolio is available at all times to participants on the website, and participants receive monthly individual account statements.

**...The review of the investment portfolio, in terms of value and price volatility, shall be performed with practices consistent with the GFOA Recommended Practice on "Mark-to-Market Practices for State and Local Government Investment Portfolios and Investment Pools."**

Compliance with the above part of section 218.409(6)(b) will be determined in part two of the annual certification, conducted by Aon Hewitt Investment Consulting, Inc.

**...Additional reporting may be made to pool participants through regular and frequent ongoing multimedia educational materials and communications, including, but not limited to, historical performance, investment holdings, amortized cost and market value of the trust fund, credit quality, and average maturity of the trust fund investment.**

Additional materials are available on the Trust Fund website and are provided through the monthly reports. Board staff are available for direct communication with participants for any questions regarding their accounts.

**(7) Costs incurred in carrying out the provisions of this part shall be deducted from the interest earnings accruing to the trust fund. Such deductions shall be prorated among the participant local governments in the percentage that each participant's deposits bear to the total trust fund. The remaining interest earned shall be distributed monthly to participants according to the amount invested. Except for costs, the board or a professional money management firm may not transfer the interest or use the interest for any other purpose, including, but not limited to, making up investment losses.**

The above statutory requirement was present in the law before substantive revisions in 2008 and has been discussed in previous reviews because it is theoretically problematic: If fund investment values were to decline sufficiently in a given month, there would be no interest from which to pay costs, and the literal requirements of this provision could not be met within a given month. Staff has reviewed this issue and has concluded that based on historical asset levels, which include an average annual balance of \$18.4 billion over the last 5 years, there have been more than sufficient assets to generate fees adequate to cover all administrative, operational, compliance and investment management charges.

**(8)(a) The principal, and any part thereof, of each and every account constituting the trust fund shall be subject to payment at any time from the moneys in the trust fund. However, the executive director may, in good faith, on the occurrence of an event that has a material impact on liquidity or operations of the trust fund, for 48 hours limit contributions to or withdrawals from the trust fund to ensure that the board can invest moneys entrusted to it in exercising its fiduciary responsibility. Such action shall be immediately disclosed to all participants, the trustees, the Joint Legislative Auditing Committee, and the Investment Advisory Council. The trustees shall convene an emergency meeting as soon as practicable from the time the executive director has instituted such measures and review the necessity of those measures. If the trustees agree with such measures, the trustees shall vote to continue the measures for up to an additional 15 days. The trustees must convene and vote to continue any such measures prior to the expiration of the time limit set, but in no case may the time limit set by the trustees exceed 15 days.**

In the time period covered by this review, the principal of all accounts in the Trust Fund has been paid at any time requested by a participant and there have been no events causing the Executive Director to limit contributions or withdrawals.

**(8)(b) An order to withdraw funds may not be issued upon any account for a larger amount than the share of the particular account to which it applies; and if such order is issued, the responsible official shall be personally liable under his or her bond for the entire overdraft resulting from the payment if made.**

In the time period covered by this review, there have been no orders to withdraw funds for a larger amount than the share of a particular account.

**(9) The Auditor General shall conduct an annual financial audit of the trust fund, which shall include testing for compliance with the investment policy. The completed audit shall be provided to the participants, the board, the**



**trustees, the Investment Advisory Council, and the Joint Legislative Auditing Committee. As soon as practicable, but no later than 30 days after completion of the audit, the trustees shall report to the Joint Legislative Auditing Committee that the trustees have reviewed the audit of the trust fund and shall certify that any necessary items are being addressed by a corrective action plan that includes target completion dates.**

The Auditor General annual financial audit of the Trust Fund, Report No. 2024-85, for the fiscal years ended June 30, 2023 and June 30, 2022 was completed in December 2023. The audit did not disclose any deficiencies in internal control over Florida PRIME's financial reporting that were considered to be material weaknesses. The report noted no instances of noncompliance or other matters required to be reported under Government Auditing Standards, and included as audit objectives determining if the SBA had complied with various provisions of laws, rules, contracts, the IPS, and other guidelines that are material to the financial statements.

#### **AUTHORIZATION TO PROVIDE ASSISTANCE**

##### **218.411 Authorization for state technical and advisory assistance.**

**(1) The board is authorized, upon request, to assist local governments in investing funds that are temporarily in excess of operating needs by:**

**(a) Explaining investment opportunities to such local governments through publication and other appropriate means.**

**(b) Acquainting such local governments with the state's practice and experience in investing short-term funds.**

**(c) Providing, in cooperation with the Department of Economic Opportunity, technical assistance to local governments in investment of surplus funds.**

**(2) The board may establish fees to cover the cost of such services, which shall be paid by the unit of local government requesting such service. Such fees shall be deposited to the credit of the appropriation or appropriations from which the costs of providing the services have been paid or are to be charged.**

The education offerings of the Fund have been discontinued, and there have been no instances of the SBA providing technical assistance to a fund participant in this review period.

##### **218.412 Rulemaking authority.—**

**The board may adopt rules as it deems necessary to carry out the provisions of this part for the administration of the trust fund.**

May 20, 2024

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As noted above, the Board has adopted rules for the administration of the Fund at Chapter 19-7, Florida Administrative Code.

#### **OTHER SECTIONS OF PART IV, CHAPTER 218**

Part IV of Chapter 218, Florida Statutes, covers other facets of investment of local government funds, such as local government investment policies (Section 218.415). Because this review, as mandated by Section 218.405, is of the pooled investment fund created by section 218.405 only, these sections are not a part of this review.

#### **CONCLUSION**

Based on the foregoing, this review finds that the Local Government Surplus Funds Trust Fund, Florida PRIME, is in compliance with the requirements of Sections 218.40 – 218.412, Florida Statutes.

# Global Governance Mandates

June 11, 2024 QUARTERLY UPDATE

Protecting Florida's Investments Act (PFIA)  
Scrutinized Companies that Boycott Israel  
MacBride Principles and Northern Ireland  
Cuba/Syria Proxy Voting Safeguards  
Venezuela Prohibited Investments  
Prohibited Investments in China

## Florida Statutes



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### ***About the State Board of Administration***

The statutory mandate of the State Board of Administration (SBA) is to invest, manage and safeguard assets of the Florida Retirement System (FRS) Trust Fund and a variety of other funds for state and local governments. FRS Trustees are dedicated to ensuring that the SBA invests assets and discharges its duties in accordance with Florida law, guided by strict policies and a code of ethics to ensure integrity, prudent risk management and top-tier performance. The SBA is an investment fiduciary under law, and subject to the stringent fiduciary duties and standards of care defined by the Employee Retirement Income Security Act of 1974 (ERISA), as incorporated into Florida law. The SBA has three Trustees: the Governor, as Chairman, the Chief Financial Officer, as Treasurer, and the Attorney General, as Secretary.

The FRS Pension Plan provides defined pension benefits to 1.1 million beneficiaries and retirees. The strong long-term performance of the FRS Pension Plan, the fourth-largest public pension fund in the nation, reflects our commitment to responsible fiscal management.

The SBA’s mission is to provide superior investment management and trust services by proactively and comprehensively managing risk and adhering to the highest ethical, fiduciary, and professional standards.

We encourage you to review additional information about the SBA and FRS on our website at [www.sbafla.com](http://www.sbafla.com).

## ***Section 1: Protecting Florida's Investments Act (PFIA)***

### ***Summary***

On June 8, 2007, the PFIA was signed into law. The PFIA requires the State Board of Administration ("SBA"), acting on behalf of the Florida Retirement System Trust Fund (the "FRSTF"), to assemble and publish a list of "Scrutinized Companies" that have prohibited business operations in Sudan and Iran. Once placed on the list of Scrutinized Companies, the SBA and its investment managers are prohibited from acquiring those companies' securities and are required to divest those securities if the companies do not cease the prohibited activities or take certain compensating actions. The implementation of the PFIA by the SBA will not affect any FRSTF investments in U.S. companies. The PFIA will solely affect foreign companies with certain business operations in Sudan and Iran involving the petroleum or energy sector, oil or mineral extraction, power production or military support activities.

As of November 10, 2023, the list of sectors subject to Iranian scrutinized operations was expanded to include the energy, petrochemical, financial, construction, manufacturing, textile, mining, metals, shipping, shipbuilding, and port sectors of Iran. The SBA is working with our external research providers to implement new screens to identify revenue and investment thresholds that capture scrutinized business operations in the expanded sector list for Iran. Future quarterly reports will include any companies identified under the expanded methodology for the Iran Terrorism Sectors List.

This quarterly report is developed pursuant to Section 215.473 (4), Florida Statutes. Scrutinized activity in Sudan is defined by the Statutes as occurring within the "Government of Sudan," or the Republic of the Sudan that has its capital in Khartoum, Sudan. Note, the PFIA only applies to assets governed by Chapter 121 ("Florida Retirement System Act"), and therefore does not affect any non-FRS funds managed by the SBA.

### ***Primary Requirements of the PFIA***

The PFIA created new reporting, engagement, and investment requirements for the SBA, including:

1. Quarterly reporting to the Board of Trustees of every equity security in which the SBA has invested for the quarter, along with its industry category. This report is posted on the SBA website.
2. Quarterly presentation to the Trustees of a Scrutinized Companies list for both Sudan and Iran for their approval. Scrutinized Company lists are available on the SBA's website, along with information on the FRSTF direct and indirect holdings of Scrutinized Companies.
3. Written notice to external investment managers of all PFIA requirements. Letters request that the managers of actively managed commingled vehicles (i.e., those with FRSTF and other clients' assets) consider removing Scrutinized Companies from the product or create a similar actively managed product that excludes such companies. Similar written requests must be provided to relevant investment managers within the defined contribution plan.
4. Written notice to any company with inactive business operations in Sudan or Iran, informing the company of the PFIA and encouraging it to continue to refrain from reinitiating active business operations. Such correspondence continues semiannually.
5. Written notice to any Scrutinized Company with active business operations, informing the company of its Scrutinized Company status and that it may become subject to divestment. The written notice must inform the company of the opportunity to clarify its Sudan-related or Iran-related activities and encourage the company, within 90 days, to cease its scrutinized business operations or convert such operations to inactive status.
6. A prohibition on further investment on behalf of the FRSTF in any Scrutinized Company once the Sudan and Iran scrutinized lists have been approved by the Trustees. All publicly traded securities of Scrutinized Companies must be divested within 12 months after the company's initial (and continued) appearance on

the Scrutinized Companies list. Divestment does not apply to indirect holdings in actively managed commingled investment funds—i.e., where the SBA is not the sole investor in the fund. Private equity funds are considered to be actively managed.

7. Reporting to each member of the Board of Trustees, the President of the Senate, and the Speaker of the House of Representatives of Scrutinized Company lists within 30 days of creation, and public disclosure of each list.
8. Quarterly reporting of the following to each member of the Board of Trustees, the President of the Senate, the Speaker of the House of Representatives, the United States Presidential Special Envoy to Sudan, and the United States Presidential Special Envoy to Iran. The report is made publicly available and posted to the SBA's website.
  - a. A summary of correspondence with engaged companies;
  - b. A listing of all investments sold, redeemed, divested, or withdrawn;
  - c. A listing of all prohibited investments;
  - d. A description of any progress related to external managers offering PFIA compliant funds; and
  - e. A list of all publicly traded securities held directly by the State.
9. Adoption and incorporation into the FRSTF Investment Policy Statement (IPS) of SBA actions taken in accordance with the PFIA. Changes to the IPS are reviewed by the Investment Advisory Council (IAC) and approved by the Trustees.
10. Relevant Sudan portions of the PFIA are discontinued if the United States revokes all sanctions imposed against the government of Sudan, or if the Congress or President of the United States affirmatively and unambiguously states, by means including, but not limited to, legislation, executive order, or written certification from the President to Congress, that:
  - a. The Darfur genocide has been halted for at least 12 months; or
  - b. The government of Sudan has honored its commitments to cease attacks on civilians, demobilize and demilitarize the Janjaweed and associated militias, grant free and unfettered access for deliveries of humanitarian assistance, and allow for the safe and voluntary return of refugees and internally displaced persons; or
  - c. Mandatory divestment of the type provided for by the PFIA interferes with the conduct of U.S. foreign policy.
11. Relevant Iran portions of the PFIA are discontinued if both of the following occur:
  - a. The Congress and President of the United States affirmatively and unambiguously state, by means including, but not limited to, legislation, executive order, or written certification from the President to Congress, that the government of Iran has ceased to acquire weapons of mass destruction and support international terrorism; and
  - b. The United States revokes all sanctions imposed against the government of Iran.
12. Cessation of divestment and/or reinvestment into previously divested companies may occur if the value of all FRSTF assets under management decreases by 50 basis points (0.5%) or more, as a result of divestment. If cessation of divestment is triggered, the SBA is required to provide a written report to each member of the Board of Trustees, the President of the Senate, and the Speaker of the House of Representatives prior to initial reinvestment. Such condition is required to be updated semiannually.
13. In 2009, the Florida Legislature approved a bill requiring the SBA to identify and offer, by March 1, 2010, at least one terror-free investment product for the FRS Investment Plan. The product must allocate its funds among securities not subject to divestiture, as provided in F.S. 215.473.



14. As of July 1, 2014, Florida Statute 624.449 requires that a domestic insurer shall provide to the Office of Insurance Regulation on an annual basis a list of investments that the insurer has in companies included on the “Scrutinized Companies with Activities in Sudan List” and the “Scrutinized Companies with Activities in the Iran Terrorism Sectors List.” Additionally, F.S. 215.473(3)(e)(2) now exempts Exchange Traded Funds from the provisions of the PFIA.
15. As of July 1, 2014, Florida Statutes clarify that the recently created “Government of South Sudan” means the Republic of South Sudan, which has its capital in Juba, South Sudan. Scrutinized activity refers to the “Government of Sudan,” which means the Republic of the Sudan that has its capital in Khartoum, Sudan. Within this report, “Sudan” refers to the latter.
16. As of July 1, 2016, and further enhanced as of November 10, 2023, the requirements for the expiration of PFIA divestment protocol were amended and new quarterly reporting requirements were implemented. Florida Statutes require the following criteria for discontinuing Iran portions of the PFIA:
  - a. The Congress and President of the United States affirmatively and unambiguously state, by means including, but not limited to, legislation, executive order, or written certification from the President to Congress, that the government of Iran has ceased to acquire weapons of mass destruction and support international terrorism; and
  - b. The United States revokes all sanctions imposed against the government of Iran.

### ***Definition of a Scrutinized Company***

The following is a brief review of the criteria on which the active business operations of companies must be judged, in accordance with subsection (1)(t) of Section 215.473, F.S.

#### ***Sudan:***

1. Have a material business relationship with the government of Sudan or a government-created project involving oil related, mineral extraction, or power generation activities, or
2. Have a material business relationship involving the supply of military equipment, or
3. Impart minimal benefit to disadvantaged citizens that are typically located in the geographic periphery of Sudan, or
4. Have been complicit in the genocidal campaign in Darfur.

#### ***Iran:***

1. Have a material business relationship with the government of Iran or a government-created project involving oil related or mineral extraction activities, or the energy, petrochemical, financial, construction, manufacturing, textile, mining, metals, shipping, shipbuilding, or port sectors of Iran, or
2. Have made material investments with the effect of significantly enhancing Iran’s petroleum sector.

Affiliates of companies with scrutinized business operations are also subject to the requirements of the PFIA. An affiliated company is generally defined as any other company that either directly or indirectly controls, is controlled by or is under common control with the company conducting scrutinized active business operations. Control generally means the power to exercise a controlling influence over the management or policies of a company. As well, many companies have parent-subsidiary relationships whereby a parent company may own several other companies. In such cases, the SBA has included any known parent and/or subsidiaries that can be clearly linked to a company with scrutinized active business operations. The SBA has used a 50 percent ownership threshold in determining whether companies are affiliated, examining parent company-subsidiary ownership on a pro rata basis.

The SBA views companies which have explicit plans and activities related to discontinuation of active business operations as meeting the PFIA definition of substantial action. For all identified companies, the SBA will request

information detailing company actions to discontinue its active business operations, or details regarding humanitarian efforts (applicable to Sudan only).

### ***SBA Scrutinized Companies Identification Methodology***

The SBA has developed two lists (the Sudan List and the Iran List) of Scrutinized Companies with active business operations. The lists are developed by principally relying on the research and findings of our “External Research Providers.” Below is a brief description of our External Research Providers, which are maintained to provide input from multiple sources.

1. **EIRIS Conflict Risk Network (CRN).** In May 2013, the Conflict Risk Network became part of EIRIS, a global provider of environmental, social, governance, and ethical performance of companies. EIRIS provides services to more than 150 asset owners and managers globally, with a staff of over 60, based primarily in London. CRN was formerly known as the Sudan Divestment Task Force (SDTF).
2. **MSCI ESG Research (MSCI).** MSCI delivers corporate governance analysis and research to institutional investors. Through its ESG Research unit, MSCI offers screening services with specific and unique components of state law pertaining to investments in sanctioned countries, including Sudan and Iran.
3. **ISS-ESG (formerly IW Financial or IWF).** On January 5, 2017, Institutional Shareholder Services (ISS) announced its acquisition of IW Financial. IWF, in partnership with Conflict Securities Advisory Group (CSAG), has been a long-time provider of information on the business ties of publicly traded companies in Sudan and Iran.

Staff members within the Investment Programs & Governance unit, as well as other senior investment staff, review the assessments of the External Research Providers and other publicly available information. The SBA has utilized the following sources to evaluate over 400 companies and affiliates with reported links to Sudan or Iran:

#### Company disclosures:

- SEC filings (DEF 14A Proxy Statements, 10-K & 20-F Annual Reports, etc.)
- Investor Relations/company websites
- Industry publications and analyst research

#### Investment/Finance Organizations:

- Other Institutional Investors/Private Investors

#### U.S. Government Agencies:

- U.S. Department of State
- U.S. Treasury, Office of Foreign Asset Control (OFAC)
- U.S. Government Accountability Office (GAO)
- Dept. of Energy, Energy Information Administration (EIA)
- Congressional Research Service (CRS), Library of Congress

#### Other Sources:

- SBA External Investment Managers
- U.S. Federal Sanctions Laws covering State Sponsors of Terror
- Non-Governmental Organizations (NGOs)

Using the previous information sources, the SBA has developed two separate categorizations of a company’s involvement in Sudan and/or Iran.

1. **“Scrutinized”** — Information provided by several External Research Providers indicates that a company meets the classification of a Scrutinized Company as defined by the PFIA as set forth in Section 215.473 (1)(t)1., 2., or 3, Florida Statutes [Sudan] or Section 215.473 (4)(t)1, Florida Statutes [Iran]. Upon SBA review, a preponderance of the evidence supports the conclusions of the External Research Providers.

2. **“Continued Examination”** — At least one External Research Provider indicates that a company meets the classification of a Scrutinized Company as defined by the PFIA as set forth in Section 215.473, (1)(t)1., 2., or 3, Florida Statutes [Sudan] or Section 215.473, (4)(t)1, Florida Statute [Iran]. In other words, the External Research Providers do not agree on the status of a company and the SBA is unable to definitively categorize the company’s activities as scrutinized without further research to resolve the differences. For companies classified as “Continued Examination,” the SBA will begin an engagement process to clarify each firm’s current business relationships.

**SUDAN Changes since the Previous PFIA Quarterly Report**

(See the following page for IRAN changes.)

Companies added to the **Sudan** Scrutinized List this quarter:

- None

Companies removed from the **Sudan** Scrutinized List this quarter:

- **Sinopec Group Overseas Development 2014 Ltd**
  - No longer publicly traded. Bonds have matured.

Companies added to the **Sudan** Continued Examination List this quarter:

- None

Companies removed from the **Sudan** Continued Examination List this quarter:

- None

***IRAN Changes since the Previous PFIA Quarterly Report***

(See the previous page for SUDAN changes.)

Companies added to the **Iran** Scrutinized List this quarter:

- None

Companies removed from the **Iran** Scrutinized List this quarter:

- **Sinopec Group Overseas Development 2014 Ltd**
  - No longer publicly traded. Bonds have matured.

Companies added to the **Iran** Continued Examination List this quarter:

- **China Railway Group Limited**
- **Engineers India Limited**
- **Hitachi Construction Machinery Co Ltd**
- **Hitachi Ltd**
- **Itochu Corporation**
- **Japan Post Bank Co Ltd**
- **Marubeni Corporation**
- **Norinco International Cooperation Ltd**
- **Power Construction Corporation of China Ltd**
- **Sberbank Russia PJSC**
- **Sony Group Corporation**
- **Sumitomo Mitsui Financial Group Inc**
- **VINCI SA**

In response to the expansion of sectors subject to Iranian scrutinized operations to include the energy, petrochemical, financial, construction, manufacturing, textile, mining, metals, shipping, shipbuilding, and port sectors of Iran, the following companies were added to the Iran Continued Examination List for review due to their possible business operations with Iran. The companies have not responded to SBA correspondence regarding their operations in Iran.

Due to the forward-looking application of new statutory requirements, beginning with business activities occurring on or after January 10, 2024, the SBA is engaging directly with numerous companies that exhibit potential scrutinized business activities. Corporate filings (e.g., 20F Annual Reports) covering their potential scrutinized business activities may not have been filed during the SBA's review period but may be subsequently disclosed in the future.

Companies placed on the Continued Examination list are under review to determine whether they meet the criteria for scrutinized business activities.

Companies removed from the **Iran** Continued Examination List this quarter:

- None

**Quarterly Status Update Regarding Potential IRAN Expiration**  
**Florida Statutes, 215.473 (5) EXPIRATION (b) subparagraphs 1. and 2.**

Florida Statutes require a quarterly update on events relating to the status of expiration clauses 1 and 2, which are copied below in their entirety:

***F.S. 215.473(5)(b): If both of the following occur, the board may no longer scrutinize companies according to subparagraph (1)(dd)4., may no longer assemble the Scrutinized Companies with Activities in the Iran Terrorism Sectors List, and shall cease engagement, investment prohibitions, and divestment:***

***1. The Congress and President of the United States affirmatively and unambiguously state, by means including, but not limited to, legislation, executive order, or written certification from the President to Congress, that the government of Iran has ceased to acquire weapons of mass destruction and support international terrorism;***

Update:

No updates at this time.

**And**

***2. The United States revokes all sanctions imposed against the government of Iran.***

Update:

April 23, 2024: The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned two companies and four individuals involved in malicious cyber activity on behalf of the Iranian Islamic Revolutionary Guard Corps Cyber Electronic Command (IRGC-CEC). These actors targeted more than a dozen U.S. companies and government entities through cyber operations, including spear phishing and malware attacks.

Source: <https://home.treasury.gov/news/press-releases/jy2292>



**Table 1: Scrutinized Companies with Activities in SUDAN**  
*(New companies on the list are shaded and in bold.)*

Scrutinized Company: Sudan	Country of Incorporation	Date of Initial Scrutinized Classification
Aviation Industry Corporation of China (AVIC)	China	September 24, 2019
AviChina Industry & Technology	China	June 4, 2019
AVIC International Finance Ltd	China	September 24, 2019
AVIC International Holdings Ltd (formerly listed as AVIC International)	China	June 4, 2019
Bank of Kunlun Co Ltd	China	March 7, 2018
Chennai Petroleum Corp Ltd	India	September 19, 2007
China National Petroleum Corporation (CNPC)	China	December 11, 2012
China Petrochemical Corporation (Sinopec Group)	China	December 3, 2019
China Petroleum & Chemical Corp (CPCC) Sinopec	China	September 19, 2007
China Petroleum Engineering Corp	China	March 7, 2018
CNPC Capital Company Limited	China	June 14, 2017
CNPC Finance HK Ltd	China	March 26, 2024
CNPC General Capital Ltd	China	June 26, 2012
CNPC Global Capital Limited	China	December 15, 2020
CNPC HK Overseas Capital Ltd	China	June 16, 2011
Daqing Huake Group Co Ltd	China	March 25, 2008
Egypt Kuwait Holding Co. SAE	Kuwait	January 13, 2009
Engen Botswana	Botswana	March 24, 2015
FACC AG	Austria	June 4, 2019
Harbin Electric Co. Ltd.	China	September 19, 2007
Hindustan Petroleum Corporation Ltd	India	June 13, 2018
Indian Oil Corp Ltd (IOCL)	India	September 19, 2007
Jiangxi Hongdu Aviation	China	September 19, 2007
KLCC Property Holdings Bhd	Malaysia	April 14, 2009
Kunlun Energy Company Ltd	Hong Kong	September 19, 2007
Lanka IOC Ltd	India	September 19, 2007
Malaysia Marine & Heavy Engineering Holdings Bhd	Malaysia	March 18, 2014
Managem SA	Morocco	November 9, 2010
Mangalore Refinery & Petrochemicals Ltd	India	September 19, 2007
MISC Bhd	Malaysia	September 19, 2007
Oil India Ltd	India	September 18, 2012
Oil & Natural Gas Corp (ONGC)	India	September 19, 2007

Scrutinized Company: Sudan	Country of Incorporation	Date of Initial Scrutinized Classification
ONGC Videsh Limited (OVL)	India	March 18, 2014
Perseus Mining Ltd	Australia	August 23, 2022
PetroChina	China	September 19, 2007
Petroliaam Nasional (Petronas)	Malaysia	September 19, 2007
Petronas Capital Limited	Malaysia	September 19, 2007
Petronas Chemicals Bhd	Malaysia	June 16, 2011
Petronas Dagangan Bhd	Malaysia	September 19, 2007
Petronas Gas Berhad	Malaysia	September 19, 2007
Petronas Global Sukuk	Malaysia	August 2, 2016
Putrajaya Management Sdn Bhd	Malaysia	March 18, 2014
Sinopec Capital 2013 Ltd	China	September 24, 2013
Sinopec Century Bright Capital Investment Ltd	China	December 3, 2019
Sinopec Engineering Group Co Ltd	China	March 18, 2014
Sinopec Group Overseas Development 2018 Ltd	China	December 15, 2020
Sinopec Group Overseas Development 2017 Ltd	China	September 11, 2019
Sinopec Group Overseas Development 2016 Ltd	China	August 2, 2016
Sinopec Group Overseas Development 2015 Ltd	China	December 15, 2020
Sinopec Group Overseas Development 2013 Ltd	China	March 18, 2014
Sinopec Group Overseas Development 2012 Ltd	China	March 7, 2018
Sinopec Kantons Holdings Ltd	Bermuda	September 19, 2007
Sinopec Oilfield Equipment Corporation	China	April 14, 2009
Sinopec Oilfield Service Corp	China	March 25, 2008
Sinopec Shanghai Petrochemical	China	September 19, 2007
Societe Metallurgique D'imiter	Morocco	November 9, 2010
<b># of Sudan Scrutinized Companies</b>	<b>56</b>	

The following companies were removed from the **SUDAN Scrutinized List** during the quarter:

Removed Company	Country of Incorporation
<i>Sinopec Group Overseas Development 2014 Ltd</i>	<i>China</i>

**Table 2: Continued Examination of Companies with Possible Business Operations in SUDAN**  
*(New companies on the list are shaded and in bold.)*

Continued Examination Company: Sudan	Country of Incorporation
Bharat Heavy Electricals, Ltd	India
China Gezhouba Group Company Ltd	China
Dongfeng Motor Group Co Ltd	China
Dongan Motor (aka Harbin Dongan Auto Engine)	China
Glencore Xstrata PLC	Switzerland
Pan African Resources Plc	South Africa
Power Construction Corporation of China Ltd. (fka Sinohydro)	China
Shanghai Electric Group Co.	China
<b># of Sudan Continued Examination Companies</b>	<b>8</b>

The following companies were removed from the **SUDAN Continued Examination List** during the quarter:

Removed Company	Country of Incorporation
<b>No companies were removed this quarter.</b>	

**Table 3: Scrutinized Companies with Activities in the IRAN Terrorism Sectors***New companies on the list are shaded and in bold.*

Scrutinized Company: Iran	Country of Incorporation	Date of Initial Scrutinized Classification
Bank of Kunlun Co Ltd	China	March 7, 2018
China BlueChemical Ltd.	China	March 19, 2013
China National Petroleum Corporation (CNPC)	China	December 11, 2012
China Oilfield Services Ltd.	China	June 16, 2011
China Petrochemical Corporation (Sinopec Group)	China	December 3, 2019
China Petroleum & Chemical Corp (CPCC) Sinopec	China	September 19, 2007
China Petroleum Engineering Corp	China	March 7, 2018
CNOOC Ltd.	China	June 16, 2011
CNOOC Energy Technology & Services Ltd	China	June 15, 2021
CNOOC Finance Limited	China	September 24, 2013
CNOOC Nexen Finance	Canada	October 17, 2017
CNPC Capital Company Limited	China	June 14, 2017
CNPC Finance HK Ltd	China	March 26, 2024
CNPC General Capital Ltd	China	December 6, 2016
CNPC Global Capital Limited	China	December 15, 2020
CNPC HK Overseas Capital Ltd.	China	June 16, 2011
COSL Finance (BVI) Limited	China	September 24, 2013
COSL Singapore Capital Ltd	Singapore	December 4, 2018
Engen Botswana	Botswana	March 24, 2015
Gazprom	Russia	September 19, 2007
Gazprom Neft	Russia	September 16, 2008
Gazprom Promgaz	Russia	June 4, 2019
GPN Capital SA	Luxembourg	June 4, 2019
Hindustan Petroleum Corporation Ltd	India	June 13, 2018
Indian Oil Corp Ltd (IOCL)	India	September 19, 2007
KLCC Property Holdings Bhd	Malaysia	April 14, 2009
Kunlun Energy Company Ltd.	Hong Kong	September 19, 2007
Malaysia Marine & Heavy Engineering Holdings Bhd	Malaysia	March 18, 2014
Mangalore Refinery & Petrochemicals Ltd.	India	March 19, 2013
MISC Bhd	Malaysia	September 19, 2007
Mosenergo	Russia	September 16, 2008
Oil & Natural Gas Corp (ONGC)	India	September 19, 2007
ONGC Videsh Limited (OVL)	India	March 18, 2014
PetroChina	China	September 19, 2007
Petroliaam Nasional (Petronas)	Malaysia	September 19, 2007

Scrutinized Company: Iran	Country of Incorporation	Date of Initial Scrutinized Classification
Petronas Capital Limited	Malaysia	September 19, 2007
Petronas Chemicals Bhd	Malaysia	June 16, 2011
Petronas Dagangan Bhd	Malaysia	September 19, 2007
Petronas Gas Berhad	Malaysia	September 19, 2007
Petronas Global Sukuk	Malaysia	August 2, 2016
Putrajaya Management Sdn Bhd	Malaysia	March 18, 2014
Sinopec Capital 2013 Ltd.	China	March 18, 2014
Sinopec Century Bright Capital Investment Ltd	China	December 3, 2019
Sinopec Engineering Group Co Ltd.	China	March 18, 2014
Sinopec Group Overseas Development 2018 Ltd	China	December 15, 2020
Sinopec Group Overseas Development 2017 Ltd	China	September 11, 2019
Sinopec Group Overseas Development 2016 Ltd	China	August 2, 2016
Sinopec Group Overseas Development 2015 Ltd	China	December 15, 2020
Sinopec Group Overseas Development 2013 Ltd	China	March 18, 2014
Sinopec Group Overseas Development 2012 Ltd	China	March 7, 2018
Sinopec Kantons Holdings Ltd.	Bermuda	September 19, 2007
Sinopec Oilfield Equipment Corporation	China	September 29, 2015
Sinopec Oilfield Service Corp	China	March 25, 2008
Sinopec Shanghai Petrochemical	China	September 19, 2007
Territorial Generating Company No 1	Russia	June 4, 2019
<b># of Iran Scrutinized Companies</b>	<b>55</b>	

The following companies were removed from the **IRAN Scrutinized List** during the quarter:

<i>Removed Company</i>	<i>Country of Incorporation</i>
<i>Sinopec Group Overseas Development 2014 Ltd</i>	<i>China</i>

**Table 4: Continued Examination of Companies with Possible Business Operations in IRAN***New companies on the list are shaded and in bold.*

Continued Examination Company: Iran	Country of Incorporation
China Nonferrous Metal Industry's Foreign Engineering and Construction	China
<b>China Railway Group Limited</b>	<b>China</b>
<b>Engineers India Limited</b>	<b>India</b>
GS Engineering & Construction Corp.	South Korea
GS Holdings	South Korea
<b>Hitachi Construction Machinery Co Ltd</b>	<b>Japan</b>
<b>Hitachi Ltd</b>	<b>Japan</b>
<b>Itochu Corporation</b>	<b>Japan</b>
<b>Japan Post Bank Co Ltd</b>	<b>Japan</b>
<b>Marubeni Corporation</b>	<b>Japan</b>
<b>Norinco International Cooperation Ltd</b>	<b>China</b>
Petronet LNG Ltd.	India
<b>Power Construction Corporation of China Ltd</b>	<b>China</b>
<b>Sberbank Russia PJSC</b>	<b>Russia</b>
<b>Sony Group Corporation</b>	<b>Japan</b>
<b>Sumitomo Mitsui Financial Group Inc</b>	<b>Japan</b>
<b>VINCI SA</b>	<b>France</b>
<b># of Iran Continued Examination Companies</b>	<b>17</b>

The following companies were **removed** from the **IRAN Continued Examination List** during the quarter:

Removed Company	Country of Incorporation
<b>No companies were removed this quarter.</b>	



**Table 5: Correspondence & Engagement Efforts with Scrutinized Companies**

In accordance with Section 215.473(3)(a), F.S., the SBA began to engage companies on the September 19, 2007 Scrutinized Company lists. The SBA sent letters to each Scrutinized Company that was owned and held as of September 19, 2007, per the requirements of the law.

The SBA also sent written communication to other scrutinized firms since the initial company engagement effort in September 2007. Each letter encouraged the company to cease any active business operations within 90 days or convert such operations to inactive status to avoid qualifying for divestment by the SBA. In addition, the SBA sent a second letter to scrutinized companies on January 25, 2008, again requesting companies to provide all information necessary to avoid divestment.

On September 30, 2008, the SBA sent a follow-up letter to all Scrutinized Companies. Although, these companies are no longer held by the SBA, the September 30, 2008 letter was intended to once again provide notice of the requirements of the PFIA. Since our original correspondence, several companies on the scrutinized list have replied with valuable information. Each company's response and classification status is summarized below. Any company that responded to the SBA's written correspondence is highlighted in blue text.

Company	Company Responsive to SBA Communications	Status
ABB	Yes; January 29, 2009	Removed from Sudan Scrutinized List
Alstom	Yes; October 1, 2007 and October 25, 2011	Removed from Sudan Scrutinized and CE Lists
Bharat Heavy Electricals Limited	Yes; October 4, 2007	Moved to Sudan Continued Examination List
Bow Valley Energy	Yes; October 22, 2008	Removed from Iran Scrutinized List
Chennai Petroleum Corporation Limited	Yes; October 16, 2008	Sudan Scrutinized Classification Continues
China Petroleum & Chemical Corp (Sinopec)	No	Iran & Sudan Scrutinized Classification Continues
CNOOC Ltd	Yes; October 28, 2008	Iran Scrutinized Classification Continues
Daelim Industrial Co Ltd.	Yes, November 13, 2018	Removed from Iran Scrutinized List
Dongfeng Motor Group Co. Ltd.	No	Moved to Sudan Continued Examination List
Electricity Generating Public Co	No	Removed from Sudan Scrutinized List
ENI	Yes; February 13, 2008 and May 13, 2011	Removed from Iran Scrutinized and CE Lists
GAIL (India) Limited, aka GAIL Ltd.	Yes; October 5, 2010	Removed from Iran Scrutinized and CE Lists
Gazprom	Yes; November 1, 2007 and August 18, 2014	Iran Scrutinized Classification Continues
Gazprom Neft	Yes; August 15, 2013	Iran Scrutinized as subsidiary of Gazprom
Harbin Electric Co. (fka Harbin Power Equipment)	No	Sudan Scrutinized Classification Continues
Indian Oil Corp Ltd (IOCL)	No	Iran & Sudan Scrutinized Classification Continues
Inpex Corp.	Yes; October 15, 2007 and July 11, 2011	Removed from Iran Scrutinized List
Kencana Petroleum	Yes; October 31, 2008	Removed from Sudan Scrutinized and CE Lists
Korea Electric Power (and subsidiaries, KEPCO Plant/Korea Plant)	Yes; December 27, 2011	Removed from Sudan Scrutinized List
Kunlun Energy Company Ltd. (fka: CNPC Hong Kong Limited)	Yes; October 5, 2007 and May 24, 2008	Iran & Sudan Scrutinized Classification Continues
Lukoil OAO	Yes; October 8, 2007	Removed from Iran Scrutinized and CE Lists
Lundin Petroleum AB	Yes; October 17, 2008	Removed from Sudan Scrutinized List

Company	Company Responsive to SBA Communications	Status
Lundin International SA	No	Removed from Sudan Scrutinized List
Malaysia Marine & Heavy Engineering Holdings Bhd	Yes; November 14, 2014	Iran & Sudan Scrutinized Classification Continues
Mangalore Refinery & Petrochemicals Ltd	Yes; March 8, 2013	Iran & Sudan Scrutinized Classification Continues
MISC Bhd	Yes; August 23, 2018; Jan 10, 2019; May 16, 2022	Iran & Sudan Scrutinized Classification Continues
Norsk Hydro	Yes; November 30, 2007	Removed from Iran Scrutinized List
Oil & Natural Gas Corp (ONGC)	Yes; July 23, 2014	Iran & Sudan Scrutinized Classification Continues
OMV AG	Yes; November 6, 2007 and April 14, 2010	Removed from Iran Scrutinized and CE Lists
Perseus Mining Ltd	Yes; September 27, 2022	Sudan Scrutinized Classification Continues
PetroChina	Yes; December 22, 2008	Iran & Sudan Scrutinized Classification Continues
Petroleo Brasileiro (Petrobras)	Yes; January 13, 2010	Removed from Iran Scrutinized List
Petroleum Nasional (Petronas)	Yes; July 6, 2015	Iran & Sudan Scrutinized Classification Continues
Putrajaya Management Sdn Bhd	Yes; September 5, 2014	Iran & Sudan Scrutinized Classification Continues
Ranhill Bhd	Yes; October 22, 2008	Removed from Sudan Scrutinized List
Repsol YPF	Yes; October 15, 2007; January 2013	Removed from Iran Scrutinized and CE Lists
Royal Dutch Shell PLC	Yes; October 5, 2007; January 27, 2011; April 13, 2011	Removed from Iran Scrutinized and CE Lists
Sinopec Century Bright Capital	Yes; June 4, 2020	Iran & Sudan Scrutinized Classification Continues
Sinopec Kantons Holdings Ltd.	No	Iran & Sudan Scrutinized Classification Continues
Sinopec Shanghai Petrochemical Company	No	Iran & Sudan Scrutinized Classification Continues
Snam Rete Gas	Yes; October 9, 2008	Removed from Iran Scrutinized Classification
Statoil ASA (fka: StatoilHydro)	Yes; February 4, 2008; January 24, 2011; June 16, 2011	Removed from Iran Scrutinized and CE Lists
Total Capital	Yes; January 26, 2011 and April 25, 2011	Removed from Iran Scrutinized and CE Lists
Total SA	Yes; October 12, 2007; October 29, 2010; April 25, 2011	Removed from Iran Scrutinized List
Wärtsilä Oyj	Yes; December 4, 2007	Moved to Sudan Continued Examination List

**Table 6: Correspondence & Engagement Efforts with Continued Examination Companies**

In addition to Scrutinized Companies, the SBA engaged companies on our initial September 19, 2007 Continued Examination company lists. The SBA also sent written communication to firms added to the Continued Examination list since the initial company engagement effort in September 2007. Such companies were asked to provide information to the SBA in order to assist us in determining the extent of their activities, if any, in Sudan and Iran. The SBA sent a follow-up letter to all companies on September 30, 2008. Each company's response and classification is summarized below. Any company that responded to the SBA's written correspondence is highlighted in blue text.

Company	Company Responsive to SBA Communications	Continued Examination Status
Actividades de Construcción y Servicios S.A.(ACS)	No	Removed from Iran List
Aggreko PLC	Yes; January 28, 2008	Removed from Iran List
Air Liquide	Yes; November 30, 2007 January 28, 2008	Removed from Iran List
Aker Solutions ASA (fka Aker Kvaerner ASA)	No	Removed from Iran List
AREF Investment Group	No	Removed from Sudan List
Areva SA	Yes; October 27, 2008 December 29, 2009	Removed from Sudan List
Bauer Aktiengesellschaft	Yes; March 13, 2008	Removed from Sudan List
BG Group	Yes; November 23, 2007	Removed from Iran List
Bharat Electronics Limited	No	Removed from Sudan CE List
Bolloré Group	No	Removed from Sudan CE
Costain Group PLC	Yes; November 5, 2007	Removed from Iran List
Daelim Industrial Co Ltd.	Yes, November 13, 2018	Removed from Iran List
Engineers India Ltd.	Yes; October 16, 2008; September 9, 2010	Removed from Iran CE List
Essar Oil	Yes; January 9, 2009	Removed from Iran List
Finmeccanica SpA	No	Removed from Sudan List
Glencore Xstrata PLC	Yes; September 20, 2010	Sudan CE Classification Continues
GVA Consultants	Yes; September 26, 2007 September 30, 2010	Removed from Iran CE List
ICSA India Limited	No	Removed from Sudan List
INA-Industrija Nafta DD Zagreb	Yes; April 15, 2014	Removed from Iran List
Itochu Corp	Yes; May 9, 2008	Removed from Iran List
JGC Corp	Yes; October 1, 2007	Removed from Iran List
La Mancha Resources	Yes; October 21, 2008	Removed from Sudan List
Linde AG	Yes; November 14, 2007	Removed from Iran List
Liquefied Natural Gas LNG	No	Removed from Iran List
Mitsubishi Heavy Industries Ltd.	Yes; October 26, 2007	Removed from Iran List
Mitsui & Co.	Yes; October 17, 2007	Removed from Iran List
Mitsui Engineering & Shipbuilding	Yes; November 21, 2007 December 18, 2007	Removed from Iran and Sudan Lists
MMC Bhd	No	Removed from Sudan List
Nam Fatt	No	Removed from Sudan List
PT Citra Tubindo Tbk.	Yes; September 27, 2010	Removed from Iran CE List

Company	Company Responsive to SBA Communications	Continued Examination Status
PTT Public Company Limited	Yes; October 1, 2010	Removed from Sudan CE List
Saipem SpA	Yes; December 12, 2007	Removed from Iran Lists
Samsung Engineering Co. Ltd.	No	Removed from Iran CE List
Samsung Heavy Industries Co. Ltd.	No	Removed from Iran List
Sasol Ltd.	Yes; May 25, 2010 September 29, 2010	Removed from Iran CE List
Seadrill Ltd	Yes; September 20, 2010	Removed from Sudan CE List
Siam Cement Group (SCG)	Yes; September 24, 2010	Removed from Iran CE List
Schlumberger Limited NV	Yes; October 19, 2007	Removed from Iran and Sudan Lists
Siam Cement PCL	Yes; October 21, 2008	Removed from Iran CE List
Siemens AG	Yes; October 22, 2009 October 8, 2010 November 7, 2018; March 2019 June 2019; July 2019; February 2021	Added to Sudan Scrutinized List on 6/4/19. Removed from Sudan Scrutinized List on 7/12/19 and Sudan CE List on 3/9/21
SNC - Lavalin Group Inc.	Yes; September 25, 2007	Removed from Iran List
Sudan Telecommunications (Sudatel)	No	Removed from Sudan CE Classification
Technip	Yes; April 30, 2010 and November 30, 2010	Removed from Iran CE Classification
The Weir Group PLC	Yes; November 16, 2007	Removed from Iran and Sudan Lists
Total SA	Yes; October 12, 2007	Removed from Sudan CE Classification
Trevi-Finanziaria Industriale S.p.A.	Yes; September 17, 2010	Removed from Iran CE List
Weatherford International, Ltd.	No	Removed from Sudan List
Welspun Corp. Limited (fka Welspun-Gujarat Stahl Rohen Ltd.)	Yes; September 24, 2010	Removed from Iran CE List

### ***Key Dates for PFIA Activities***

**June 8, 2007** — Legislation’s effective date, upon becoming a law.

**August 6, 2007** — SBA letter to state agencies requesting data on all publicly traded securities held directly by the State.

**August 20, 2007** — First of two letters to investment managers providing written notice of PFIA enactment and amendment to Schedule B of investment management contracts.

**September 19, 2007** — SBA assembles initial Scrutinized Companies lists for Sudan and Iran.

**September 20, 2007** — SBA engages companies classified as either Scrutinized or needing Continued Examination through written correspondence, subsequent conference calls and additional communication. SBA disclosed the Scrutinized Companies lists on its website, including reporting of all equities held by direct State of Florida governmental entities.

**September 21, 2007** — Second of two letters to investment managers providing Scrutinized Companies lists.

**October 16, 2007** — SBA formally submits the Scrutinized Companies lists to the Florida Legislature and the United States Special Envoy to Sudan and continues to do so every quarter.

**November 30, 2007** — SBA sends notification via email to any owned scrutinized company that has not responded to initial written correspondence. Similar notification was sent to each company classified as needing continued examination.

**January 25, 2008** — SBA sends additional notice of divestment and request for information to all Scrutinized Companies, with emphasis to companies that have been unresponsive to the SBA's prior request for the necessary information.

**July 1, 2008** — In March 2008, the SBA developed a policy approach directing all affected managers to sell their remaining PFIA related holdings no later than July 1, 2008, approximately three months earlier than the statutory deadline of September 18, 2008.

**September 18, 2008** — Statutory deadline for the SBA to complete divestment of *initial* Scrutinized Companies (i.e., within 12 months of their initial appearance on the September 19, 2007 list), if they do not stop scrutinized active business operations.

**March 1, 2010** — Deadline for the SBA to identify and offer at least one terror-free investment product for the FRS Investment Plan (Defined Contribution).

**November 10, 2023**—The Florida Legislature convened a special session on Iran and expanded the sectors subject to Iranian scrutinized operations to include the energy, petrochemical, financial, construction, manufacturing, textile, mining, metals, shipping, shipbuilding, and port sectors of Iran.

**Quarterly Reporting** — SBA provides quarterly updates to the Scrutinized Companies lists for Sudan and Iran, including a summary of engagement activities. PFIA quarterly reports have been issued on the following dates:

September 19, 2007  
December 18, 2007  
March 25, 2008  
June 10, 2008  
September 16, 2008  
January 13, 2009  
April 14, 2009  
July 28, 2009  
October 27, 2009  
January 26, 2010  
April 27, 2010  
July 29, 2010  
November 9, 2010  
February 22, 2011  
June 16, 2011  
September 20, 2011  
December 6, 2011  
March 20, 2012  
June 26, 2012  
September 18, 2012  
December 11, 2012  
March 19, 2013

June 25, 2013  
September 24, 2013  
December 10, 2013  
March 18, 2014  
June 17, 2014  
September 23, 2014  
December 9, 2014  
March 24, 2015  
June 23, 2015  
September 29, 2015  
December 8, 2015  
March 29, 2016  
August 2, 2016  
December 6, 2016  
March 14, 2017  
June 14, 2017  
October 17, 2017  
December 13, 2017  
March 7, 2018  
June 13, 2018  
September 11, 2018  
December 4, 2018

January 29, 2019  
June 4, 2019  
July 12, 2019  
September 24, 2019  
December 3, 2019  
May 28, 2020  
September 22, 2020  
December 15, 2020  
March 9, 2021  
June 15, 2021  
September 21, 2021  
December 20, 2021  
March 29, 2022  
June 22, 2022  
August 23, 2022  
January 17, 2023  
May 23, 2023  
October 25, 2023  
December 19, 2023  
March 26, 2024  
April 9, 2024  
June 11, 2024

### Summary of Investments Sold, Redeemed, Divested or Withdrawn

In accordance with the PFIA, the SBA must divest all holdings of any scrutinized companies within 12 months of their original appearance on the prohibited securities list. External managers are contractually responsible for administering investments in accordance with restrictions set forth by the SBA, including the prohibited securities list of the PFIA. Historical divestment transaction data is contained in prior PFIA Quarterly Reports. The table below presents the cumulative market capitalization of scrutinized companies divested by the SBA since the PFIA's inception:

Cumulative Divestment	
Royal Dutch Shell**	\$215,784,700.79
Total SA**	\$214,536,015.45
Petroleo Brasileiro SA (Petrobras) **	\$206,135,264.10
ENI**	\$141,403,034.78
CNOOC Ltd	\$131,737,735.86
Gazprom (a.k.a. OAO Gazprom)	\$71,275,453.14
Alstom**	\$65,897,698.67
Repsol YPF**	\$53,420,179.87
Statoil ASA** (fka: StatoilHydro)	\$46,792,677.58
China Petroleum and Chemical Corp (CPCC) Sinopec	\$38,455,440.48
PetroChina	\$25,723,158.75
Inpex Corp.**	\$24,835,110.63
MISC Bhd	\$16,448,397.44
Hindustan Petroleum Corporation Ltd	\$10,916,213.94
Snam Rete Gas**	\$9,596,905.78
Lukoil OAO**	\$9,487,631.46
OMV AG **	\$8,601,977.98
Shell International Finance**	\$8,599,813.40
China BlueChemical Ltd	\$7,538,215.73
Wärtsilä Oyj**	\$1,797,871.96
Daelim Industrial Co Ltd**	\$1,566,926.73
Petrofac Ltd **	\$1,496,881.43
The Weir Group PLC **	\$1,322,666.62
Petrobras International Finance**	\$1,148,750.00
Lundin Petroleum AB **	\$1,133,120.04
Oil & Natural Gas Corporation (ONGC)	\$945,363.83
Perseus Mining Ltd	\$586,998.71
Petrobras Energia (Participaciones) **	\$298,632.08
FACC AG	\$285,343.11
Dongfeng Motor Group**	\$158,623.49
Electricity Generating Public Company**	\$121,321.38
AVIC International Holdings Ltd	\$50,827.53
Gazprom Neft	\$37,892.73
** denotes companies no longer on the Prohibited Company list	<b>\$1,318,664,916.97</b>



**Table 7: List of *Prohibited Investments (Scrutinized Companies)****New companies on the list are shaded and in bold.*

Prohibited Investments (Scrutinized Companies)	Scrutinized Country	Country of Incorporation	Initial Appearance on Scrutinized List	Full Divestment
Aviation Industry Corporation of China (AVIC)	Sudan	China	September 24, 2019	Yes
AviChina Industry & Technology	Sudan	China	June 4, 2019	Yes
AVIC International Finance Ltd	Sudan	China	September 24, 2019	Yes
AVIC International Holdings Ltd (formerly listed as AVIC International)	Sudan	China	June 4, 2019	Yes
Bank of Kunlun Co Ltd	Sudan & Iran	China	March 7, 2018	Yes
Chennai Petroleum Corp Ltd	Sudan	India	September 19, 2007	Yes
China BlueChemical Ltd	Iran	China	March 19, 2013	Yes
China National Petroleum Corporation (CNPC)	Sudan & Iran	China	December 11, 2012	Yes
China Oilfield Services Ltd	Iran	China	June 16, 2011	Yes
China Petrochemical Corporation (Sinopec Group)	Sudan & Iran	China	December 3, 2019	Yes
China Petroleum & Chemical Corp (CPCC) Sinopec	Sudan & Iran	China	September 19, 2007	Yes
China Petroleum Engineering Corp	Sudan & Iran	China	March 7, 2018	Yes
CNOOC Ltd	Iran	China	June 16, 2011	Yes
CNOOC Energy Technology & Services Ltd	Iran	China	June 15, 2021	Yes
CNOOC Finance Limited	Iran	China	September 24, 2013	Yes
CNOOC Nexen Finance	Iran	Canada	October 17, 2017	Yes
CNPC Capital Company Limited	Sudan & Iran	China	June 14, 2017	Yes
CNPC Finance HK Ltd	Sudan & Iran	China	March 26, 2024	Yes
CNPC General Capital Ltd	Sudan & Iran	China	June 26, 2012	Yes
CNPC Global Capital Limited	Sudan & Iran	China	December 15, 2020	Yes
CNPC HK Overseas Capital Ltd	Sudan & Iran	China	June 16, 2011	Yes
COSL Finance (BVI) Limited	Iran	China	September 24, 2013	Yes
COSL Singapore Capital Ltd	Iran	Singapore	December 4, 2018	Yes
Daqing Huake Group Co Ltd	Sudan	China	March 25, 2008	Yes

Prohibited Investments (Scrutinized Companies)	Scrutinized Country	Country of Incorporation	Initial Appearance on Scrutinized List	Full Divestment
Egypt Kuwait Holding Co. SAE	Sudan	Kuwait	January 13, 2009	Yes
Engen Botswana	Sudan & Iran	Botswana	March 24, 2015	Yes
FACC AG	Sudan	Austria	June 4, 2019	Yes
Gazprom	Iran	Russia	September 19, 2007	Yes
Gazprom Neft	Iran	Russia	September 16, 2008	Yes
Gazprom Promgaz	Iran	Russia	June 4, 2019	Yes
GPN Capital SA	Iran	Luxembourg	June 4, 2019	Yes
Harbin Electric Co. Ltd.	Sudan	China	September 19, 2007	Yes
Hindustan Petroleum Corporation Ltd	Sudan & Iran	India	June 13, 2018	Yes
Indian Oil Corp Ltd (IOCL)	Sudan & Iran	India	September 19, 2007	Yes
Jiangxi Hongdu Aviation	Sudan	China	September 19, 2007	Yes
KLCC Property Holdings Bhd	Sudan & Iran	Malaysia	April 14, 2009	Yes
Kunlun Energy Company Ltd.	Sudan & Iran	Hong Kong	September 19, 2007	Yes
Lanka IOC Ltd	Sudan	India	September 19, 2007	Yes
Managem SA	Sudan	Morocco	November 9, 2010	Yes
Mangalore Refinery & Petrochemicals Ltd	Sudan & Iran	India	September 19, 2007	Yes
Malaysia Marine & Heavy Engineering Holdings Bhd	Sudan & Iran	Malaysia	March 18, 2014	Yes
MISC Bhd	Sudan & Iran	Malaysia	September 19, 2007	Yes
Mosenergo	Iran	Russia	September 16, 2008	Yes
Oil India Ltd	Sudan	India	September 18, 2012	Yes
Oil & Natural Gas Corp (ONGC)	Sudan & Iran	India	September 19, 2007	Yes
ONGC Videsh Limited (OVL)	Sudan & Iran	India	March 18, 2014	Yes
Perseus Mining Ltd	Sudan	Australia	August 23, 2022	Yes
PetroChina	Sudan & Iran	China	September 19, 2007	Yes
Petrolia Nasional (Petronas)	Sudan & Iran	Malaysia	September 19, 2007	Yes
Petronas Capital Limited	Sudan & Iran	Malaysia	September 19, 2007	Yes

Prohibited Investments (Scrutinized Companies)	Scrutinized Country	Country of Incorporation	Initial Appearance on Scrutinized List	Full Divestment
Petronas Chemicals Bhd	Sudan & Iran	Malaysia	June 16, 2011	Yes
Petronas Dagangan Bhd	Sudan & Iran	Malaysia	September 19, 2007	Yes
Petronas Gas Berhad	Sudan & Iran	Malaysia	September 19, 2007	Yes
Petronas Global Sukuk	Sudan & Iran	Malaysia	August 2, 2016	Yes
Putrajaya Management Sdn Bhd	Sudan & Iran	Malaysia	March 18, 2014	Yes
Sinopec Capital 2013 Ltd	Sudan & Iran	China	September 24, 2013	Yes
Sinopec Century Bright Capital Investment Ltd	Sudan & Iran	China	December 3, 2019	Yes
Sinopec Engineering Group Co Ltd	Sudan & Iran	China	March 18, 2014	Yes
Sinopec Group Overseas Development 2018 Ltd	Sudan & Iran	China	December 15, 2020	Yes
Sinopec Group Overseas Development 2017 Ltd	Sudan & Iran	China	September 11, 2019	Yes
Sinopec Group Overseas Development 2016 Ltd	Sudan & Iran	China	August 2, 2016	Yes
Sinopec Group Overseas Development 2015 Ltd	Sudan & Iran	China	December 15, 2020	Yes
Sinopec Group Overseas Development 2013 Ltd	Sudan & Iran	China	March 18, 2014	Yes
Sinopec Group Overseas Development 2012 Ltd	Sudan & Iran	China	March 7, 2018	Yes
Sinopec Kantons Holdings Ltd	Sudan & Iran	Bermuda	September 19, 2007	Yes
Sinopec Oilfield Equipment Corporation	Sudan & Iran	China	April 14, 2009	Yes
Sinopec Oilfield Service Corp	Sudan & Iran	China	March 25, 2008	Yes
Sinopec Shanghai Petrochemical	Sudan & Iran	China	September 19, 2007	Yes
Societe Metallurgique D'imiter	Sudan	Morocco	November 9, 2010	Yes
Territorial Generating Company No 1	Iran	Russia	June 4, 2019	Yes
<b># of Prohibited Investments</b>	<b>70</b>	<b>-</b>	<b>-</b>	

The following companies were removed from the PFIA Prohibited Investments List this quarter.

Removed Company	Country of Incorporation
<i>Sinopec Group Overseas Development 2014 Ltd</i>	<i>China</i>

**Table 8: SBA Holdings in Prohibited Investments Subject to Divestment**

The SBA currently has no holdings in companies on the Prohibited Investments List in accounts subject to the PFIA divestiture requirements.

**Summary of Progress, SBA Investment Manager Engagement Efforts**

On August 20, 2007, the SBA sent letters to external investment managers notifying them of the Act and informing them of new contract language that would enforce their cooperation with the requirements of the new law.

On September 19, 2007, the SBA sent letters to all affected managers outlining the list of prohibited securities for any future purchases. The letter described the SBA's engagement process with companies on the list, which affords companies a 90-day period in which to comply with the conditions of the law or clarify their activities. The letter directed these managers to cease purchase of securities on the list and to await the direction of the SBA for any divestment necessary in the event engagement fails, with a deadline for divestment under the law of September 18, 2008.

On September 19, 2007, the SBA sent letters to actively-managed, indirectly held funds holding scrutinized securities, including managers of the defined contribution program, asking the funds to review the list of scrutinized securities and consider eliminating such holdings from the portfolio or create a similar fund, devoid of such holdings, per the requirements of the law.

Each quarter, the SBA sends written and electronic notification to all affected managers about the list of prohibited companies.

The SBA has received responses noting our concerns in writing and by phone from several of the contacted managers.

**Listing of All Publicly Traded Securities (Including Equity Investments)**

Due to the large number of individual securities and the volume of information, this list has been electronically posted to the SBA's website and is updated quarterly. A list of all publicly traded securities owned by the State of Florida can be found within the [Global Governance Mandates](#) section of the SBA's website. Please observe the electronic report's notes page for important clarifying explanations of included data.

In accordance with the PFIA, the SBA will report on the performance implications of PFIA-related divestitures and restrictions. Generally, the impact of PFIA legislation on performance is measured as the opportunity cost of not being able to hold prohibited securities, measured by comparing the monthly return of the standard foreign equity benchmark (i.e., the MSCI ACWI ex-US) to a custom foreign equity benchmark based upon PFIA divestiture requirements. The difference in returns between the standard benchmark and custom benchmark represents the opportunity cost to the SBA of not being able to invest in (or hold) prohibited companies. The percent return difference is then applied to the average monthly balance of foreign equity investments to determine a dollar impact. Monthly dollar impacts, whether positive or negative, are added together through time and then compared to the total value of the FRS Pension Plan to determine the percentage or basis point impact of PFIA legislation.

## ***Section 2: Prohibited Investments by the SBA, Companies that Boycott Israel***

### ***Section 215.4725 F.S.***

#### **Summary**

In 2016, the SBA was directed by state law to create a "scrutinized companies that boycott Israel" list, composed of companies that participate in a boycott of Israel including actions that limit commercial relations with Israel or Israeli-controlled territories in a discriminatory manner. The SBA is prohibited from acquiring direct holdings of the companies on this list. The law requires the SBA to use best efforts in identifying companies that boycott Israel, publish the list on a quarterly basis, send written notice to the companies, engage with the SBA's external managers concerning holdings of the companies on the list, and publish a list of the SBA's directly-held securities and certain other information detailed below.

**UPDATE:** During the 2023 session, the legislature revised section 215.4725, Florida Statutes, **requiring divestment of companies on the *Scrutinized Companies that Boycott Israel* list within 12 months, if engagement efforts fail.** Previously, there was only a prohibition on further purchases of companies on the list. Section 215.4725 F.S. applies only to assets governed by Chapter 121 ("Florida Retirement System Act"), and therefore does not affect any non-FRS funds managed by the SBA.

The 2023 statutory changes also expanded the term, "boycott of Israel", to include the following:

The term includes taking adverse action, including changes to published commercial financial ratings, risk ratings, and controversy ratings based on nonpecuniary factors, to inflict economic harm on Israel or persons or entities doing business in Israel or in Israeli-controlled territories. The term includes trade practices that are prohibited by federal regulations issued in compliance with 50 U.S.C. s. 4842 and does not include trade practices that are preempted by federal law.

#### **Primary Requirements of Section 215.4725 F.S.**

##### **1. Identification of companies**

As required by statute, the SBA will make best efforts to identify all scrutinized companies in which the SBA has indirect or direct holdings or possibly could have holdings in the future. The SBA reviews publicly available information, including from NGOs, non-profits, government entities and research firms. SBA staff is also frequently in contact with other institutional investors regarding anti-BDS efforts. Since the law went into effect, SBA staff has communicated with several stakeholder groups in our efforts to learn more about individual company activities and determine whether they meet the criteria of the Florida statute.

SBA contracts with external research providers to obtain information on companies that are potentially engaging in BDS activities, and SBA staff incorporates the information in making a final determination of scrutinized status based on Florida statute. External research providers sell their research to a variety of subscribers, and they do not compile their lists specific to Florida law. The SBA currently contracts with ISS and MSCI. Companies that use ESG investment policies in a broadly applied manner are generally not considered by SBA to be acting in a "discriminatory manner" toward Israel.

Using various information sources, the SBA has developed two separate categorizations of a company's status for consideration under this law.

**"Scrutinized"** — Information provided by an external research provider, publicly available information or information from the company itself or another reliable source indicates that a company meets the classification of a Scrutinized Company as defined by Florida law.

**"Continued Examination"** — Information suggests but does not clearly demonstrate that a company's activities are a boycott of Israel. The SBA is unable to definitively categorize the company's activities as

scrutinized without further research to resolve the ambiguity. For companies classified as “Continued Examination,” the SBA will begin an engagement process to clarify each firm’s current business relationships.

The following definitions are provided by Florida Statutes to assist in company identification:

“Scrutinized companies” means companies that boycott Israel or engage in a boycott of Israel.

“Boycott Israel” means refusing to deal, terminating business activities, or taking other actions to limit commercial relations with Israel, or persons or entities doing business in Israel or in Israeli-controlled territories, in a discriminatory manner. A statement by a company that it is participating in a boycott of Israel, or that it has initiated a boycott in response to a request for a boycott of Israel or in compliance with, or in furtherance of, calls for a boycott of Israel, may be considered by the State Board of Administration to be evidence that a company is participating in a boycott of Israel. The term includes taking adverse action, including changes to published commercial financial ratings, risk ratings, and controversy ratings based on nonpecuniary factors, to inflict economic harm on Israel or persons or entities doing business in Israel or in Israeli-controlled territories. The term includes trade practices that are prohibited by federal regulations issued in compliance with 50 U.S.C. s. 4842 and does not include trade practices that are preempted by federal law.

“Direct holdings” are company securities held directly by the SBA or accounts in which SBA owns all interest (such as non-commingled funds).

“Indirect holdings” are company securities that are held in collective investment with other investors, such as commingled funds and mutual funds.

## 2. Publish and reporting

By the first meeting of the Trustees of the SBA after August 1, 2016, the SBA will publicly release the *Scrutinized Companies that Boycott Israel* list and thereafter provide quarterly updates of the list based on evolving information and events.

The SBA shall file a report with each member of the Board of Trustees of the SBA, the Speaker of the Florida House of Representatives, and the President of the Florida Senate within 30 days after the list is created and shall make the report publicly available. At each quarterly trustee meeting thereafter, the SBA shall file a publicly available report to these persons. The quarterly reports will include:

- a. A summary of correspondence with companies engaged by the SBA as required above.
- b. All prohibited investments (Scrutinized Companies list).
- c. Any progress made with respect to requests of SBA's external managers to remove scrutinized companies from indirect holdings or create similar funds devoid of such holdings.
- d. A list of all publicly held securities held directly by the SBA.

Actions taken in compliance with this section must be adopted and incorporated into the Investment Policy Statement as provided in Section 215.4725, F.S.

## 3. Engagement

The SBA is required to determine the companies on the *Scrutinized Companies that Boycott Israel* list in which the SBA has direct or indirect holdings. For each company newly identified after August 1, 2016, the public fund shall send a written notice informing the company of its scrutinized company status and that it may become subject to investment prohibition by the public fund. The notice must inform the company of the



opportunity to clarify its activities regarding the boycott of Israel and encourage the company to cease the boycott of Israel within 90 days to avoid qualifying for investment prohibition or divestment.

If, within 90 days after the public fund's first engagement with a company pursuant to this paragraph, the company ceases a boycott of Israel, the company shall be removed from the *Scrutinized Companies that Boycott Israel* list, and the provisions of this section shall cease to apply to that company unless that company resumes a boycott of Israel.

#### **4. Divestment**

The requirement to divest of any entity on the *Scrutinized Companies that Boycott Israel* list was added as of the 2023 Florida Statutes, and includes the following: if, after 90 days following the SBA's first engagement, the company continues to boycott Israel, the public fund must sell, redeem, divest, or withdraw all publicly traded securities of the company from the public fund within 12 months after the company's most recent appearance on the Scrutinized Companies that Boycott Israel List.

#### **5. Prohibition**

The SBA may not acquire directly held securities of companies on the *Scrutinized Companies that Boycott Israel* list. Indirect holdings are exempt from the prohibition (such as commingled accounts, index funds and mutual funds). The SBA will submit letters to the managers of such investment funds which hold companies from the Scrutinized Companies list requesting that they consider removing the companies from the fund or creating a similar fund devoid of such holdings. SBA shall replace applicable investments in the similar fund devoid of such holdings in an expedited timeframe subject to prudent investing standards if the manager complies with such a request. Exchange-traded funds are also exempted from the prohibition and divestment requirements, without the requirement to contact the fund management. A cessation of the investment prohibition and divestment is allowed if the fund has evidence that the assets under management become equal or less than 99.5% of the hypothetical fund value assuming no investment prohibition had occurred. This must be reported to the parties listed in "Publish and reporting" and updated semi-annually for the cessation to be authorized.

**Table 9: *Scrutinized Companies that Boycott Israel****New companies on the list are shaded and in bold.*

Scrutinized Company that Boycott Israel	Country of Incorporation	Date of Initial Scrutinized Classification	Full Divestment
Betsah Invest SA	Luxembourg	August 2, 2016	Yes
Betsah SA	Luxembourg	August 2, 2016	Yes
Cactus SA	Luxembourg	August 2, 2016	Yes
Co-operative Group Limited	United Kingdom	September 26, 2017	Yes
Guloguz Dis Deposu Ticaret Ve Pazarlama Ltd	Turkey	August 2, 2016	Yes
Unilever PLC (Ben & Jerry's parent company)	United Kingdom	July 29, 2021	Prior to 10/25/24
Hindustan Unilever Ltd	India	July 29, 2021	Yes
PT Unilever Indonesia Tbk	Indonesia	July 29, 2021	Yes
Unilever Bangladesh Ltd	Bangladesh	July 29, 2021	Yes
Unilever Capital Corp (Unilever PLC bond issuance)	United States	July 29, 2021	Prior to 10/25/24
Unilever Caribbean Ltd	Trinidad and Tobago	July 29, 2021	Yes
Unilever Consumer Care Ltd	Bangladesh	July 29, 2021	Yes
Unilever Côte d'Ivoire	Ivory Coast	July 29, 2021	Yes
Unilever Finance Netherlands BV (Unilever PLC bond issuance)	Netherlands	July 29, 2021	Yes
Unilever Ghana Ltd	Ghana	July 29, 2021	Yes
Unilever Nigeria Plc	Nigeria	July 29, 2021	Yes
Unilever Pakistan Foods Ltd	Pakistan	July 29, 2021	Yes
<b># of Companies that Boycott Israel</b>	17		

The following company was removed from the **Scrutinized Companies that Boycott Israel List** as of the intra-quarter update (April 9, 2024).

<i>Removed Company</i>	<i>Country of Incorporation</i>
<i>Morningstar, Inc (Sustainalytics)</i>	<i>United States</i>

**Table 10: Continued Examination Companies that Boycott Israel***New companies on the list are shaded and in bold.*

Continued Examination Company: Israel	Country of Incorporation
Morningstar, Inc (Sustainalytics) (Moved to CE as of the intra-quarter update (April 9, 2024))	<i>United States</i>
<b>Itochu Corp</b>	<b><i>Japan</i></b>

Itochu Corp. has been added to the Continued Examination List for review and possible addition to the Scrutinized Companies that Boycott Israel List. Itochu has announced that it will terminate its memorandum of understanding with Israel-based Elbit Systems due to the war in Gaza.

The following companies were **removed** from the  
**Companies that Boycott Israel Continued Examination List** during the quarter:

Removed Company	Country of Incorporation
<i>No companies were removed from CE this quarter.</i>	

**Table 11: Correspondence & Engagement Efforts**

In accordance with Section 215.4725, F.S., the SBA began to engage companies on the Scrutinized Companies that Boycott Israel and Continued Examination lists. The SBA sent letters to each company per the requirements of the law. Each company's response and classification status is summarized below. Any company that responded to the SBA's written correspondence is highlighted in blue text.

Company	Company Responsive to SBA Communications	Status
Cactus SA	No	Remains on Scrutinized List
Betsah Invest SA	No	Remains on Scrutinized List
Betsah SA	No	Remains on Scrutinized List
FreedomCall Ltd	Yes, November 4, 2016	Removed from Scrutinized List
Co-operative Group Ltd	No	Remains on Scrutinized List
Cooperative Group Gomersall	No	Removed from Scrutinized List
Guloguz Dis Deposu Ticaret Ve Pazarlama Ltd	No	Remains on Scrutinized List
U2u Consult NV	Yes, December 29, 2016	Removed from Scrutinized List
Danske Bank	Yes, multiple dates	Removed from Continued Examination List
Dexia	Yes, multiple dates	Removed from Continued Examination List
Aldi	No	Removed from Continued Examination List
ASN Bank NV	No	Removed from Continued Examination List
HEMA BV	No	Removed from Continued Examination List

Company	Company Responsive to SBA Communications	Status
Karsten Farms	No	Removed from Continued Examination List
Airbnb	Yes, multiple dates	Removed from Scrutinized List
Unilever PLC	Yes, multiple dates (including August 24, 2023 response)	Remains on Scrutinized List
Morningstar, Inc (Sustainalytics)	Yes, multiple dates	Removed from Scrutinized List & placed on Continued Examination List (4/9/24)

### ***Section 3: Investments in Publicly Traded Companies Operating in Northern Ireland (Section 215.4702 F.S.)***

#### **Summary**

The SBA is subject to s. 215.4702, Florida Statutes (F.S.) (“MacBride Principles”), which directs the SBA to notify publicly traded companies of support for the MacBride Principles, inquire regarding the actions a company has taken in support of or furtherance of the MacBride Principles, and encourage publicly traded companies with certain business operations in Northern Ireland to adopt the MacBride Principles. In addition, the SBA will also demonstrate support for the MacBride Principles through its proxy voting authority.

#### **Requirements of the Law**

As defined by the Northern Ireland statute, “publicly traded company” is any business organization having equity securities listed on a national or an international exchange that is regulated by a national or an international regulatory authority. In addition, “operating” is defined as actively engaging in commerce geographically in Northern Ireland through the acquisition, development, maintenance, ownership, sale, possession, lease, or operation of equipment, facilities, personnel, products, services, or personal property.

#### **Publishing and Reporting**

In making the determination specified in subsection (2) of 215.4702, F.S., the SBA may, to the extent it deems appropriate, rely on available public information, including information provided by nonprofit organizations, research firms, international organizations, and government entities.

The SBA is encouraged to determine which publicly traded companies, in which the Florida Retirement System Trust Fund is invested, operate in Northern Ireland. If the SBA determines that a publicly traded company meets such criteria, it is encouraged to engage with the company and determine its support for the MacBride Principles. SBA staff annually reviews the list of companies that meet the definition of publicly traded companies operating in Northern Ireland, and periodically engages those firms.

Update: During Q4 2021, the SBA conducted an engagement with all owned firms determined to have operations in Northern Ireland. The SBA sent letters to 219 firms, encouraging support for and adoption of the MacBride Principles.

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***Section 4: Companies Operating in Cuba or Syria***  
***(Section 215.471 F.S.)***

**Summary**

The Free Cuba Act of 1993 was passed by the Florida Legislature in accordance with federal law. Chapter 215.471 of the Florida Statutes prohibits the SBA from investing in: (1)(a) any institution or company domiciled in the United States, or foreign subsidiary of a company domiciled in the United States, doing business in or with Cuba, or with agencies or instrumentalities thereof in violation of federal law; and (1)(b) any institution or company domiciled outside of the United States if the President of the United States has applied sanctions against the foreign country in which the institution or company is domiciled. Section (2)(a) states the SBA may not be a fiduciary with respect to voting on, and may not have the right to vote in favor of, any proxy resolution advocating expanded U.S. trade with Cuba or Syria.

**Requirements of the Law**

In order to comply with this law, the U.S. State Department and/or the Treasury Department's Office of Foreign Assets Control (OFAC) are contacted periodically to confirm that no sanctions have been implemented. Since the Act's inception, sanctions have never been issued against any country. During the fiscal year ending June 30, 2021, there were no shareowner proposals related to expanding trade with Cuba or Syria.



### ***Section 5: Companies Operating in Venezuela***

During the 2018 session, the Florida Legislature passed HB 359, prohibiting certain investments related to the Venezuelan government. The bill was signed into law by Governor Rick Scott and is effective July 1, 2018.

Florida Statute, 215.471 now requires that:

The State Board of Administration shall divest any investment under s. 121.151 and ss. 215.44-215.53, and is prohibited from investment in stocks, securities, or other obligations of:

(c)1. Any institution or company domiciled in the United States, or foreign subsidiary of a company domiciled in the United States, doing business in or with the government of Venezuela, or with any agency or instrumentality thereof, in violation of federal law. The term “government of Venezuela” means the government of Venezuela, its agencies or instrumentalities, or any company that is majority-owned or controlled by the government of Venezuela.

2. The Governor may waive the requirements of this paragraph if the existing regime in Venezuela collapses and there is a need for immediate aid to Venezuela before the convening of the Legislature or for other humanitarian reasons as determined by the Governor.

Florida Statute 215.472 addresses state agencies and requires that:

Notwithstanding any other provision of law, each state agency, as defined in s. 216.011, is prohibited from investing in: (3)(a) Any financial institution or company domiciled in the United States, or foreign subsidiary of a company domiciled in the United States which, directly or through the United States or foreign subsidiary, extends credit of any kind or character, advances funds in any manner, or purchases or trades any goods or services with the government of Venezuela, or any company doing business in or with the government of Venezuela, in violation of federal law. The term “government of Venezuela” means the government of Venezuela, its agencies or instrumentalities, or any company that is majority-owned or controlled by the government of Venezuela.

(b) The Governor may waive the requirements of this subsection if the existing regime in Venezuela collapses and there is a need for immediate aid to Venezuela before the convening of the Legislature or for other humanitarian reasons as determined by the Governor.

On August 16th, 2017, the Trustees of the State Board of Administration set forth a resolution condemning the oppression of the Venezuelan citizens under the current regime and set language to be included in the State Board of Administration’s Investment Policy Statement (Florida Retirement System Defined Benefit Plan) upon review of the Investment Advisory Council, and in accordance with s.215.475(2) Florida Statutes. The resolution included the following:

1. **Prohibited Investments.** Until such time as the SBA determines it is otherwise prudent to do so, the SBA is prohibited from investing in:

- (a) any financial institution or company domiciled in the United States, or foreign subsidiary of a company domiciled in the United States, which directly or through a United States or foreign subsidiary and in violation of federal law, makes any loan, extends credit of any kind or character, advances funds in any manner, or purchases or trades any goods or services in or with the government of Venezuela; and
- (b) any securities issued by the government of Venezuela or any company that is majority-owned by the government of Venezuela.

2. **Proxy Voting.** The SBA will not vote in favor of any proxy resolution advocating the support of the Maduro Regime in Venezuela.

## ***Section 6: Prohibited Investments in China***

### **Summary**

During the 2024 legislative session, Florida Statutes were amended to include a section on Prohibited Foreign Investments, F.S. 215.4735, which prohibits the State Board of Administration (SBA) and the Florida Retirement System Trust Fund from acquiring or maintaining direct holdings in companies that are majority-owned by China.

The Prohibited Foreign Investments statute requires that the SBA:

1. Initiate, no later than June 1, 2024, a review of all current direct holdings to determine which direct holdings, if any, include securities of a Chinese company. "Chinese company" is defined as a company that is publicly known to be majority-owned by China (i.e., the government of the People's Republic of China, the Chinese Communist Party, the Chinese military, or any instrumentality thereof, or any combination thereof.)
2. Develop, no later than September 1, 2024, a divestment plan for all direct holdings in Chinese companies.
3. Complete divestment from direct holdings in Chinese companies included in the divestment plan no later than September 1, 2025, or at such later time if necessary for the board to implement the divestment plan consistent with the fiduciary standards set forth in s. 215.47(10).

The SBA's initial screen resulted in 547 securities that were determined to be majority-owned by China and placed on the Prohibited Investments in China List. Going forward, the SBA and its portfolio managers may not acquire, on behalf of the Florida Retirement System Trust Fund, direct holdings of any companies on the Prohibited Investments in China List. Any current holdings by the SBA are to be divested no later than September 1, 2025.

Due to the large number of individual securities and the volume of information, the Prohibited Investments in China List has been electronically posted to the SBA's website and will be updated quarterly in concert with publication of the Global Governance Mandates report. The list of prohibited Chinese majority-owned securities can be found on the SBA's Global Governance Mandates webpage:

<https://www.sbafla.com/governance/global-governance-mandates/>

For more information, please contact:

State Board of Administration of Florida (SBA)  
Investment Programs & Governance  
1801 Hermitage Blvd., Suite 100  
Tallahassee, FL 32308  
[www.sbafla.com](http://www.sbafla.com)

or send an email to:  
[governance@sbafla.com](mailto:governance@sbafla.com)



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# Memo

**TO:** Chris Spencer, SBA Executive Director

**THRU:** Gina Wilson, Chief Operating Officer, FHCF

**FROM:** Mary Linzee Branham, Director of Legal & Risk Operations, FHCF

**DATE:** May 20, 2024

**SUBJECT:** SBA Trustees Meeting, June 12, 2024

Request approval of the 2024-2025 Florida Hurricane Catastrophe Fund  
Reimbursement Premium Formula

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**BACKGROUND:** The Florida Hurricane Catastrophe Fund (FHCF) provides reimbursement to insurers writing residential property insurance in Florida for a portion of their hurricane losses. The FHCF is statutorily required to charge an “actuarially indicated premium” for the coverage provided to the participants pursuant to a premium formula that is developed by an independent consultant and meets specified criteria. The FHCF statute requires that the premium formula be approved by unanimous vote of the Trustees.

In accordance with these statutory requirements, the FHCF has contracted with Paragon Strategic Solutions Inc. to provide the actuarial services necessary to develop the Reimbursement Premium Formula.

**EXTERNAL INTEREST:** On March 21, 2024, the 2024-2025 Reimbursement Premium Formula was presented to the FHCF Advisory Council. Council members and members of the public were present and participated virtually. The Advisory Council voted to recommend approval of the Reimbursement Premium Formula.

The original report included pre-event debt expense for a \$2 billion issue in the premium formula. However, Exhibit XI provided additional options just in case the contemplated issuance amount was different. Subsequently on May 10, 2024, following the May 1<sup>st</sup> closing date for issuance of Series 2024A pre-event bonds of \$1 billion, the FHCF issued an addendum to the 2024 Ratemaking Formula Report presented to the FHCF Advisory Council to reflect the pre-event debt expense for a \$1 billion issuance; specifically changes to the table in the Executive Summary, Exhibit II and Exhibit X.

**ACTIONS REQUESTED:** Request approval of the 2024-2025 Florida Hurricane Catastrophe Fund Reimbursement Premium Formula to be presented to the Cabinet Aides and to the State Board of Administration Trustees.

**ATTACHMENTS TO BE INCLUDED:**

- Memorandum dated May 28, 2024, from Gina Wilson to Chris Spencer regarding the 2024-2025 FHCF Reimbursement Premium Formula
- “Florida Hurricane Catastrophe Fund: 2024 Ratemaking Formula Report Presented to the State Board of Administration of Florida, March 21, 2024” (Subsequently amended May 10, 2024)

# Memo

To: Chris Spencer, SBA Executive Director  
From: Gina Wilson, Chief Operating Officer, FHCF  
Date: May 28, 2024  
Re: SBA Trustees Agenda Item - FHCF's 2024-2025 Reimbursement Premium Formula

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There are two Florida Hurricane Catastrophe Fund (FHCF) agenda items for the upcoming SBA Trustees meeting related to the FHCF Reimbursement Premium Formula. These items are as follows:

- Vote to approve the Contract Year 2024-2025 FHCF Reimbursement Premium Formula (unanimous vote of the Trustees required).
- Vote to file a Notice of Proposed Rule (Rule 19-8.028, Florida Administrative Code, Reimbursement Premium Formula) and to file for adoption if no hearing is timely requested or if a hearing is requested but no Notice of Change is needed.

## Statutory Requirements

Under subsection (5) of section 215.555, Florida Statutes:

- The premium formula must be developed by an **independent consultant** selected by the SBA;
- The premium formula must be used to determine the **actuarially indicated** premiums to be paid to the FHCF by participating insurers; and
- The premium formula must be approved by a **unanimous vote** of the Trustees.

## The Reimbursement Premium Formula Development Process

The reimbursement premium formula is detailed in a document provided by Paragon Strategic Solutions Inc. whose actuary, Andrew Rapoport, FCAS, MAAA, serves as the FHCF's independent consultant. The reimbursement premium formula development process also includes input from other members of Paragon's actuarial team and the actuary on the FHCF Advisory Council, Kathy Hurta. FHCF staff members also participate in order to provide information and monitor the process.



The basic process for developing the reimbursement premium formula has been in place since 1995. The process involves these steps:

- By September 1 of each year, insurers report their exposure data as of June 30 to the FHCF.
- The exposure data is trended (i.e., adjusted for such factors as exposure growth and changes in construction costs) and given to hurricane modelers to estimate losses.
  - By law, the FHCF must use hurricane models found acceptable by the Florida Commission on Hurricane Loss Projection Methodology (the Commission) to the extent feasible. The five models used have been found acceptable by the Commission based on the 2021 standards set by the Commission.
  - The models are used to determine the average annual hurricane loss. The results from the five models are weighted such that the models with the highest and lowest results count for 5% each, the next-highest and next-lowest count for 20% each, and the model with results in the middle counts for 50%. By limiting the impact of the outliers, this weighting scheme tends to create stability over time.
- To estimate losses in the aggregate layer of coverage, a projected aggregate industry retention is calculated according to statute, which requires the retention be adjusted annually to reflect exposure growth from 2004 to the contract year two years prior to this particular contract year.
- The loss only limit is grossed up using the average coverage level of 86.874% based on selections by participating insurers on March 1, 2024. The loss and loss adjustment expense layer is 86.874% of \$19,568,621,249 excess \$9,929,000,000.
- Adjustments are made to reflect other costs, including FHCF operating costs, pre-event note expenses and loss adjustment expenses (the statute provides for a loss adjustment expense allowance of 10% of reimbursed losses).
- Rates are then allocated by type of business, territory, construction type, and deductible, and then further adjusted to reflect mitigation classifications (year built, structure opening protection, and roof shape).
- Finally, the statutory cash buildup factor of 25% is applied.

### **Contract Year 2024-2025 Recommended Reimbursement Premium Formula**

	<b>2024 Contract Year Modeled</b>	<b>2023 Contract Year Actual</b>
<b>FHCF Coverage</b>		
Industry Retention	\$9.929 billion	\$9.465 billion
Limit	\$17 billion	\$17 billion
Average Coverage	86.87%	87.36%
 FHCF Premium Revenue	 \$1.518 billion	 \$1.513 billion
 Rate Change	 - 7.74%	 - 6.44%
Coverage Selection Change	- 0.56%	2.48%
Exposure Change	9.37%	13.45%
Premium Change	0.34%	8.78%
<b>Overall Average Rate Change</b>	<b>- 8.25%</b>	<b>- 4.12%</b>
 Projected Exposure Base	 \$3.615 trillion	 \$3.306 trillion

The FHCF coverage limit is \$17 billion excess of \$9.929 billion. The \$9.929 billion industry retention is \$4.5 billion adjusted for a 120.6% growth in exposure from 2004 to 2022. The FHCF limit is \$17 billion until there is sufficient estimated claims-paying capacity to fund \$17 billion of loss in the subsequent contract year. Since the \$17 billion subsequent season capacity is not available, the limit remains at \$17 billion.

The premium revenues are projected to slightly increase 0.34% from \$1.513 billion to \$1.518 billion.

The average rate decrease of 7.74% is for companies that do not change their coverage selection. After adjusting for individual company coverage selection changes from 2023 to 2024, the industry overall rate change is projected to decrease 8.25%.

The major factors affecting premium and rate changes include:

- Projected growth in exposure
- Decrease in modeled loss costs
- Technical change related to law and ordinance coverage

**Projected growth in exposure** – The FHCF trended exposure projections are used to estimate the amount of exposure and risk counts as of June 30 that will be reported by companies for Contract Year 2024-2025.

- Detailed exposure data as of 6/30/23 as reported through 10/24/23 by 140 participating insurers for Contract Year 2023-2024 was trended for one year.
- The projected exposure base of \$3.615 trillion for 2024 is \$309 billion or 9.37% higher than the 2023 actual exposure of \$3.306 trillion.
- For comparison purposes, trended exposure for 2023 was projected to increase 8.59%; however, the actual increase was 13.45%. A portion of the growth in exposure can be contributed to a 37.60% increase in commercial exposure.
- Actuaries are projecting that high inflation will continue in 2024 but at a lower rate than 2023. Trended amounts are a combination of inflation on existing policies and recognition of newer constructions.

- The methodology for allocating trends recognizes that most of the increase in exposure will be due to new construction (i.e., year built 2012 and subsequent).
- Exposure growth affects overall premium by type of business but not rates.

**Decrease in modeled loss costs** - Trended exposures and risk counts are given to the modelers to estimate the average annual loss.

- Modeled loss costs decreased 7.40% overall.
- Four models produced lower loss costs than in 2023 ratemaking and one model produced higher loss costs. The weighted average of the five models produced lower loss costs for 2024. The models recognize an increase in newer constructions, resulting in a better book of business overall.
- Although exposure is projected to increase, allocating exposure trends to newer constructions moderates the growth in modeled loss costs and better reflects the improvement in damageability levels due to new construction.
- The change in modeled loss costs affects overall premium and rates.

**Technical change related to law and ordinance coverage** – Models used in the 2024 ratemaking include losses related to law and ordinance either implicitly based on historical reported losses or explicitly in the modeled losses.

- There is a technical change in the ratemaking formula where an adjustment to modeled losses for law and ordinance coverage was reduced from 4.86% to 0%.
- This change reduces adjusted gross losses by 3.20%.
- Law and ordinance coverage provides an additional limit for the building to allow for extra costs to rebuild a property to code. Historically, the FHCF made an adjustment in ratemaking for the coverage since not all models recognized this type of loss.

In general, the impact of a decrease in rates will vary by policyholder and company. Some policyholders may see a change in their FHCF premium charge and others may not. The decreases in FHCF rates by 8.25% is an average decrease for all policy types reported from all insurance companies to the FHCF and cannot be applied to an individual policyholder's total premium. However, a general application of the rate decrease could provide perspective on the impact of a rate change. Premium paid by insurers to the FHCF represent approximately 7.20% or \$183 of the average personal residential premium of approximately \$2,542. Therefore, the decrease in rates by 8.25% could potentially translate to an average decrease of \$15.09 for personal residential homeowners' premiums.

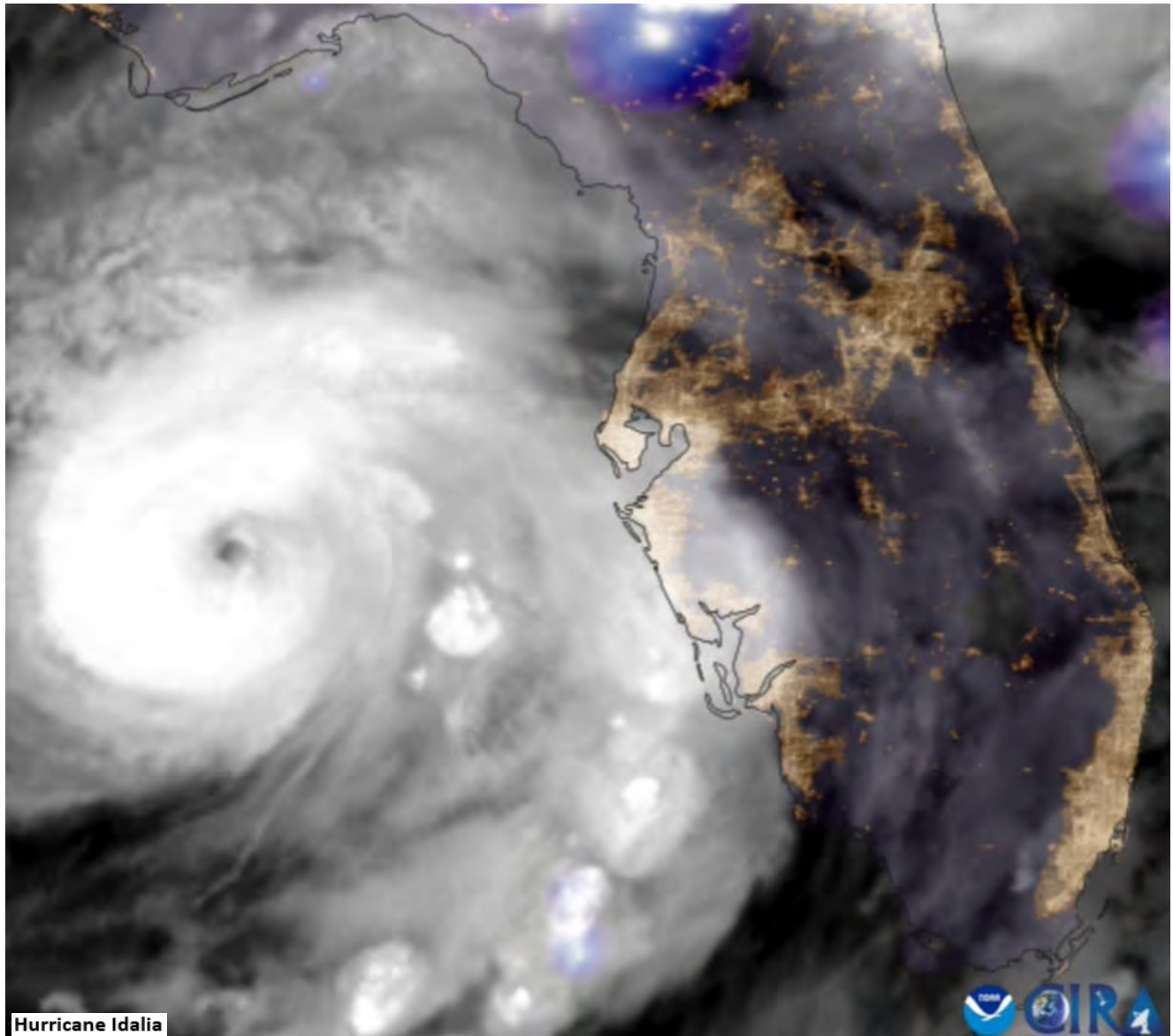
It is also important to consider that the impact of a rate decrease can vary by type of business (i.e., type of policy) as shown on the following page:

			3/21/2024 Ratemaking Report (with actual 2024A Note Expense)		
			Rate	Exposure	Premium
20	Residential		-10.09%	10.00%	-1.10%
21	Tenants		-9.89%	7.00%	-3.58%
22	Condominiums		0.43%	7.00%	7.46%
23	Mobile Homes		-10.10%	7.00%	-3.81%
24	Commercial		6.06%	3.00%	9.24%
25	Total		-8.25%	9.37%	0.34%

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# **Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report**

**Presented to the  
State Board of Administration of Florida  
March 21, 2024**



**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**Supplemental Information May 10, 2024**

The Florida Hurricane Catastrophe Fund (FHCF) 2024 Ratemaking Formula, presented to the FHCF Advisory Council on March 21, 2024 and subject to approval by the State Board of Administration of Florida (SBA) Trustees at their June 12, 2024 meeting, includes provisions for the anticipated cost of the issuance of pre-event notes designated 2024A. The cost of \$19,068,533 for the bond expenses has now been determined, which results in a -0.94% adjustment to the total premium reflected in the 2024 Ratemaking Formula Report. The Report accommodates the cost of a pre-event notes as follows:

Section L “Pre-Event Note Expense” (Exhibit I, page 13) states: “There is an additional pre-event note expense of \$30.6 million as an estimate of potential cost for new 2024A pre-event notes. The timing and final costs are not yet known, and the estimate is based on discussions with the Raymond James representatives and the SBA. The preliminary estimates for the 2024A pre-event notes are \$2 billion of proceeds, \$30 million of 2024 carrying cost, and \$0.6 million (0.03% x \$2 billion) in 2024 for held asset risk.”

The actual 2024A pre-event notes are for \$1 billion of proceeds, \$18,768,533 of carrying cost, and \$0.3 million (0.03% x \$1 billion) in 2024 for held asset risk.

Per the section of the 2024 Ratemaking Formula Report cited above, the -0.94% premium adjustment has been applied to all rates. The retention and projected payout multiples were calculated by dividing the originally proposed multiples by 0.9906. The adjustments to premiums and factors are displayed on the next page.

The 2024 Premium Formula as presented incorporated the appropriate cost adjustment factors. A revised Ratemaking Formula Report will not be created. However, to provide further details on how the bonding expense will impact the premium formula, updated versions of the Executive Summary Table and Exhibits II and X of the FHCF 2024 Ratemaking Formula Report are incorporated and included in this supplemental document. The same adjustments have been applied to all rates including the base rates that will be posted online. However, we have not updated the base rates in this document.



<b>FHCF Coverage</b>	<b>2024 Contract Year Modeled – Revised May 10, 2024</b>	<b>2024 Contract Year Modeled – Prior Estimate as of March 21, 2024</b>	<b>2023 Contract Year Actual as of 10/24/2023 for Ratemaking*</b>	<b>2023 Contract Year Modeled</b>
Industry Retention Limit	\$9.929 billion \$17 billion	\$9.929 billion \$17 billion	\$9.465 billion \$17 billion	\$9.067 billion \$17 billion
Average Coverage	86.874%	86.874%	87.362%	87.401%
FHCF Layer	\$19.569 billion	\$19.569 billion	\$19.459 billion	\$19.450 billion
FHCF Premium	\$1.518 billion	\$1.532 billion	\$1.513 billion	\$1.450 billion
Rate Change	-7.74%	-6.86%	-6.44%	-6.08%
Coverage Selection Change	-0.56%	-0.56%	2.48%	2.52%
Exposure Change	9.37%	9.37%	13.45%	8.59%
Premium Change	0.34%	1.29%	8.78%	4.57%
Overall Average Rate Change	-8.25%	-7.38%	-4.12%	-3.71%
Projected Payout Multiple	11.1988	11.0935	11.2368	11.7254
90% Retention Multiple	6.3136	6.2542	6.0732	6.0732
Exposure Base	\$3.615 trillion	\$3.615 trillion	\$3.306 trillion	\$3.158 trillion
Overall FHCF Rate/\$1,000 Exp.	0.4199	0.4239	0.4576	0.4591

\* As of 12/31/2023, FHCF premium was \$1.513 billion and Projected Payout Multiple was 11.2368

<b>Florida Hurricane Catastrophe Fund</b>					
<b>2024 Ratemaking Formula Report</b>					
<b>Effect of Adjustments for Actual Pre_Event Note Cost</b>					
1	Limit			17,000,000,000	
2	Retention			9,929,000,000	
3	Coverage %			86.874%	
<b>Part 1:</b>	<b>Premium Adjustment</b>				
4	Total FHCF proposed premium from Ratemaking Formula Report 3/21/2024 with estimated pre-event note cost			1,532,432,466	
5	Premium adjustment for actual pre-event note cost			-14,414,333	
6	Total FHCF proposed premium with actual pre-event note cost			1,518,018,133	
7	Factor Adjustment			0.9906	
8	% Adjustment			-0.94%	
<b>Part 2:</b>	<b>Projected Payout and Retention Multiple Adjustments</b>			3/21/2024 Ratemaking Report (with estimated pre-event note cost)	3/21/2024 Ratemaking Report (with actual pre-event note cost)
9	Projected Payout Multiple			11.0935	11.1988
10	Retention Multiples		100%	5.6288	5.6822
11			90%	6.2542	6.3136
12			75%	7.5050	7.5763
13			45%	12.5084	12.6271
<b>Part 3:</b>	<b>Premium and Rate Changes from 2023 by Type of Business</b>				
			3/21/2024 Ratemaking Report (with estimated 2024A Note Expense)		
			Rate	Exposure	Premium
14	Residential		-9.24%	10.00%	-0.16%
15	Tenants		-9.04%	7.00%	-2.67%
16	Condominiums		1.38%	7.00%	8.48%
17	Mobile Homes		-9.25%	7.00%	-2.90%
18	Commercial		7.06%	3.00%	10.28%
19	Total		-7.38%	9.37%	1.29%
			3/21/2024 Ratemaking Report (with actual 2024A Note Expense)		
			Rate	Exposure	Premium
20	Residential		-10.09%	10.00%	-1.10%
21	Tenants		-9.89%	7.00%	-3.58%
22	Condominiums		0.43%	7.00%	7.46%
23	Mobile Homes		-10.10%	7.00%	-3.81%
24	Commercial		6.06%	3.00%	9.24%
25	Total		-8.25%	9.37%	0.34%

Updated Exhibit II  
of the  
Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Summary of Rate Calculation

<b>Section I : Retention, Attachment and Coverage</b>		Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Coverage Avg. % as of 06/30/2023		86.964%	84.080%	87.428%	89.985%	89.956%	87.362%	(0.9)	
Coverage Avg. % as of 03/01/2024		86.429%	83.978%	86.505%	89.985%	89.956%	86.874%	(1)	
Coverage Change		-0.615%	-0.121%	-1.057%	0.000%	0.000%	-0.559%	(1.1)	
Retention	9,929,000,000							(2)	
Loss Only Limit	17,789,655,681							(3)	
Retention + Limit	27,718,655,681							(4)	(2)+(3)
Loss and LAE at Coverage Limit	17,000,000,000							(5)	(3)*total(1)*1.10
Section I		Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Gross Losses at 100% Unadjusted		3,749,536,114	15,845,271	309,033,926	135,495,821	487,448,923	4,697,360,055	(6)	
Gross Losses at 100% Adjusted*		3,770,533,516	15,876,961	309,651,994	135,875,209	489,203,740	4,721,141,420	(7)	
% Adjustment		0.560%	0.200%	0.200%	0.280%	0.360%	0.506%	(8)	(7)/(6) - 1
* Adjustment includes factor for annual aggregate deductibles.									
Allocation of Excess Loss to Type of Business at Coverage Level		79.223%	0.384%	6.562%	3.164%	10.667%	100.000%	(9)	[Alloc of Excess Losses] (7)
Excess Losses and LAE at Coverage		885,135,436	4,285,684	73,318,635	35,347,608	119,181,061	1,117,268,424	(10)	(9)*total(10)
Per Company Analysis Factors									
Retention Adjustment								(11)	
Limit Adjustment	adj value							(14)	(14 Factor)*(10)
Combined Retention and Limit Adjustment	-1.3601%	-12,038,974	-58,291	-997,227	-480,773	-1,621,015	-15,196,279	(15)	(15 Factor)*(10)
Total Loss After Per Company Analysis Factors		873,096,462	4,227,393	72,321,408	34,866,835	117,560,046	1,102,072,145	(16)	(10)+(15)
Post Model Adjustment Factors		5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	(17)	
		43,654,823	211,370	3,616,070	1,743,342	5,878,002	55,103,607	(18)	(17)*(16)
Total Gross Excess Loss and LAE		916,751,286	4,438,763	75,937,478	36,610,177	123,438,049	1,157,175,752	(19)	(18)+(16)
Special Adjustments									
Investment Income	0.000%	0	0	0	0	0	0	(20)	(20 Factor)*(19)
Ceded Loss & LAE	0.000%	0	0	0	0	0	0	(21)	No Risk Transfer in Contract Year 2024
Total Special Adjustment	0.000%	0	0	0	0	0	0	(22)	(20)+(21)
Net Loss & LAE Prior to Expense Loadings and Credits (Base Prem)		916,751,286	4,438,763	75,937,478	36,610,177	123,438,049	1,157,175,752	(23)	(19)+(22)
Fixed Expense Loadings									
Operating Expense	1.047%	9,602,023	46,491	795,367	383,454	1,292,886	12,120,221	(24a)	SBA Operating Expenses
2020A Note Expense	2.251%	20,637,635	99,924	1,709,482	824,158	2,778,801	26,050,000	(24b)	Debt Service Payment & Held Asset Risk Charge
2024A Note Expense	1.648%	15,106,696	73,144	1,251,337	603,281	2,034,075	19,068,533	(24c)	Debt Service Payment & Held Asset Risk Charge (Estimated)
Mitigation Funding	0.000%	0	0	0	0	0	0	(25)	Paid from Investment Income (not from premium)
Offset for Premium Credits and Adjustments		0	0	0	0	0	0	(26)	-((1+(33))*(1+(37))-1)*((24a+24b+24c+24d)+(25))/((1+(33))*(1+(37)))
Total Fixed Expense Loadings	4.946%	45,346,354	219,560	3,756,185	1,810,893	6,105,762	57,238,754	(27)	(24a)+(24b)+(24c)+(25)+(26)
Base Premium Prior to Credits (i.e., for FHCF Rates)		962,097,640	4,658,323	79,693,663	38,421,069	129,543,811	1,214,414,506	(28)	(23)+(27)
Premium Credits									
BCEG (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(31)	Given larger of BCEG or Windstorm Mitigation Credit in rates
BCEG (\$)		0	0	0	0	0	0	(32)	(28)*(31)
Total Premium Credits		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(33)	(31)
2024 Section I Base Premium at Coverage Level prior to Cash Build Up		962,097,640	4,658,323	79,693,663	38,421,069	129,543,811	1,214,414,506	(34)	

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Section I: Adjustment to 10/24/2023 Exposure Base And Summary of Rate Change

			Residential	Tenants	Condos	Mobile Home	Commercial	Total		
<b>Adjustment for Change in Reportings 10/24/2023 to 10/24/2023</b>										
2023 Section I Base Premium	as of 10/24/2023		1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(35)	
(Net of Credits)	as of 10/24/2023		1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(36)	
Change	Change		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(37)	(36)/(35) - 1
2023 Section I Exposure	as of 10/24/2023		2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(38)	
(All ZIP Codes)	as of 10/24/2023		2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(39)	
Change	Change		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(40)	(39)/(38) - 1
Exposure Trend (2023 to 2024)			10.00%	7.00%	7.00%	7.00%	3.00%	9.37%	(41)	
2024 Section I Exposure			3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(42)	(1+(41))*(39)
2024 Section I Actuarially Indicated Base Premium at Coverage Level			962,097,640	4,658,323	79,693,663	38,421,069	129,543,811	1,214,414,506	(43)	(34)
2024 Section I Actuarially Indicated Base Premium at Cov. Level Adj. For Reporting Change			962,097,640	4,658,323	79,693,663	38,421,069	129,543,811	1,214,414,506	(43.01)	(1+(37))*(43)
<b>Cash Build-up Factor</b>										
2024 Adjusted Sect. I Base Premium at Coverage at 2024 Cash Build-up Level	25%		1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(45)	(43.01)*1.25
Variable Expense Loading										
Reinsurance Factor	0.000%		0	0	0	0	0	0	(45a)	No Risk Transfer in Contract Year 2024
2024 Section I Base Premium at Coverage with Cash Build-up & Variable Expenses	0.0000%		1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(45b)	(45)+(45a)

**Summary of Section I , Premium, Exposure and Rate Change**

			Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Base Premium (25% CB)	2023	as of 10/24/2023	1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(46)	(36)
	2024		1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(47)	(45b)
Change			-1.10%	-3.58%	7.46%	-3.81%	9.24%	0.34%	(48)	((47)/(46))-1
Exposure	2023	as of 10/24/2023	2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(49)	(39)
	2024		3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(50)	(42)
Change			10.00%	7.00%	7.00%	7.00%	3.00%	9.37%	(51)	((50)/(49))-1
Rate (at 25% CB)	2023	as of 10/24/2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576	(52)	1000*(46)/(49)
	2024		0.3783	0.1893	0.6626	1.2805	0.7425	0.4199	(53)	1000*(47)/(50)
Change			-10.09%	-9.89%	0.43%	-10.10%	6.06%	-8.25%	(54)	((53)/(52))-1
Rate at 25% CB	2024		0.3783	0.1893	0.6626	1.2805	0.7425	0.4199	(54.01)	
Overall Rate Change			-10.09%	-9.89%	0.43%	-10.10%	6.06%	-8.25%	(55)	((1000*(45b)/(50))/(52))-1
Rates at 90% (Unadjusted for Coverage Level)										
	2023		0.4355	0.2248	0.6792	1.4247	0.7005	0.4715	(56)	((52)*(.9/(0.9))
	2024		0.3940	0.2028	0.6894	1.2807	0.7429	0.4350	(57)	((53)*(.9/(1))
Rate Change Unadjusted for Coverage Level			-9.53%	-9.78%	1.50%	-10.10%	6.06%	-7.74%	(58)	((57)/(56))-1

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Summary of Results

	Retention	Limit	Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Premium										
Section I: Basic Cov.			1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(69)	(45b)
Section I: Extended Cov.			-	-	-	-	-	-	(70)	There is no Extended Coverage Charge for Citizens
Section I: Subtotal	9,929,000,000	17,000,000,000	1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(71)	(70)+(69)
Section II	0	0	0	0	0	0	0	0	(72)	There is no Section II exposure
Total	9,929,000,000	17,000,000,000	1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(73)	(71)+(72)
Coverage %			86.429%	83.978%	86.505%	89.985%	89.956%	86.874%	(74)	(1)
Projected Payout Multiple		11.1988							(74.01)	(73Limit)/(73total prem)
Retention Multiples	100%	5.6822	1,391,451,120	6,933,851	115,158,147	53,371,369	180,010,284	1,747,383,641	(75)	(73ret)/(73 tot prem)*(74tot)/100%
	90%	6.3136	1,252,306,008	6,240,465	103,642,333	48,034,232	162,009,255	1,572,645,277	(76)	(73ret)/(73 tot prem)*(74tot)/90%
	75%	7.5763	1,043,588,340	5,200,388	86,368,611	40,028,527	135,007,713	1,310,537,731	(77)	(73ret)/(73 tot prem)*(74tot)/75%
	45%	12.6271	626,153,004	3,120,233	51,821,166	24,017,116	81,004,628	786,322,638	(78)	(73ret)/(73 tot prem)*(74tot)/45%
Sect. I Projected Exposure		2024	3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(79)	(49)
Sect. I Avg. Basic Rates	100%		0.4377	0.2254	0.7660	1.4230	0.8254	0.4833	(80)	1000*(69)/(79)*((100%)/(74))
	90%		0.3940	0.2028	0.6894	1.2807	0.7429	0.4350	(81)	1000*(69)/(79)*((90%)/(74))
	75%		0.3283	0.1690	0.5745	1.0673	0.6191	0.3625	(82)	1000*(69)/(79)*((75%)/(74))
	45%		0.1970	0.1014	0.3447	0.6404	0.3714	0.2175	(83)	1000*(69)/(79)*((45%)/(74))
Average Coverage			0.3783	0.1893	0.6626	1.2805	0.7425	0.4199	(84)	1000*(69)/(79) or (52)
Overall Section I Rate Change										
Total Premium		2023	1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(85)	(45)
		2024	1,202,622,050	5,822,903	99,617,079	48,026,336	161,929,764	1,518,018,133	(86)	(73)
Total Exposure		2023	2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(87)	(48)
		2024	3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(88)	(49)
Average Rate (000s)		2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576	(89)	1000*(85)/(87)
		2024	0.3783	0.1893	0.6626	1.2805	0.7425	0.4199	(90)	1000*(86)/(88)
Overall Rate Change			-10.09%	-9.89%	0.43%	-10.10%	6.06%	-8.25%	(91)	(90)/(89) - 1
Rates at 90% (Unadjusted for Coverage Level)		2023	0.4355	0.2248	0.6792	1.4247	0.7005	0.4715	(92)	(56)
		2024	0.3940	0.2028	0.6894	1.2807	0.7429	0.4350	(93)	(57)
Rate Change Unadjusted for Coverage Level			-9.53%	-9.78%	1.50%	-10.10%	6.06%	-7.74%	(94)	(57)/(56)-1

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Section I: Historical Exposures and Premiums

	Residential	Tenants*	Condo-Owners	Mobile Home	Commercial	Total
<b>Section I Exposures (as of 1/30/2024)</b>						
2013	\$1,692,585,905,910	\$20,716,140,015	\$84,939,169,492	\$28,539,351,997	\$197,362,838,239	\$2,024,143,405,653
2014	\$1,719,567,803,513	\$22,229,245,146	\$86,702,102,354	\$27,474,291,575	\$188,824,739,041	\$2,044,798,181,629
2015	\$1,754,969,315,990	\$22,508,843,627	\$88,453,721,949	\$25,877,523,024	\$170,243,010,515	\$2,062,052,415,105
2016	\$1,822,895,641,425	\$25,213,767,240	\$92,927,887,318	\$26,037,614,203	\$159,080,068,043	\$2,126,154,978,229
2017	\$1,874,475,550,556	\$27,524,693,929	\$96,602,096,966	\$26,353,385,960	\$152,405,421,800	\$2,177,361,149,211
2018	\$1,957,115,844,385	\$27,582,791,531	\$101,960,350,577	\$27,088,783,563	\$156,489,178,066	\$2,270,236,948,122
2019	\$2,049,049,434,406	\$21,941,616,066	\$106,760,992,426	\$27,976,005,851	\$163,057,586,759	\$2,368,785,635,508
2020	\$2,163,848,506,212	\$23,304,294,435	\$112,878,372,506	\$28,964,052,637	\$169,730,425,127	\$2,498,725,650,917
2021	\$2,331,365,801,715	\$25,258,247,645	\$121,985,871,058	\$29,996,378,812	\$150,746,872,831	\$2,659,353,172,061
2022	\$2,567,257,722,961	\$27,692,326,999	\$132,974,746,721	\$32,142,181,052	\$153,858,289,315	\$2,913,925,267,048
2023	\$2,889,736,373,541	\$28,753,178,967	\$140,503,636,945	\$35,052,473,775	\$211,725,614,402	\$3,305,771,277,630
2024 (Proj.)	\$3,178,709,980,790	\$30,765,903,946	\$150,338,856,070	\$37,506,146,832	\$218,077,382,776	\$3,615,398,270,414
2025						

	12.56%	3.83%	5.66%	9.05%	37.61%	13.45%
<b>Section I Premiums (as of 1/30/2024)</b>						
2013	\$977,906,580	\$9,143,951	\$64,528,991	\$37,315,378	\$175,438,169	\$1,264,333,070
2014	\$981,990,781	\$10,188,137	\$66,375,860	\$35,208,908	\$173,880,302	\$1,267,643,988
2015	\$975,194,503	\$9,276,293	\$67,838,597	\$34,674,641	\$128,846,280	\$1,215,830,315
2016	\$909,067,322	\$8,944,937	\$68,539,686	\$39,405,140	\$110,550,511	\$1,136,507,596
2017	\$911,917,792	\$9,224,815	\$70,507,479	\$43,442,087	\$94,028,996	\$1,129,121,169
2018	\$885,243,706	\$8,245,008	\$72,223,086	\$44,669,682	\$92,422,774	\$1,102,804,256
2019	\$962,096,967	\$5,641,986	\$75,383,653	\$42,342,022	\$105,229,504	\$1,190,694,132
2020	\$967,639,623	\$5,766,197	\$76,260,388	\$41,296,919	\$114,298,688	\$1,205,261,815
2021	\$987,403,358	\$5,439,228	\$79,498,876	\$39,817,973	\$104,420,984	\$1,216,580,419
2022	\$1,136,875,244	\$6,245,227	\$92,308,101	\$45,662,336	\$109,721,625	\$1,390,812,533
2023	\$1,215,979,551	\$6,039,340	\$92,701,966	\$49,929,409	\$148,233,592	\$1,512,883,858
2024 (Proj.)	\$1,202,622,050	\$5,822,903	\$99,617,079	\$48,026,336	\$161,929,764	\$1,518,018,133
2025						

<b>Section I Average Rates (per \$1000)</b>						
2013	0.5778	0.4414	0.7597	1.3075	0.8889	0.6246
2014	0.5711	0.4583	0.7656	1.2815	0.9209	0.6199
2015	0.5557	0.4121	0.7669	1.3400	0.7568	0.5896
2016	0.4987	0.3548	0.7376	1.5134	0.6949	0.5345
2017	0.4865	0.3351	0.7299	1.6484	0.6170	0.5186
2018	0.4523	0.2989	0.7083	1.6490	0.5906	0.4858
2019	0.4695	0.2571	0.7061	1.5135	0.6454	0.5027
2020	0.4472	0.2474	0.6756	1.4258	0.6734	0.4824
2021	0.4235	0.2153	0.6517	1.3274	0.6927	0.4575
2022	0.4428	0.2255	0.6942	1.4206	0.7131	0.4773
2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576
2024 (Proj.)	0.3783	0.1893	0.6626	1.2805	0.7425	0.4199

<b>Percent Change in Rates</b>						
2013-14	-1.16%	3.84%	0.77%	-1.99%	3.59%	-0.75%
2014-15	-2.70%	-10.08%	0.18%	4.56%	-17.81%	-4.89%
2015-16	-10.25%	-13.92%	-3.83%	12.94%	-8.18%	-9.34%
2016-17	-2.45%	-5.53%	-1.04%	8.92%	-11.22%	-2.99%
2017-18	-7.02%	-10.81%	-2.95%	0.03%	-4.27%	-6.33%
2018-19	3.81%	-13.98%	-0.32%	-8.22%	9.27%	3.48%
2019-20	-4.76%	-3.77%	-4.32%	-5.80%	4.35%	-4.04%
2020-21	-5.29%	-12.97%	-3.54%	-6.90%	2.86%	-5.16%
2021-22	4.56%	4.73%	6.52%	7.02%	2.95%	4.33%
2022-23	-4.98%	-6.86%	-4.95%	0.27%	-1.82%	-4.12%
2023-24	-10.09%	-9.89%	0.43%	-10.10%	6.06%	-8.25%

<b>Historical Rates as Percent of 2024 Rates</b>						
2013	153%	233%	115%	102%	120%	149%
2014	151%	242%	116%	100%	124%	148%
2015	147%	218%	116%	105%	102%	140%
2016	132%	187%	111%	118%	94%	127%
2017	129%	177%	110%	129%	83%	124%
2018	120%	158%	107%	129%	80%	116%
2019	124%	136%	107%	118%	87%	120%
2020	118%	131%	102%	111%	91%	115%
2021	112%	114%	98%	104%	93%	109%
2022	117%	119%	105%	111%	96%	114%
2023	111%	111%	100%	111%	94%	109%
2024	100%	100%	100%	100%	100%	100%

<b>Historical Rate on Line (Mandatory Coverage only)</b>						
	Limit(\$B)					
2013	17.000					7.4%
2014	17.000					7.5%
2015	17.000					7.2%
2016	17.000					6.7%
2017	17.000					6.6%
2018	17.000					6.5%
2019	17.000					7.0%
2020	17.000					7.1%
2021	17.000					7.2%
2022	17.000					8.2%
2023	17.000					8.9%
2024	17.000					8.9%

\*Includes Inland Marine/Stand Alone & Other Contents Type Policies



Updated Exhibit X  
of the  
Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Pre-Event Note Expense Loading  
Contract Term: 6/01/2024 to 5/31/2025

	2020A Projected Debt Service	2024A Projected Debt Service	Total Debt Service Net Cost
1 Reimbursement Deposit Premium	25,000,000	18,768,533	43,768,533
2 Average Market Value	3,500,000,000	1,000,000,000	4,500,000,000
3 Exp. Default Loading %	0.03%	0.03%	
4 Exp. Default Cost (2)*(3)	1,050,000	300,000	1,350,000
5 Total Projected Liquidity Facility Cost (1)+(4)	26,050,000	19,068,533	45,118,533

Notes

- This method uses values projected by the FHCF's Financial Advisor, Raymond James (01/16/2024 for 2020A); (04/17/24 for 2024A estimate) plus a judgmental loading for potential asset loss.
- 2024A Projected Debt Service includes initial Costs of Issuance.





March 15, 2024

Enclosed is the Florida Hurricane Catastrophe Fund (FHCF) 2024 Ratemaking Formula Report which will be presented to the FHCF Advisory Council on March 21, 2024. The rates developed in this report assume a FHCF per event insurance industry aggregate retention of \$9.929 billion (which applies to a participating insurer's two largest events and drops to 1/3 for all other events) and a FHCF limit level of \$17.000 billion.

Also included in this report are windstorm mitigation construction rating factor relativities, as well as formulas to adjust the presented rates for any changes related to pre-event financing or reinsurance structure should they become applicable subsequent to the presentation of this report.

### **Distribution and Use**

The attached report was prepared for the use of the State Board of Administration of Florida for the sole purpose of developing a formula for determining the actuarially indicated premium to be paid by individual companies to the FHCF for the 2024 contract year as specified by Section 215.555, Florida Statutes. The report has been prepared to meet actuarial standards of practice of the Actuarial Standards Board. The data, assumptions, methodology and results in this report may not be appropriate for other purposes than the intended use. We recommend that any party using this report have its own actuary review this report to ensure that the party understands the assumptions and uncertainties inherent in our estimates.

Discussion of report limitations, including scope, data sources and variability of projections, can be found in Exhibit 1, Part III of the report. Loss simulation data provided by catastrophe modelers are considered confidential by the modeling organizations.

A copy of the report will be available on the FHCF web site.

Sincerely,

A handwritten signature in black ink, reading "Andrew J. Rapoport".

Andrew J. Rapoport, FCAS, FSA, MAAA  
Managing Director and Actuary  
Paragon Strategic Solutions Inc.

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# EXHIBIT

## I



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# Florida Hurricane Catastrophe Fund

## 2024 Ratemaking Formula Report

### Executive Summary

1. **Rates:** Paragon recommends an average 6.86% decrease in Florida Hurricane Catastrophe Fund (FHCF) rates for the 2024-2025 (2024) Contract Year based on coverage under Section 215.555, Florida Statutes. This is the average rate change for companies that do not change their coverage selections. After adjusting for individual company coverage selection changes from 2023 to 2024, the industry FHCF overall rate change is projected to decrease 7.38%.
2. **Coverage, Layer, and Retention Changes:**
  - a. The average coverage for 2024, based on 2023 market shares and 2024 coverage selections, is projected to be 86.874%, compared to 87.362% for 2023 (0.56% decrease).
  - b. The decrease in the average FHCF coverage selection generates the 2024 FHCF layer of \$19.569 billion, compared to the 2023 layer of \$19.459 billion.
  - c. The projected loss retention for 2024 is \$9.929 billion compared to \$9.465 billion for 2023.
3. **Premium Change:** FHCF premium will increase from \$1.513 billion to \$1.532 billion due to exposure growth, a decrease in rates, and coverage selection changes.

	2024 Contract Year Modeled	2023 Contract Year Actual as of 10/24/2023 for Ratemaking*	2023 Contract Year Modeled
<b>FHCF Coverage</b>			
Industry Retention	\$9.929 billion	\$9.465 billion	\$9.067 billion
Limit	\$17 billion	\$17 billion	\$17 billion
Average Coverage	86.874%	87.362%	87.401%
FHCF Layer	\$19.569 billion	\$19.459 billion	\$19.450 billion
FHCF Premium	\$1.532 billion	\$1.513 billion	\$1.450 billion
Rate Change	-6.86%	-6.44%	-6.08%
Coverage Selection Change	-0.56%	2.48%	2.52%
Exposure Change	9.37%	13.45%	8.59%
Premium Change	1.29%	8.78%	4.57%
Overall Average Rate Change	-7.38%	-4.12%	-3.71%
Projected Payout Multiple	11.0935	11.2368	11.7254
90% Retention Multiple	6.2542	6.0732	6.0732
Exposure Base	\$3.615 trillion	\$3.306 trillion	\$3.158 trillion
Overall FHCF Rate/\$1,000 Exp.	0.4239	0.4576	0.4591

\* As of 12/31/2023, FHCF premium was \$1.513 billion and Projected Payout Multiple was 11.2368

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## Part I: The Ratemaking Process

### Overview

The Florida Hurricane Catastrophe Fund (FHCF) premium formula, which forms the basis of the premiums paid to the FHCF by insurers writing covered policies, as defined in Section 215.555, Florida Statutes, is developed according to statutory requirements, including the requirements of Florida's Administrative Procedure Act and the Florida Public Records Law, which provide a high degree of oversight, accountability, and transparency. This Ratemaking Formula Report presents details of the ratemaking process.

The rates in this report are developed for the limits and retentions, as specified by Section 215.555, Florida Statutes, for the FHCF 2024 Contract Year. Paragon recommends an average 6.86% decrease in FHCF rates for the 2024 Contract Year based on a \$17.000 billion coverage limit and a \$9.929 billion per event retention, which drops to \$3.310 billion for the third largest and all smaller events when there are multiple events in a single season (1/3 of \$9.929 billion). After adjusting for changes in company coverage selections, the overall average FHCF rate change is projected to decrease 7.38%.

This premium formula will produce an estimated \$1.532 billion in total FHCF premium, compared to \$1.513 billion premium for the 2023 Contract Year. This premium is based on an overall rate decrease of 7.38%, a decrease in coverage level of 0.56% and projected growth in exposure of 9.37%. There is no change in the statutory mandated cash build-up factor of 25% from 2023 to 2024.

This premium estimate assumes no reinsurance will be purchased in 2024. Should the FHCF decide to procure reinsurance for the 2024 Contract Year, Exhibit XVII provides the methodology for adjusting 2024 rates for alternative reinsurance structures and contracted reinsurance premiums.

For 2024, FHCF coverage is a limit of \$17.000 billion excess of \$9.929 billion. There are two major factors affecting the FHCF layer of coverage for the 2024 Contract Year:

1. Pursuant to Section 215.555, Florida Statutes, the industry retention is equal to \$4.5 billion adjusted for the increase in reported exposure from 2004 through 2022. As exposures have grown 120.6% over this period, the modeled retention for 2024 is \$9.929 billion.
2. Pursuant to Section 215.555, Florida Statutes, the FHCF limit is equal to \$17.000 billion until there is sufficient estimated claims-paying capacity to fund \$17.000 billion of loss in subsequent contract years. As \$17.000 billion of subsequent season capacity is not available, the FHCF limit for 2024 will remain \$17.000 billion.

The above changes will vary by deductible, construction, and territory. To improve stability in ZIP Code rating groups, a ZIP Code will shift to a different rating territory only if the indication is for a shift of two or more rating territories or if the indicated shift of one rating territory is consistent for three years.

## Type of Business Allocation

The following table shows the components of the indicated premium changes by type of business.

Exh. 2 Sources	A Line 48	B Line 51	C Line 55	D Line 1.1	E Line 58
Calculations			$((1+A)/(1+B))-1$		$((1+C)/(1+D))-1$
Type of Business	Premium Change	Exposure Change	Overall Avg. Rate Change	Company Selected Coverage Change	Avg. Rate Change Unadjusted For Coverage Change
Residential	-0.16%	10.00%	-9.24%	-0.62%	-8.67%
Tenants	-2.67%	7.00%	-9.04%	-0.12%	-8.93%
Condos	8.48%	7.00%	1.38%	-1.06%	2.47%
Mobile Home	-2.90%	7.00%	-9.25%	0.00%	-9.25%
Commercial	10.28%	3.00%	7.06%	0.00%	7.06%
<b>Total</b>	<b>1.29%</b>	<b>9.37%</b>	<b>-7.38%</b>	<b>-0.56%</b>	<b>-6.86%</b>

## Territory Changes

The 2024 recommended territories, like the 2023 FHCF territories, are based on analysis of losses in the FHCF coverage as modeled by Verisk, Corelogic- and Risk Management Solutions (RMS). The relationship between lowest rate and highest rate is approximately 1:35, similar to 2023. As was done last year, this ratio was adjusted to accurately reflect the indicated loss costs for territory 1. Indicated territory changes were tempered so that ZIP Codes would only shift one territory up or down if the indication was for a shift of two or more territories or if there has been an indicated one territory shift consistently for three years. As a result, in 2024, 57 ZIP Codes shifted down one territory and 408 ZIP Codes shifted up one territory.

## Premium Summary

We project premium, exposure, and retention changes as follows:

Exposure Growth (2023 to 2024)	9.37%
Retention	\$9.929 billion
Premium – 2023 (as of 10/24/2023)	\$1.513 billion
Premium – 2024 (Projected) 3/21/2024	\$1.532 billion

## Use of Five Models Found Acceptable by the Florida Commission on Hurricane Loss Projection Methodology

For 2024, a weighting of four models found acceptable by the Florida Commission on Hurricane Loss Projection Methodology as of December 1, 2023 and one model found acceptable as of January 4, 2024 is used for aggregate results. In 2024, all five models meet the 2021 standards. The five models are Verisk, Corelogic, RMS, Applied Research Associates (ARA), and the Florida Public Model (FPM).

Model results were compared in detail to construct an industry distribution of losses by size. For the industry aggregate basis, consistent with the weighting methodology used in all years when the FHCF had five models, 5%, 20%, 50%, 20%, and 5% weights were applied to the models ranked from lowest to highest based on annual expected aggregate FHCF losses. Four models produced lower loss cost indications and one model produced higher loss cost indications than in 2023 ratemaking.

For analysis of detailed allocation to type of business, territory, construction, and deductible, and for special coverage questions, three models (Verisk, Corelogic, and RMS) were used for all types of business. Model results were compared in detail and 1/3 weight was given to each model for all types of business.

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## Summary of Changes to the 2024 Ratemaking Formula

In 2024, there are seven notable factors that impact premium and rate changes. Three of these factors have a major impact and four have a minor impact.

The major impact factors are:

1. Projected growth in FHCF exposure
2. Modeled loss cost decreases
3. Law and Ordinance Assumption Change

The minor impact factors are:

4. Pre-event Note Expense
5. Removal of Mitigation Appropriation back to investment income
6. Coverage Change
7. Mobile Home: Year of Manufacture Relativities

### Major Impact Factors

1. The projected exposure trend increased from 8.59% in 2023 to 9.37% in 2024. The actual exposure growth in 2023 was 13.45%. There was a 37.6% increase in commercial exposure likely due to availability issues in the surplus lines market. The current methodology for allocating trend recognizes that much of the increase in exposure will be due to new construction. The change in distribution of exposure by age of home moderates the growth in modeled loss due to the projected increase in exposure. Exposure growth affects overall premium by type of business but not rates.
2. Modeled loss costs decreased 7.4%. Four models had lower loss cost indications and one model had a higher indication than in 2023. This change affects overall premium and rates.
3. The law and ordinance adjustment to modeled loss was reset from the default assumption of 4.86% to 0.0% for three models (Verisk, Corelogic and FPM) based on statements from the modelers that their model results implicitly included law and ordinance adjustment losses since they were based on historical reported losses. ARA and RMS explicitly include law and ordinance in their model results as was recognized in 2023 ratemaking. This change reduces adjusted gross losses by 3.2%.

### Minor Impact Factors

4. Pre-event notes are estimated to increase by \$25.6 million from \$31.05 million in 2023 to \$56.65 million to cover the potential cost of new 2024 pre-event notes that are discussed in more detail in Section L. This increase is partially offset by a reduction in carrying costs for 2020 pre-event notes. This change generated a 2.1% increase in rates and affects overall premium.
5. In 2024 the minimum mitigation appropriation of \$10 million will be covered by FHCF investment income and does not need to be included in 2024 premiums. FHCF premium formula includes \$10 million to cover the minimum appropriation for loss mitigation per statute. This cost transfer generates a 0.83% decrease in rates and affects overall premium.
6. The industry coverage selection decreased 0.599% from 87.362% to 86.874%. This causes a decrease in the average FHCF layer size and changes in FHCF premium and rates.
7. Mobile Home: There was additional refinement in year of manufacture modeling for mobile homes that decreased the relativity for post-7/13/1994 mobile homes and increased the relativity for pre-7/13/1994 mobile home. While this change will decrease FHCF rates for newer mobile homes and increase FHCF rates for older mobile homes, it has no impact on total FHCF mobile home premiums. The number of rating categories based on manufactured year increased from two to four.

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Details of the overall changes can be found in Exhibit II, which contains the following exhibits:

1. Summary of 2024 Rate Calculation;
2. Adjustment to Exposure Base and Summary of Rate Change;
3. Summary of Results; and
4. Historical Exposures and Premiums.

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## Details of the Ratemaking Process

The FHCF ratemaking formula is based on Section 215.555, Florida Statutes. We have followed the same basic process used since 1995. Legislation enacted in 2005 (Chapter 2005-111, Laws of Florida, CS/SBN 1486) addressed retention in multiple-event seasons by creating a per event retention that applies to a participating insurer's two largest events and drops to 1/3 for all other events. This drop-down coverage has again been incorporated into the 2024 rates.

### A. Trend

The FHCF trend projections are used to estimate the amount of exposure and risk counts that will be reported by companies as of June 30 of for the upcoming contract year. The trended exposure and risk counts will be the input for modelers to project expected FHCF losses. The FHCF trend selections apply only to model inputs and do not affect the underlying repair cost assumptions used by modelers.

For 2024 ratemaking, we reviewed construction data indices from Marshall & Swift and the actual exposures by coverage reported to the FHCF from 1995 to 2023. The Marshall Swift construction indices provide a snapshot of recent changes to residential construction costs. The Marshall & Swift construction indices for the Southeast were down 2.5% in 2023 (as of October) compared to a 14.7% increase in 2022. Countrywide indices were down 1.4% compared to an 13.1% increase the prior year. These indices are used as an independent check on the magnitude and direction of FHCF historical data. The Marshall Swift indexes do not project new construction.

Our selection of exposure and risk count trends for 2024 was based predominantly on the last three years of historical FHCF data. The table below displays the last five years of annual growth in exposure and risks. In making selections, the FHCF trend data was benchmarked against the indications generated from the Marshall & Swift construction indices. We have selected 10.0% trend for Residential, 7.0% for Tenants, Mobile Homes and Condos and 3% for Commercial. The overall trend of 9.37% is lower than last year's actual trend of 13.45%. We are projecting that high inflation will continue in 2024 but at a lower rate than 2023.

The 37.6% increase in 2023 commercial exposure may have been due to availability and affordability issues in the surplus lines markets. We project a positive trend of 3% for the commercial book of business in 2024, assuming there will not be significant additional transfers from the surplus lines markets.

Mobile home business has historically had decreasing unit counts. We do not select negative trends, so we set the mobile home count trend at 0%. Despite the decrease in unit counts, mobile home business total exposure has increased in recent years, and we have set the exposure trend at 7%.

Historical FHCF exposure and risk counts can be found in Exhibit III. Note that the trended exposure data in Exhibit III is based on exposure reported to the FHCF as of 10/24/2023. This data was used in the catastrophe modeling process.

Beginning in 2019, the exposure trending process has been refined to focus on new construction. For residential, tenants, and condominium unit owners, trends in unit counts were mainly applied to newer construction (year built 2012 and subsequent) and older year-built counts were assumed to have minimal to negative trends. Exposure trends were also mainly allocated to newer construction (year built 2012 and subsequent), with trend levels closer to inflation changes for older construction. Using this approach, the overall trended FHCF exposures better reflect the improvement in damageability levels due to new construction.

**Annual Growth in Exposure and Risk Counts Reported  
by FHCF Participating Insurers as of 10/24/2023**

	Residential		Tenants		Condominiums		Mobile Homes		Commercial	
	Exposure	Risk Count	Exposure	Risk Count	Exposure	Risk Count	Exposure	Risk Count	Exposure	Risk Count
2018-2019	4.7%	1.1%	-20.7%	-18.4%	4.7%	1.5%	3.3%	-0.8%	4.5%	12.4%
2019-2020	5.6%	1.9%	6.0%	8.4%	5.7%	2.9%	3.6%	-0.1%	3.8%	-16.0%
2020-2021	7.8%	3.0%	6.8%	10.1%	8.1%	4.4%	3.6%	-0.3%	-11.1%	-9.8%
2021-2022	9.9%	0.5%	9.7%	4.8%	8.9%	2.2%	6.9%	-1.4%	0.9%	-4.5%
2022-2023	12.6%	2.4%	3.8%	1.5%	5.7%	-0.1%	9.1%	-0.9%	37.6%	22.7%
Prior Year Selected	9.0%	1.5%	9.0%	6.0%	9.0%	3.0%	5.0%	0.0%	2.0%	0.0%
Selected	10.0%	2.0%	7.0%	4.0%	7.0%	2.0%	7.0%	0.0%	3.0%	0.0%

**B. Insurance Industry Aggregate Retention for Ratemaking Purposes (Exhibit IV)**

For development of this premium formula, it is necessary to assume a projected aggregate insurance industry retention to estimate losses in the aggregate layer of coverage.

Section 215.555, Florida Statutes, specifies the calculation of the retention multiple for each participating insurer. The numerator of the retention multiple is \$4.5 billion adjusted by the percentage growth in FHCF covered exposure from 2004 to the contract year two years prior to the current year. The historical exposure for 2022 was \$2,913.9 billion (as of 10/24/2023) as compared to \$1,320.6 billion in 2004. The percent adjustment is 120.6%, so the numerator of the retention multiple is \$9.929 billion (rounded to the nearest million).

The denominator of the retention multiple is the projected total FHCF reimbursement premium assuming all participating insurers have selected the specified coverage option. Retention multiples by coverage % are:

Coverage %	90%	75%	45%
Retention Multiple	6.2542	7.5050	12.5084

Each participating insurer's provisional retention is the retention multiple (adjusted for coverage selection) times its provisional premium. An insurer's actual retention is the retention multiple times its actual premium. Based on this calculation, the retention multiple numerator of \$9.929 billion is used as the insurance industry aggregate retention for simulating losses in the aggregate layer of coverage. This value is equivalent to the sum of retentions for all insurers.

Since 2003, 100% of all FHCF premiums are calculated based on the premium formula rates applied to individual company exposures. This is called Section I premium. Section II premium refers to a premium calculated from exposure under covered policies that would require individual ratemaking, with each policy risk modeled and rated individually by company. There is currently no Section II exposure and therefore no Section II premium. The Section I insurance industry aggregate retention is \$9.929 billion (based on 100% of projected premium) and the Section II aggregate retention is \$0 (based on 0% of projected premium).

**C. Industry Excess Layer (Exhibit IV)**

Under Section 215.555(4)(c)1, Florida Statutes, "The contract shall also provide that the obligation of the board with respect to all contracts covering a particular contract year shall not exceed the actual claims-paying capacity of the fund up to a limit of \$17 billion for that contract year, unless the board determines that there is sufficient estimated claims-paying capacity to provide \$17 billion of capacity for the current contract year and an additional \$17 billion of capacity for subsequent contract years."

As \$17 billion of subsequent season capacity is not available, the FHCF limit for 2024 will remain \$17 billion. This \$17 billion represents the total capacity at selected coverage levels for loss and loss adjustment expense allowance. Loss adjustment expense allowance is statutorily set at 10% of losses recoverable from the FHCF. Participating insurers report only losses and do not report actual loss adjustment expenses.



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The limit of \$17 billion is first divided by 1.10 to produce a loss only limit of \$15,454,545,455. This limit is then split between Sections I and II based on trended actual premium at current selected coverage levels. We view this as the best indicator of expected losses in the layer. Based on this split, 100% of the \$15,454,545,455 limit is in Section I. This value is the Section I loss only limit.

The next step is to gross up the loss only limit for coverage level. The 2023 average coverage level was 87.362%. Final 2024 company coverage selections as of March 1, 2024, produced an average coverage level of 86.874% based on 2023 company market shares and rating group definitions. Grossing up the loss only layer of \$15,454,545,455 for coverage selections produces a 100% loss layer of \$17,789,655,681. The top end of the loss only layer is then an estimated projected aggregate retention of \$9,929,000,000 for ratemaking purposes plus this limit, which equals \$27,718,655,681. The loss and loss adjustment expense combined layer are \$19,568,621,249.

In summary, for Section I and II loss only modeling purposes we use the following layer:

86.874% of \$17,789,655,681 xs \$9,929,000,000

For publication purposes, the Sections I and II loss and loss adjustment expense layer is:

86.874% of \$19,568,621,249 xs \$9,929,000,000

The simulations produced by the modelers are for producing manual rates per \$1,000 of exposure under covered policies. The rates resulting from such simulations are referred to as Section I rates.

#### **D. Industry Detail Exposure Data**

Actual 2023 industry FHCF exposures for buildings, contents, and appurtenant structures were summarized by:

1. Type of Business (residential, tenants, condominium unit owners, mobile home, commercial habitation);
2. ZIP Code;
3. Construction/Tie-Down Type; and
4. Deductible.

For modeling, we used data as of 6/30/2023 as reported through 10/24/2023 by 140 of 140 companies reporting FHCF Section I exposure for the 2023 year. This data was trended one year as described in Section A. Exhibit III contains trended control totals of the FHCF exposures used in the modeling process.

#### **E. Modeling Assumption and Data Changes: Combining Five Models - Verisk, Corelogic, RMS, ARA & FPM**

**Table of Models Used to Calculate Overall Industry Losses**

Model	2006-2007	2008-2024
Verisk	X	X
ARA	X	X
Corelogic	X	X
RMS	X	X
FPM		X

The table above lists the models that were used to calculate the overall FHCF losses by year. Models used in ratemaking were found acceptable by the Florida Commission on Hurricane Loss Projection Methodology as of December 1 of the prior year and have met the 2021 standards. Note that individual results provided to the FHCF by the modelers are considered confidential by the modeling organizations.

Four models produced lower loss cost indications than in 2023 ratemaking. One model produced a higher loss cost indication than in 2023. The weighted average of the five models produces lower loss costs for 2024.

All five of the modelers produce a distribution of industry-wide losses based on trended reported exposures by type of business, deductible, construction, and ZIP Code. The Verisk model produces a listing of losses for 50,000 simulated years while the FPM model losses are based on 61,000 simulated years. The ARA model produced a listing of losses and counts from a simulation of 500,000 years. The other models produce a listing of losses by size with assigned annual frequencies. Since 2008, demand surge has been modeled directly by each of the accepted modelers. Adjustments to these loss distributions are described in the next section.

Exposure data for invalid ZIP Codes was provided to the modelers who then modeled such exposure at the county level. Less than 0.001% of total reported exposure comes from invalid ZIP Codes, which are either ZIP Codes that are located outside of the state of Florida or are ZIP Codes that the U.S. Postal Service does not recognize or has decommissioned. In the latter case, the FHCF continues to produce rates for such codes for several years in order to give companies time to update their data.

Paragon used the results from each modeler to produce industry-wide gross (that is, net of policy deductibles and after application of policy limits) annual expected losses by type of business and to produce industry-wide FHCF excess losses for all coverages combined. Data from the modelers was combined by giving weights of 5%, 20%, 50%, 20%, and 5% to the model results from lowest to highest. A weighted loss distribution is included in Exhibit VIII.

The FHCF weighted loss curve in Exhibit VIII is developed solely for estimating excess hurricane losses within the FHCF layer. Estimates of losses above the FHCF layer were not taken into consideration in developing the curve. Shifts in modeler weights within the FHCF loss layer may have an amplified impact on loss estimates above the FHCF layer.

Although not used for ratemaking purposes, we have included an additional loss distribution based on uniform modeler weights (20% / 20% / 20% / 20% / 20%) in Exhibit VIII. Over time this curve may show greater stability for losses above the FHCF layer. As stated in the disclaimer in Part III herein, we recommend that any party using this report have its own actuary review this report to ensure that the party understands the assumptions and uncertainties inherent in our estimates.

**Table of Models Used for Classifications**

Model	2006-2008	2009-2012	2013-2024
Verisk	X	X	X
Corelogic	X	X	X
RMS	X	X	X
FPM		X	

Three of the modelers ran our 2023 Contract Year trended exposures through their models and provided more detailed outputs (i.e., losses by ZIP Code, construction, and deductible codes for each type of business) that were used to update the class plan relativities. We used a straight average of the indicated loss costs for each rating cell as a basis in order to populate our class plan with rates. Details of the allocation of rates to type of business, deductible, construction, and territory are described in Part III. Exhibit VIII contains tables and graphs of modeled loss severity distributions:

1. Gross Loss per Event;
2. Excess Retention Aggregate;
3. Single Event FHCF Liabilities; and
4. FHCF Layer Aggregate.

Note: Exhibit V has been eliminated this year since the industry distributions are also included in Exhibit VIII.

#### **F. Losses in the Layer at Coverage Percent**

The limit for the 2024 Contract Year is \$17 billion. Because the size of the excess layer is dependent on the average coverage selections of all the FHCF participating insurers, losses must be modeled after coverage selection. Coverage percentage varies by type of business, so modeled losses need

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to also reflect this variation. As a result, we start with the allocation to type of business and apply the coverage percentages to the layered loss (a method used consistently since 2001). We calculate the overall rates and premiums at the different coverage percentages at the end of the calculations.

Excess losses are allocated to type of business based on their adjusted gross losses. The allocations are adjusted so that no type of business has an overall rate change exceeding 15% in any one year, prior to legislated rate changes. This allocation appears in line 9 of the summary in Exhibit II. See Exhibit VI for additional details.

## **G. Adjustments to Modeled Losses**

- **Law and Ordinance Coverage**
- **Aggregate Wind Deductible Adjustment**

The adjustment for Law and Ordinance has been eliminated because this coverage is included in modeled losses. The adjustment for Aggregate Wind Deductible is similar to the adjustment made in the 2023 ratemaking formula. The projected industry retention was applied to the adjusted modeled losses to estimate the FHCF excess losses. Details on the Aggregate Wind Deductible adjustment discussed here are presented in Exhibit VII. The overall increase in modeled gross losses due to the aggregate wind adjustment is 0.506%, compared to the combined law and ordinance and aggregate wind adjustment increase of 3.87% in 2023.

### **Law and Ordinance Coverage Adjustment Eliminated**

Law and ordinance coverage provides extra limit for Coverage A (building) in the case where additional rebuilding costs are incurred in order to comply with local laws and ordinances.

For 2024, the law and ordinance adjustment has been eliminated for all modelers. Based on communication with each modeler, it was determined that law and ordinance coverage is implicitly included in modeled losses by Verisk, Corelogic, and the FIU public model. RMS has explicitly included law and ordinance in its modeled loss for the past two years. ARA provided an adjustment for its industry losses for the prior two years and in 2024 included law and ordinance coverage in its modeled losses.

Based on the elimination of the default adjustment of 4.86% of residential losses for Verisk, Corelogic, and the FIU Public Model, it is estimated that modeled adjusted gross FHCF losses are reduced by 3.2%.

### **Aggregate Wind Deductible Adjustment**

Under Section 627.701, Florida Statutes, residential property insurance policies issued on or after May 1, 2005, must have hurricane deductibles that apply on an annual, rather than a per-event, basis. Insurers may apply the "other perils" deductible or any amount remaining from the hurricane deductible, whichever is greater, to each subsequent hurricane that year.

The loss events were adjusted to account for this change in loss exposure. Adjustment factors by type of business were developed. Exhibit VII details the derivation of these factors. The take-up ratio only impacts the commercial type of business as only these policyholders have the option of having an annual hurricane deductible. The adjusted load was then weighted with the adjusted load from 2023 giving 33% weight and 67% weight to 2024. The selected adjustment factor is the rounded value of the weighted load after the "take-up" modification.

In 2024, the aggregate wind adjustment is based on results from the average of the Verisk and Corelogic models. Prior to 2021, the aggregate wind adjustment was based on a single model.

## **H. Adjustments for Per Company Limits and Retentions**

In this year's ratemaking report Paragon has updated the adjustment to expected losses for individual company limits, retentions and coverage based on information from an analysis based on detailed loss projections run by Paragon from the RMS and Verisk model runs used for 2024 ratemaking. The average of the results from the two separate analyses is -1.5135%. Weighting this result against the prior adjustment factor of -1.0534% (2/3 current indication, 1/3 prior selection), we recommend a

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factor of -1.3601%. To summarize the approach, using the same exposure inputs and assumptions used by Verisk and RMS, Paragon generated files of simulated Florida statewide gross hurricane losses. Average gross losses were first adjusted by type of business for Verisk and RMS to match the average gross loss generated by the five models used in FHCF ratemaking. Each simulated gross loss was then allocated to ZIP Code and type of business. Next, FHCF market shares were applied by ZIP Code and company (based on 2023 FHCF premium) to allocate each simulated gross loss to all the FHCF companies. Simulated gross losses for each individual company were then summed and the program applied each company's projected retention, limit, and coverage percentage (based on 2023 FHCF premium market shares and 2024 selected coverages) to generate each company's FHCF losses. These were summed by simulated event to get FHCF total loss by event. Paragon summed losses by simulated year applying aggregate limits and impact of retention drop downs.

Separately for the Verisk and RMS runs, the average annual FHCF loss based on individual company losses was compared to the average annual FHCF loss based on industry total losses, retention, limit, and coverage percentage. The average of the resulting adjustment factors is -1.5135% indicating, on an expected loss basis, the per company approach and the industry approach generate almost identical results.

Using this more detailed approach, we also observe that there is significant variability between industry gross losses and FHCF layer losses. This variability cannot be determined when using industry gross losses, limits, and retentions to calculate FHCF layered losses. One observation is that the return time for the FHCF to exhaust its total capacity is longer than the value based on industry gross losses. Another observation is that due to increased market share of a single FHCF participating insurer in specific parts of the state, losses in areas where that insurer has very limited market share cannot generate full capacity FHCF layer losses. On the other hand, in parts of the state where one member company has significant market share, that company's retention becomes the effective retention for the industry on storm tracks in that area.

The current and prior special analyses indications can be found in Exhibit VIII.

The return time distributions of the industry and per company portfolio exceedance curves presented in Exhibit VIII are different, but the overall expected values of the FHCF loss layers are very similar. The per company portfolio curve is the more appropriate curve to use for analysis of interval FHCF losses within the FHCF layer because it more realistically recognizes the impact of company exposure distributions, retentions, and limits. Therefore, the company portfolio curve is used for analysis of expected FHCF losses offset by potential risk transfer options in section P below.

As the industry distributions formerly included in Exhibit V are included in Exhibit VIII, Exhibit V has been eliminated this year. New Exhibit IX is included to present expected FHCF layer loss and return times for various loss scenarios including exhaustion of fund balance. This exhibit will replace scenario information that had previously been included in Exhibit V.

#### **I. Other Post-Model Adjustments: (5%)**

There are a few coverages that may appear on some FHCF covered policies that are not explicitly modeled in the FHCF's requested simulation. These coverages include guaranteed replacement cost, inflation guard, and reimbursable amounts paid as fees on behalf of or inuring to the benefit of a policyholder. We do not believe there is sufficient FHCF exposure from these coverages to justify additional administrative reporting and modeling at this time, but we do believe it is appropriate to load for these coverages in the post model adjustment.

Consistent with prior years, we recommend judgmentally increasing the modeled excess loss costs by 5% for all types of business to account for these coverages and other factors that are not directly included in the modeled loss results.

#### **J. Investment Income Credit**

Since 2012, the FHCF has not used investment income in the rates. There are three reasons that the use of an investment income credit in FHCF ratemaking is not appropriate and was discontinued.

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First, the FHCF investment credit is based on anticipated future long term retained investment income. The amount of anticipated future investment income assumes the FHCF would maintain a stable structure in perpetuity. Since the FHCF's inception, Florida statutes have been revised and FHCF coverage layers have changed resulting in lower return times and less investment income than originally projected in prior contract year ratemaking.

Second, during periods of sharp interest rate drops such as after 2000 and 2008 the FHCF will need rate increases due to reductions in the investment credit. These rate increases reduce FHCF long term rate stability.

Third, when investment income is used for providing a credit to current year rates, the same investment income cannot be used for mitigation funds appropriated by the legislature. During the years when an investment income credit was used, the premium formula required a matrix to adjust final rates to cover the potential for FHCF mitigation appropriations which were usually not finalized until the end of the legislative session after the premium formula had been approved. This approach could cause potential instability in FHCF rates. During years when no investment credit is included in the premium formula, the investment income can be used for mitigation appropriation without impacting FHCF rates.

For the three reasons above, investment income is not used in the FHCF ratemaking formula.

#### **K. Operating Expenses and Mitigation Funding**

Operating expenses of \$12,120,221 are based on an estimate of 2024 fiscal year operating expenses provided by the State Board of Administration of Florida (SBA). This is an increase of \$2,237,000 from the 2023 Contract Year projected expense of \$9,883,221. This increase is primarily due to increased administrative costs.

Pursuant to Section 215.555, Florida Statutes, the minimum mitigation appropriation is \$10 million, and the maximum appropriation is 35% of the prior fiscal year's investment income. For 2023, the Legislature appropriated \$10 million for mitigation. As the FHCF did not generate any prior year investment income in 2022, this minimum mitigation appropriation was included in the ratemaking formula. In 2024, the minimum mitigation appropriation of \$10 million will be covered by FHCF investment income and does not need to be included in 2024 premiums. This expense reduction generates a 0.8% decrease in rates and affects overall premium.

#### **L. Pre-Event Notes Expense**

This year's estimate of \$26.05 million is the projected cost estimate for 2020A pre-event notes. This is a decrease of \$5.0 million from the 2023 cost of \$31.05 million. This estimate includes the net carrying cost and a judgmental loading for potential asset loss during the contract year. The 2024 carrying cost estimates are provided by the FHCF's Financial Advisor, Raymond James & Associates. Raymond James' cost estimate is the projected difference between the interest payments to note holders and the investment income on the note proceeds during the 2024 Contract Year (see Exhibit X). The decrease in 2020A pre-event note expense is due to increased projected investment income on held assets which requires less funds to be provided from FHCF premium.

In 2024, the loading for asset risk is 0.03% based on an estimate provided by Raymond James. This loading is added to the carrying cost for potential asset loss during the contract year. The value of the 2020A notes will be \$3.5 billion for the entire 12 months of the 2024 Contract Year. The loading for the 2020A notes is \$1.05 million (0.03% of \$3.5 billion).

There is an additional pre-event note expense of \$30.6 million as an estimate of potential cost for new 2024A pre-event notes. The timing and final costs are not yet known, and the estimate is based on discussions with the Raymond James representatives and the SBA. The preliminary estimates for the 2024A pre-event notes are \$2 billion of proceeds, \$30 million of 2024 carrying cost, and \$0.6 million (0.03% x \$2 billion) in 2024 for held asset risk.

The total 2024 costs for the 2020A pre-event notes and estimated 2024A pre-event notes is \$56.65 million. Should the SBA expenditures for pre-event notes during the 2024 Contract Year vary from

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this estimate, the rates, retention multiples, and payout multiple should be modified using the factors provided in Exhibit XI.

**M. Premium Credits (Windstorm Mitigation Construction Credits)**

We are using the same approach to windstorm mitigation construction factors as we used in the 2023 Ratemaking Formula Report, including the incorporation of factors for the following mitigation features recognized since 2012:

<i>Type of Business</i>	<i>Year Built</i>	<i>Structure Opening Protection</i>	<i>Roof Shape</i>
<i>Commercial Residential</i>	X	X	X
<i>Residential</i>	X	X	X
<i>Mobile Home</i>			
<i>Tenants</i>	X	X	X
<i>Condominium Owners</i>	X	X	X

The proposed rate factors associated with each variable are shown in Exhibit XIV. We propose that these be applied to calculate the final rate for any covered policy subject to the following:

- Year built, structure opening protection, and roof shape factors be applied multiplicatively;
- The combined factor for any risk will not be capped;
- Every risk will be evaluated for its rating factor; and
- A final factor will be applied by type of business so that the indicated premium levels for each type of business are achieved.

Exhibit XII includes:

1. Calculation of actual 2023 premium credits/surcharges;
2. 2023 distribution of credits/surcharges; and
3. 2023 distribution of exposure and counts by rating region and type of business.

**N. Section II (Excess) Adjustment**

We included \$0 of Section II premium, based on the fact that there was no Section II exposure reported in 2023. Section II premium covers policies that require individual rating procedures. These exposures would be modeled and rated individually by company.

**O. Adjustment for Updated Exposures**

In the past, we have included an adjustment for change in premiums and exposures between November of the prior year and February of the current year. This change does not affect rate changes but should improve the accuracy of projected premium. For this year, there was no material change to FHCF exposure, so an adjustment was not included.

**P. Risk Transfer Options**

This premium estimate assumes no reinsurance will be purchased in 2024. Should the FHCF decide to procure reinsurance later for the 2024 Contract Year, Exhibit XVII provides the methodology for adjusting 2024 rates for alternative reinsurance structures and contracted reinsurance premiums.

The estimates for FHCF loss credits are based on the average of 2024 Verisk and RMS data distributions in Exhibit VIII. Exhibit XVII is based on the same loss severity distribution and displays probability of exceedance for specific FHCF layers with the adjustments to the FHCF loss layer level prior to fixed expenses. These values are used to illustrate a range of potential risk transfer structures and costs in Exhibit XVII. The details of the formula calculation, along with potential revised factors, are provided in Exhibit XVII.

The Net Risk Transfer Cost Premium in Exhibit XVII and the Estimated Additional Annual Cost of Pre-Event Notes in Exhibit XI are additive in their impact on FHCF premium and rates. Retention and

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Projected Payout Multiples can be adjusted with interpolation based on the sum of the combined impact on FHCF premiums.



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## Part II: Allocation of Premium

Within a type of business, premium is allocated to territory, construction, and deductible based on a set of relativities. This is the same process that has been used since the creation of the 2001 rates. In all cases, the relativities recommended for 2024 have been adjusted so that none of them has changed by more than 15% with a special construction exception for mobile homes of 20% as discussed below. While there is a significant change in the relativities within mobile home constructions, there were no other significant changes in the allocation process for 2024. Following is an overview of the FHCF rating classifications and the entire allocation process.

### Overview of the Rating Classifications

#### 1. Type of Business

The actuarially indicated FHCF premium is allocated first among the five types of business: commercial, residential, mobile home, tenants, and condominium unit owners. This allocation is based on the hurricane catastrophe modeling. For each modeled event, the proportion of FHCF layer losses allocated to each type of business is identical to the allocation of gross losses from that event. This process incorporates the varying weighted average coverage selection of each type of business. This approach produces indicated allocations, which are then adjusted so that no type of business has an indicated rate change of more than 15%. Actual allocations can be found in Exhibit VI.

#### 2. Territorial Definitions

Since 2001, the FHCF revises rating territories using information from three hurricane models: Verisk, Corelogic, and RMS. Territory definitions are based on excess layer loss costs, as they are indicative of what insurers might recover from the FHCF. Actual changes to territories are tempered each year to minimize the magnitude of rate changes. For 2024, indicated territories have been recalculated for each ZIP Code using the latest data from these models.

In order to increase rating stability, the FHCF territory tempering method was changed in 2017. Review of past FHCF rating history showed that there were many years when large numbers of ZIP Codes shifted one territory in a year and then shifted back one territory the following year (see Exhibit XVIII). Starting in 2017, a ZIP Code is shifted by one territory to a new territory only if the indication is for a shift of two or more territories or a shift of one territory has been consistent for three years. For 2024, 57 ZIP Codes shifted down one territory and 408 ZIP Codes shifted up one territory most due to three-year indications of one territory shift.

#### 3. Construction

FHCF data is collected for seven construction types for residential, tenants, condominiums, and commercial types of business, and two construction types for mobile homes. The mobile home codes relate to the extent of their tie downs, and starting with 2024 ratemaking, the year of manufacture is used as a proxy for additional construction differences.

Starting in 2021, the FHCF began receiving detail on the year of manufacture for mobile homes. In 2024, the FHCF reviewed the year manufactured modeling assumptions used by the three modelers (Verisk, Corelogic and RMS) that provide detailed modeling by deductibles. These assumptions were refined and resulted in greater relativity differences between pre-7/13/1994 and post 7/13/1994 mobile homes. The 2023 relativity for older mobile homes was 165.9% of newer mobile homes. The 2024 analysis indicates this difference should be significantly greater and we will phase in this change over multiple years. For 2024, we are using a relativity for older homes of 199.3% of newer mobile homes, an overall increase of 20%. This change will not impact the overall mobile home rate decrease of 9.25% but it will generate smaller rate decreases for older mobile homes and greater rate decreases for newer mobile homes. This relativity cap is larger than our usual 15% but actual overall rate changes will vary by ZIP Code and deductible and because of the overall rate decrease most rate changes for older mobile homes will be less than the full change in relativity.

Based on review of loss costs by year built for mobile homes we expanded the tied down mobile home rating into four groupings: Pre-1976, 1976 to 1994, 1995 to 2008 and post 2008. Due to the

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20% cap on relativity changes, the pre-1976 and 1976 to 1994 groups will have the same rates for 2024. Over time the pre-1976 mobile homes will have higher rates than the 1976 to 1994 group.

#### **4. Deductibles**

The rates proposed are for the same sets of deductibles as for 2023. Relativities for each deductible vary by type of business. As with construction relativities, changes in deductible relativities were limited to changing no more than 15%.

### **General Overview of the Rate Allocation Process**

#### **Construction Classes**

Relativities between the most common construction within a type of business and the other construction types were calculated using Verisk, Corelogic, and RMS generated ZIP Code level loss costs. The indicated relativities were selected, except that they were limited to changing from the 2023 relativities by no more than 15%, with the exception of mobile homes which had a special limitation of 20% as discussed previously.

Rates for unknown construction are calculated using the same method as other construction types, not to exceed the highest rate for all known constructions in the same type of business.

#### **Rating Region (Territory) Definition**

To begin the process this year, we identified the 1,448 ZIP Codes for which rates would be produced. These are the currently valid U.S. Postal Service ZIP Codes in Florida, plus some recently deactivated ZIP Codes for which we continue to produce rates. We identified 930 of the ZIP Codes that had at least \$30 million of total exposure. The remaining 518 ZIP Codes were mapped to these 930 ZIP Codes by location. Most of these 518 ZIP Codes were exclusively post-office boxes. They inherited their territory from the territory of the ZIP Code to which they were mapped. The purpose of this step was to avoid trying to assign ZIP Codes to territories if they had very little exposure. When a ZIP Code has no frame exposure, for example, the models produce a 0.00 loss cost. To avoid these problems and to increase the reliability of the modeled losses, this mapping technique was employed.

In order to define territories, residential base deductible ZIP Code level loss costs to the FHCF layer were used. The excess loss costs from three models (Verisk, Corelogic, and RMS) were averaged and then weighted by the amount of construction in the three classes: frame, masonry, and masonry veneer. Together, these constructions account for over 99% of residential exposure. The result was a weighted average loss cost for each ZIP Code.

The ZIP Codes were ranked by weighted average loss cost and partitioned into 25 territories, or rating regions. We set the relativities between rating regions ahead of time, and then fit the ZIP Codes to these values. This enabled a more consistent spread of values between the highest and lowest rates. In keeping with past rates, the ratio of the rates in the highest and lowest regions was set at 35:1. Subject to these guidelines, statistical methods were used to maximize the differences between regions and minimize the variation within a region. This same procedure was performed for this year's rates. Subsequently, we judgmentally adjusted the territory 1 loss cost down to better reflect actual indications for territory 1 if needed. This adjustment had the effect of keeping the ratio at approximately 35:1.

We tempered the change in territory from 2023 to 2024 by limiting the territory movement to no more than one from its 2023 territory assignment and only if there is an indication of a movement of two or more territories or a three-year indication of at least one territory. This approach has increased the stability of territory definitions.

The proposed (tempered) territories, or rating groups, are presented in Exhibit XIII. Exhibit XV shows exposure and counts by territory. Exhibit XIX displays the proposed territories as maps.

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## **Production of Rates**

The total FHCF losses have been allocated to five types of business (Exhibit VI). Within each, construction and deductible relativities have been calculated. In this process, ZIP Code level modeled loss costs were combined using a straight average. Relativities between territories were determined in the territorial definition process.

An overall premium adjustment factor was calculated for each type of business, so that the modeled exposure, when rated using 90% coverage rates, produced the desired total premium for each type of business. In this last step, the premium required was adjusted to the 90% coverage level.

Rates for 75% and 45% coverage level were calculated as 75/90ths and 45/90ths, respectively, of the 90% coverage rates.

The proposed rates produced for the base set of deductibles are found in Exhibit XIV.

Exhibit XV shows exposure and counts by territory.

Exhibit XVI compares rate changes for Residential Masonry (2% Deductible) by rating region across the state before application of windstorm mitigation credits.

The rates that are published in these exhibits are base rates. To calculate the final rate for an insured risk, one must take into consideration the relativities applicable for the three construction characteristics:

Preliminary factor = (year-built factor) x (roof shape factor) x (opening protection factor).

Actual factor = Preliminary Factor.

A small on balance factor is applied so that the final rates will produce the indicated FHCF reimbursement premium levels by type of business.

Final rate = (Base rate) x (actual factor) x (on balance factor).

All rate factors for the windstorm mitigation construction rating classifications and the on-balance factor are shown in Exhibit XIV.

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## Part III: Limitations

### Scope

This report was prepared for the use of the SBA for the sole purpose of developing a formula for determining the actuarially indicated premium to be paid by individual companies for the FHCF for the 2024 Contract Year as specified by Section 215.555, Florida Statutes. The formula must be approved by unanimous vote of the SBA Trustees, and they may, at any time, revise the formula pursuant to the procedure provided in Section 215.555(5)(b), Florida Statutes.

The rates in this report are developed for the limits and retentions specified by Section 215.555, Florida Statutes, for the 2024 Contract Year. No adjustments have been made to reflect availability of FHCF financial capacity during and subsequent to the 2024 Contract Year. Actual coverage provided by the FHCF for the 2024 Contract Year is subject to modification due to legislative, judicial, or regulatory actions. Except where explicitly noted, such modifications are not considered in this report.

### Data Sources

In developing the 2024 FHCF ratemaking formula, we have relied on the following data:

1. FHCF 2023 Contract Year exposure data as of 10/24/2023 as reported by 140 FHCF companies and compiled by Paragon. This data has not been fully audited yet and could be subject to variability in terms of amounts and classifications of exposure data.
2. Historical FHCF exposure data from prior years, subject to audit by the FHCF, and compiled by Paragon.
3. Projections of 2024 season hurricane losses prepared by Verisk, ARA, Corelogic, FPM, and RMS for use in determining overall expected industry losses. All loss projections are based on catastrophe models that have been accepted by the Florida Commission on Hurricane Loss Projection Methodology as of December 1, 2023, except for the Verisk model which was accepted January 4, 2024.
4. Allocations of projected 2024 season hurricane losses prepared by Verisk, Corelogic, and RMS for use in developing various rating classifications.
5. Special analyses of mitigation rating factors prepared by Verisk, ARA, Corelogic and RMS.
6. Special analyses of projected hurricane losses by county by ARA, Corelogic and RMS.
7. Special analyses of projected hurricane losses by ZIP Code by Paragon using Verisk and RMS models.
8. Industry residential construction cost trends for Florida and the United States as developed by Marshall & Swift.
9. Estimates of projected FHCF operating expenses by FHCF staff.
10. Estimates of projected net expenses for 2020A and 2024A Pre-Event Notes by Raymond James and Associates.

We have not audited or verified the sources of the data and information. If the underlying data or information is inaccurate or incomplete, the results of our formula report may be impacted.

### Variability of Results

Ratemaking is the projection of future losses and expenses and their relationship to future exposures. The projected rates contained in the attached report represent our best professional judgment. In property catastrophe reinsurance, actual losses are likely to vary from expected losses. The degree of variation could be substantial and could be in either direction from estimates. There is also significant potential for future variability in projections of expenses and exposures.

### Distribution and Use

This report was prepared for the use of the SBA for the sole purpose of developing a formula for determining the actuarially indicated premium to be paid by individual companies to the FHCF for the 2024 Contract Year as specified by Section 215.555, Florida Statutes. The data, assumptions, methodology, and results in this report may not be appropriate for other than the intended use. We recommend that any party using this report have its own actuary review this report to ensure that the party understands the

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assumptions and uncertainties inherent in our estimates. A copy of this report will be available on the FHCF's web site.

# EXHIBIT

## II

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Summary of Rate Calculation

**Section I : Retention, Attachment and Coverage**

		Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Coverage Avg. % as of 06/30/2023		86.964%	84.080%	87.428%	89.985%	89.956%	87.362%	(0.9)	
Coverage Avg. % as of 03/01/2024		86.429%	83.978%	86.505%	89.985%	89.956%	86.874%	(1)	
Coverage Change		-0.615%	-0.121%	-1.057%	0.000%	0.000%	-0.559%	(1.1)	
Retention	9,929,000,000							(2)	
Loss Only Limit	17,789,655,681							(3)	
Retention + Limit	27,718,655,681							(4)	(2)+(3)
Loss and LAE at Coverage Limit	17,000,000,000							(5)	(3)*total(1)*1.10
Section I		Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Gross Losses at 100% Unadjusted		3,749,536,114	15,845,271	309,033,926	135,495,821	487,448,923	4,697,360,055	(6)	
Gross Losses at 100% Adjusted*		3,770,533,516	15,876,961	309,651,994	135,875,209	489,203,740	4,721,141,420	(7)	
% Adjustment		0.560%	0.200%	0.200%	0.280%	0.360%	0.506%	(8)	(7)/(6) - 1
* Adjustment includes factor for annual aggregate deductibles.									
Allocation of Excess Loss to Type of Business at Coverage Level		79.223%	0.384%	6.562%	3.164%	10.667%	100.000%	(9)	[Alloc of Excess Losses] (7)
Excess Losses and LAE at Coverage		885,135,436	4,285,684	73,318,635	35,347,608	119,181,061	1,117,268,424	(10)	(9)*total(10)
Per Company Analysis Factors									
Retention Adjustment								(11)	
Limit Adjustment	adj value							(14)	(14 Factor)*(10)
Combined Retention and Limit Adjustment	-1.3601%	-12,038,974	-58,291	-997,227	-480,773	-1,621,015	-15,196,279	(15)	(15 Factor)*(10)
Total Loss After Per Company Analysis Factors		873,096,462	4,227,393	72,321,408	34,866,835	117,560,046	1,102,072,145	(16)	(10)+(15)
Post Model Adjustment Factors		5.00%	5.00%	5.00%	5.00%	5.00%	5.00%	(17)	
		43,654,823	211,370	3,616,070	1,743,342	5,878,002	55,103,607	(18)	(17)*(16)
Total Gross Excess Loss and LAE		916,751,286	4,438,763	75,937,478	36,610,177	123,438,049	1,157,175,752	(19)	(18)+(16)
Special Adjustments									
Investment Income	0.000%	0	0	0	0	0	0	(20)	(20 Factor)*(19)
Ceded Loss & LAE	0.000%	0	0	0	0	0	0	(21)	No Risk Transfer in Contract Year 2024
Total Special Adjustment	0.000%	0	0	0	0	0	0	(22)	(20)+(21)
Net Loss & LAE Prior to Expense Loadings and Credits (Base Prem)		916,751,286	4,438,763	75,937,478	36,610,177	123,438,049	1,157,175,752	(23)	(19)+(22)
Fixed Expense Loadings									
Operating Expense	1.047%	9,602,023	46,491	795,367	383,454	1,292,886	12,120,221	(24a)	SBA Operating Expenses
2020A Note Expense	2.251%	20,637,635	99,924	1,709,482	824,158	2,778,801	26,050,000	(24b)	Debt Service Payment & Held Asset Risk Charge
2024A Note Expense	2.644%	24,242,289	117,377	2,008,067	968,108	3,264,158	30,600,000	(24c)	Debt Service Payment & Held Asset Risk Charge (Estimated)
Mitigation Funding	0.000%	0	0	0	0	0	0	(25)	Paid from Investment Income (not from premium)
Offset for Premium Credits and Adjustments		0	0	0	0	0	0	(26)	-((1+(33))*(1+(37))-1)*((24a+24b+24c+24d)+(25))/((1+(33))*(1+(37)))
Total Fixed Expense Loadings	5.943%	54,481,947	263,793	4,512,916	2,175,720	7,335,845	68,770,221	(27)	(24a)+(24b)+(24c)+(25)+(26)
Base Premium Prior to Credits (i.e., for FHCF Rates)		971,233,233	4,702,556	80,450,394	38,785,896	130,773,894	1,225,945,973	(28)	(23)+(27)
Premium Credits									
BCEG (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(31)	Given larger of BCEG or Windstorm Mitigation Credit in rates
BCEG (\$)		0	0	0	0	0	0	(32)	(28)*(31)
Total Premium Credits		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(33)	(31)
2024 Section I Base Premium at Coverage Level prior to Cash Build Up		971,233,233	4,702,556	80,450,394	38,785,896	130,773,894	1,225,945,973	(34)	

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Section I: Adjustment to 10/24/2023 Exposure Base And Summary of Rate Change

			Residential	Tenants	Condos	Mobile Home	Commercial	Total		
<b>Adjustment for Change in Reportings 10/24/2023 to 10/24/2023</b>										
2023 Section I Base Premium	as of 10/24/2023		1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(35)	
(Net of Credits)	as of 10/24/2023		1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(36)	
Change	Change		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(37)	(36)/(35) - 1
2023 Section I Exposure	as of 10/24/2023		2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(38)	
(All ZIP Codes)	as of 10/24/2023		2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(39)	
Change	Change		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	(40)	(39)/(38) - 1
Exposure Trend (2023 to 2024)			10.00%	7.00%	7.00%	7.00%	3.00%	9.37%	(41)	
2024 Section I Exposure			3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(42)	(1+(41))*(39)
2024 Section I Actuarially Indicated Base Premium at Coverage Level			971,233,233	4,702,556	80,450,394	38,785,896	130,773,894	1,225,945,973	(43)	(34)
2024 Section I Actuarially Indicated Base Premium at Cov. Level Adj. For Reporting Change			971,233,233	4,702,556	80,450,394	38,785,896	130,773,894	1,225,945,973	(43.01)	(1+(37))*(43)
<b>Cash Build-up Factor</b>										
2024 Adjusted Sect. I Base Premium at Coverage at 2024 Cash Build-up Level	25%		1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(45)	(43.01)*1.25
Variable Expense Loading										
Reinsurance Factor	0.000%		0	0	0	0	0	0	(45a)	No Risk Transfer in Contract Year 2024
2024 Section I Base Premium at Coverage with Cash Build-up & Variable Expenses	0.0000%		1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(45b)	(45)+(45a)

**Summary of Section I , Premium, Exposure and Rate Change**

			Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Base Premium (25% CB)	2023	as of 10/24/2023	1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(46)	(36)
	2024		1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(47)	(45b)
Change			-0.16%	-2.67%	8.48%	-2.90%	10.28%	1.29%	(48)	((47)/(46))-1
Exposure	2023	as of 10/24/2023	2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(49)	(39)
	2024		3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(50)	(42)
Change			10.00%	7.00%	7.00%	7.00%	3.00%	9.37%	(51)	((50)/(49))-1
Rate (at 25% CB)	2023	as of 10/24/2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576	(52)	1000*(46)/(49)
	2024		0.3819	0.1911	0.6689	1.2927	0.7496	0.4239	(53)	1000*(47)/(50)
Change			-9.24%	-9.04%	1.38%	-9.25%	7.06%	-7.38%	(54)	((53)/(52))-1
Rate at 25% CB	2024		0.3819	0.1911	0.6689	1.2927	0.7496	0.4239	(54.01)	
Overall Rate Change			-9.24%	-9.04%	1.38%	-9.25%	7.06%	-7.38%	(55)	((1000*(45b)/(50))/(52))-1
Rates at 90% (Unadjusted for Coverage Level)										
	2023		0.4355	0.2248	0.6792	1.4247	0.7005	0.4715	(56)	((52)*(.9/(0.9)))
	2024		0.3977	0.2048	0.6959	1.2929	0.7500	0.4391	(57)	((53)*(.9/(1)))
Rate Change Unadjusted for Coverage Level			-8.67%	-8.93%	2.47%	-9.25%	7.06%	-6.86%	(58)	((57)/(56))-1



Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Summary of Results

	Retention	Limit	Residential	Tenants	Condos	Mobile Home	Commercial	Total		
Premium										
Section I: Basic Cov.			1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(69)	(45b)
Section I: Extended Cov.			-	-	-	-	-	-	(70)	There is no Extended Coverage Charge for Citizens
Section I: Subtotal	9,929,000,000	17,000,000,000	1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(71)	(70)+(69)
Section II	0	0	0	0	0	0	0	0	(72)	There is no Section II exposure
Total	9,929,000,000	17,000,000,000	1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(73)	(71)+(72)
Coverage %			86.429%	83.978%	86.505%	89.985%	89.956%	86.874%	(74)	(1)
Projected Payout Multiple		11.0935							(74.01)	(73Limit)/(73total prem)
Retention Multiples	100%	5.6288	1,404,663,637	6,999,691	116,251,631	53,878,157	181,719,570	1,763,975,913	(75)	(73ret)/(73 tot prem)*(74tot)/100%
	90%	6.2542	1,264,197,273	6,299,722	104,626,468	48,490,341	163,547,613	1,587,578,322	(76)	(73ret)/(73 tot prem)*(74tot)/90%
	75%	7.5050	1,053,497,728	5,249,768	87,188,723	40,408,617	136,289,678	1,322,981,935	(77)	(73ret)/(73 tot prem)*(74tot)/75%
	45%	12.5084	632,098,637	3,149,861	52,313,234	24,245,170	81,773,807	793,789,161	(78)	(73ret)/(73 tot prem)*(74tot)/45%
Sect. I Projected Exposure		2024	3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(79)	(49)
Sect. I Avg. Basic Rates	100%		0.4419	0.2275	0.7733	1.4365	0.8333	0.4879	(80)	1000*(69)/(79)*((100%)/(74))
	90%		0.3977	0.2048	0.6959	1.2929	0.7500	0.4391	(81)	1000*(69)/(79)*((90%)/(74))
	75%		0.3314	0.1706	0.5799	1.0774	0.6250	0.3659	(82)	1000*(69)/(79)*((75%)/(74))
	45%		0.1989	0.1024	0.3480	0.6464	0.3750	0.2196	(83)	1000*(69)/(79)*((45%)/(74))
Average Coverage			0.3819	0.1911	0.6689	1.2927	0.7496	0.4239	(84)	1000*(69)/(79) or (52)
Overall Section I Rate Change										
Total Premium		2023	1,215,979,551	6,039,340	92,701,966	49,929,409	148,233,592	1,512,883,858	(85)	(45)
		2024	1,214,041,541	5,878,195	100,562,993	48,482,370	163,467,367	1,532,432,466	(86)	(73)
Total Exposure		2023	2,889,736,373,541	28,753,178,967	140,503,636,945	35,052,473,775	211,725,614,402	3,305,771,277,630	(87)	(48)
		2024	3,178,709,980,790	30,765,903,946	150,338,856,070	37,506,146,832	218,077,382,776	3,615,398,270,414	(88)	(49)
Average Rate (000s)		2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576	(89)	1000*(85)/(87)
		2024	0.3819	0.1911	0.6689	1.2927	0.7496	0.4239	(90)	1000*(86)/(88)
Overall Rate Change			-9.24%	-9.04%	1.38%	-9.25%	7.06%	-7.38%	(91)	(90)/(89) - 1
Rates at 90% (Unadjusted for Coverage Level)		2023	0.4355	0.2248	0.6792	1.4247	0.7005	0.4715	(92)	(56)
		2024	0.3977	0.2048	0.6959	1.2929	0.7500	0.4391	(93)	(57)
Rate Change Unadjusted for Coverage Level			-8.67%	-8.93%	2.47%	-9.25%	7.06%	-6.86%	(94)	(57)/(56)-1

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Section I: Historical Exposures and Premiums

	Residential	Tenants*	Condo-Owners	Mobile Home	Commercial	Total
<b>Section I Exposures (as of 1/30/2024)</b>						
2013	\$1,692,585,905,910	\$20,716,140,015	\$84,939,169,492	\$28,539,351,997	\$197,362,838,239	\$2,024,143,405,653
2014	\$1,719,567,803,513	\$22,229,245,146	\$86,702,102,354	\$27,474,291,575	\$188,824,739,041	\$2,044,798,181,629
2015	\$1,754,969,315,990	\$22,508,843,627	\$88,453,721,949	\$25,877,523,024	\$170,243,010,515	\$2,062,052,415,105
2016	\$1,822,895,641,425	\$25,213,767,240	\$92,927,887,318	\$26,037,614,203	\$159,080,068,043	\$2,126,154,978,229
2017	\$1,874,475,550,556	\$27,524,693,929	\$96,602,096,966	\$26,353,385,960	\$152,405,421,800	\$2,177,361,149,211
2018	\$1,957,115,844,385	\$27,582,791,531	\$101,960,350,577	\$27,088,783,563	\$156,489,178,066	\$2,270,236,948,122
2019	\$2,049,049,434,406	\$21,941,616,066	\$106,760,992,426	\$27,976,005,851	\$163,057,586,759	\$2,368,785,635,508
2020	\$2,163,848,506,212	\$23,304,294,435	\$112,878,372,506	\$28,964,052,637	\$169,730,425,127	\$2,498,725,650,917
2021	\$2,331,365,801,715	\$25,258,247,645	\$121,985,871,058	\$29,996,378,812	\$160,746,872,831	\$2,659,353,172,061
2022	\$2,567,257,722,961	\$27,692,326,999	\$132,974,746,721	\$32,142,181,052	\$153,858,289,315	\$2,913,925,267,048
2023	\$2,889,736,373,541	\$28,753,178,967	\$140,503,636,945	\$35,052,473,775	\$211,725,614,402	\$3,305,771,277,630
2024 (Proj.)	\$3,178,709,980,790	\$30,765,903,946	\$150,338,856,070	\$37,506,146,832	\$218,077,382,776	\$3,615,398,270,414
2025						

	12.56%	3.83%	5.66%	9.05%	37.61%	13.45%
<b>Section I Premiums (as of 1/30/2024)</b>						
2013	\$977,906,580	\$9,143,951	\$64,528,991	\$37,315,378	\$175,438,169	\$1,264,333,070
2014	\$981,990,781	\$10,188,137	\$66,375,860	\$35,208,908	\$173,880,302	\$1,267,643,988
2015	\$975,194,503	\$9,276,293	\$67,838,597	\$34,674,641	\$128,846,280	\$1,215,830,315
2016	\$909,067,322	\$8,944,937	\$68,539,686	\$39,405,140	\$110,550,511	\$1,136,507,596
2017	\$911,917,792	\$9,224,815	\$70,507,479	\$43,442,087	\$94,028,996	\$1,129,121,169
2018	\$885,243,706	\$8,245,008	\$72,223,086	\$44,669,682	\$92,422,774	\$1,102,804,256
2019	\$962,096,967	\$5,641,986	\$75,383,653	\$42,342,022	\$105,229,504	\$1,190,694,132
2020	\$967,639,623	\$5,766,197	\$76,260,388	\$41,296,919	\$114,298,688	\$1,205,261,815
2021	\$987,403,358	\$5,439,228	\$79,498,876	\$39,817,973	\$104,420,984	\$1,216,580,419
2022	\$1,136,875,244	\$6,245,227	\$92,308,101	\$45,662,336	\$109,721,625	\$1,390,812,533
2023	\$1,215,979,551	\$6,039,340	\$92,701,966	\$49,929,409	\$148,233,592	\$1,512,883,858
2024 (Proj.)	\$1,214,041,541	\$5,878,195	\$100,562,993	\$48,482,370	\$163,467,367	\$1,532,432,466
2025						

<b>Section I Average Rates (per \$1000)</b>						
2013	0.5778	0.4414	0.7597	1.3075	0.8889	0.6246
2014	0.5711	0.4583	0.7656	1.2815	0.9209	0.6199
2015	0.5557	0.4121	0.7669	1.3400	0.7568	0.5896
2016	0.4987	0.3548	0.7376	1.5134	0.6949	0.5345
2017	0.4865	0.3351	0.7299	1.6484	0.6170	0.5186
2018	0.4523	0.2989	0.7083	1.6490	0.5906	0.4858
2019	0.4695	0.2571	0.7061	1.5135	0.6454	0.5027
2020	0.4472	0.2474	0.6756	1.4258	0.6734	0.4824
2021	0.4235	0.2153	0.6517	1.3274	0.6927	0.4575
2022	0.4428	0.2255	0.6942	1.4206	0.7131	0.4773
2023	0.4208	0.2100	0.6598	1.4244	0.7001	0.4576
2024 (Proj.)	0.3819	0.1911	0.6689	1.2927	0.7496	0.4239

<b>Percent Change in Rates</b>						
2013-14	-1.16%	3.84%	0.77%	-1.99%	3.59%	-0.75%
2014-15	-2.70%	-10.08%	0.18%	4.56%	-17.81%	-4.89%
2015-16	-10.25%	-13.92%	-3.83%	12.94%	-8.18%	-9.34%
2016-17	-2.45%	-5.53%	-1.04%	8.92%	-11.22%	-2.99%
2017-18	-7.02%	-10.81%	-2.95%	0.03%	-4.27%	-6.33%
2018-19	3.81%	-13.98%	-0.32%	-8.22%	9.27%	3.48%
2019-20	-4.76%	-3.77%	-4.32%	-5.80%	4.35%	-4.04%
2020-21	-5.29%	-12.97%	-3.54%	-6.90%	2.86%	-5.16%
2021-22	4.56%	4.73%	6.52%	7.02%	2.95%	4.33%
2022-23	-4.98%	-6.86%	-4.95%	0.27%	-1.82%	-4.12%
2023-24	-9.24%	-9.04%	1.38%	-9.25%	7.06%	-7.38%

<b>Historical Rates as Percent of 2024 Rates</b>						
2013	151%	231%	114%	101%	119%	147%
2014	150%	240%	114%	99%	123%	146%
2015	145%	216%	115%	104%	101%	139%
2016	131%	186%	110%	117%	93%	126%
2017	127%	175%	109%	128%	82%	122%
2018	118%	156%	106%	128%	79%	115%
2019	123%	135%	106%	117%	86%	119%
2020	117%	130%	101%	110%	90%	114%
2021	111%	113%	97%	103%	92%	108%
2022	116%	118%	104%	110%	95%	113%
2023	110%	110%	99%	110%	93%	108%
2024	100%	100%	100%	100%	100%	100%

<b>Historical Rate on Line (Mandatory Coverage only)</b>						
	Limit(\$B)					
2013	17.000					7.4%
2014	17.000					7.5%
2015	17.000					7.2%
2016	17.000					6.7%
2017	17.000					6.6%
2018	17.000					6.5%
2019	17.000					7.0%
2020	17.000					7.1%
2021	17.000					7.2%
2022	17.000					8.2%
2023	17.000					8.9%
2024	17.000					9.0%

\*Includes Inland Marine/Stand Alone & Other Contents Type Policies

# EXHIBIT

## III

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Control Totals By Type

Type	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Commercial	147,284	1.9%	\$218,077,382,776	\$1,480,659	6.0%
Residential	4,984,752	66.0%	\$3,178,709,980,790	\$637,687	87.9%
Mobile Home	319,735	4.2%	\$37,506,146,832	\$117,304	1.0%
Tenants	1,120,297	14.8%	\$30,765,903,946	\$27,462	0.9%
Condominium Unit Owners	982,803	13.0%	\$150,338,856,070	\$152,969	4.2%
Total	7,554,871	100.0%	\$3,615,398,270,414	\$478,552	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Commercial Control Totals By Construction

Construction	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Frame	27,450	18.6%	\$24,490,649,769	\$892,191	11.2%
Masonry	101,403	68.8%	\$94,695,748,702	\$933,855	43.4%
Masonry with Reinforced Concrete Roof	12,582	8.5%	\$30,477,688,275	\$2,422,325	14.0%
Superior	246	0.2%	\$3,366,256,513	\$13,683,970	1.5%
Superior with Reinforced Concrete Roof	2,391	1.6%	\$64,521,576,017	\$26,985,184	29.6%
Masonry Veneer	394	0.3%	\$350,977,671	\$890,806	0.2%
Unknown/Non Mobile Home Default	2,818	1.9%	\$174,485,829	\$61,918	0.1%
Total	147,284	100.0%	\$218,077,382,776	\$1,480,659	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Residential Control Totals By Construction

Construction	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Frame	1,139,112	22.9%	\$691,450,676,618	\$607,009	21.8%
Masonry	3,460,666	69.4%	\$2,221,686,964,600	\$641,982	69.9%
Masonry with Reinforced Concrete Roof	8,035	0.2%	\$9,601,356,440	\$1,194,942	0.3%
Superior	210	0.0%	\$513,581,706	\$2,445,627	0.0%
Superior with Reinforced Concrete Roof	158	0.0%	\$459,452,203	\$2,907,925	0.0%
Masonry Veneer	326,259	6.5%	\$239,605,911,625	\$734,404	7.5%
Unknown/Non Mobile Home Default	50,312	1.0%	\$15,392,037,598	\$305,932	0.5%
Total	4,984,752	100.0%	\$3,178,709,980,790	\$637,687	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Mobile Home Control Totals By Construction

Construction	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Mobile Home - Fully Tied Down, Mfg Before 1976	24,144	7.6%	\$1,475,005,936	\$61,092	3.9%
Mobile Home - Fully Tied Down, Mfg 1976-1994	111,452	34.9%	\$9,638,507,844	\$86,481	25.7%
Mobile Home - Fully Tied Down, Mfg 1995-2008	104,416	32.7%	\$13,825,501,525	\$132,408	36.9%
Mobile Home - Fully Tied Down, Mfg Post 2008	45,697	14.3%	\$8,270,036,489	\$180,975	22.0%
Mobile Home - Other Than Fully Tied Down or Unknown	34,026	10.6%	\$4,297,095,038	\$126,289	11.5%
Total	319,735	100.0%	\$37,506,146,832	\$117,304	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Tenants Control Totals By Construction

Construction	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Frame	259,249	23.1%	\$6,327,749,237	\$24,408	20.6%
Masonry	244,532	21.8%	\$7,254,097,587	\$29,665	23.6%
Masonry with Reinforced Concrete Roof	748	0.1%	\$74,384,509	\$99,445	0.2%
Superior	21,562	1.9%	\$671,236,989	\$31,131	2.2%
Superior with Reinforced Concrete Roof	646	0.1%	\$102,073,871	\$158,009	0.3%
Masonry Veneer	13,774	1.2%	\$449,849,221	\$32,659	1.5%
Unknown/Non Mobile Home Default	579,786	51.8%	\$15,886,512,532	\$27,401	51.6%
Total	1,120,297	100.0%	\$30,765,903,946	\$27,462	100.0%



Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Condominium Unit Owners Control Totals By Construction

Construction	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
Frame	99,471	10.1%	\$13,314,306,519	\$133,851	8.9%
Masonry	519,577	52.9%	\$64,974,882,340	\$125,053	43.2%
Masonry with Reinforced Concrete Roof	82,136	8.4%	\$13,188,681,507	\$160,571	8.8%
Superior	62,970	6.4%	\$12,967,329,469	\$205,929	8.6%
Superior with Reinforced Concrete Roof	131,007	13.3%	\$35,012,081,585	\$267,254	23.3%
Masonry Veneer	18,755	1.9%	\$2,579,106,780	\$137,516	1.7%
Unknown/Non Mobile Home Default	68,887	7.0%	\$8,302,467,870	\$120,523	5.5%
Total	982,803	100.0%	\$150,338,856,070	\$152,969	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Commercial Control Totals By Deductible Code

Deductible Code	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
CA (\$0 to \$2,500)	50	0.0%	\$128,489,471	\$2,569,789	0.1%
CB (\$2,501 to \$7,500)	31	0.0%	\$66,161,470	\$2,134,241	0.0%
CC (\$7,501 to \$15,000)	24	0.0%	\$7,044,587	\$293,524	0.0%
CD (\$15,001 to \$50,000)	11	0.0%	\$3,447,707	\$313,428	0.0%
C1 (1%)	69	0.0%	\$218,703,202	\$3,169,612	0.1%
C2 (2%)	2,057	1.4%	\$3,807,458,298	\$1,850,976	1.7%
C3 (3%)	26,020	17.7%	\$60,959,715,399	\$2,342,802	28.0%
C4 (4%)	8	0.0%	\$33,107,254	\$4,138,407	0.0%
C5 (5%)	117,072	79.5%	\$148,379,133,989	\$1,267,418	68.0%
C6 (6%)	0	0.0%	\$0	\$0	0.0%
C7 (7%)	0	0.0%	\$0	\$0	0.0%
C8 (8%)	434	0.3%	\$491,360,669	\$1,132,167	0.2%
C9 (9%)	0	0.0%	\$0	\$0	0.0%
C0 (10%)	1,508	1.0%	\$3,982,760,730	\$2,641,088	1.8%
Total	147,284	100.0%	\$218,077,382,776	\$1,480,659	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Residential Control Totals By Deductible Code

Deductible Code	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
RM (\$0)	11,898	0.2%	\$399,365,336	\$33,566	0.0%
RA (\$1 to \$500)	94,168	1.9%	\$48,130,627,351	\$511,114	1.5%
RB (\$501 to \$1,500)	126,852	2.5%	\$89,794,240,833	\$707,866	2.8%
RC (\$1,501 to \$2,500)	22,991	0.5%	\$19,239,235,764	\$836,816	0.6%
RD (Greater Than \$2,500)	12,028	0.2%	\$14,463,453,899	\$1,202,482	0.5%
R1 (1%)	121,185	2.4%	\$102,772,700,023	\$848,065	3.2%
R2 (2%)	4,038,626	81.0%	\$2,555,879,293,984	\$632,859	80.4%
R3 (3%)	29,084	0.6%	\$17,782,802,653	\$611,429	0.6%
R4 (4%)	3,539	0.1%	\$3,061,045,146	\$864,946	0.1%
R5 (5%)	479,943	9.6%	\$282,355,113,519	\$588,310	8.9%
R6 (6%)	225	0.0%	\$3,439,791	\$15,288	0.0%
R7 (7%)	1	0.0%	\$1,984,704	\$1,984,704	0.0%
R8 (8%)	0	0.0%	\$0	\$0	0.0%
R9 (9%)	31	0.0%	\$9,194,619	\$296,601	0.0%
R0 (10% to 14%)	42,769	0.9%	\$39,010,579,283	\$912,123	1.2%
RZ (15% or Greater)	1,412	0.0%	\$5,806,903,885	\$4,112,538	0.2%
Total	4,984,752	100.0%	\$3,178,709,980,790	\$637,687	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Mobile Home Control Totals By Deductible Code

Deductible Code	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
MM (\$0)	130	0.0%	\$1,228,668	\$9,451	0.0%
MA (\$1 to \$250)	1,038	0.3%	\$19,284,433	\$18,578	0.1%
MB (\$251 to \$500)	90,916	28.4%	\$8,686,515,919	\$95,544	23.2%
MC (Greater Than \$500)	14,822	4.6%	\$2,034,472,498	\$137,260	5.4%
M1 (1%)	1,297	0.4%	\$214,073,170	\$165,053	0.6%
M2 (2%)	134,460	42.1%	\$19,442,146,695	\$144,594	51.8%
M3 (3%)	148	0.0%	\$17,656,235	\$119,299	0.0%
M4 (4%)	8	0.0%	\$676,594	\$84,574	0.0%
M5 (5%)	67,455	21.1%	\$6,334,045,633	\$93,900	16.9%
M6 (6%)	73	0.0%	\$5,893,864	\$80,738	0.0%
M7 (7%)	0	0.0%	\$0	\$0	0.0%
M8 (8%)	0	0.0%	\$0	\$0	0.0%
M9 (9%)	1	0.0%	\$520,020	\$520,020	0.0%
M0 (10% or Greater)	9,387	2.9%	\$749,633,103	\$79,859	2.0%
Total	319,735	100.0%	\$37,506,146,832	\$117,304	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Tenants Control Totals By Deductible Code

Deductible Code	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
RM (\$0)	2,089	0.2%	\$34,492,016	\$16,511	0.1%
RA (\$1 to \$500)	656,038	58.6%	\$18,547,292,458	\$28,272	60.3%
RB (\$501 to \$1,500)	376,024	33.6%	\$8,913,239,828	\$23,704	29.0%
RC (\$1,501 to \$2,500)	2,361	0.2%	\$108,994,462	\$46,165	0.4%
RD (Greater Than \$2,500)	2,927	0.3%	\$127,237,791	\$43,470	0.4%
R1 (1%)	13	0.0%	\$4,940,189	\$380,015	0.0%
R2 (2%)	67,983	6.1%	\$2,534,326,322	\$37,279	8.2%
R3 (3%)	3	0.0%	\$594,925	\$198,308	0.0%
R4 (4%)	0	0.0%	\$0	\$0	0.0%
R5 (5%)	8,117	0.7%	\$335,523,452	\$41,336	1.1%
R6 (6%)	0	0.0%	\$0	\$0	0.0%
R7 (7%)	0	0.0%	\$0	\$0	0.0%
R8 (8%)	0	0.0%	\$0	\$0	0.0%
R9 (9%)	0	0.0%	\$0	\$0	0.0%
R0 (10% to 14%)	4,616	0.4%	\$116,310,592	\$25,197	0.4%
RZ (15% or Greater)	126	0.0%	\$42,951,911	\$340,888	0.1%
Total	1,120,297	100.0%	\$30,765,903,946	\$27,462	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Condominium Unit Owners Control Totals By Deductible Code

Deductible Code	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
RM (\$0)	2,158	0.2%	\$63,697,204	\$29,517	0.0%
RA (\$1 to \$500)	282,014	28.7%	\$25,601,437,331	\$90,781	17.0%
RB (\$501 to \$1,500)	176,167	17.9%	\$23,844,388,282	\$135,351	15.9%
RC (\$1,501 to \$2,500)	42,591	4.3%	\$6,738,576,949	\$158,216	4.5%
RD (Greater Than \$2,500)	7,528	0.8%	\$1,944,996,690	\$258,368	1.3%
R1 (1%)	2,658	0.3%	\$613,287,130	\$230,733	0.4%
R2 (2%)	358,955	36.5%	\$69,047,727,286	\$192,358	45.9%
R3 (3%)	800	0.1%	\$237,568,927	\$296,961	0.2%
R4 (4%)	220	0.0%	\$52,608,458	\$239,129	0.0%
R5 (5%)	84,532	8.6%	\$17,196,403,814	\$203,431	11.4%
R6 (6%)	0	0.0%	\$0	\$0	0.0%
R7 (7%)	1	0.0%	\$1,609,910	\$1,609,910	0.0%
R8 (8%)	0	0.0%	\$0	\$0	0.0%
R9 (9%)	14	0.0%	\$3,190,743	\$227,910	0.0%
R0 (10% to 14%)	24,361	2.5%	\$4,112,074,301	\$168,797	2.7%
RZ (15% or Greater)	804	0.1%	\$881,289,045	\$1,096,131	0.6%
Total	982,803	100.0%	\$150,338,856,070	\$152,969	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 Reported Exposures as of 10/24/23 (Trended to 6/30/24)

Trended Exposures and Risks from Invalid ZIP Codes

Type	Invalid ZIP Code Data			Valid Zip Code Data		
	Units	Exposure	Average	Units	Exposure	Average
Commercial	2	\$1,434,395	\$0	147,282	218,075,948,381	\$1,480,669
Residential	21	\$20,836,167	\$992,198	4,984,731	3,178,689,144,623	\$637,685
Mobile Home	36	\$1,645,889	\$45,719	319,699	37,504,500,943	\$117,312
Tenants	37	\$1,135,340	\$30,685	1,120,260	30,764,768,606	\$27,462
Condo Owners	3	\$493,031	\$164,344	982,800	150,338,363,039	\$152,969
Total	99	\$25,544,822	\$258,029	7,554,772	\$3,615,372,725,592	\$478,555

Type	All Data			% from Invalid ZIP Codes	
	Units	Exposure	Average	Units	Exposure
Commercial	147,284	\$218,077,382,776	\$1,480,659	0.00%	0.00%
Residential	4,984,752	\$3,178,709,980,790	\$637,687	0.00%	0.00%
Mobile Home	319,735	\$37,506,146,832	\$117,304	0.01%	0.00%
Tenants/Other	1,120,297	\$30,765,903,946	\$27,462	0.00%	0.00%
Condo Owners	982,803	\$150,338,856,070	\$152,969	0.00%	0.00%
Total	7,554,871	\$3,615,398,270,414	\$478,552	0.00%	0.00%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Exposures, Unit Counts and Averages  
As of 10/24/23

Exposures (\$)					Annual Change (%)** Exposures						
Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total	Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total		
1994	250,798,066,574	573,595,663,128	27,708,002,887	N/A	852,101,732,589	1994-1995	NA	12.9	(0.9)	N/A	N/A
1995	72,259,223,184	647,611,806,441	27,471,321,323	N/A	747,342,350,948	1995-1996	(0.3)	1.3	(3.0)	N/A	0.9
1996	72,045,415,920	655,747,424,327	26,641,265,399	N/A	754,434,105,646	1996-1997	(6.9)	1.5	3.6	N/A	0.8
1997	67,060,941,081	665,706,907,693	27,603,802,377	N/A	760,371,651,151	1997-1998	(6.9)	2.1	3.2	N/A	1.3
1998	62,406,306,257	679,581,831,252	28,500,346,256	N/A	770,488,483,765	1998-1999	(0.2)	4.1	2.9	N/A	3.7
1999	62,310,422,803	707,168,630,617	29,321,225,365	N/A	798,800,278,785	1999-2000	28.9	9.0	1.7	N/A	10.3
2000	80,327,371,492	771,151,251,493	29,805,027,583	N/A	881,283,650,568	2000-2001	19.4	3.2	1.8	N/A	4.6
2001	95,903,685,545	795,830,648,826	30,336,699,432	N/A	922,071,033,803	2001-2002	17.9	19.2	12.6	N/A	19.3
2002	113,055,152,173	948,240,567,004	34,158,045,008	4,649,506,167	1,100,103,270,352	2002-2003	8.5	8.3	(0.1)	78.7	8.4
2003	122,711,546,221	1,027,400,432,961	34,109,501,584	8,307,577,221	1,192,529,057,987	2003-2004	(1.7)	12.5	2.7	9.4	10.7
2004	120,567,809,498	1,155,969,925,095	35,014,550,966	9,090,209,248	1,320,642,494,807	2004-2005	4.1	17.2	3.7	16.6	15.6
2005	125,518,806,067	1,354,455,492,240	36,309,216,467	10,602,304,913	1,526,885,819,687	2005-2006	8.6	19.4	4.8	N/A	17.3
2006	136,340,614,829	1,617,264,717,950	38,069,099,793	N/A	1,791,674,432,572	2006-2007	37.0	11.2	(1.5)	N/A	12.9
2007	186,827,864,101	1,798,433,070,223	37,500,069,047	N/A	2,022,761,003,371	2007-2008	5.9	4.5	(0.4)	N/A	4.6
2008	197,900,227,178	1,880,244,332,666	37,368,104,549	N/A	2,115,512,664,393	2008-2009	7.4	2.0	(1.6)	N/A	2.4
2009	212,460,681,802	1,917,016,979,268	36,761,961,986	N/A	2,166,239,623,056	2009-2010	(1.2)	0.1	(3.3)	N/A	(0.1)
2010	209,853,976,263	1,919,117,708,514	35,542,039,480	N/A	2,164,513,724,257	2010-2011	(3.2)	(2.0)	(4.8)	N/A	(2.2)
2011	203,072,396,562	1,880,455,711,002	33,837,366,975	N/A	2,117,365,474,539	2011-2012	(2.0)	(1.9)	(6.7)	N/A	(1.9)
2012	199,076,994,510	1,845,564,939,783	31,569,203,791	N/A	2,076,211,138,084	2012-2013	(0.9)	(2.6)	(9.6)	N/A	(2.5)
2013	197,362,838,239	1,798,241,215,417	28,539,351,997	N/A	2,024,143,405,653	2013-2014	(4.3)	1.7	(3.7)	N/A	1.0
2014	188,824,739,041	1,828,499,151,013	27,474,291,575	N/A	2,044,798,181,629	2014-2015	(9.8)	2.0	(5.8)	N/A	0.8
2015	170,243,010,515	1,865,931,881,566	25,877,523,024	N/A	2,062,052,415,105	2015-2016	(6.6)	4.0	0.6	N/A	3.1
2016	159,080,068,043	1,941,037,295,983	26,037,614,203	N/A	2,126,154,978,229	2016-2017	(4.2)	3.0	1.2	N/A	2.4
2017	152,405,421,800	1,998,602,341,451	26,353,385,960	N/A	2,177,361,149,211	2017-2018	2.7	4.4	2.8	N/A	4.3
2018	156,489,178,066	2,086,658,986,493	27,088,783,563	N/A	2,270,236,948,122	2018-2019	4.2	4.4	3.3	N/A	4.3
2019	163,057,586,759	2,177,752,042,898	27,976,005,851	N/A	2,368,785,635,508	2019-2020	4.1	5.6	3.5	N/A	5.5
2020	169,730,425,127	2,300,031,173,153	28,964,052,637	N/A	2,498,725,650,917	2020-2021	(11.2)	7.8	3.6	N/A	6.4
2021	150,746,872,831	2,478,609,920,418	29,996,378,812	N/A	2,659,353,172,061	2021-2022	2.1	10.1	7.2	N/A	9.6
2022	153,858,289,315	2,727,924,796,681	32,142,181,052	N/A	2,913,925,267,048	2022-2023	37.6	12.1	9.1	N/A	13.4
2023	211,725,614,402	3,058,993,189,453	35,052,473,775	N/A	3,305,771,277,630	Avg. 95-23	4.6	5.9	1.0	N/A	5.6

Unit Counts					Unit Counts						
Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total	Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total		
1994	667,009	4,523,478	630,092	N/A	5,820,579	1994-1995	NA	3.1	(0.1)	N/A	N/A
1995	217,433	4,662,527	629,593	N/A	5,509,553	1995-1996	7.1	(1.6)	(6.1)	N/A	(1.8)
1996	232,810	4,589,144	590,981	N/A	5,412,935	1996-1997	(14.4)	2.9	1.7	N/A	2.0
1997	199,267	4,722,716	601,167	N/A	5,523,150	1997-1998	(13.8)	(0.6)	(0.5)	N/A	(1.0)
1998	171,866	4,695,966	598,446	N/A	5,466,278	1998-1999	(23.1)	(1.4)	1.5	N/A	(1.8)
1999	132,195	4,627,958	607,162	N/A	5,367,315	1999-2000	(8.9)	4.2	(0.2)	N/A	3.4
2000	120,422	4,820,714	606,046	N/A	5,547,182	2000-2001	39.5	1.2	(2.1)	N/A	1.6
2001	167,961	4,877,216	593,148	N/A	5,638,325	2001-2002	13.2	0.3	(0.3)	N/A	3.7
2002	190,197	4,889,766	591,094	174,492	5,845,549	2002-2003	(5.4)	(0.1)	(2.3)	99.5	2.5
2003	179,954	4,885,715	577,547	348,037	5,991,253	2003-2004	(15.1)	2.3	(2.5)	(5.9)	0.8
2004	152,720	4,998,614	562,979	327,482	6,041,795	2004-2005	(4.6)	4.6	(3.3)	2.9	3.6
2005	145,657	5,229,215	544,433	336,976	6,256,281	2005-2006	(2.7)	9.8	(4.1)	N/A	2.4
2006	141,782	5,742,372	542,008	N/A	6,406,163	2006-2007	36.7	0.5	(6.0)	N/A	0.7
2007	193,852	5,768,968	490,928	N/A	6,453,746	2007-2008	(3.6)	(0.6)	(1.9)	N/A	(0.6)
2008	186,851	5,736,170	481,647	N/A	6,404,668	2008-2009	4.8	0.4	(2.7)	N/A	0.3
2009	195,884	5,757,481	468,744	N/A	6,422,109	2009-2010	(0.8)	0.2	(3.4)	N/A	(0.1)
2010	194,310	5,767,950	452,889	N/A	6,415,149	2010-2011	(0.6)	0.3	(4.1)	N/A	(0.0)
2011	193,114	5,784,513	434,355	N/A	6,411,982	2011-2012	(1.5)	(0.1)	(7.3)	N/A	(0.7)
2012	190,172	5,776,731	402,738	N/A	6,369,641	2012-2013	(1.4)	0.3	(6.2)	N/A	(0.1)
2013	187,504	5,794,914	377,877	N/A	6,360,295	2013-2014	(5.1)	1.8	(1.0)	N/A	1.4
2014	178,004	5,896,356	374,055	N/A	6,448,415	2014-2015	(7.2)	1.7	(7.9)	N/A	0.9
2015	165,116	5,998,865	344,350	N/A	6,508,331	2015-2016	(6.5)	2.9	(1.8)	N/A	2.4
2016	154,410	6,170,343	338,035	N/A	6,662,788	2016-2017	36.4	2.5	(1.5)	N/A	3.1
2017	210,586	6,323,865	333,058	N/A	6,867,509	2017-2018	(30.4)	0.6	(0.4)	N/A	(0.4)
2018	146,463	6,361,864	331,578	N/A	6,839,905	2018-2019	12.4	(2.0)	(0.8)	N/A	(1.6)
2019	164,649	6,236,609	328,801	N/A	6,730,059	2019-2020	(15.7)	2.9	(0.2)	N/A	2.3
2020	138,751	6,417,591	328,219	N/A	6,884,561	2020-2021	(10.4)	4.3	(0.3)	N/A	3.7
2021	124,295	6,691,209	327,215	N/A	7,142,719	2021-2022	(3.4)	1.6	(1.4)	N/A	1.4
2022	120,048	6,800,258	322,772	N/A	7,243,078	2022-2023	22.7	1.9	(0.9)	N/A	2.1
2023	147,284	6,929,526	319,735	N/A	7,396,545	Avg. 95-23	(0.1)	1.5	(2.4)	N/A	1.1

Averages (\$)					Averages						
Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total	Commercial	Residential*	Mobile Home	Stand Alone I.M.**	Total		
1994	376,004	126,804	43,975	N/A	146,395	1994-1995	NA	9.5	(0.8)	N/A	N/A
1995	332,329	138,897	43,633	N/A	135,645	1995-1996	(6.9)	2.9	3.3	N/A	2.8
1996	309,460	142,891	45,080	N/A	139,376	1996-1997	8.8	(1.4)	1.9	N/A	(1.2)
1997	336,538	140,958	45,917	N/A	137,670	1997-1998	7.9	2.7	3.7	N/A	2.4
1998	363,110	144,716	47,624	N/A	140,953	1998-1999	29.8	5.6	1.4	N/A	5.6
1999	471,352	152,804	48,292	N/A	148,827	1999-2000	41.5	4.7	1.8	N/A	6.7
2000	667,049	159,966	49,179	N/A	158,871	2000-2001	(14.4)	2.0	4.0	N/A	2.9
2001	570,988	163,173	51,145	N/A	163,536	2001-2002	4.1	18.8	13.0	N/A	15.1
2002	594,411	193,924	57,788	26,646	188,195	2002-2003	14.7	8.4	2.2	(10.4)	5.8
2003	681,905	210,287	59,059	23,870	199,045	2003-2004	15.8	10.0	5.3	16.3	9.8
2004	789,470	231,258	62,195	27,758	218,584	2004-2005	9.2	12.0	7.2	13.3	11.7
2005	861,742	259,017	66,692	31,463	244,056	2005-2006	11.6	8.7	9.4	N/A	14.6
2006	961,621	281,637	72,528	N/A	279,680	2006-2007	0.2	10.7	4.7	N/A	12.1
2007	963,765	311,743	76,366	N/A	313,424	2007-2008	9.9	5.1	1.6	N/A	5.4
2008	1,059,134	327,787	77,584	N/A	330,308	2008-2009	2.4	1.6	1.1	N/A	2.1
2009	1,084,625	332,961	78,427	N/A	337,310	2009-2010	(0.4)	(0.1)	0.1	N/A	0.0
2010	1,079,996	332,721	78,478	N/A	337,407	2010-2011	(2.6)	(2.3)	(0.7)	N/A	(2.1)
2011	1,051,567	325,085</									



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Commercial Totals By Mitigation Features

Mitigation Feature	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
<b>YEAR BUILT</b>					
Unknown	42	0.0%	\$123,442,636	\$2,939,110	0.1%
1994 or Earlier	103,669	70.4%	\$128,795,824,326	\$1,242,375	59.1%
1995-2001	14,189	9.6%	\$23,141,942,867	\$1,630,978	10.6%
2002-2011	20,521	13.9%	\$44,650,925,697	\$2,175,865	20.5%
2012 or Later	8,863	6.0%	\$21,365,247,250	\$2,410,611	9.8%
<b>TOTAL</b>	<b>147,284</b>	<b>100.0%</b>	<b>\$218,077,382,776</b>	<b>\$1,480,659</b>	<b>100.0%</b>
<b>STRUCTURE OPENING PROTECTION</b>					
No Credit is Given to Policyholder	131,435	89.2%	\$155,105,488,550	\$1,180,093	71.1%
Credit is Given to Policyholder	15,849	10.8%	\$62,971,894,226	\$3,973,241	28.9%
<b>TOTAL</b>	<b>147,284</b>	<b>100.0%</b>	<b>\$218,077,382,776</b>	<b>\$1,480,659</b>	<b>100.0%</b>
<b>ROOF SHAPE</b>					
Hip, Mansard, or Pyramid	47,552	32.3%	\$48,376,925,990	\$1,017,348	22.2%
Gable, Other, or Unknown	99,732	67.7%	\$169,700,456,786	\$1,701,565	77.8%
<b>TOTAL</b>	<b>147,284</b>	<b>100.0%</b>	<b>\$218,077,382,776</b>	<b>\$1,480,659</b>	<b>100.0%</b>

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Residential Totals By Mitigation Features

Mitigation Feature	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
<b>YEAR BUILT</b>					
Unknown	36,296	0.7%	\$13,514,087,860	\$372,330	0.4%
1994 or Earlier	2,436,152	48.9%	\$1,263,932,863,062	\$518,823	39.8%
1995-2001	593,806	11.9%	\$417,143,859,902	\$702,492	13.1%
2002-2011	914,944	18.4%	\$674,976,136,062	\$737,724	21.2%
2012 or Later	1,003,554	20.1%	\$809,143,033,904	\$806,278	25.5%
TOTAL	4,984,752	100.0%	\$3,178,709,980,790	\$637,687	100.0%
<b>STRUCTURE OPENING PROTECTION</b>					
No Credit is Given to Policyholder	3,758,915	75.4%	\$2,197,628,115,007	\$584,644	69.1%
Credit is Given to Policyholder	1,225,837	24.6%	\$981,081,865,783	\$800,336	30.9%
TOTAL	4,984,752	100.0%	\$3,178,709,980,790	\$637,687	100.0%
<b>ROOF SHAPE</b>					
Hip, Mansard, or Pyramid	1,667,820	33.5%	\$1,263,861,268,968	\$757,792	39.8%
Gable, Other, or Unknown	3,316,932	66.5%	\$1,914,848,711,822	\$577,295	60.2%
TOTAL	4,984,752	100.0%	\$3,178,709,980,790	\$637,687	100.0%

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Mobile Home Totals By Mitigation Features

Mitigation Feature	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
<b>YEAR BUILT</b>					
Unknown	1,739	0.5%	\$71,936,200	\$41,366	0.2%
1994 or Earlier	154,464	48.3%	\$13,379,887,795	\$86,621	35.7%
1995-2001	61,729	19.3%	\$7,430,235,242	\$120,369	19.8%
2002-2011	59,268	18.5%	\$8,807,519,892	\$148,605	23.5%
2012 or Later	42,535	13.3%	\$7,816,567,703	\$183,768	20.8%
TOTAL	319,735	100.0%	\$37,506,146,832	\$117,304	100.0%
<b>STRUCTURE OPENING PROTECTION</b>					
No Credit is Given to Policyholder	319,732	100.0%	\$37,505,776,105	\$117,304	100.0%
Credit is Given to Policyholder	3	0.0%	\$370,727	\$0	0.0%
TOTAL	319,735	100.0%	\$37,506,146,832	\$117,304	100.0%
<b>ROOF SHAPE</b>					
Hip, Mansard, or Pyramid	19	0.0%	\$216,140	\$11,376	0.0%
Gable, Other, or Unknown	319,716	100.0%	\$37,505,930,692	\$117,310	100.0%
TOTAL	319,735	100.0%	\$37,506,146,832	\$117,304	100.0%

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Tenants Totals By Mitigation Features

Mitigation Feature	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
<b>YEAR BUILT</b>					
Unknown	325,567	29.1%	\$5,899,685,572	\$18,121	19.2%
1994 or Earlier	295,317	26.4%	\$8,689,774,794	\$29,425	28.2%
1995-2001	111,188	9.9%	\$3,380,579,651	\$30,404	11.0%
2002-2011	144,106	12.9%	\$4,885,654,632	\$33,903	15.9%
2012 or Later	244,119	21.8%	\$7,910,209,297	\$32,403	25.7%
TOTAL	1,120,297	100.0%	\$30,765,903,946	\$27,462	100.0%
<b>STRUCTURE OPENING PROTECTION</b>					
No Credit is Given to Policyholder	1,066,953	95.2%	\$29,109,717,008	\$27,283	94.6%
Credit is Given to Policyholder	53,344	4.8%	\$1,656,186,938	\$31,047	5.4%
TOTAL	1,120,297	100.0%	\$30,765,903,946	\$27,462	100.0%
<b>ROOF SHAPE</b>					
Hip, Mansard, or Pyramid	81,917	7.3%	\$2,276,199,893	\$27,787	7.4%
Gable, Other, or Unknown	1,038,380	92.7%	\$28,489,704,053	\$27,437	92.6%
TOTAL	1,120,297	100.0%	\$30,765,903,946	\$27,462	100.0%

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Condominium Unit Owners Totals By Mitigation Features

Mitigation Feature	Units	Percent of Units	Primary Exposure	Average Exposure	Percent of Exposure
<b>YEAR BUILT</b>					
Unknown	2,256	0.2%	\$229,440,785	\$101,702	0.2%
1994 or Earlier	616,694	62.7%	\$70,977,794,937	\$115,094	47.2%
1995-2001	98,761	10.0%	\$18,052,562,172	\$182,790	12.0%
2002-2011	197,492	20.1%	\$39,100,230,009	\$197,984	26.0%
2012 or Later	67,600	6.9%	\$21,978,828,167	\$325,131	14.6%
TOTAL	982,803	100.0%	\$150,338,856,070	\$152,969	100.0%
<b>STRUCTURE OPENING PROTECTION</b>					
No Credit is Given to Policyholder	785,852	80.0%	\$97,044,116,169	\$123,489	64.6%
Credit is Given to Policyholder	196,951	20.0%	\$53,294,739,901	\$270,599	35.4%
TOTAL	982,803	100.0%	\$150,338,856,070	\$152,969	100.0%
<b>ROOF SHAPE</b>					
Hip, Mansard, or Pyramid	134,378	13.7%	\$23,576,266,965	\$175,447	15.7%
Gable, Other, or Unknown	848,425	86.3%	\$126,762,589,105	\$149,409	84.3%
TOTAL	982,803	100.0%	\$150,338,856,070	\$152,969	100.0%

# EXHIBIT

## IV

**Florida Hurricane Catastrophe Fund**  
**2024 Calculation of Layer of Coverage**  
**Using 2023 FHCF Premium and Exposure Data as of 10/24/2023**

Type of Business	Coverage Option	Total Insured Risks	Total Exposure	Gross FHCF Premium	Net FHCF Premium	Net FHCF Prem at 100%
<b>Section I</b>						
1	45%	36	160,326,000	60,954	72,768	161,707
1	75%	0	0	0	0	0
1	90%	147,248	211,565,288,402	144,377,534	148,160,824	164,623,138
2	45%	392,590	321,974,513,578	47,677,522	42,444,497	94,321,105
2	75%	0	0	0	0	0
2	90%	4,496,867	2,567,761,859,963	1,158,552,264	1,173,535,054	1,303,927,838
3	45%	204	24,960,304	8,208	8,208	18,241
3	75%	0	0	0	0	0
3	90%	319,531	35,027,513,471	49,921,201	49,921,201	55,468,001
4	45%	154,690	5,754,224,215	444,901	425,241	944,980
4	75%	0	0	0	0	0
4	90%	922,474	22,998,954,752	5,453,931	5,614,099	6,237,888
6	45%	71,266	8,685,120,389	2,403,449	2,726,750	6,059,444
6	75%	0	0	0	0	0
6	90%	891,639	131,818,516,556	90,119,437	89,975,216	99,972,462
<b>Section II</b>						
1	45%		0	0	0	0
1	75%		0	0	0	0
1	90%		0	0	0	0
<b>Section I Totals</b>						
1	xx	147,284	211,725,614,402	144,438,489	148,233,592	164,784,845
2	xx	4,889,457	2,889,736,373,541	1,206,229,786	1,215,979,551	1,398,248,943
3	xx	319,735	35,052,473,775	49,929,409	49,929,409	55,486,242
4	xx	1,077,164	28,753,178,967	5,898,832	6,039,340	7,182,868
6	xx	962,905	140,503,636,945	92,522,887	92,701,966	106,031,906
xx	45%	618,786	336,599,144,486	50,595,035	45,677,465	101,505,477
xx	75%	0	0	0	0	0
xx	90%	6,777,759	2,969,172,133,144	1,448,424,367	1,467,206,393	1,630,229,326
<b>Section I Total</b>		7,396,545	3,305,771,277,630	1,499,019,402	1,512,883,858	1,731,734,803
<b>Section II Total*</b>		0	0	0	0	0
<b>Grand Total</b>		7,396,545	3,305,771,277,630	1,499,019,402	1,512,883,858	1,731,734,803
* We last had a very small amount of Section II exposure in 2002.						
<b>Weighted Average Coverage Multiples - Section I Only</b>					For Exh II Ratemaking Premium	
	Risks	Exposure				
1	Commercial	0.89989	0.89966			0.89956
2	Residential	0.86387	0.84986			0.86964
3	Mobile Home	0.89971	0.89968			0.89985
4	Tenants	0.83538	0.80994			0.84080
6	Condos	0.86669	0.87218			0.87428
Total		0.86235	0.85418			0.87362
<b>Weighted Average Coverage Multiple - Sections I and II</b>						
Total		0.86235	0.85418			0.87362

**Florida Hurricane Catastrophe Fund**  
**2024 Calculation of Layer of Coverage**  
Using 2023 FHCF Premium and Exposure Data as of 10/24/2023

**1. Calculate Section I and II Retention**

**Historical Exposure**

		Data as of 10/24/2023	Estimate of Missing Data	Total	
<b>2004</b>	Total	1,320,642,494,807	-	1,320,642,494,807	
<b>2022</b>	Total	2,913,925,267,048	-	2,913,925,267,048	
Growth in exposure, 2004 to 2022			120.645%		[1a]
Base FHCF Retention			4,500,000,000		[1b]
2023 Retention (Actual, based on premiums paid)			9,465,447,156		
2024 Target Retention			9,929,003,310	Change 2023 to 2024	[1c]=(1+[1a])x[1b]
2024 Selected Retention			9,929,000,000	4.90%	[1d]=[1c], rnd'd to \$M

**2. Allocate Retention to Sections I and II**

2023 Net Full Coverage FHCF Premium (ie at 100%)					
	Section I	1,731,734,803	100.000%	[2a]	
	Section II	-	0.000%	[2b]	
	Total	1,731,734,803	100.000%	[2c]=[2a]+[2b]	
<i>Note: Allocate Retention based on <b>full coverage</b> premium, which is the best indicator of expected ground-up losses</i>					
2024 Selected Retention (using full coverage FHCF premium for weighting)					
	Section I	9,929,000,000	100.000%	[2d]	
	Section II	-	0.000%	[2e]	
	Total	9,929,000,000	100.000%	[2f]=[2d]+[2e]	

**3. Calculate FHCF Limit**

Estimated Claims Paying Capacity Average (Pre Hurricane Idalia)	\$17,000,000,000	[3a]
<b>Source: FHCF 12/31/2023 Unaudited Financial Statements</b>		

Dollar growth in cash balance over prior calendar year

Cash Balance @12/31/2022	\$ 2,253,026,779	[3b]
Est Cash Balance @ 12/31/2023	\$ 4,513,327,779	[3c]
Change in Cash Balance	\$ 2,260,301,000	[3d]=[3c]-[3b]

2023 Statutory Maximum Coverage Limit	17,000,000,000	[3e]=[3g prior year]
2024 Statutory Coverage Limit Prior to Change in Cash Balance Limit	17,000,000,000	[3f]=17Billion + .5*(max(3a-\$34 billion
2024 Statutory Coverage Limit	\$ 17,000,000,000	[3g]=[3e]+min([3f]-[3e],max([3d],0))

0.00%



**Florida Hurricane Catastrophe Fund**  
**2024 Calculation of Layer of Coverage**  
Using 2023 FHCF Premium and Exposure Data as of 10/24/2023

**4. Allocate Limit to Sections I and II**

Total FHCF Capacity		17,000,000,000		[4a]
Pure Loss		15,454,545,455		[4b] = [4a]/1.10
Loss Adjustment Expenses		1,545,454,545		[4c] = [4a] - [4b]
Actual Coverage FHCF Premium				
	Section I	1,512,883,858	100.000%	[4d]
	Section II	-	0.000%	[4e]
	Total	1,512,883,858	100.000%	[4f]=[4d]+[4e]

Note: Allocate Limit based on **actual** premium, which is the best indicator of expected FHCF losses.

Sections I and II Limit Allocations

	Pure loss	LAE	Total
Section I	15,454,545,455	1,545,454,545	17,000,000,000
Section II	-	-	-
Total	15,454,545,455	1,545,454,545	17,000,000,000

**5. FHCF Layer Structure for Sections I and II**

**Section I**

	Based on 2023 Selections	Based on 2024 Selections	
Retention	9,929,000,000	9,929,000,000	[5a] = [2d]
Pure Loss Limit Available	15,454,545,455	15,454,545,455	[5b] from Part 3
Total Limit Available	17,000,000,000	17,000,000,000	[5c] from Part 3
Wtd Average Coverage	87.362%	86.874%	[5d]
Top of Loss Layer	27,619,171,050	27,718,655,681	[5e]=[5a]+[5b]/[5d]

<b>Layer used for modeled losses:</b>	86.874% of \$17,789,655,681 xs \$9,929,000,000 (Modeled losses are Section I losses only, no LAE)
---------------------------------------	--

**Sections I and II**

	2023 Selections	2024 Selections	
Retention	9,929,000,000	9,929,000,000	[5f] = [2f]
Pure Loss Limit Available	15,454,545,455	15,454,545,455	[5g] from Part 3
Total Limit Available	17,000,000,000	17,000,000,000	[5h] from Part 3
Wtd Average Coverage	87.362%	86.874%	[5i]
Top of Loss Layer	27,619,171,050	27,718,655,681	[5j]=[5f]+[5g]/[5i]

<b>Layer used for FHCF publications:</b>	
<b>Loss only:</b>	86.874% of \$17,789,655,681 xs \$9,929,000,000
<b>Loss + LAE:</b>	86.874% of \$19,568,621,249 xs \$9,929,000,000

# EXHIBIT

V

RESERVED  
FOR  
FUTURE USE

# EXHIBIT

VI

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Allocation of Excess Losses to Type of Business at Coverage Level

	Evaluated	Residential	Tenants	Condos	Mobile Home	Commercial	Total
(1) Coverage Selection by Type of Business	10/24/2023	86.964%	84.080%	87.428%	89.985%	89.956%	87.362%
(2) Coverage Selection by Type of Business	03/01/2024	86.429%	83.978%	86.505%	89.985%	89.956%	86.874%
(3) Allocation of XS Loss Using 100% Adjusted Gross Losses		79.86%	0.34%	6.56%	2.88%	10.36%	100.00%
(4) Allocation of XS Loss at Coverage Level (2) x (3)		69.03%	0.28%	5.67%	2.59%	9.32%	86.87%
(5) Allocation of XS Loss at Cov. Level to Type of Business (4)/Total(4)		79.46%	0.33%	6.53%	2.98%	10.73%	100.02%
(6) Balance Adjustment to Allocation (5)/Total (5)		79.44%	0.33%	6.53%	2.98%	10.73%	100.00%
(7) Selected Allocation of XS Loss at Coverage Level for Ratemaking		79.22%	0.38%	6.56%	3.16%	10.67%	100.00%
(8) Rate Change by Type of Business		-9.24%	-9.04%	1.38%	-9.25%	7.06%	-7.38%

# EXHIBIT

VII

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Wind Deductible Adjustment Factor

**Calculation of Loading Factor to Adjust Modeled Losses for the Impact of Aggregate Wind Deductibles**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Type of Business	Per Event Deductibles	Annual Wind Deductible + AOP Deductible	Ratio	Implied Load	Take-up Rate	2024 Adjusted Load	2023 Adjusted Load	2023/2024 Weighted Load	2024 Selected Load
Commercial Residential	372,482,644	374,988,693	1.00673	0.673%	50%	0.336%	0.420%	0.364%	0.360%
Residential	3,527,263,413	3,545,285,136	1.00511	0.511%	100%	0.511%	0.656%	0.559%	0.560%
Mobile Home	149,239,493	149,588,449	1.00234	0.234%	100%	0.234%	0.367%	0.278%	0.280%
Tenants	18,551,356	18,589,343	1.00205	0.205%	100%	0.205%	0.196%	0.202%	0.200%
Condo	274,859,150	275,364,633	1.00184	0.184%	100%	0.184%	0.222%	0.196%	0.200%
<b>Total</b>	<b>4,342,396,056</b>	<b>4,363,816,253</b>	<b>1.00493</b>						

**Notes:**

Verisk, Corelogic Deliverable 2 is per event; Verisk, Corelogic Deliverable 5 is aggregate

(1) Based on average of Verisk and Corelogic studies (Deliverable 2) completed in 2024

(2) Based on average of Verisk and Corelogic studies (Deliverable 5) completed in 2024

(3) = (2) / (1)

(4) = (3) - 1

(5) Judgmentally Selected

(6) = (4) \* (5)

(7) Indication in 2023

(8) = (6)\*2/3+(7)\*1/3

EXHIBIT

VIII



**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**Verisk and RMS 2024 Retention Limit Analyses: Adjustment to Expected FHCF Layer Losses**  
**Coverage Selections as of 03/01/2024**

		RMS Adjusted Aggregate Run	Verisk Adjusted Aggregate Run	Average RMS Verisk Adjusted Aggregate Runs	RMS/WTD	VERISK /WTD	AVE/WTD	
	2024 (WTD)							
1 Wtd Ave. Expected Gross Loss Adjusted	4,721,141,420	4,703,591,969	4,721,085,962	4,712,338,966	99.628%	99.999%	99.814%	2024 Ex. 2 (7)
2 Expected FHCF Wtd Ave.Aggregate Layer Loss and LAE at Coverage Level	1,117,268,424	1,101,025,410	1,099,526,518	1,100,275,964	98.546%	98.412%	98.479%	2024 Ex. 2 (10)
2a Expected FHCF RMS Aggregate Layer Loss and LAE at Coverage Level Using Company Limits, Retentions		1,092,879,299	1,074,367,642	1,083,623,470				
3 Model Adjustment Factor		0.992601341	0.977118445	0.984865166				(2a)/(2)
4 Indicated Adjustment Factor		-0.740%	-2.288%	-1.5135%	(3)-1.00			Weights 67%
5 Prior Selected Factor (2023)				-1.0534%				33%
6 Current Year Selected Factor Weighted (2/3 Indicated, 1/3 Prior)				-1.3601%				2024 Ex. 2 (15)

**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**Retention and Limit Adjustment Factor Calculation History**

Year	Indicated	Selected	Modeler Data	
2013	-1.9000%	-0.7347%	ARA	
2014	0.3103%	-0.0371%	RMS	
2015	0.3103%	-0.0371%	RMS (prior year , no update)	
2016	0.0298%	0.0075%	AIR,RMS run by Paragon	
2017	0.8549%	0.5724%	AIR,RMS run by Paragon	0.5724%
2018	0.1618%	0.2987%	AIR,RMS run by Paragon	0.2987%
2019	-0.3910%	-0.1611%	AIR,RMS run by Paragon	-0.1611%
2020	-0.4315%	-0.3566%	AIR,RMS run by Paragon	-0.3566%
2021	-0.4846%	-0.4419%	AIR,RMS run by Paragon	-0.4419%
2022	-0.7192%	-0.6268%	AIR,RMS run by Paragon	-0.6268%
2023	-1.2667%	-1.0534%	AIR,RMS run by Paragon	-1.0534%
2024	-1.5135%	-1.3601%	Verisk,RMS run by Paragon	-1.3601%

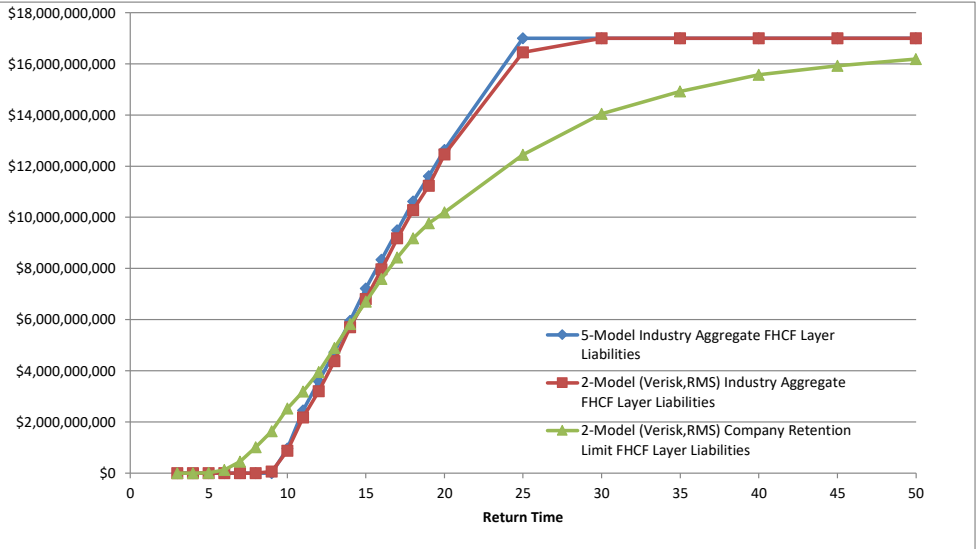
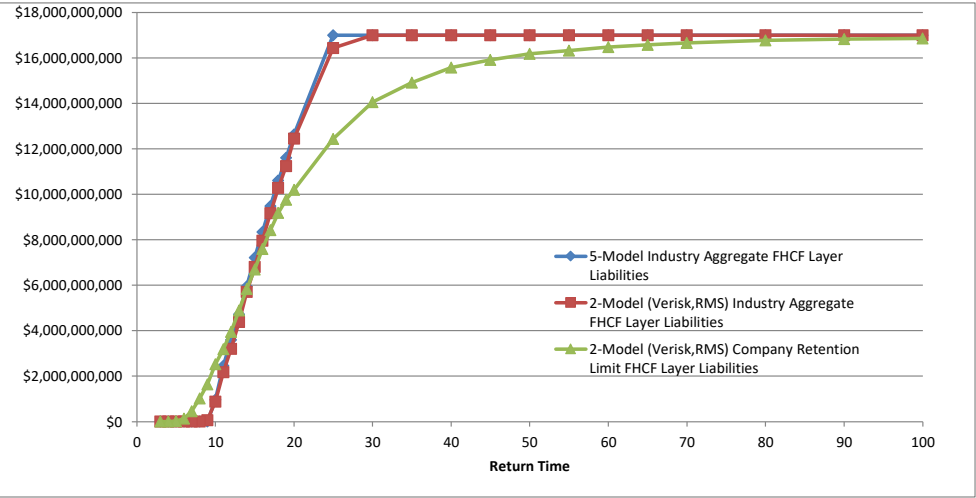
Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report  
Average (Verisk,RMS) Modeled Adjusted Loss Severity Distributions  
Coverage Selections Data as of 03/01/2024

Return Time	Probability of Exceedance	5-Model Uniform Weighted Section I Gross Per Event (100% Coverage, no LAE)	5-Model Weighted Section I Gross Per Event (100% Coverage, no LAE)	5-Model Section I Excess Retention Aggregate (100% Coverage, no LAE)	Traditional FHCF Only Layer		2-Model (Verisk,RMS) Section I Gross Annual (100% Coverage, no LAE)	2-Model (Verisk,RMS) Industry Aggregate FHCF Layer Liabilities	2-Model (Verisk,RMS) Company Retention Limit FHCF Layer Liabilities
					5-Model Single Event FHCF Layer Liabilities	5-Model Industry Aggregate FHCF Layer Liabilities			
1000	0.0010	\$175,513,420,882	\$183,173,174,356	\$176,420,207,760	\$17,000,000,000	\$17,000,000,000	\$186,713,687,334	\$17,000,000,000	\$16,999,933,588
900	0.0011	\$169,401,331,973	\$177,836,375,888	\$170,516,221,964	\$17,000,000,000	\$17,000,000,000	\$180,643,625,305	\$17,000,000,000	\$16,999,924,454
800	0.0013	\$163,164,902,263	\$168,986,762,223	\$162,226,198,237	\$17,000,000,000	\$17,000,000,000	\$173,396,370,819	\$17,000,000,000	\$16,999,898,419
700	0.0014	\$156,172,363,062	\$161,392,772,490	\$154,021,427,499	\$17,000,000,000	\$17,000,000,000	\$166,317,753,120	\$17,000,000,000	\$16,999,844,995
600	0.0017	\$149,346,996,037	\$151,320,752,771	\$144,152,883,230	\$17,000,000,000	\$17,000,000,000	\$158,472,344,238	\$17,000,000,000	\$16,999,727,719
500	0.0020	\$138,953,950,582	\$140,694,454,943	\$133,939,806,877	\$17,000,000,000	\$17,000,000,000	\$148,817,219,304	\$17,000,000,000	\$16,999,524,479
400	0.0025	\$127,372,071,956	\$127,027,487,769	\$120,046,563,079	\$17,000,000,000	\$17,000,000,000	\$133,508,371,722	\$17,000,000,000	\$16,999,315,943
300	0.0033	\$114,200,362,020	\$109,879,712,414	\$104,096,276,891	\$17,000,000,000	\$17,000,000,000	\$118,329,197,853	\$17,000,000,000	\$16,998,366,175
250	0.0040	\$105,887,749,126	\$101,816,940,020	\$94,244,836,967	\$17,000,000,000	\$17,000,000,000	\$109,806,924,043	\$17,000,000,000	\$16,992,817,116
200	0.0050	\$97,401,500,998	\$94,548,978,020	\$85,933,562,280	\$17,000,000,000	\$17,000,000,000	\$100,629,528,472	\$17,000,000,000	\$16,982,866,682
150	0.0067	\$86,112,479,544	\$83,419,991,845	\$74,815,888,016	\$17,000,000,000	\$17,000,000,000	\$87,115,595,796	\$17,000,000,000	\$16,944,889,254
100	0.0100	\$70,336,297,695	\$67,937,116,419	\$59,835,352,009	\$17,000,000,000	\$17,000,000,000	\$71,957,912,835	\$17,000,000,000	\$16,861,914,955
90	0.0111	\$66,142,761,996	\$64,052,134,851	\$55,816,953,983	\$17,000,000,000	\$17,000,000,000	\$68,548,620,705	\$17,000,000,000	\$16,829,231,807
80	0.0125	\$62,081,944,037	\$59,944,871,352	\$51,644,920,190	\$17,000,000,000	\$17,000,000,000	\$64,202,466,114	\$17,000,000,000	\$16,774,657,935
70	0.0143	\$57,096,165,222	\$55,232,325,846	\$46,681,278,576	\$17,000,000,000	\$17,000,000,000	\$59,269,227,804	\$17,000,000,000	\$16,663,434,821
65	0.0154	\$54,563,177,173	\$53,093,451,078	\$44,352,241,962	\$17,000,000,000	\$17,000,000,000	\$56,711,084,206	\$17,000,000,000	\$16,574,921,735
60	0.0167	\$51,584,440,482	\$50,095,602,703	\$41,534,331,739	\$17,000,000,000	\$17,000,000,000	\$53,995,279,186	\$17,000,000,000	\$16,475,981,777
55	0.0182	\$48,568,223,654	\$47,695,603,428	\$38,870,001,896	\$17,000,000,000	\$17,000,000,000	\$51,514,023,618	\$17,000,000,000	\$16,324,598,603
50	0.0200	\$45,613,471,850	\$44,868,621,686	\$35,952,206,757	\$17,000,000,000	\$17,000,000,000	\$48,596,515,647	\$17,000,000,000	\$16,187,047,025
45	0.0222	\$42,557,612,901	\$42,138,887,807	\$32,954,644,713	\$17,000,000,000	\$17,000,000,000	\$45,358,638,906	\$17,000,000,000	\$15,917,253,848
40	0.0250	\$38,934,821,698	\$38,746,029,406	\$29,644,672,527	\$17,000,000,000	\$17,000,000,000	\$41,820,906,232	\$17,000,000,000	\$15,571,927,366
35	0.0286	\$35,123,274,906	\$35,053,752,604	\$25,982,637,757	\$17,000,000,000	\$17,000,000,000	\$38,196,047,567	\$17,000,000,000	\$14,919,069,263
30	0.0333	\$30,848,219,875	\$30,869,637,828	\$21,522,561,047	\$17,000,000,000	\$17,000,000,000	\$34,006,570,536	\$17,000,000,000	\$14,050,344,096
25	0.0400	\$26,908,072,128	\$27,355,882,818	\$17,820,792,201	\$16,653,330,066	\$17,000,000,000	\$29,391,989,092	\$16,441,771,730	\$12,440,604,842
20	0.0500	\$22,226,174,674	\$22,871,140,089	\$13,223,704,983	\$12,367,658,227	\$12,636,724,885	\$24,676,727,653	\$12,451,733,443	\$10,196,036,694
19	0.0526	\$21,378,536,273	\$21,828,216,414	\$12,148,992,937	\$11,371,028,344	\$11,609,717,668	\$23,719,910,411	\$11,236,689,775	\$9,768,528,570
18	0.0556	\$20,357,610,234	\$20,878,030,001	\$11,105,385,265	\$10,463,019,257	\$10,612,434,149	\$22,536,699,031	\$10,280,532,354	\$9,180,129,425
17	0.0588	\$19,317,364,547	\$19,739,599,897	\$9,927,684,738	\$9,375,122,329	\$9,487,009,952	\$21,224,505,649	\$9,173,551,237	\$8,425,150,613
16	0.0625	\$18,228,920,993	\$18,526,352,711	\$8,724,520,190	\$8,215,729,335	\$8,337,252,043	\$19,883,291,796	\$7,959,676,130	\$7,590,449,363
15	0.0667	\$16,991,125,248	\$17,327,864,507	\$7,552,274,450	\$7,070,440,195	\$7,217,040,504	\$18,628,364,653	\$6,798,360,257	\$6,696,644,444
14	0.0714	\$15,743,931,465	\$16,047,688,964	\$6,229,436,436	\$5,847,089,692	\$5,952,921,252	\$17,343,501,441	\$5,699,968,460	\$5,828,387,176
13	0.0769	\$14,572,530,070	\$14,822,036,982	\$4,947,788,914	\$4,675,842,532	\$4,728,164,109	\$16,053,083,796	\$4,379,082,477	\$4,888,751,327
12	0.0833	\$13,327,137,025	\$13,659,152,380	\$3,758,650,338	\$3,564,576,604	\$3,591,809,581	\$14,662,530,102	\$3,204,775,781	\$3,950,004,617
11	0.0909	\$12,020,687,615	\$12,465,254,749	\$2,565,890,279	\$2,423,674,268	\$2,451,994,322	\$13,298,270,229	\$2,170,389,525	\$3,182,947,149
10	0.1000	\$10,693,652,102	\$11,005,919,345	\$1,076,919,345	\$1,029,116,538	\$957,391,775	\$11,968,222,080	\$872,627,698	\$2,522,785,172
9	0.1111	\$9,353,201,331	\$9,857,627,323	\$0	\$0	\$0	\$10,475,335,877	\$66,030,611	\$1,635,701,474
8	0.1250	\$7,990,823,833	\$8,480,185,386	\$0	\$0	\$0	\$9,103,665,017	\$0	\$1,016,594,204
7	0.1429	\$6,503,130,835	\$6,968,422,535	\$0	\$0	\$0	\$7,500,100,670	\$0	\$449,983,900
6	0.1667	\$4,850,626,718	\$5,109,382,939	\$0	\$0	\$0	\$5,790,018,471	\$0	\$126,175,764
5	0.2000	\$3,305,867,081	\$3,476,897,975	\$0	\$0	\$0	\$3,922,992,695	\$0	\$14,386,794
4	0.2500	\$1,891,243,500	\$2,061,025,425	\$0	\$0	\$0	\$2,327,083,488	\$0	\$232,223
3	0.3333	\$676,127,792	\$755,061,625	\$0	\$0	\$0	\$813,221,064	\$0	\$0

Aggregate FHCF Liabilities include Sections I, II and LAE, and are at weighted average coverage.  
2024 Severity distributions based on ARA, AIR, CoreLogic, FPM and RMS models.

FHCF: Adjusted Curve for Company Retentions and Limits

Based on Average (Verisk, RMS) 2024 Ratemaking Analysis



# EXHIBIT

IX

**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**FHCF Layer Loss Scenarios**

FHCF Layer Loss Scenario	FHCF Layer Loss (\$ in B)	Ground Up Losses for Average Verisk, RMS Portfolio Analysis (\$ in B)	Return Times (Yrs) for Aggregate Verisk, RMS Portfolio Analysis
1 \$1 Billion FHCF Layer	1.000	9.057	8.0
2 \$5 Billion FHCF Layer	5.000	16.206	13.1
3 Projected Fund Balance Exhausted	6.239	17.951	14.5
4 Pre-Event 2020A Bonds Exhausted	8.489	21.335	17.1
5 \$10 Billion FHCF Layer (Ian Level)	10.000	24.238	19.5
6 50 Year Event	16.187	48.597	50.0
7 100 Year Event	16.862	71.958	100.0
8 Maximum Statutory Limit	17.000	109.807	250.0

EXHIBIT

X

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Pre-Event Note Expense Loading  
Contract Term: 6/01/2024 to 5/31/2025

	2020A Projected Debt Service	2024A Projected Debt Service	Total Debt Service Net Cost
1 Reimbursement Deposit Premium	25,000,000	30,000,000	55,000,000
2 Average Market Value	3,500,000,000	2,000,000,000	5,500,000,000
3 Exp. Default Loading %	0.03%	0.03%	
4 Exp. Default Cost (2)*(3)	1,050,000	600,000	1,650,000
5 Total Projected Liquidity Facility Cost (1)+(4)	26,050,000	30,600,000	56,650,000

Notes

- This method uses values projected by the FHCF's Financial Advisor, Raymond James  
(01/16/2024 for 2020A); (02/01/2024 for 2024A estimate) plus a judgmental loading for potential asset loss.



# EXHIBIT

XI

**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**Additional Pre-Event Note Options**

1 Est. FHCF Premium (with cash build up)	1,532,432,466	Exhibit 2, Line 73	
2 Cash Build-up Factor	25%		
3 Limit	\$17,000,000,000	Projected Payout Multiple	11.0935
4 Retention	\$9,929,000,000	Retention Multiple 100%	5.6288
5 Coverage %	86.874%	Retention Multiple 90%	6.2542
		Retention Multiple 75%	7.5050
		Retention Multiple 45%	12.5084

	Change in Cost + Cash		Projected	Retention	Retention	Retention
Est. Annual Cost Change	Build-up	Impact on Rate	Payout Multiple	Multiple 90%	Multiple 75%	Multiple 45%
-3 -15,000,000	-18,750,000	-1.22%	11.2309	6.3317	7.5980	12.6633
-2 -10,000,000	-12,500,000	-0.82%	11.1847	6.3056	7.5667	12.6112
-1 -5,000,000	-6,250,000	-0.41%	11.1389	6.2798	7.5357	12.5596
1 At Current Level Costs	0	0.00%	11.0935	6.2542	7.5050	12.5084
2 5,000,000	6,250,000	0.41%	11.0484	6.2288	7.4745	12.4576
3 10,000,000	12,500,000	0.82%	11.0037	6.2036	7.4443	12.4072
4 15,000,000	18,750,000	1.22%	10.9594	6.1786	7.4143	12.3572
5 20,000,000	25,000,000	1.63%	10.9154	6.1538	7.3845	12.3076
6 25,000,000	31,250,000	2.04%	10.8718	6.1292	7.3550	12.2584
7 30,000,000	37,500,000	2.45%	10.8285	6.1048	7.3257	12.2096
8 35,000,000	43,750,000	2.85%	10.7856	6.0806	7.2967	12.1612
9 40,000,000	50,000,000	3.26%	10.7430	6.0566	7.2679	12.1131
10 45,000,000	56,250,000	3.67%	10.7007	6.0327	7.2393	12.0655
11 50,000,000	62,500,000	4.08%	10.6588	6.0091	7.2109	12.0182
12 55,000,000	68,750,000	4.49%	10.6172	5.9856	7.1828	11.9713
13 60,000,000	75,000,000	4.89%	10.5759	5.9624	7.1548	11.9247

# EXHIBIT

XII

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	2023 FHCF Premium (Base Premium)					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Gross FHCF Premium	\$144,438,489	\$1,206,229,786	\$49,929,409	\$5,898,832	\$92,522,887	\$1,499,019,402
FHCF Premium Credits/Debits	\$3,795,103	\$9,749,765	\$0	\$140,508	\$179,079	\$13,864,456
Net FHCF Premium	\$148,233,592	\$1,215,979,551	\$49,929,409	\$6,039,340	\$92,701,966	\$1,512,883,858

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	Percent of Gross Premium					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Gross FHCF Premium	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
FHCF Premium Credits/Debits	2.63%	0.81%	0.00%	2.38%	0.19%	0.92%
Net FHCF Premium	102.63%	100.81%	100.00%	102.38%	100.19%	100.92%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	2023 FHCF Exposure					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Exposure	\$211,725,614,402	\$2,889,736,373,541	\$35,052,473,775	\$28,753,178,967	\$140,503,636,945	\$3,305,771,277,630
Debit = 30% or greater	\$91,101,931,467	\$1,128,629,425,475	\$0	\$7,471,680,708	\$51,971,034,032	\$1,279,174,071,682
20%<Debit<30%	\$16,504,666,282	\$0	\$0	\$6,212,159,690	\$14,321,216,328	\$37,038,042,300
15%<Debit<20%	\$0	\$0	\$0	\$0	\$0	\$0
10%<Debit<15%	\$17,660,151,723	\$74,587,347,505	\$0	\$0	\$0	\$92,247,499,228
5%<Debit <10%	\$0	\$0	\$0	\$0	\$0	\$0
0%<Debit<=5%	\$0	\$11,267,417	\$0	\$0	\$0	\$11,267,417
No Credit/Debit	\$0	\$2	\$35,052,473,775	\$0	\$0	\$35,052,473,777
0%<Credit<=5%	\$0	\$145,452,304,254	\$0	\$2,870,400	\$15,453,493	\$145,470,628,147
5%<Credit<10%	\$1,316,124,770	\$0	\$0	\$459,521,266	\$10,517,125,878	\$12,292,771,914
10%<Credit<15%	\$0	\$0	\$0	\$2,916,654,914	\$0	\$2,916,654,914
15%<Credit<20%	\$0	\$0	\$0	\$0	\$0	\$0
20%<Credit<30%	\$9,613,022,816	\$172,113,917,434	\$0	\$0	\$2,867,407,182	\$184,594,347,432
Credit =30% or greater	\$75,529,717,344	\$1,368,942,111,454	\$0	\$11,690,291,989	\$60,811,400,032	\$1,516,973,520,819

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	Percent of Total Exposure					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Exposure	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Debit = 30% or greater	43.03%	39.06%	0.00%	25.99%	36.99%	38.70%
20%<Debit<30%	7.80%	0.00%	0.00%	21.61%	10.19%	1.12%
15%<Debit<20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10%<Debit<15%	8.34%	2.58%	0.00%	0.00%	0.00%	2.79%
5%<Debit <10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0%<Debit<=5%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
No Credit/Debit	0.00%	0.00%	100.00%	0.00%	0.00%	1.06%
0%<Credit<=5%	0.00%	5.03%	0.00%	0.01%	0.01%	4.40%
5%<Credit<10%	0.62%	0.00%	0.00%	1.60%	7.49%	0.37%
10%<Credit<15%	0.00%	0.00%	0.00%	10.14%	0.00%	0.09%
15%<Credit<20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20%<Credit<30%	4.54%	5.96%	0.00%	0.00%	2.04%	5.58%
Credit =30% or greater	35.67%	47.37%	0.00%	40.66%	43.28%	45.89%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	2023 FHCF Risk Counts					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Risk Counts	147,284	4,889,457	319,735	1,077,164	962,905	7,396,545
Debit = 30% or greater	76,028	2,387,724	0	255,001	518,277	3,237,030
20%<Debit<30%	21,743	0	0	323,746	84,361	429,850
15%<Debit<20%	0	0	0	0	0	0
10%<Debit<15%	4,376	95,713	0	0	0	100,089
5%<Debit <10%	0	0	0	0	0	0
0%<Debit<=5%	0	26	0	0	0	26
No Credit/Debit	0	1	319,735	0	0	319,736
0%<Credit<=5%	0	245,524	0	127	142	245,793
5%<Credit<10%	1,564	0	0	33,000	71,506	106,070
10%<Credit<15%	0	0	0	98,002	0	98,002
15%<Credit<20%	0	0	0	0	0	0
20%<Credit<30%	6,522	264,516	0	0	18,635	289,673
Credit =30% or greater	37,051	1,895,953	0	367,288	269,984	2,570,276



Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Reimbursement Premium Credits as of 10/24/23

	Percent of All Risks					
	Commercial	Residential	Mobile Home	Tenants	Condo-Owners	Total
Total Risk Counts	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Debit = 30% or greater	51.62%	48.83%	0.00%	23.67%	53.82%	43.76%
20%<Debit<30%	14.76%	0.00%	0.00%	30.06%	8.76%	5.81%
15%<Debit<20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10%<Debit<15%	2.97%	1.96%	0.00%	0.00%	0.00%	1.35%
5%<Debit <10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0%<Debit<=5%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
No Credit/Debit	0.00%	0.00%	100.00%	0.00%	0.00%	4.32%
0%<Credit<=5%	0.00%	5.02%	0.00%	0.01%	0.01%	3.32%
5%<Credit<10%	1.06%	0.00%	0.00%	3.06%	7.43%	1.43%
10%<Credit<15%	0.00%	0.00%	0.00%	9.10%	0.00%	1.32%
15%<Credit<20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20%<Credit<30%	4.43%	5.41%	0.00%	0.00%	1.94%	3.92%
Credit =30% or greater	25.16%	38.78%	0.00%	34.10%	28.04%	34.75%

# EXHIBIT

XIII

**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Formula Report**  
**County Rating Regions**

County Number	County Name	2024 Region	County Number	County Name	2024 Region
1	ALACHUA	1	71	LEE	8
3	BAKER	1	73	LEON	1
5	BAY	7	75	LEVY	2
7	BRADFORD	1	77	LIBERTY	1
9	BREVARD	7	79	MADISON	1
11	BROWARD	12	81	MANATEE	6
13	CALHOUN	1	83	MARION	2
15	CHARLOTTE	8	85	MARTIN	12
17	CITRUS	3	86	MIAMI-DADE	15
19	CLAY	1	87	MONROE	22
21	COLLIER	11	89	NASSAU	2
23	COLUMBIA	1	91	OKALOOSA	8
27	DE SOTO	5	93	OKEECHOBEE	9
29	DIXIE	2	95	ORANGE	3
31	DUVAL	1	97	OSCEOLA	4
33	ESCAMBIA	7	99	PALM BEACH	12
35	FLAGLER	3	101	PASCO	4
37	FRANKLIN	8	103	PINELLAS	8
39	GADSDEN	1	105	POLK	4
41	GILCHRIST	2	107	PUTNAM	1
43	GLADES	7	109	SAINT JOHNS	2
45	GULF	8	111	SAINT LUCIE	9
47	HAMILTON	1	113	SANTA ROSA	8
49	HARDEE	5	115	SARASOTA	8
51	HENDRY	8	117	SEMINOLE	3
53	HERNANDO	3	119	SUMTER	2
55	HIGHLANDS	5	121	SUWANNEE	1
57	HILLSBOROUGH	5	123	TAYLOR	1
59	HOLMES	1	125	UNION	1
61	INDIAN RIVER	11	127	VOLUSIA	3
63	JACKSON	1	129	WAKULLA	1
65	JEFFERSON	1	131	WALTON	10
67	LAFAYETTE	1	133	WASHINGTON	2
69	LAKE	3			

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
32003	1	32105	2	32182	1	32259	1
32004	3	32110	1	32183	2	32260	1
32006	1	32111	2	32185	1	32266	3
32007	2	32112	2	32187	1	32277	1
32008	1	32113	2	32189	1	32301	1
32009	1	32114	4	32190	2	32302	1
32011	1	32115	7	32192	2	32303	1
32013	1	32116	6	32193	1	32304	1
32024	1	32117	4	32195	3	32305	1
32025	1	32118	7	32198	6	32306	1
32030	1	32119	4	32201	1	32307	1
32033	1	32120	6	32202	1	32308	1
32034	2	32121	6	32203	2	32309	1
32035	2	32122	4	32204	2	32310	1
32038	1	32123	4	32205	1	32311	1
32040	1	32124	2	32206	2	32312	1
32041	1	32125	6	32207	1	32313	1
32042	1	32126	7	32208	1	32314	1
32043	1	32127	4	32209	1	32315	1
32044	1	32128	2	32210	1	32316	1
32046	1	32129	3	32211	1	32317	1
32050	1	32130	2	32212	1	32318	1
32052	1	32131	2	32214	1	32320	9
32053	1	32132	5	32216	1	32321	1
32054	1	32133	3	32217	1	32322	6
32055	1	32134	1	32218	1	32323	6
32056	1	32135	4	32219	1	32324	1
32058	1	32136	5	32220	1	32326	1
32059	1	32137	3	32221	1	32327	1
32060	1	32138	1	32222	1	32328	8
32061	1	32139	2	32223	1	32329	9
32062	1	32140	1	32224	1	32330	1
32063	1	32141	4	32225	1	32331	1
32064	1	32142	3	32226	1	32332	1
32065	1	32143	3	32227	3	32333	1
32066	1	32145	1	32228	3	32334	1
32067	1	32147	1	32229	1	32336	1
32068	1	32148	1	32231	3	32337	1
32071	1	32157	2	32232	3	32340	1
32073	1	32158	3	32233	3	32341	1
32079	1	32159	3	32234	1	32343	1
32080	4	32160	1	32235	1	32344	1
32081	1	32162	2	32236	1	32345	1
32082	3	32163	3	32238	1	32346	5
32083	1	32164	2	32239	1	32347	1
32084	3	32168	3	32240	2	32348	1
32085	3	32169	7	32241	1	32350	1
32086	3	32170	7	32244	1	32351	1
32087	1	32173	6	32245	1	32352	1
32091	1	32174	3	32246	1	32353	1
32092	1	32175	6	32247	1	32355	2
32094	1	32176	7	32250	3	32356	1
32095	2	32177	1	32254	1	32357	1
32096	1	32178	1	32255	1	32358	1
32097	1	32179	2	32256	1	32359	1
32099	2	32180	2	32257	1	32360	1
32102	2	32181	2	32258	1	32361	1

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
32362	1	32504	8	32604	1	32707	3
32399	1	32505	7	32605	1	32708	3
32401	8	32506	7	32606	1	32709	3
32402	8	32507	10	32607	1	32710	3
32403	5	32508	10	32608	1	32712	3
32404	4	32509	5	32609	1	32713	3
32405	6	32511	7	32610	1	32714	3
32406	6	32512	7	32611	1	32715	3
32407	9	32513	9	32612	1	32716	3
32408	11	32514	6	32614	1	32718	3
32409	4	32516	7	32615	1	32719	3
32410	9	32520	12	32616	1	32720	2
32411	11	32521	10	32617	2	32721	2
32412	8	32522	10	32618	1	32722	2
32413	10	32523	9	32619	1	32723	2
32417	8	32524	8	32621	2	32724	2
32420	1	32526	5	32622	1	32725	3
32421	1	32530	4	32625	6	32726	4
32422	2	32531	2	32626	2	32727	4
32423	1	32533	4	32627	1	32728	3
32424	1	32534	5	32628	1	32730	3
32425	1	32535	1	32631	1	32732	3
32426	1	32536	3	32633	1	32733	3
32427	2	32537	3	32634	2	32735	4
32428	2	32538	2	32635	1	32736	2
32430	1	32539	3	32639	2	32738	3
32431	1	32540	12	32640	1	32739	3
32432	1	32541	12	32641	1	32744	2
32433	3	32542	8	32643	1	32746	3
32434	3	32544	11	32644	2	32747	3
32435	3	32547	8	32648	3	32750	3
32437	10	32548	11	32653	1	32751	3
32438	2	32549	11	32654	1	32752	3
32439	5	32550	13	32655	1	32753	3
32440	1	32559	7	32656	1	32754	4
32442	1	32560	4	32658	1	32756	3
32443	1	32561	14	32662	1	32757	3
32444	5	32562	13	32663	2	32759	5
32445	1	32563	12	32664	2	32762	3
32446	1	32564	2	32666	1	32763	2
32447	1	32565	2	32667	1	32764	2
32448	1	32566	9	32668	2	32765	3
32449	1	32567	2	32669	1	32766	3
32455	2	32568	2	32680	1	32767	2
32456	9	32569	11	32681	2	32768	3
32457	9	32570	3	32683	2	32771	3
32459	10	32571	4	32686	2	32772	3
32460	1	32572	3	32692	5	32773	3
32461	12	32577	3	32693	2	32774	2
32462	3	32578	7	32694	1	32775	4
32463	2	32579	9	32696	2	32776	2
32464	1	32580	6	32697	1	32777	4
32465	2	32583	4	32701	3	32778	4
32466	3	32588	6	32702	2	32779	3
32501	9	32591	10	32703	3	32780	5
32502	12	32601	1	32704	3	32781	5
32503	9	32603	1	32706	2	32783	5

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
32784	3	32868	3	32967	9	33065	10
32789	3	32869	3	32968	8	33066	10
32790	3	32872	3	32969	11	33067	10
32791	3	32877	3	32970	9	33068	10
32792	3	32878	3	32971	11	33069	12
32793	3	32885	3	32976	11	33070	25
32794	3	32886	3	32978	10	33071	10
32795	3	32891	3	33001	23	33072	14
32796	4	32896	3	33002	12	33073	9
32798	4	32899	6	33004	18	33074	15
32799	3	32901	9	33008	19	33075	10
32801	3	32902	9	33009	19	33076	8
32802	3	32903	12	33010	12	33077	10
32803	4	32904	6	33011	12	33081	12
32804	4	32905	8	33012	11	33082	11
32805	4	32906	8	33013	12	33083	11
32806	4	32907	5	33014	12	33084	11
32807	3	32908	6	33015	11	33090	14
32808	3	32909	6	33016	10	33092	14
32809	4	32910	8	33017	11	33093	10
32810	3	32911	8	33018	11	33097	10
32811	3	32912	9	33019	21	33101	19
32812	3	32919	9	33020	18	33102	10
32814	3	32920	12	33021	12	33106	15
32815	5	32922	6	33022	18	33109	25
32816	3	32923	6	33023	12	33112	11
32817	3	32924	6	33024	11	33114	15
32818	3	32925	12	33025	10	33116	14
32819	4	32926	4	33026	11	33119	24
32820	3	32927	5	33027	10	33122	10
32821	3	32931	13	33028	8	33124	16
32822	3	32932	13	33029	9	33125	16
32824	3	32934	6	33030	14	33126	13
32825	3	32935	8	33031	15	33127	17
32826	3	32936	8	33032	14	33128	19
32827	3	32937	11	33033	14	33129	21
32828	3	32940	6	33034	13	33130	19
32829	3	32941	9	33035	13	33131	19
32830	4	32948	6	33036	24	33132	19
32831	3	32949	10	33037	23	33133	19
32832	3	32950	9	33039	14	33134	15
32833	3	32951	13	33040	20	33135	17
32835	3	32952	8	33041	20	33136	17
32836	3	32953	6	33042	19	33137	17
32837	3	32954	6	33043	19	33138	18
32839	3	32955	6	33045	20	33139	24
32853	4	32956	6	33050	21	33140	24
32854	4	32957	11	33051	21	33141	23
32855	3	32958	10	33052	21	33142	14
32856	4	32959	5	33054	12	33143	17
32857	3	32960	12	33055	11	33144	13
32858	3	32961	12	33056	11	33145	18
32859	4	32962	11	33060	16	33146	17
32860	3	32963	14	33061	16	33147	13
32861	3	32964	14	33062	20	33149	25
32862	3	32965	13	33063	9	33150	16
32867	3	32966	8	33064	15	33152	10

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
33153	18	33256	18	33402	18	33468	15
33154	23	33257	16	33403	16	33469	17
33155	14	33261	19	33404	16	33470	9
33156	17	33265	12	33405	19	33471	7
33157	16	33266	12	33406	13	33472	10
33158	19	33269	12	33407	15	33473	9
33160	22	33280	19	33408	18	33474	15
33161	17	33283	12	33409	12	33475	15
33162	16	33296	15	33410	13	33476	14
33163	20	33299	15	33411	9	33477	17
33164	16	33301	17	33412	9	33478	8
33165	13	33302	18	33413	9	33480	20
33166	12	33303	17	33414	9	33481	19
33167	13	33304	19	33415	10	33482	14
33168	14	33305	18	33416	13	33483	20
33169	12	33306	21	33417	11	33484	11
33170	15	33307	16	33418	10	33486	15
33172	11	33308	19	33419	16	33487	18
33173	13	33309	12	33420	13	33488	14
33174	12	33310	13	33421	9	33493	10
33175	11	33311	13	33422	12	33496	11
33176	14	33312	13	33424	18	33497	11
33177	13	33313	10	33425	16	33498	11
33178	11	33314	11	33426	15	33499	17
33179	15	33315	16	33427	18	33503	4
33180	20	33316	20	33428	11	33508	4
33181	19	33317	10	33429	20	33509	4
33182	13	33318	10	33430	10	33510	4
33183	12	33319	10	33431	17	33511	4
33184	11	33320	10	33432	20	33513	3
33185	12	33321	10	33433	11	33514	3
33186	13	33322	10	33434	11	33521	3
33187	14	33323	11	33435	19	33523	3
33188	11	33324	10	33436	12	33524	4
33189	17	33325	11	33437	10	33525	4
33190	16	33326	12	33438	14	33526	4
33191	18	33327	9	33440	9	33527	4
33192	14	33328	10	33441	17	33530	4
33193	12	33329	12	33442	11	33534	6
33194	13	33330	11	33443	17	33537	3
33195	20	33331	11	33444	18	33538	3
33196	14	33332	11	33445	14	33539	4
33197	16	33334	16	33446	10	33540	4
33198	13	33335	16	33448	11	33541	4
33199	12	33336	15	33449	9	33542	4
33206	15	33338	12	33454	11	33543	4
33222	14	33339	21	33455	15	33544	3
33231	18	33340	13	33458	12	33545	4
33233	19	33345	10	33459	10	33547	4
33234	17	33346	18	33460	20	33548	4
33238	17	33348	21	33461	13	33549	4
33239	24	33351	10	33462	16	33550	4
33242	14	33355	11	33463	10	33556	4
33243	17	33359	10	33464	18	33558	4
33245	16	33388	10	33465	16	33559	4
33247	12	33394	17	33466	13	33563	4
33255	16	33401	17	33467	10	33564	4

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
33565	4	33635	5	33761	6	33848	3
33566	4	33637	4	33762	7	33849	3
33567	4	33646	5	33763	6	33850	5
33568	4	33647	3	33764	6	33851	4
33569	4	33650	6	33765	6	33852	6
33570	6	33655	5	33766	7	33853	5
33571	6	33672	5	33767	10	33854	5
33572	6	33673	5	33769	6	33855	5
33573	5	33674	4	33770	8	33856	5
33574	4	33675	6	33771	6	33857	6
33575	6	33677	6	33772	9	33858	4
33576	4	33679	7	33773	6	33859	4
33578	5	33680	5	33774	9	33860	4
33579	4	33681	8	33775	9	33862	6
33583	4	33682	4	33776	10	33863	4
33584	4	33684	6	33777	6	33865	5
33585	3	33685	6	33778	8	33867	5
33586	6	33687	4	33779	7	33868	4
33587	4	33688	4	33780	6	33870	6
33592	4	33689	4	33781	6	33871	6
33593	3	33694	4	33782	5	33872	5
33594	4	33701	10	33784	7	33873	5
33595	4	33702	7	33785	11	33875	5
33596	4	33703	9	33786	11	33876	6
33597	3	33704	9	33801	4	33877	5
33598	4	33705	11	33802	4	33880	5
33601	5	33706	12	33803	4	33881	5
33602	5	33707	10	33804	4	33882	5
33603	5	33708	12	33805	4	33883	5
33604	4	33709	7	33806	4	33884	5
33605	6	33710	8	33807	4	33885	5
33606	8	33711	10	33809	4	33888	5
33607	6	33712	11	33810	4	33890	5
33608	8	33713	7	33811	4	33896	3
33609	7	33714	7	33812	4	33897	3
33610	5	33715	12	33813	4	33898	4
33611	8	33716	7	33815	4	33901	8
33612	4	33729	7	33820	5	33902	8
33613	4	33730	7	33823	4	33903	7
33614	5	33731	10	33825	5	33904	9
33615	6	33732	7	33826	5	33905	7
33616	9	33733	7	33827	5	33906	7
33617	4	33734	9	33830	4	33907	8
33618	4	33736	12	33831	4	33908	9
33619	5	33738	12	33834	5	33909	7
33620	4	33740	11	33835	4	33910	8
33621	9	33741	12	33836	4	33912	7
33622	6	33742	7	33837	4	33913	7
33623	6	33743	8	33838	5	33914	9
33624	4	33744	10	33839	5	33915	8
33625	4	33747	9	33840	4	33916	7
33626	4	33755	8	33841	5	33917	7
33629	8	33756	8	33843	5	33918	7
33630	6	33757	8	33844	4	33919	8
33631	6	33758	8	33845	4	33920	6
33633	6	33759	6	33846	4	33921	15
33634	6	33760	7	33847	4	33922	12



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ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group	ZIP Code	2024 Group
33924	17	34117	8	34260	7	34474	2
33927	7	34119	8	34264	7	34475	2
33928	8	34120	7	34265	5	34476	2
33929	9	34133	9	34266	5	34477	2
33930	8	34134	11	34267	5	34478	2
33931	13	34135	9	34268	5	34479	2
33932	13	34136	10	34269	5	34480	2
33935	7	34137	11	34270	6	34481	2
33936	8	34138	11	34272	9	34482	2
33938	7	34139	11	34274	9	34483	2
33944	7	34140	16	34275	9	34484	2
33945	12	34141	11	34276	10	34487	3
33946	12	34142	8	34277	9	34488	1
33947	9	34143	8	34280	9	34489	2
33948	7	34145	18	34281	8	34491	2
33949	7	34146	18	34282	8	34492	2
33950	8	34201	5	34284	10	34498	4
33951	8	34202	5	34285	10	34601	3
33952	7	34203	6	34286	5	34602	3
33953	7	34204	6	34287	6	34603	3
33954	6	34205	8	34288	5	34604	3
33955	7	34206	8	34289	5	34605	3
33956	13	34207	8	34290	5	34606	4
33957	14	34208	6	34291	5	34607	5
33960	6	34209	9	34292	7	34608	4
33965	8	34210	10	34293	9	34609	3
33966	7	34211	5	34295	11	34610	3
33967	8	34212	5	34420	2	34611	4
33970	8	34215	13	34421	2	34613	3
33971	7	34216	13	34423	3	34614	3
33972	8	34217	14	34428	3	34636	3
33973	7	34218	13	34429	3	34637	4
33974	8	34219	5	34430	3	34638	4
33975	7	34220	8	34431	2	34639	4
33976	7	34221	7	34432	2	34652	6
33980	7	34222	6	34433	2	34653	5
33981	8	34223	11	34434	3	34654	4
33982	6	34224	9	34436	3	34655	4
33983	7	34228	13	34441	3	34656	6
33990	8	34229	10	34442	3	34660	8
33991	8	34230	10	34445	3	34661	3
33993	8	34231	10	34446	3	34667	6
33994	7	34232	6	34447	3	34668	6
34101	13	34233	6	34448	3	34669	4
34102	15	34234	8	34449	2	34673	6
34103	14	34235	6	34450	3	34674	6
34104	10	34236	10	34451	3	34677	5
34105	11	34237	8	34452	3	34679	6
34106	15	34238	8	34453	3	34680	6
34107	11	34239	9	34460	3	34681	8
34108	13	34240	5	34461	3	34682	7
34109	10	34241	6	34464	3	34683	7
34110	10	34242	11	34465	3	34684	5
34112	11	34243	6	34470	2	34685	4
34113	11	34249	7	34471	2	34688	4
34114	10	34250	9	34472	2	34689	7
34116	9	34251	5	34473	2	34690	6

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2024 Rating Group Definitions by ZIP Code

ZIP Code	2024 Group	ZIP Code	2024 Group
34691	7	34954	12
34692	6	34956	9
34695	6	34957	15
34697	7	34958	15
34698	7	34972	8
34705	4	34973	8
34711	4	34974	11
34712	4	34979	13
34713	3	34981	9
34714	3	34982	12
34715	4	34983	9
34729	5	34984	9
34731	3	34985	10
34734	4	34986	8
34736	3	34987	8
34737	4	34988	8
34739	5	34990	10
34740	5	34991	11
34741	4	34992	14
34742	4	34994	13
34743	4	34995	13
34744	4	34996	16
34745	4	34997	11
34746	4		
34747	3		
34748	4		
34749	4		
34753	4		
34755	4		
34756	5		
34758	4		
34759	3		
34760	5		
34761	4		
34762	4		
34769	5		
34770	5		
34771	4		
34772	4		
34773	4		
34777	5		
34778	5		
34785	2		
34786	3		
34787	4		
34788	4		
34789	4		
34797	4		
34945	8		
34946	12		
34947	10		
34948	11		
34949	16		
34950	13		
34951	10		
34952	11		
34953	9		

EXHIBIT

XIV

**PROPOSED FHCF 2024 Commercial Rates (Not Yet Approved by FHCF Trustees for Use)**

Rates are Dollars per \$1000 of Exposure

Coverage Level: 90%

Deductible: 5%

ZIP Code				Masonry with Reinforced Concrete		Superior with Reinforced Concrete	Non-MH Default
<u>Group</u>	<u>Frame</u>	<u>Masonry Veneer</u>	<u>Masonry</u>	<u>Roof Deck</u>	<u>Superior</u>	<u>Roof Deck</u>	<u>and Unknown</u>
1	0.1056	0.0988	0.0783	0.0535	0.0470	0.0390	0.0746
2	0.1761	0.1647	0.1306	0.0892	0.0784	0.0651	0.1244
3	0.2483	0.2322	0.1841	0.1258	0.1105	0.0918	0.1754
4	0.3258	0.3047	0.2416	0.1650	0.1450	0.1205	0.2301
5	0.4089	0.3825	0.3032	0.2071	0.1820	0.1512	0.2888
6	0.4977	0.4656	0.3691	0.2521	0.2216	0.1840	0.3516
7	0.5926	0.5543	0.4394	0.3002	0.2638	0.2191	0.4186
8	0.6937	0.6489	0.5144	0.3514	0.3088	0.2565	0.4900
9	0.8013	0.7495	0.5942	0.4059	0.3567	0.2963	0.5660
10	0.9159	0.8567	0.6791	0.4639	0.4077	0.3386	0.6469
11	1.0376	0.9706	0.7694	0.5256	0.4619	0.3836	0.7329
12	1.1670	1.0916	0.8653	0.5912	0.5195	0.4315	0.8243
13	1.3045	1.2202	0.9673	0.6608	0.5807	0.4823	0.9214
14	1.4505	1.3568	1.0756	0.7348	0.6457	0.5363	1.0245
15	1.6057	1.5019	1.1906	0.8134	0.7148	0.5937	1.1341
16	1.7705	1.6561	1.3129	0.8969	0.7882	0.6546	1.2506
17	1.9457	1.8200	1.4428	0.9857	0.8662	0.7194	1.3743
18	2.1320	1.9942	1.5809	1.0800	0.9491	0.7883	1.5059
19	2.3301	2.1795	1.7278	1.1804	1.0373	0.8615	1.6458
20	2.5408	2.3767	1.8841	1.2871	1.1311	0.9394	1.7947
21	2.7652	2.5865	2.0504	1.4008	1.2310	1.0224	1.9531
22	3.0040	2.8099	2.2275	1.5218	1.3373	1.1107	2.1218
23	3.2584	3.0478	2.4161	1.6506	1.4506	1.2047	2.3015
24	3.5294	3.3013	2.6171	1.7879	1.5712	1.3049	2.4929
25	3.8181	3.5713	2.8311	1.9341	1.6997	1.4117	2.6968

**PROPOSED FHCF 2024 Commercial Rates (Not Yet Approved by FHCF Trustees for Use)**

Rates are Dollars per \$1000 of Exposure

Coverage Level: 75%

Deductible: 5%

ZIP Code				Masonry with Reinforced Concrete		Superior with Reinforced Concrete	Non-MH Default
<u>Group</u>	<u>Frame</u>	<u>Masonry Veneer</u>	<u>Masonry</u>	<u>Roof Deck</u>	<u>Superior</u>	<u>Roof Deck</u>	<u>and Unknown</u>
1	0.0880	0.0823	0.0652	0.0446	0.0392	0.0325	0.0621
2	0.1467	0.1372	0.1088	0.0743	0.0653	0.0543	0.1036
3	0.2069	0.1935	0.1534	0.1048	0.0921	0.0765	0.1461
4	0.2715	0.2540	0.2013	0.1375	0.1209	0.1004	0.1918
5	0.3407	0.3187	0.2527	0.1726	0.1517	0.1260	0.2407
6	0.4148	0.3880	0.3076	0.2101	0.1847	0.1534	0.2930
7	0.4938	0.4619	0.3662	0.2502	0.2198	0.1826	0.3488
8	0.5781	0.5407	0.4286	0.2928	0.2573	0.2137	0.4083
9	0.6678	0.6246	0.4952	0.3383	0.2973	0.2469	0.4717
10	0.7632	0.7139	0.5659	0.3866	0.3398	0.2822	0.5391
11	0.8647	0.8088	0.6412	0.4380	0.3849	0.3197	0.6107
12	0.9725	0.9097	0.7211	0.4926	0.4329	0.3596	0.6869
13	1.0871	1.0168	0.8061	0.5507	0.4839	0.4019	0.7678
14	1.2088	1.1307	0.8963	0.6123	0.5381	0.4469	0.8538
15	1.3381	1.2516	0.9922	0.6778	0.5957	0.4947	0.9451
16	1.4754	1.3801	1.0941	0.7474	0.6568	0.5455	1.0421
17	1.6214	1.5167	1.2023	0.8214	0.7218	0.5995	1.1453
18	1.7767	1.6618	1.3174	0.9000	0.7909	0.6569	1.2549
19	1.9417	1.8163	1.4398	0.9836	0.8644	0.7179	1.3715
20	2.1174	1.9805	1.5701	1.0726	0.9426	0.7829	1.4956
21	2.3043	2.1554	1.7087	1.1673	1.0258	0.8520	1.6276
22	2.5033	2.3416	1.8563	1.2681	1.1144	0.9256	1.7682
23	2.7153	2.5398	2.0134	1.3755	1.2088	1.0040	1.9179
24	2.9411	2.7511	2.1809	1.4899	1.3093	1.0874	2.0774
25	3.1817	2.9761	2.3593	1.6118	1.4164	1.1764	2.2474

**PROPOSED FHCF 2024 Commercial Rates (Not Yet Approved by FHCF Trustees for Use)**

Rates are Dollars per \$1000 of Exposure

Coverage Level: 45%

Deductible: 5%

ZIP Code				Masonry with Reinforced Concrete		Superior with Reinforced Concrete	Non-MH Default and Unknown
<u>Group</u>	<u>Frame</u>	<u>Masonry Veneer</u>	<u>Masonry</u>	<u>Roof Deck</u>	<u>Superior</u>	<u>Roof Deck</u>	
1	0.0528	0.0494	0.0391	0.0267	0.0235	0.0195	0.0373
2	0.0880	0.0823	0.0653	0.0446	0.0392	0.0326	0.0622
3	0.1241	0.1161	0.0920	0.0629	0.0553	0.0459	0.0877
4	0.1629	0.1524	0.1208	0.0825	0.0725	0.0602	0.1151
5	0.2044	0.1912	0.1516	0.1036	0.0910	0.0756	0.1444
6	0.2489	0.2328	0.1845	0.1261	0.1108	0.0920	0.1758
7	0.2963	0.2771	0.2197	0.1501	0.1319	0.1096	0.2093
8	0.3468	0.3244	0.2572	0.1757	0.1544	0.1282	0.2450
9	0.4007	0.3748	0.2971	0.2030	0.1784	0.1481	0.2830
10	0.4579	0.4283	0.3396	0.2320	0.2039	0.1693	0.3234
11	0.5188	0.4853	0.3847	0.2628	0.2310	0.1918	0.3664
12	0.5835	0.5458	0.4327	0.2956	0.2598	0.2157	0.4121
13	0.6522	0.6101	0.4836	0.3304	0.2904	0.2412	0.4607
14	0.7253	0.6784	0.5378	0.3674	0.3229	0.2682	0.5123
15	0.8028	0.7510	0.5953	0.4067	0.3574	0.2968	0.5671
16	0.8853	0.8281	0.6564	0.4485	0.3941	0.3273	0.6253
17	0.9729	0.9100	0.7214	0.4928	0.4331	0.3597	0.6872
18	1.0660	0.9971	0.7904	0.5400	0.4746	0.3941	0.7529
19	1.1650	1.0898	0.8639	0.5902	0.5187	0.4308	0.8229
20	1.2704	1.1883	0.9420	0.6436	0.5656	0.4697	0.8973
21	1.3826	1.2932	1.0252	0.7004	0.6155	0.5112	0.9766
22	1.5020	1.4049	1.1138	0.7609	0.6687	0.5553	1.0609
23	1.6292	1.5239	1.2081	0.8253	0.7253	0.6024	1.1507
24	1.7647	1.6506	1.3085	0.8939	0.7856	0.6525	1.2464
25	1.9090	1.7857	1.4156	0.9671	0.8499	0.7058	1.3484

**PROPOSED FHCF 2024 Residential Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 90%**

**Deductible: 2%**

<b>ZIP Code</b>				<b>Masonry with Reinforced Concrete</b>		<b>Superior with Reinforced Concrete</b>	<b>Non-MH Default and Unknown</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Roof Deck</b>	
1	0.0873	0.0832	0.0670	0.0452	0.0507	0.0299	0.0899
2	0.1456	0.1387	0.1117	0.0753	0.0846	0.0498	0.1500
3	0.2053	0.1955	0.1576	0.1062	0.1193	0.0703	0.2115
4	0.2695	0.2566	0.2068	0.1393	0.1566	0.0922	0.2776
5	0.3382	0.3221	0.2595	0.1749	0.1965	0.1158	0.3484
6	0.4117	0.3921	0.3159	0.2129	0.2392	0.1409	0.4241
7	0.4902	0.4668	0.3761	0.2535	0.2848	0.1678	0.5049
8	0.5738	0.5464	0.4403	0.2967	0.3334	0.1964	0.5910
9	0.6628	0.6312	0.5086	0.3427	0.3851	0.2269	0.6827
10	0.7576	0.7214	0.5813	0.3917	0.4402	0.2593	0.7803
11	0.8583	0.8173	0.6585	0.4438	0.4987	0.2937	0.8840
12	0.9653	0.9192	0.7407	0.4991	0.5609	0.3304	0.9942
13	1.0790	1.0275	0.8279	0.5579	0.6270	0.3693	1.1114
14	1.1998	1.1425	0.9206	0.6204	0.6972	0.4106	1.2358
15	1.3282	1.2648	1.0191	0.6868	0.7717	0.4546	1.3680
16	1.4645	1.3946	1.1237	0.7573	0.8510	0.5012	1.5084
17	1.6094	1.5326	1.2349	0.8322	0.9352	0.5508	1.6577
18	1.7635	1.6793	1.3531	0.9119	1.0247	0.6036	1.8164
19	1.9274	1.8354	1.4788	0.9966	1.1199	0.6596	1.9852
20	2.1017	2.0014	1.6126	1.0867	1.2212	0.7193	2.1647
21	2.2872	2.1781	1.7549	1.1827	1.3290	0.7828	2.3558
22	2.4848	2.3662	1.9065	1.2848	1.4438	0.8504	2.5593
23	2.6952	2.5666	2.0680	1.3936	1.5661	0.9224	2.7760
24	2.9194	2.7800	2.2399	1.5095	1.6963	0.9991	3.0069
25	3.1582	3.0074	2.4232	1.6330	1.8351	1.0809	3.2529

**PROPOSED FHCF 2024 Residential Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 75%**

**Deductible: 2%**

<b>ZIP Code</b>				<b>Masonry with Reinforced Concrete</b>		<b>Superior with Reinforced Concrete</b>	<b>Non-MH Default and Unknown</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Roof Deck</b>	
1	0.0728	0.0693	0.0558	0.0376	0.0423	0.0249	0.0750
2	0.1214	0.1156	0.0931	0.0628	0.0705	0.0415	0.1250
3	0.1711	0.1630	0.1313	0.0885	0.0994	0.0586	0.1763
4	0.2246	0.2139	0.1723	0.1161	0.1305	0.0769	0.2313
5	0.2818	0.2684	0.2163	0.1457	0.1638	0.0965	0.2903
6	0.3431	0.3267	0.2632	0.1774	0.1994	0.1174	0.3534
7	0.4085	0.3890	0.3134	0.2112	0.2373	0.1398	0.4207
8	0.4782	0.4553	0.3669	0.2472	0.2778	0.1636	0.4925
9	0.5524	0.5260	0.4238	0.2856	0.3210	0.1890	0.5689
10	0.6313	0.6012	0.4844	0.3264	0.3668	0.2161	0.6502
11	0.7152	0.6811	0.5488	0.3698	0.4156	0.2448	0.7367
12	0.8044	0.7660	0.6172	0.4159	0.4674	0.2753	0.8285
13	0.8992	0.8563	0.6899	0.4649	0.5225	0.3077	0.9261
14	0.9998	0.9521	0.7672	0.5170	0.5810	0.3422	1.0298
15	1.1068	1.0540	0.8492	0.5723	0.6431	0.3788	1.1400
16	1.2204	1.1622	0.9364	0.6311	0.7091	0.4177	1.2570
17	1.3412	1.2772	1.0291	0.6935	0.7793	0.4590	1.3814
18	1.4696	1.3994	1.1276	0.7599	0.8539	0.5030	1.5137
19	1.6061	1.5295	1.2323	0.8305	0.9333	0.5497	1.6543
20	1.7514	1.6678	1.3438	0.9056	1.0177	0.5994	1.8039
21	1.9060	1.8151	1.4624	0.9856	1.1075	0.6523	1.9632
22	2.0707	1.9718	1.5888	1.0707	1.2032	0.7087	2.1327
23	2.2460	2.1388	1.7233	1.1614	1.3051	0.7687	2.3133
24	2.4328	2.3167	1.8666	1.2579	1.4136	0.8326	2.5057
25	2.6318	2.5062	2.0193	1.3609	1.5292	0.9007	2.7107



**PROPOSED FHCF 2024 Residential Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 45%**

**Deductible: 2%**

<b>ZIP Code</b>				<b>Masonry with Reinforced Concrete</b>		<b>Superior with Reinforced Concrete</b>	<b>Non-MH Default and Unknown</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Roof Deck</b>	
1	0.0437	0.0416	0.0335	0.0226	0.0254	0.0149	0.0450
2	0.0728	0.0693	0.0559	0.0377	0.0423	0.0249	0.0750
3	0.1027	0.0978	0.0788	0.0531	0.0597	0.0351	0.1058
4	0.1347	0.1283	0.1034	0.0697	0.0783	0.0461	0.1388
5	0.1691	0.1610	0.1298	0.0874	0.0983	0.0579	0.1742
6	0.2059	0.1960	0.1579	0.1064	0.1196	0.0705	0.2120
7	0.2451	0.2334	0.1880	0.1267	0.1424	0.0839	0.2524
8	0.2869	0.2732	0.2201	0.1483	0.1667	0.0982	0.2955
9	0.3314	0.3156	0.2543	0.1714	0.1926	0.1134	0.3414
10	0.3788	0.3607	0.2906	0.1959	0.2201	0.1296	0.3901
11	0.4291	0.4087	0.3293	0.2219	0.2494	0.1469	0.4420
12	0.4827	0.4596	0.3703	0.2496	0.2804	0.1652	0.4971
13	0.5395	0.5138	0.4139	0.2790	0.3135	0.1846	0.5557
14	0.5999	0.5713	0.4603	0.3102	0.3486	0.2053	0.6179
15	0.6641	0.6324	0.5095	0.3434	0.3859	0.2273	0.6840
16	0.7323	0.6973	0.5618	0.3786	0.4255	0.2506	0.7542
17	0.8047	0.7663	0.6174	0.4161	0.4676	0.2754	0.8288
18	0.8818	0.8397	0.6765	0.4559	0.5123	0.3018	0.9082
19	0.9637	0.9177	0.7394	0.4983	0.5600	0.3298	0.9926
20	1.0508	1.0007	0.8063	0.5434	0.6106	0.3596	1.0824
21	1.1436	1.0890	0.8775	0.5913	0.6645	0.3914	1.1779
22	1.2424	1.1831	0.9533	0.6424	0.7219	0.4252	1.2796
23	1.3476	1.2833	1.0340	0.6968	0.7830	0.4612	1.3880
24	1.4597	1.3900	1.1200	0.7548	0.8482	0.4996	1.5034
25	1.5791	1.5037	1.2116	0.8165	0.9175	0.5404	1.6264

**PROPOSED FHCF 2024 Mobile Home Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 90%**

**Deductible: 2%**

Mobile Home - Fully Tied Down					
ZIP Code Group	Year Built Pre-1976	Year Built 1976-1994	Year Built 1995-2008	Year Built Post 2008	Other Than Fully Tied Down or Unknown All Years
1	0.4970	0.4970	0.2496	0.2273	0.6074
2	0.8288	0.8288	0.4162	0.3790	1.0130
3	1.1686	1.1686	0.5868	0.5344	1.4283
4	1.5336	1.5336	0.7701	0.7013	1.8744
5	1.9247	1.9247	0.9666	0.8801	2.3525
6	2.3429	2.3429	1.1766	1.0714	2.8637
7	2.7893	2.7893	1.4008	1.2755	3.4093
8	3.2652	3.2652	1.6398	1.4931	3.9910
9	3.7719	3.7719	1.8942	1.7249	4.6103
10	4.3110	4.3110	2.1649	1.9714	5.2692
11	4.8841	4.8841	2.4528	2.2334	5.9697
12	5.4932	5.4932	2.7586	2.5120	6.7142
13	6.1403	6.1403	3.0836	2.8079	7.5051
14	6.8277	6.8277	3.4288	3.1222	8.3453
15	7.5580	7.5580	3.7956	3.4562	9.2380
16	8.3340	8.3340	4.1853	3.8110	10.1864
17	9.1587	9.1587	4.5994	4.1882	11.1944
18	10.0355	10.0355	5.0397	4.5891	12.2661
19	10.9679	10.9679	5.5080	5.0155	13.4058
20	11.9600	11.9600	6.0062	5.4691	14.6184
21	13.0159	13.0159	6.5364	5.9520	15.9089
22	14.1401	14.1401	7.1010	6.4661	17.2830
23	15.3374	15.3374	7.7023	7.0136	18.7465
24	16.6130	16.6130	8.3429	7.5969	20.3056
25	17.9720	17.9720	9.0253	8.2184	21.9667

**PROPOSED FHCF 2024 Mobile Home Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 75%**

**Deductible: 2%**

Mobile Home - Fully Tied Down					Other Than Fully Tied Down or Unknown
<u>ZIP Code Group</u>	<u>Year Built Pre-1976</u>	<u>Year Built 1976-1994</u>	<u>Year Built 1995-2008</u>	<u>Year Built Post 2008</u>	<u>All Years</u>
1	0.4141	0.4141	0.2080	0.1894	0.5062
2	0.6907	0.6907	0.3468	0.3158	0.8442
3	0.9738	0.9738	0.4890	0.4453	1.1903
4	1.2780	1.2780	0.6418	0.5844	1.5620
5	1.6039	1.6039	0.8055	0.7334	1.9604
6	1.9524	1.9524	0.9805	0.8928	2.3864
7	2.3245	2.3245	1.1673	1.0629	2.8411
8	2.7210	2.7210	1.3665	1.2443	3.3258
9	3.1433	3.1433	1.5785	1.4374	3.8419
10	3.5925	3.5925	1.8041	1.6428	4.3910
11	4.0701	4.0701	2.0440	1.8612	4.9748
12	4.5777	4.5777	2.2989	2.0933	5.5951
13	5.1169	5.1169	2.5697	2.3399	6.2542
14	5.6898	5.6898	2.8573	2.6019	6.9544
15	6.2984	6.2984	3.1630	2.8802	7.6983
16	6.9450	6.9450	3.4877	3.1759	8.4887
17	7.6323	7.6323	3.8328	3.4901	9.3287
18	8.3629	8.3629	4.1998	3.8242	10.2217
19	9.1399	9.1399	4.5900	4.1796	11.1715
20	9.9667	9.9667	5.0052	4.5576	12.1820
21	10.8466	10.8466	5.4470	4.9600	13.2574
22	11.7834	11.7834	5.9175	5.3884	14.4025
23	12.7812	12.7812	6.4186	5.8447	15.6221
24	13.8442	13.8442	6.9524	6.3308	16.9213
25	14.9767	14.9767	7.5211	6.8486	18.3055

**PROPOSED FHCF 2024 Mobile Home Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 45%**

**Deductible: 2%**

Mobile Home - Fully Tied Down					
<b>ZIP Code Group</b>	<b>Year Built Pre-1976</b>	<b>Year Built 1976-1994</b>	<b>Year Built 1995-2008</b>	<b>Year Built Post 2008</b>	<b>Other Than Fully Tied Down or Unknown All Years</b>
1	0.2485	0.2485	0.1248	0.1136	0.3037
2	0.4144	0.4144	0.2081	0.1895	0.5065
3	0.5843	0.5843	0.2934	0.2672	0.7142
4	0.7668	0.7668	0.3851	0.3506	0.9372
5	0.9623	0.9623	0.4833	0.4401	1.1762
6	1.1715	1.1715	0.5883	0.5357	1.4318
7	1.3947	1.3947	0.7004	0.6378	1.7047
8	1.6326	1.6326	0.8199	0.7466	1.9955
9	1.8860	1.8860	0.9471	0.8624	2.3052
10	2.1555	2.1555	1.0825	0.9857	2.6346
11	2.4421	2.4421	1.2264	1.1167	2.9849
12	2.7466	2.7466	1.3793	1.2560	3.3571
13	3.0701	3.0701	1.5418	1.4039	3.7525
14	3.4139	3.4139	1.7144	1.5611	4.1727
15	3.7790	3.7790	1.8978	1.7281	4.6190
16	4.1670	4.1670	2.0926	1.9055	5.0932
17	4.5794	4.5794	2.2997	2.0941	5.5972
18	5.0177	5.0177	2.5199	2.2945	6.1330
19	5.4840	5.4840	2.7540	2.5077	6.7029
20	5.9800	5.9800	3.0031	2.7346	7.3092
21	6.5079	6.5079	3.2682	2.9760	7.9545
22	7.0700	7.0700	3.5505	3.2330	8.6415
23	7.6687	7.6687	3.8512	3.5068	9.3733
24	8.3065	8.3065	4.1714	3.7985	10.1528
25	8.9860	8.9860	4.5127	4.1092	10.9833

**PROPOSED FHCF 2024 Tenants Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 90%**

**Deductible: \$1 - \$500**

<b>ZIP Code</b>				<b>Masonry with Reinforced Concrete</b>		<b>Superior with Reinforced Concrete</b>	<b>Non-MH Default and Unknown</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Roof Deck</b>	
1	0.0467	0.0464	0.0357	0.0272	0.0246	0.0222	0.0328
2	0.0778	0.0773	0.0595	0.0454	0.0410	0.0370	0.0547
3	0.1097	0.1090	0.0839	0.0640	0.0578	0.0522	0.0771
4	0.1440	0.1431	0.1101	0.0840	0.0759	0.0685	0.1012
5	0.1807	0.1796	0.1382	0.1054	0.0952	0.0859	0.1270
6	0.2199	0.2186	0.1682	0.1283	0.1159	0.1046	0.1545
7	0.2618	0.2603	0.2002	0.1528	0.1380	0.1245	0.1840
8	0.3065	0.3047	0.2344	0.1788	0.1615	0.1458	0.2154
9	0.3541	0.3519	0.2707	0.2066	0.1866	0.1684	0.2488
10	0.4047	0.4022	0.3094	0.2361	0.2132	0.1925	0.2844
11	0.4585	0.4557	0.3506	0.2675	0.2416	0.2180	0.3222
12	0.5157	0.5125	0.3943	0.3009	0.2717	0.2452	0.3623
13	0.5764	0.5729	0.4407	0.3363	0.3037	0.2741	0.4050
14	0.6409	0.6371	0.4901	0.3740	0.3377	0.3048	0.4504
15	0.7095	0.7052	0.5425	0.4140	0.3739	0.3374	0.4985
16	0.7823	0.7776	0.5982	0.4565	0.4122	0.3721	0.5497
17	0.8598	0.8546	0.6574	0.5016	0.4530	0.4089	0.6041
18	0.9421	0.9364	0.7203	0.5497	0.4964	0.4480	0.6620
19	1.0296	1.0234	0.7873	0.6007	0.5425	0.4896	0.7235
20	1.1227	1.1159	0.8585	0.6551	0.5916	0.5339	0.7889
21	1.2218	1.2144	0.9343	0.7129	0.6438	0.5811	0.8586
22	1.3274	1.3193	1.0150	0.7745	0.6994	0.6313	0.9327
23	1.4398	1.4311	1.1009	0.8400	0.7587	0.6847	1.0117
24	1.5595	1.5501	1.1925	0.9099	0.8218	0.7417	1.0958
25	1.6871	1.6769	1.2900	0.9843	0.8890	0.8023	1.1855

**PROPOSED FHCF 2024 Tenants Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 75%**

**Deductible: \$1 - \$500**

ZIP Code	Masonry with				Superior with		Non-MH Default
	Reinforced Concrete				Reinforced Concrete		
Group	Frame	Masonry Veneer	Masonry	Roof Deck	Superior	Roof Deck	and Unknown
1	0.0389	0.0386	0.0297	0.0227	0.0205	0.0185	0.0273
2	0.0648	0.0644	0.0496	0.0378	0.0342	0.0308	0.0456
3	0.0914	0.0909	0.0699	0.0533	0.0482	0.0435	0.0642
4	0.1200	0.1192	0.0917	0.0700	0.0632	0.0571	0.0843
5	0.1506	0.1497	0.1151	0.0878	0.0793	0.0716	0.1058
6	0.1833	0.1822	0.1401	0.1069	0.0966	0.0872	0.1288
7	0.2182	0.2169	0.1668	0.1273	0.1150	0.1038	0.1533
8	0.2554	0.2539	0.1953	0.1490	0.1346	0.1215	0.1795
9	0.2951	0.2933	0.2256	0.1722	0.1555	0.1403	0.2073
10	0.3372	0.3352	0.2579	0.1968	0.1777	0.1604	0.2370
11	0.3821	0.3798	0.2921	0.2229	0.2013	0.1817	0.2685
12	0.4297	0.4271	0.3286	0.2507	0.2264	0.2044	0.3020
13	0.4803	0.4774	0.3673	0.2803	0.2531	0.2284	0.3375
14	0.5341	0.5309	0.4084	0.3116	0.2814	0.2540	0.3753
15	0.5912	0.5877	0.4521	0.3450	0.3115	0.2812	0.4155
16	0.6520	0.6480	0.4985	0.3804	0.3435	0.3100	0.4581
17	0.7165	0.7121	0.5478	0.4180	0.3775	0.3407	0.5034
18	0.7851	0.7803	0.6003	0.4580	0.4137	0.3733	0.5516
19	0.8580	0.8528	0.6561	0.5006	0.4521	0.4080	0.6029
20	0.9356	0.9299	0.7154	0.5459	0.4930	0.4449	0.6574
21	1.0182	1.0120	0.7786	0.5941	0.5365	0.4842	0.7155
22	1.1062	1.0995	0.8458	0.6454	0.5829	0.5260	0.7773
23	1.1998	1.1926	0.9174	0.7000	0.6322	0.5706	0.8431
24	1.2996	1.2917	0.9937	0.7583	0.6848	0.6180	0.9132
25	1.4059	1.3974	1.0750	0.8203	0.7408	0.6686	0.9879

**PROPOSED FHCF 2024 Tenants Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 45%**

**Deductible: \$1 - \$500**

<b>ZIP Code</b>	<b>Masonry with</b>			<b>Reinforced Concrete</b>		<b>Superior with</b>	<b>Non-MH Default</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Reinforced Concrete</b>	<b>and Unknown</b>
						<b>Roof Deck</b>	
1	0.0233	0.0232	0.0178	0.0136	0.0123	0.0111	0.0164
2	0.0389	0.0387	0.0297	0.0227	0.0205	0.0185	0.0273
3	0.0548	0.0545	0.0419	0.0320	0.0289	0.0261	0.0385
4	0.0720	0.0715	0.0550	0.0420	0.0379	0.0342	0.0506
5	0.0903	0.0898	0.0691	0.0527	0.0476	0.0430	0.0635
6	0.1100	0.1093	0.0841	0.0642	0.0579	0.0523	0.0773
7	0.1309	0.1301	0.1001	0.0764	0.0690	0.0623	0.0920
8	0.1533	0.1523	0.1172	0.0894	0.0808	0.0729	0.1077
9	0.1770	0.1760	0.1354	0.1033	0.0933	0.0842	0.1244
10	0.2023	0.2011	0.1547	0.1181	0.1066	0.0962	0.1422
11	0.2292	0.2279	0.1753	0.1338	0.1208	0.1090	0.1611
12	0.2578	0.2563	0.1971	0.1504	0.1359	0.1226	0.1812
13	0.2882	0.2865	0.2204	0.1682	0.1519	0.1371	0.2025
14	0.3205	0.3185	0.2450	0.1870	0.1689	0.1524	0.2252
15	0.3547	0.3526	0.2713	0.2070	0.1869	0.1687	0.2493
16	0.3912	0.3888	0.2991	0.2282	0.2061	0.1860	0.2749
17	0.4299	0.4273	0.3287	0.2508	0.2265	0.2044	0.3021
18	0.4710	0.4682	0.3602	0.2748	0.2482	0.2240	0.3310
19	0.5148	0.5117	0.3936	0.3004	0.2713	0.2448	0.3617
20	0.5614	0.5580	0.4292	0.3275	0.2958	0.2670	0.3945
21	0.6109	0.6072	0.4671	0.3564	0.3219	0.2905	0.4293
22	0.6637	0.6597	0.5075	0.3872	0.3497	0.3156	0.4664
23	0.7199	0.7155	0.5505	0.4200	0.3793	0.3424	0.5058
24	0.7798	0.7750	0.5962	0.4550	0.4109	0.3708	0.5479
25	0.8435	0.8384	0.6450	0.4922	0.4445	0.4012	0.5927

**PROPOSED FHCF 2024 Condominium Unit Owners Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 90%**

**Deductible: 2%**

<b>ZIP Code</b>	<b>Masonry with</b>			<b>Reinforced Concrete</b>	<b>Superior with</b>		<b>Non-MH Default</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Reinforced Concrete</b>	<b>and Unknown</b>
						<b>Roof Deck</b>	
1	0.1047	0.0941	0.0810	0.0562	0.0508	0.0374	0.0791
2	0.1747	0.1569	0.1351	0.0937	0.0847	0.0624	0.1319
3	0.2463	0.2212	0.1905	0.1321	0.1195	0.0880	0.1860
4	0.3232	0.2903	0.2500	0.1733	0.1568	0.1155	0.2440
5	0.4056	0.3643	0.3138	0.2175	0.1968	0.1450	0.3063
6	0.4938	0.4435	0.3820	0.2648	0.2396	0.1765	0.3728
7	0.5879	0.5280	0.4547	0.3152	0.2852	0.2101	0.4439
8	0.6882	0.6180	0.5323	0.3690	0.3339	0.2459	0.5196
9	0.7950	0.7139	0.6149	0.4262	0.3857	0.2841	0.6002
10	0.9086	0.8160	0.7028	0.4872	0.4408	0.3247	0.6860
11	1.0294	0.9245	0.7962	0.5519	0.4994	0.3679	0.7772
12	1.1577	1.0397	0.8955	0.6207	0.5617	0.4137	0.8742
13	1.2941	1.1622	1.0010	0.6939	0.6279	0.4625	0.9771
14	1.4390	1.2923	1.1131	0.7716	0.6982	0.5142	1.0865
15	1.5929	1.4306	1.2322	0.8541	0.7728	0.5692	1.2027
16	1.7564	1.5774	1.3587	0.9418	0.8522	0.6277	1.3262
17	1.9303	1.7335	1.4931	1.0350	0.9365	0.6898	1.4575
18	2.1150	1.8995	1.6361	1.1340	1.0262	0.7558	1.5970
19	2.3116	2.0760	1.7881	1.2394	1.1215	0.8261	1.7454
20	2.5206	2.2638	1.9498	1.3515	1.2229	0.9008	1.9033
21	2.7432	2.4636	2.1219	1.4708	1.3309	0.9803	2.0713
22	2.9801	2.6764	2.3052	1.5979	1.4459	1.0650	2.2502
23	3.2325	2.9030	2.5004	1.7332	1.5683	1.1552	2.4407
24	3.5013	3.1445	2.7084	1.8773	1.6987	1.2512	2.6437
25	3.7877	3.4017	2.9299	2.0309	1.8377	1.3536	2.8600



**PROPOSED FHCF 2024 Condominium Unit Owners Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 75%**

**Deductible: 2%**

<b>ZIP Code</b>	<b>Masonry with</b>			<b>Reinforced Concrete</b>	<b>Superior with</b>		<b>Non-MH Default</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Reinforced Concrete</b>	<b>and Unknown</b>
				<b>Roof Deck</b>		<b>Roof Deck</b>	
1	0.0873	0.0784	0.0675	0.0468	0.0423	0.0312	0.0659
2	0.1456	0.1307	0.1126	0.0780	0.0706	0.0520	0.1099
3	0.2052	0.1843	0.1588	0.1100	0.0996	0.0733	0.1550
4	0.2693	0.2419	0.2083	0.1444	0.1307	0.0963	0.2034
5	0.3380	0.3036	0.2615	0.1812	0.1640	0.1208	0.2552
6	0.4115	0.3696	0.3183	0.2206	0.1996	0.1470	0.3107
7	0.4899	0.4400	0.3789	0.2627	0.2377	0.1751	0.3699
8	0.5735	0.5150	0.4436	0.3075	0.2782	0.2049	0.4330
9	0.6625	0.5950	0.5124	0.3552	0.3214	0.2367	0.5002
10	0.7571	0.6800	0.5857	0.4060	0.3673	0.2706	0.5717
11	0.8578	0.7704	0.6635	0.4599	0.4162	0.3065	0.6477
12	0.9648	0.8664	0.7463	0.5173	0.4681	0.3448	0.7285
13	1.0784	0.9685	0.8342	0.5782	0.5232	0.3854	0.8143
14	1.1991	1.0769	0.9276	0.6430	0.5818	0.4285	0.9054
15	1.3274	1.1921	1.0268	0.7117	0.6440	0.4744	1.0023
16	1.4637	1.3145	1.1322	0.7848	0.7101	0.5231	1.1052
17	1.6085	1.4446	1.2443	0.8625	0.7804	0.5748	1.2146
18	1.7625	1.5829	1.3634	0.9450	0.8551	0.6299	1.3308
19	1.9263	1.7300	1.4901	1.0328	0.9346	0.6884	1.4545
20	2.1005	1.8865	1.6248	1.1263	1.0191	0.7507	1.5860
21	2.2860	2.0530	1.7683	1.2257	1.1091	0.8169	1.7261
22	2.4834	2.2303	1.9210	1.3316	1.2049	0.8875	1.8752
23	2.6937	2.4192	2.0837	1.4443	1.3069	0.9626	2.0339
24	2.9177	2.6204	2.2570	1.5644	1.4156	1.0427	2.2031
25	3.1564	2.8348	2.4416	1.6924	1.5314	1.1280	2.3833

**PROPOSED FHCF 2024 Condominium Unit Owners Rates (Not Yet Approved by FHCF Trustees for Use)**

**Rates are Dollars per \$1000 of Exposure**

**Coverage Level: 45%**

**Deductible: 2%**

<b>ZIP Code</b>				<b>Masonry with Reinforced Concrete</b>		<b>Superior with Reinforced Concrete</b>	<b>Non-MH Default and Unknown</b>
<b>Group</b>	<b>Frame</b>	<b>Masonry Veneer</b>	<b>Masonry</b>	<b>Roof Deck</b>	<b>Superior</b>	<b>Roof Deck</b>	
1	0.0524	0.0470	0.0405	0.0281	0.0254	0.0187	0.0395
2	0.0873	0.0784	0.0676	0.0468	0.0424	0.0312	0.0659
3	0.1231	0.1106	0.0953	0.0660	0.0597	0.0440	0.0930
4	0.1616	0.1451	0.1250	0.0866	0.0784	0.0578	0.1220
5	0.2028	0.1821	0.1569	0.1087	0.0984	0.0725	0.1531
6	0.2469	0.2217	0.1910	0.1324	0.1198	0.0882	0.1864
7	0.2939	0.2640	0.2274	0.1576	0.1426	0.1050	0.2219
8	0.3441	0.3090	0.2662	0.1845	0.1669	0.1230	0.2598
9	0.3975	0.3570	0.3075	0.2131	0.1928	0.1420	0.3001
10	0.4543	0.4080	0.3514	0.2436	0.2204	0.1623	0.3430
11	0.5147	0.4622	0.3981	0.2760	0.2497	0.1839	0.3886
12	0.5789	0.5199	0.4478	0.3104	0.2808	0.2069	0.4371
13	0.6470	0.5811	0.5005	0.3469	0.3139	0.2312	0.4886
14	0.7195	0.6462	0.5566	0.3858	0.3491	0.2571	0.5433
15	0.7964	0.7153	0.6161	0.4270	0.3864	0.2846	0.6014
16	0.8782	0.7887	0.6793	0.4709	0.4261	0.3138	0.6631
17	0.9651	0.8668	0.7466	0.5175	0.4683	0.3449	0.7287
18	1.0575	0.9497	0.8180	0.5670	0.5131	0.3779	0.7985
19	1.1558	1.0380	0.8940	0.6197	0.5608	0.4130	0.8727
20	1.2603	1.1319	0.9749	0.6758	0.6115	0.4504	0.9516
21	1.3716	1.2318	1.0610	0.7354	0.6655	0.4902	1.0356
22	1.4901	1.3382	1.1526	0.7989	0.7229	0.5325	1.1251
23	1.6162	1.4515	1.2502	0.8666	0.7842	0.5776	1.2204
24	1.7506	1.5722	1.3542	0.9387	0.8494	0.6256	1.3219
25	1.8939	1.7009	1.4650	1.0154	0.9188	0.6768	1.4300

## Florida Hurricane Catastrophe Fund

### 2024 Ratemaking Formula Report

#### Windstorm Mitigation Construction Rating Classification Factors

**To Calculate the Final FHCF Rate for a risk:**

*Preliminary factor = (year built factor) x (roof shape factor) x (opening protection factor)*

*Capped factor\* = Preliminary Factor*

*Final rate = (Base rate) x (Capped factor) x (On balance factor)*

*\*Capped factor = 100% of Preliminary Factor (i.e. no cap in current factors)*

Rating Factor	Description	Type of Business				
		Commercial	Residential	Mobile Home	Tenants	Condos
Year Built	2012 or later	0.4009	0.4753	1.0000	0.5071	0.4736
	2002 - 2011	0.4251	0.5103	1.0000	0.5400	0.5008
	1995-2001	0.6525	0.8054	1.0000	0.8383	0.7864
	1994 or Earlier	1.3189	1.5592	1.0000	1.5849	1.4661
	Unknown	1.0888	1.1338	1.0000	1.1820	1.1150
Roof Shape	Hip, Mansard, or Pyramid	0.8551	0.8476	1.0000	0.7880	0.8037
	Gable, Other or Unknown	1.0353	1.1246	1.0000	1.0174	1.0380
Opening Protection	Structure Opening Protection	0.8369	0.8726	1.0000	0.7591	0.8201
	No Structure Opening Protection	1.0912	1.1265	1.0000	1.0266	1.1453
On Balance Factor		0.9738	0.9617	1.0000	0.9942	0.9725

# EXHIBIT

XV

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Exposure and Risks as of 10/24/23 (Trended to 6/30/24)

2024 FHCF Rating Region	Total Exposure (\$)					
	Commercial	Residential	Mobile Home	Tenants	Condominium- Owners	Total
1	4,600,073,600	352,310,874,096	7,273,942,510	4,203,214,999	4,105,082,415	372,493,187,620
2	1,382,682,088	163,802,991,894	3,418,112,239	891,205,176	2,293,691,960	171,788,683,357
3	10,871,002,323	492,317,401,366	5,394,474,203	5,548,180,470	9,704,093,372	523,835,151,734
4	6,561,766,646	467,042,867,155	8,021,472,722	4,085,989,700	6,015,830,647	491,727,926,870
5	5,331,243,881	179,633,954,658	3,241,267,969	1,758,115,470	4,367,602,557	194,332,184,535
6	6,785,926,707	165,487,178,141	2,687,617,133	1,834,928,490	5,223,689,004	182,019,339,475
7	10,348,130,288	146,132,194,208	2,116,111,499	1,273,271,693	8,239,499,794	168,109,207,482
8	10,320,761,892	196,658,226,450	1,224,439,219	1,706,845,277	8,192,515,653	218,102,788,491
9	11,313,041,943	221,463,707,043	868,329,810	1,509,861,190	7,905,386,732	243,060,326,718
10	31,419,325,719	212,055,931,573	732,831,712	1,978,594,532	19,259,160,604	265,445,844,140
11	22,446,697,887	158,446,912,897	1,750,895,594	1,476,969,507	13,728,880,306	197,850,356,191
12	13,583,305,597	87,934,591,563	246,797,455	736,279,017	7,023,724,370	109,524,698,002
13	10,795,607,685	66,850,640,321	232,374,207	476,986,057	7,970,789,290	86,326,397,560
14	5,292,400,943	57,346,616,240	37,143,511	299,363,843	4,373,639,782	67,349,164,319
15	4,514,203,607	44,362,300,302	101,913,794	340,538,517	2,725,488,741	52,044,444,961
16	4,427,663,512	26,989,083,916	42,534,358	275,946,025	2,711,264,592	34,446,492,403
17	7,687,369,699	42,856,155,060	2,566,576	742,214,979	4,670,746,857	55,959,053,171
18	6,714,986,970	24,560,606,574	5,382,660	282,253,859	4,210,536,939	35,773,767,002
19	12,343,981,426	19,010,744,985	54,237,980	607,760,045	7,063,999,302	39,080,723,738
20	10,884,465,825	31,199,650,660	11,312,008	394,128,005	7,721,768,695	50,211,325,193
21	2,819,549,287	5,002,220,532	4,434,478	48,299,318	1,187,819,431	9,062,323,046
22	5,803,636,152	1,436,575,235	-	80,019,512	3,304,782,913	10,625,013,812
23	3,765,871,043	6,760,730,712	29,088,996	78,806,765	3,142,675,160	13,777,172,676
24	5,188,792,032	6,165,053,331	884,576	109,608,740	3,445,219,612	14,909,558,291
25	2,874,896,024	2,882,771,878	7,981,623	26,522,760	1,750,967,342	7,543,139,627
Total	\$218,077,382,776	\$3,178,709,980,790	\$37,506,146,832	\$30,765,903,946	\$150,338,856,070	\$3,615,398,270,414
1-5	\$28,746,768,538	\$1,655,108,089,169	\$27,349,269,643	\$16,486,705,815	\$26,486,300,951	\$1,754,177,134,116
6-10	\$70,187,186,549	\$941,797,237,415	\$7,629,329,373	\$8,303,501,182	\$48,820,251,787	\$1,076,737,506,306
11-15	\$56,632,215,719	\$414,941,061,323	\$2,369,124,561	\$3,330,136,941	\$35,822,522,489	\$513,095,061,033
16-20	\$42,058,467,432	\$144,616,241,195	\$116,033,582	\$2,302,302,913	\$26,378,316,385	\$215,471,361,507
21-25	\$20,452,744,538	\$22,247,351,688	\$42,389,673	\$343,257,095	\$12,831,464,458	\$55,917,207,452
% of Total within Type of Business						
1-5	13.2%	52.1%	72.9%	53.6%	17.6%	48.5%
6-10	32.2%	29.6%	20.3%	27.0%	32.5%	29.8%
11-15	26.0%	13.1%	6.3%	10.8%	23.8%	14.2%
16-20	19.3%	4.5%	0.3%	7.5%	17.5%	6.0%
21-25	9.4%	0.7%	0.1%	1.1%	8.5%	1.5%
% of Total within Territory						
Total	6.0%	87.9%	1.0%	0.9%	4.2%	100.0%
1-5	1.6%	94.4%	1.6%	0.9%	1.5%	100.0%
6-10	6.5%	87.5%	0.7%	0.8%	4.5%	100.0%
11-15	11.0%	80.9%	0.5%	0.6%	7.0%	100.0%
16-20	19.5%	67.1%	0.1%	1.1%	12.2%	100.0%
21-25	36.6%	39.8%	0.1%	0.6%	22.9%	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Exposure and Risks as of 10/24/23 (Trended to 6/30/24)

2024 FHCF Rating Region	Total Risks					
	Commercial	Residential	Mobile Home	Tenants	Condominium- Owners	Total
1	3,149	558,647	57,794	154,274	29,530	803,394
2	1,024	271,070	27,613	25,275	11,856	336,838
3	8,805	755,209	44,397	206,581	67,856	1,082,848
4	6,319	767,794	69,575	148,281	43,539	1,035,508
5	6,325	302,347	28,236	63,790	30,716	431,414
6	8,947	292,479	25,694	67,631	42,863	437,614
7	8,234	247,361	18,927	46,231	59,856	380,609
8	9,770	299,987	10,681	59,690	55,526	435,654
9	12,518	339,821	8,218	50,326	58,613	469,496
10	22,966	306,281	6,664	72,871	147,956	556,738
11	18,887	244,090	13,592	54,602	109,449	440,620
12	9,589	151,404	2,426	30,063	58,887	252,369
13	6,266	121,014	2,328	19,847	43,468	192,923
14	4,021	89,175	532	11,811	20,982	126,521
15	3,202	50,711	1,141	13,071	18,685	86,810
16	2,500	51,879	436	11,086	18,549	84,450
17	3,133	42,597	25	28,808	27,338	101,901
18	2,572	29,978	81	11,328	23,119	67,078
19	2,808	25,981	577	23,514	42,779	95,659
20	3,303	18,572	180	11,759	30,483	64,297
21	437	6,930	63	1,485	7,571	16,486
22	443	622	-	2,607	10,700	14,372
23	860	5,650	437	2,300	7,726	16,973
24	875	2,872	9	2,612	11,838	18,206
25	331	2,281	109	454	2,918	6,093
Total	147,284	4,984,752	319,735	1,120,297	982,803	7,554,871
1-5	25,622	2,655,067	227,615	598,201	183,497	3,690,002
6-10	62,435	1,485,929	70,184	296,749	364,814	2,280,111
11-15	41,965	656,394	20,019	129,394	251,471	1,099,243
16-20	14,316	169,007	1,299	86,495	142,268	413,385
21-25	2,946	18,355	618	9,458	40,753	72,130
% of Total within Type of Business						
1-5	17.4%	53.3%	71.2%	53.4%	18.7%	48.8%
6-10	42.4%	29.8%	22.0%	26.5%	37.1%	30.2%
11-15	28.5%	13.2%	6.3%	11.5%	25.6%	14.6%
16-20	9.7%	3.4%	0.4%	7.7%	14.5%	5.5%
21-25	2.0%	0.4%	0.2%	0.8%	4.1%	1.0%
% of Total within Territory						
Total	1.9%	66.0%	4.2%	14.8%	13.0%	100.0%
1-5	0.7%	72.0%	6.2%	16.2%	5.0%	100.0%
6-10	2.7%	65.2%	3.1%	13.0%	16.0%	100.0%
11-15	3.8%	59.7%	1.8%	11.8%	22.9%	100.0%
16-20	3.5%	40.9%	0.3%	20.9%	34.4%	100.0%
21-25	4.1%	25.4%	0.9%	13.1%	56.5%	100.0%

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
2023 FHCF Exposure and Risks as of 10/24/23 (Trended to 6/30/24)

2024 FHCF Rating Region	Averages				
	Commercial	Residential	Mobile Home	Tenants	Condominium- Owners
1	1,460,805	630,650	125,860	27,245	139,014
2	1,350,275	604,283	123,786	35,260	193,463
3	1,234,640	651,896	121,505	26,857	143,010
4	1,038,419	608,292	115,292	27,556	138,171
5	842,884	594,132	114,792	27,561	142,193
6	758,458	565,809	104,601	27,131	121,869
7	1,256,756	590,765	111,804	27,542	137,655
8	1,056,373	655,556	114,637	28,595	147,544
9	903,742	651,707	105,662	30,002	134,874
10	1,368,080	692,357	109,969	27,152	130,168
11	1,188,473	649,133	128,818	27,050	125,436
12	1,416,551	580,794	101,730	24,491	119,275
13	1,722,887	552,421	99,817	24,033	183,371
14	1,316,190	643,080	69,819	25,346	208,447
15	1,409,807	874,806	89,320	26,053	145,865
16	1,771,065	520,231	97,556	24,891	146,168
17	2,453,677	1,006,084	102,663	25,764	170,852
18	2,610,804	819,288	66,453	24,916	182,125
19	4,396,005	731,717	94,000	25,847	165,128
20	3,295,327	1,679,929	62,844	33,517	253,314
21	6,452,058	721,821	70,389	32,525	156,891
22	13,100,759	2,309,606	-	30,694	308,858
23	4,378,920	1,196,590	66,565	34,264	406,766
24	5,930,048	2,146,606	98,286	41,964	291,031
25	8,685,486	1,263,819	73,226	58,420	600,057
Total	\$1,480,659	\$637,687	\$117,304	\$27,462	\$152,969
1-5	\$1,121,956	\$623,377	\$120,156	\$27,560	\$144,342
6-10	\$1,124,164	\$633,810	\$108,705	\$27,982	\$133,822
11-15	\$1,349,511	\$632,152	\$118,344	\$25,736	\$142,452
16-20	\$2,937,864	\$855,682	\$89,325	\$26,618	\$185,413
21-25	\$6,942,547	\$1,212,059	\$68,592	\$36,293	\$314,859

EXHIBIT

XVI



Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report Valid Zip Codes With Residential Exposure  
2024 Residential Masonry Base Premium (2% Deductible) Comparison  
Prior to Application of Premium Credits/Surcharges

**% Change in Rates**

**Maximum Decrease                    -22.48%**  
**Maximum Increase                 43.38%**

Threshold From      To		Count of ZIP Codes	Percentage of Zip Codes in Group	Residential Exposure (in 000's)	Percentage of Res Exposure in Group	Residential Exposure Risk Counts (Houses)	Percentage of Risk Counts in Group
Less Than	-15%	20	2.16%	39,955,370	1.56%	64,265	1.59%
-15%	-5%	655	70.66%	1,741,414,754	68.13%	2,699,510	66.84%
-5%	0%	10	1.08%	26,025,690	1.02%	32,072	0.79%
0%	10%	89	9.60%	310,899,915	12.16%	508,740	12.60%
10%	20%	83	8.95%	253,772,736	9.93%	426,082	10.55%
20%	30%	52	5.61%	174,357,460	6.82%	290,751	7.20%
30%	45%	18	1.94%	9,435,391	0.37%	17,192	0.43%
Greater Than	45%	0	0.00%	-	0.00%	-	0.00%
<b>New ZIP Codes in 2024</b>		<b>927</b>	<b>100.00%</b>	<b>2,555,861,316</b>	<b>100.00%</b>	<b>4,038,612</b>	<b>100.00%</b>
		0	0.00%	-	0.00%	-	0.00%
		<b>927</b>	<b>100.00%</b>	<b>2,555,861,316</b>	<b>100.00%</b>	<b>4,038,612</b>	<b>100.00%</b>

**\$ Change in Rates**

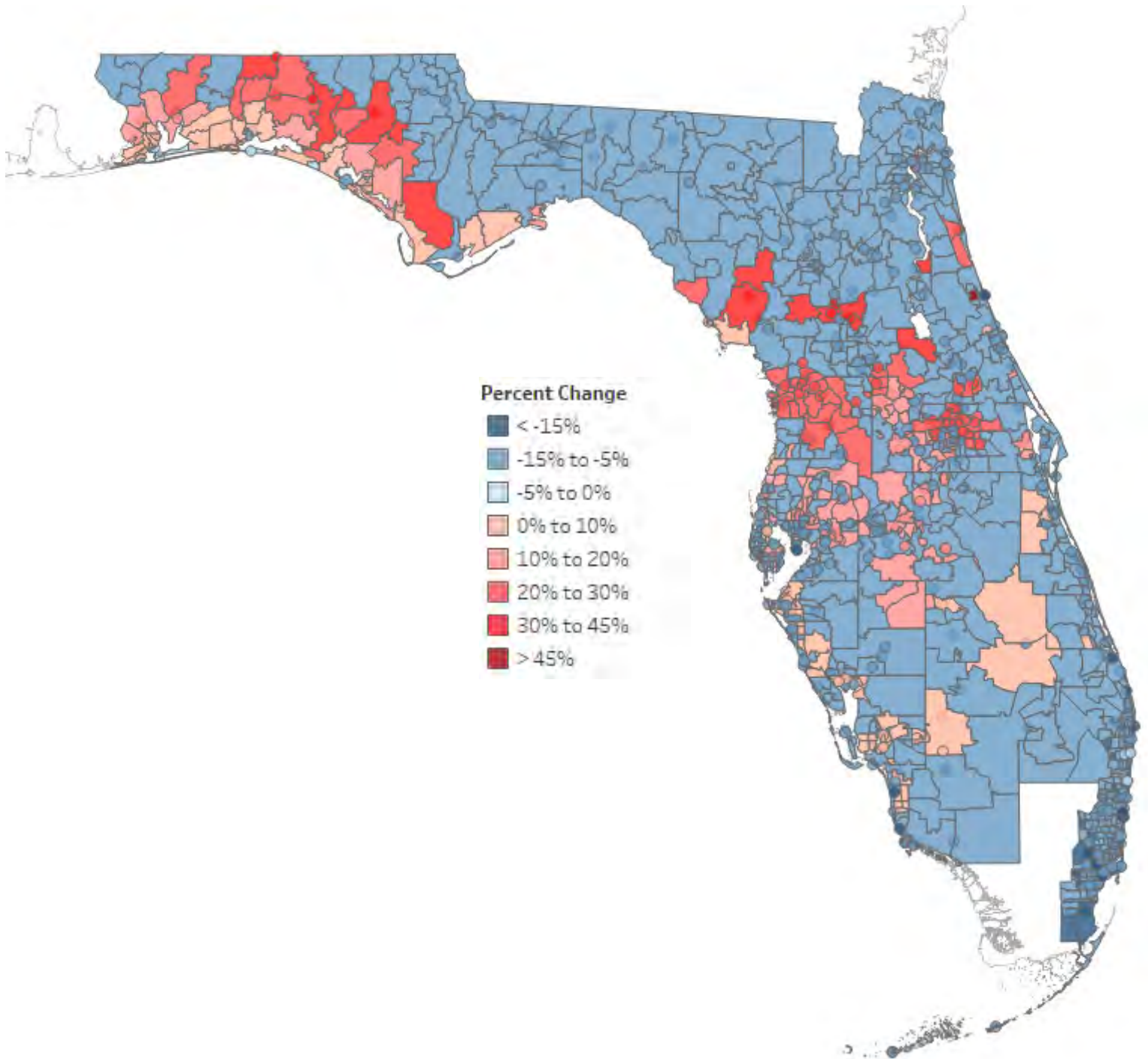
**Maximum Decrease                    (\$234.58)**  
**Maximum Increase                 \$21.40**

Premium Threshold* From      To		Count of ZIP Codes	Percentage of Zip Codes in Group	Residential Exposure (in 000's)	Percentage of Res Exposure in Group	Residential Exposure Risk Counts (Houses)	Percentage of Risk Counts in Group
-\$230	-\$100	80	8.63%	123,993,547	4.85%	159,810	3.96%
-\$100	-\$50	116	12.51%	260,555,601	10.19%	396,116	9.81%
-\$50	-\$20	146	15.75%	479,232,833	18.75%	745,985	18.47%
-\$20	-\$10	145	15.64%	520,853,171	20.38%	815,005	20.18%
-\$10	\$0	195	21.04%	422,710,110	16.54%	678,795	16.81%
\$0	\$10	25	2.70%	118,231,819	4.63%	186,845	4.63%
\$10	\$20	91	9.82%	251,252,517	9.83%	431,090	10.67%
\$20	\$30	129	13.92%	379,031,717	14.83%	624,966	15.47%
<b>New ZIP Codes in 2024</b>		<b>927</b>	<b>100.00%</b>	<b>2,555,861,316</b>	<b>100.00%</b>	<b>4,038,612</b>	<b>100.00%</b>
		0	0.00%	-	0.00%	-	0.00%
		<b>927</b>	<b>100.00%</b>	<b>2,555,861,316</b>	<b>100.00%</b>	<b>4,038,612</b>	<b>100.00%</b>

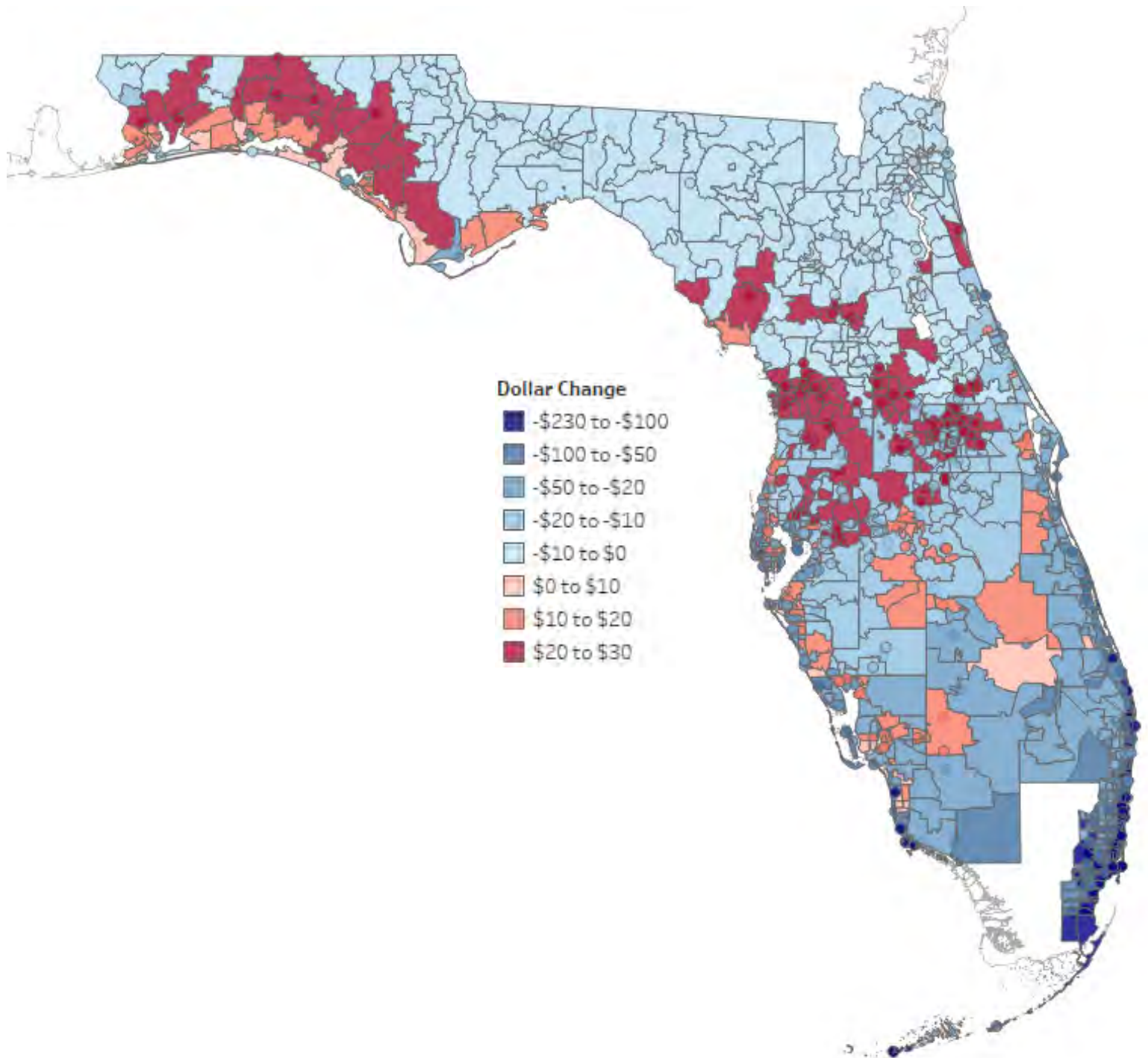
**\*Exposure Assumptions**

Coverages:     \$     372 Building Value  
(in thousands)   \$     37 Appurtenant Structures  
                      \$    186 Contents  
                      \$     37 Additional Living Expense  
                      \$    633 FHCF Exposure

**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Percentage Rate Change by 5-Digit ZIP Code**  
**Entire State**



**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Dollar Rate Change by 5-Digit ZIP Code**  
**Entire State**



EXHIBIT

XVII

**Florida Hurricane Catastrophe Fund**  
**2024 Ratemaking Premium Formula Report**  
**Exhibit XVII - Risk Transfer Options Formula**

The rates presented in this report do not include a loading for the cost of risk transfer. Should the FHCF enter into a different risk transfer arrangement, the impact of the cost shall be determined, and the 2024-2025 FHCF premium rates and factors would be accordingly adjusted, by using the formula specified in this Exhibit.

The estimates for FHCF loss credits are based on the average of the Verisk and RMS data distributions in Exhibit VIII. Exhibit XVII is based on the same loss severity distribution and displays probability of exceedance for specific FHCF layers with the adjustments to the FHCF loss layer level prior to fixed expenses. These values are used to illustrate a range of potential risk transfer structures, costs and factors in the tables of this exhibit.

To adjust the FHCF premium/rates to account for the impact of a future risk transfer arrangement, if any, the rates presented in this 2024 Ratemaking Formula Report would be adjusted by a Risk Transfer Adjustment Factor (RTAF):

$$\text{Amended FHCF Rate} = \text{Original FHCF Rate} \times \text{RTAF}$$

The details of the formula calculation are provided below.

**Definitions**

1. Amended FHCF Rate:  $\text{Original FHCF Rate} \times \text{RTAF}$
2. Amended FHCF Rate Change:  $\text{FHCF Current Rate Change} \times \text{RTAF}$
3. Amended FHCF Projected Payout Multiple:  $\text{FHCF Current Projected Payout Multiple} / \text{RTAF}$
4. Amended FHCF Retention Multiple:  $\text{FHCF Current Retention Multiple} / \text{RTAF}$
5. AP = Amended FHCF Premium:  $\text{OP} \times \text{RTAF}$
6. CBF: Cash Build-up Factor [25% for the 2024 Contract Year]
7. ELC: Expected Loss Credit
8. NRCP: Net Risk Transfer Cost Premium =  $(\text{RTC} - (\text{ELC} \times (1 + \text{CBF})))$
9. OP = Original FHCF Premium: \$1,532,432,466 for the 2024 Contract Year [Exh. II, line 73]
10. ONRCP: = Original Net Risk Transfer Cost Premium = Reinsurance [Exh. II, line 45a] – (ceded loss and lae [Exh. II, line 21]  $\times (1 + \text{CBF})$ ) =  $\$0 - (\$0 \times 1.25) = \$0$
11.  $\text{RTAF} = (\text{OP} - \text{ONRCP} + \text{NRCP}) / \text{OP}$
12. RTC: Risk Transfer Costs

### **Calculation of the Expected Loss Credit (ELC)**

The ELC is calculated, based on the Modeled Adjusted Loss Severity Distributions in Exhibit XVII, as  $ELC = ((P(LA) + P(LE)/2)) \times (LE - LA) \times TUP$ , whereas:

1. LA: Layer Attachment
2. LE: Layer Exhaustion
3. P(LA): probability of exceedance for Layer Attachment
4. P(LE): probability of exceedance for Layer Exhaustion
5. TUP: True Up Factor = FHCF Losses Prior to special adjustments and expenses (Exh. II, Line 19) / Exh. XVII total expected losses (no LAE, Adj.) =  $\$1,157,175,752 / \$1,082,877,030 = 1.068612354$

### **Example of RTAF Calculation**

Risk Transfer of \$500 million excess of \$10.5 billion purchased for 12% Rate on Line (\$60 million)

- $RTC = 60,000,000$
- Layer Attachment: \$10,500,000,000,  $P(LA) = 4.86600\%$
- Layer Exhaustion: \$11,000,000,000,  $P(LE) = 4.68050\%$
- $ELC = ((0.0486600 + 0.0468050)/2) \times (\$11,000,000,000 - \$10,500,000,000) \times 1.068612354 = 25,503,769$
- $NRCP = \$60,000,000 - (\$25,503,769 \times 1.25) = \$28,120,289$

$$RTAF = (\$1,532,432,466 - \$0 + \$28,120,289) / \$1,532,432,466 = 1.01835010$$

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Expected Loss and Premium by Layer

Based on Avg. (Verisk, RMS) 2024 Trended Zip Code Loss Data and 2024 Per Company Estimated Limits and Retentions

Aggregate FHCFLoss Level	Return Time	Prob(Exceed)	Expected Loss Company Ret, Lim	Adjust to Total Gross Loss and LAE (Expected Loss Credits)
0	3.5	28.29875%	2,425,475	2,591,892
10,000,000	4.9	20.21075%	16,711,650	17,858,275
100,000,000	5.9	16.92625%	24,227,250	25,889,538
250,000,000	6.5	15.37675%	36,846,875	39,375,025
500,000,000	7.1	14.10075%	66,388,125	70,943,169
1,000,000,000	8.0	12.45450%	114,915,000	122,799,587
2,000,000,000	9.5	10.52850%	99,193,750	105,999,665
3,000,000,000	10.7	9.31025%	88,077,500	94,120,703
4,000,000,000	12.0	8.30525%	79,488,750	84,942,659
5,000,000,000	13.2	7.59250%	73,212,500	78,235,781
6,000,000,000	14.2	7.05000%	67,873,750	72,530,726
7,000,000,000	15.3	6.52475%	63,057,500	67,384,022
8,000,000,000	16.4	6.08675%	58,651,250	62,675,449
9,000,000,000	17.7	5.64350%	53,641,250	57,321,701
10,000,000,000	19.7	5.08475%	24,876,875	26,583,735
10,500,000,000	20.6	4.86600%	23,866,250	25,503,769
11,000,000,000	21.4	4.68050%	22,729,375	24,288,891
11,500,000,000	22.7	4.41125%	21,501,875	22,977,169
12,000,000,000	23.9	4.18950%	20,451,875	21,855,126
12,500,000,000	25.1	3.99125%	19,455,000	20,789,853
13,000,000,000	26.4	3.79075%	18,375,625	19,636,420
13,500,000,000	28.1	3.55950%	17,260,625	18,444,917
14,000,000,000	29.9	3.34475%	16,057,500	17,159,243
14,500,000,000	32.5	3.07825%	14,806,875	15,822,809
15,000,000,000	35.2	2.84450%	13,550,625	14,480,365
15,500,000,000	38.8	2.57575%	6,181,250	6,605,360
15,750,000,000	42.2	2.36925%	5,687,812	6,078,067
16,000,000,000	45.9	2.18100%	5,112,187	5,462,947
16,250,000,000	52.4	1.90875%	8,251,171	8,817,303
16,999,000,000	339.6	0.29450%	1,484	1,586
17,000,000,000	44,444.4	0.00225%		
Total			1,082,877,030	1,157,175,752
True Up Factor				1.0686123354
Average AIR,RMS detail modeled expected losses			1,083,623,470	

Paragon Strategic Solutions Inc.

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Risk Transfer Estimated Cost and Rate Impact  
Based on Avg. (Verisk, RMS) 2024 Trended Zip Code Loss Data and 2024 Per Company Estimated Limits and Retentions

Aggregate

Reinsurance Attachment	\$10,500,000,000	Limit	\$17,000,000,000	Projected Payout Multiple	11.0935
FHCF Premium with Cash Build Up	\$1,532,432,466	Retention	\$9,929,000,000	Retention Multiple 100%	5.6288
Cash Build Up Factor	25%	Coverage %	86.874%	Retention Multiple 90%	6.2542
				Retention Multiple 75%	7.5050
Rate Change	-7.38%	2024 Model Net Rein	\$0	Retention Multiple 45%	12.5084
Risk Transfer Premiums Gross		Risk Transfer Rate on Line			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000	\$25,503,769	\$75,000,000	\$77,500,000	\$80,000,000	\$82,500,000
\$1,000,000,000	\$49,792,660	\$150,000,000	\$155,000,000	\$160,000,000	\$165,000,000
\$1,500,000,000	\$72,769,829	\$225,000,000	\$232,500,000	\$240,000,000	\$247,500,000
\$2,000,000,000	\$94,624,954	\$300,000,000	\$310,000,000	\$320,000,000	\$330,000,000
Risk Transfer Dollar Impact on Premiums		Net Risk Transfer Cost Premium			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000	\$25,503,769	\$43,120,289	\$45,620,289	\$48,120,289	\$50,620,289
\$1,000,000,000	\$49,792,660	\$87,759,175	\$92,759,175	\$97,759,175	\$102,759,175
\$1,500,000,000	\$72,769,829	\$134,037,714	\$141,537,714	\$149,037,714	\$156,537,714
\$2,000,000,000	\$94,624,954	\$181,718,807	\$191,718,807	\$201,718,807	\$211,718,807
Risk Transfer % Impact on Rates		FHCF Rate Impact			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000	\$25,503,769	2.8%	3.0%	3.1%	3.3%
\$1,000,000,000	\$49,792,660	5.7%	6.1%	6.4%	6.7%
\$1,500,000,000	\$72,769,829	8.7%	9.2%	9.7%	10.2%
\$2,000,000,000	\$94,624,954	11.9%	12.5%	13.2%	13.8%
Risk Transfer: Revised Rate Change		FHCF Revised Rate Change			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000	\$25,503,769	-4.78%	-4.63%	-4.47%	-4.32%
\$1,000,000,000	\$49,792,660	-2.08%	-1.78%	-1.47%	-1.17%
\$1,500,000,000	\$72,769,829	0.72%	1.17%	1.62%	2.08%
\$2,000,000,000	\$94,624,954	3.60%	4.20%	4.81%	5.41%
Projected Payout Multiple		Revised Payout Multiples			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000		10.7899	10.7728	10.7557	10.7387
\$1,000,000,000		10.4926	10.4603	10.4282	10.3963
\$1,500,000,000		10.2012	10.1555	10.1102	10.0653
\$2,000,000,000		9.9174	9.8599	9.8031	9.7469
Retention Multiple 90%		Revised Retention Multiple 90%			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000		6.0830	6.0734	6.0638	6.0542
\$1,000,000,000		5.9154	5.8972	5.8791	5.8612
\$1,500,000,000		5.7511	5.7254	5.6998	5.6745
\$2,000,000,000		5.5912	5.5587	5.5267	5.4950
Retention Multiple 75%		Revised Retention Multiple 75%			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000		7.2996	7.2881	7.2765	7.2650
\$1,000,000,000		7.0985	7.0767	7.0550	7.0334
\$1,500,000,000		6.9014	6.8705	6.8398	6.8094
\$2,000,000,000		6.7094	6.6705	6.6320	6.5940
Retention Multiple 45%		Revised Retention Multiple 45%			
Limit	Expected Loss Credit	15.00%	15.50%	16.00%	16.50%
				17.00%	17.50%
				18.00%	18.50%
				19.00%	
\$500,000,000		12.1660	12.1468	12.1275	12.1084
\$1,000,000,000		11.8308	11.7944	11.7583	11.7223
\$1,500,000,000		11.5023	11.4508	11.3997	11.3491
\$2,000,000,000		11.1823	11.1175	11.0534	10.9900



Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Risk Transfer Estimated Cost and Rate Impact  
Based on Avg. (Verisk, RMS) 2024 Trended Zip Code Loss Data and 2024 Per Company Estimated Limits and Retentions

Aggregate

Reinsurance Attachment	\$11,000,000,000	Limit	\$17,000,000,000	Projected Payout Multiple	11.0935
FHCF Premium with Cash Build Up	\$1,532,432,466	Retention	\$9,929,000,000	Retention Multiple 100%	5.6288
Cash Build Up Factor	25%	Coverage %	86.874%	Retention Multiple 90%	6.2542
				Retention Multiple 75%	7.5050
Rate Change	-7.38%	2024 Model Net Rein	0	Retention Multiple 45%	12.5084
Risk Transfer Premiums Gross					
Limit	Expected Loss Credit	Risk Transfer Rate on Line			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$24,288,891	\$75,000,000	\$77,500,000	\$80,000,000	\$82,500,000
\$1,000,000,000	\$47,266,059	\$150,000,000	\$155,000,000	\$160,000,000	\$165,000,000
\$1,500,000,000	\$69,121,185	\$225,000,000	\$232,500,000	\$240,000,000	\$247,500,000
\$2,000,000,000	\$89,911,038	\$300,000,000	\$310,000,000	\$320,000,000	\$330,000,000
Risk Transfer Dollar Impact on Premiums					
Limit	Expected Loss Credit	Net Risk Transfer Cost Premium			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$24,288,891	\$44,638,887	\$47,138,887	\$49,638,887	\$52,138,887
\$1,000,000,000	\$47,266,059	\$90,917,426	\$95,917,426	\$100,917,426	\$105,917,426
\$1,500,000,000	\$69,121,185	\$138,598,518	\$146,098,518	\$153,598,518	\$161,098,518
\$2,000,000,000	\$89,911,038	\$187,611,202	\$197,611,202	\$207,611,202	\$217,611,202
Risk Transfer % Impact on Rates					
Limit	Expected Loss Credit	FHCF Rate Impact			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$24,288,891	2.9%	3.1%	3.2%	3.4%
\$1,000,000,000	\$47,266,059	5.9%	6.3%	6.6%	6.9%
\$1,500,000,000	\$69,121,185	9.0%	9.5%	10.0%	10.5%
\$2,000,000,000	\$89,911,038	12.2%	12.9%	13.5%	14.2%
Risk Transfer: Revised Rate Change					
Limit	Expected Loss Credit	FHCF Revised Rate Change			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$24,288,891	-4.68%	-4.53%	-4.38%	-4.23%
\$1,000,000,000	\$47,266,059	-1.89%	-1.59%	-1.28%	-0.98%
\$1,500,000,000	\$69,121,185	0.99%	1.45%	1.90%	2.35%
\$2,000,000,000	\$89,911,038	3.96%	4.56%	5.16%	5.77%
Projected Payout Multiple					
Limit		Revised Payout Multiples			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		10.7795	10.7624	10.7454	10.7285
\$1,000,000,000		10.4722	10.4400	10.4081	10.3763
\$1,500,000,000		10.1734	10.1279	10.0829	10.0382
\$2,000,000,000		9.8835	9.8263	9.7699	9.7140
Retention Multiple 90%					
Limit		Revised Retention Multiple 90%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		6.0772	6.0675	6.0579	6.0484
\$1,000,000,000		5.9039	5.8858	5.8678	5.8499
\$1,500,000,000		5.7354	5.7098	5.6844	5.6592
\$2,000,000,000		5.5720	5.5398	5.5080	5.4765
Retention Multiple 75%					
Limit		Revised Retention Multiple 75%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		7.2926	7.2810	7.2695	7.2581
\$1,000,000,000		7.0847	7.0629	7.0413	7.0198
\$1,500,000,000		6.8825	6.8518	6.8213	6.7911
\$2,000,000,000		6.6864	6.6478	6.6096	6.5718
Retention Multiple 45%					
Limit		Revised Retention Multiple 45%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		12.1543	12.1351	12.1159	12.0968
\$1,000,000,000		11.8078	11.7716	11.7355	11.6997
\$1,500,000,000		11.4709	11.4196	11.3688	11.3185
\$2,000,000,000		11.1440	11.0796	11.0159	10.9530

Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Risk Transfer Estimated Cost and Rate Impact  
Based on Avg. (Verisk, RMS) 2024 Trended Zip Code Loss Data and 2024 Per Company Estimated Limits and Retentions

Aggregate

Reinsurance Attachment	\$11,500,000,000	Limit	\$17,000,000,000	Projected Payout Multiple	11.0935
FHCF Premium with Cash Build Up	\$1,532,432,466	Retention	\$9,929,000,000	Retention Multiple 100%	5.6288
Cash Build Up Factor	25%	Coverage %	86.874%	Retention Multiple 90%	6.2542
				Retention Multiple 75%	7.5050
Rate Change	-7.38%	2024 Model Net Rein	0	Retention Multiple 45%	12.5084
Risk Transfer Premiums Gross					
Limit	Expected Loss Credit	Risk Transfer Rate on Line			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$22,977,169	\$75,000,000	\$77,500,000	\$80,000,000	\$82,500,000
\$1,000,000,000	\$44,832,295	\$150,000,000	\$155,000,000	\$160,000,000	\$165,000,000
\$1,500,000,000	\$65,622,148	\$225,000,000	\$232,500,000	\$240,000,000	\$247,500,000
\$2,000,000,000	\$85,258,567	\$300,000,000	\$310,000,000	\$320,000,000	\$330,000,000
Risk Transfer Dollar Impact on Premiums					
Limit	Expected Loss Credit	Net Risk Transfer Cost Premium			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$22,977,169	\$46,278,539	\$48,778,539	\$51,278,539	\$53,778,539
\$1,000,000,000	\$44,832,295	\$93,959,632	\$98,959,632	\$103,959,632	\$108,959,632
\$1,500,000,000	\$65,622,148	\$142,972,315	\$150,472,315	\$157,972,315	\$165,472,315
\$2,000,000,000	\$85,258,567	\$193,426,791	\$203,426,791	\$213,426,791	\$223,426,791
Risk Transfer % Impact on Rates					
Limit	Expected Loss Credit	FHCF Rate Impact			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$22,977,169	3.0%	3.2%	3.3%	3.5%
\$1,000,000,000	\$44,832,295	6.1%	6.5%	6.8%	7.1%
\$1,500,000,000	\$65,622,148	9.3%	9.8%	10.3%	10.8%
\$2,000,000,000	\$85,258,567	12.6%	13.3%	13.9%	14.6%
Risk Transfer: Revised Rate Change					
Limit	Expected Loss Credit	FHCF Revised Rate Change			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000	\$22,977,169	-4.59%	-4.43%	-4.28%	-4.13%
\$1,000,000,000	\$44,832,295	-1.70%	-1.40%	-1.10%	-0.80%
\$1,500,000,000	\$65,622,148	1.26%	1.71%	2.16%	2.62%
\$2,000,000,000	\$85,258,567	4.31%	4.91%	5.52%	6.12%
Projected Payout Multiple					
Limit		Revised Payout Multiples			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		10.7683	10.7513	10.7343	10.7174
\$1,000,000,000		10.4526	10.4205	10.3887	10.3571
\$1,500,000,000		10.1468	10.1016	10.0568	10.0123
\$2,000,000,000		9.8502	9.7934	9.7373	9.6819
Retention Multiple 90%					
Limit		Revised Retention Multiple 90%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		6.0708	6.0612	6.0517	6.0421
\$1,000,000,000		5.8929	5.8748	5.8569	5.8390
\$1,500,000,000		5.7205	5.6950	5.6697	5.6447
\$2,000,000,000		5.5532	5.5212	5.4896	5.4584
Retention Multiple 75%					
Limit		Revised Retention Multiple 75%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		7.2850	7.2735	7.2620	7.2506
\$1,000,000,000		7.0714	7.0498	7.0282	7.0068
\$1,500,000,000		6.8646	6.8340	6.8037	6.7736
\$2,000,000,000		6.6639	6.6255	6.5875	6.5500
Retention Multiple 45%					
Limit		Revised Retention Multiple 45%			
		15.00%	15.50%	16.00%	16.50%
\$500,000,000		12.1417	12.1225	12.1034	12.0843
\$1,000,000,000		11.7857	11.7496	11.7137	11.6780
\$1,500,000,000		11.4409	11.3900	11.3394	11.2893
\$2,000,000,000		11.1065	11.0425	10.9792	10.9167

EXHIBIT

XVIII

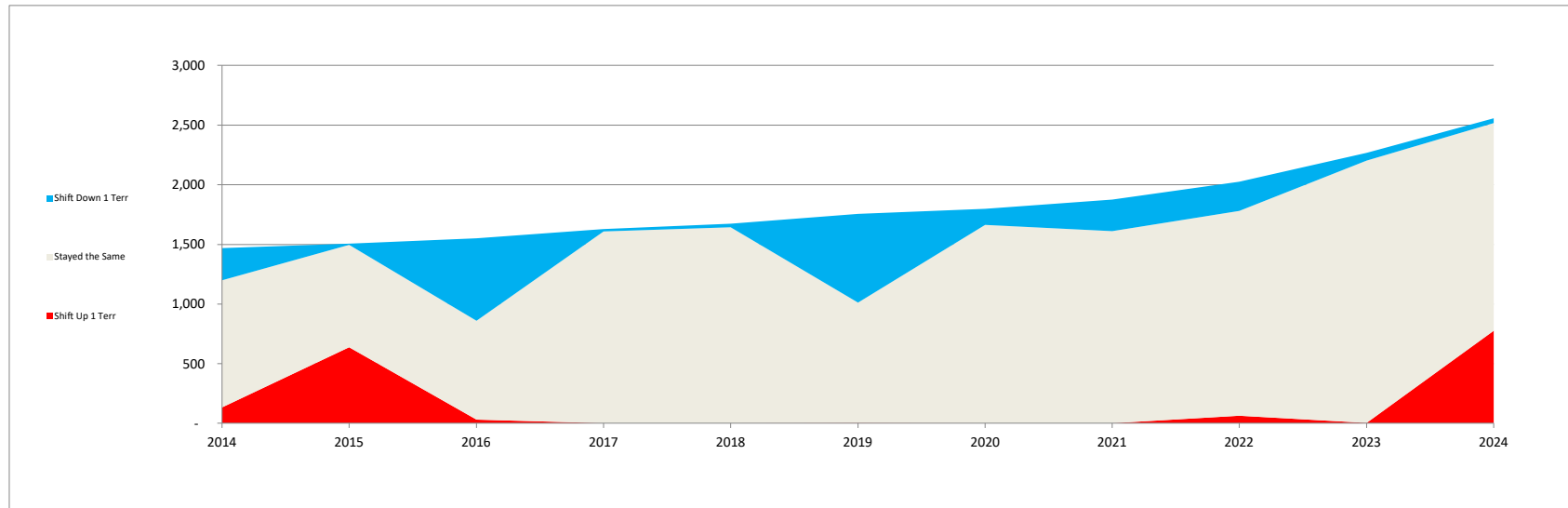
Florida Hurricane Catastrophe Fund  
2024 Ratemaking Formula Report  
Summary of Changes in ZIP Codes 2014 to 2024

The table below outlines how the Zip Codes, after tempering, have moved relative to the prior year's territory allocations.

- Columns in yellow highlight years when large numbers of ZIP Code changes were reversed in the following year.
- 2017 and 2018 indicated shifts were not implemented, except if the indication was for a change of two or more territories.
- 2019-2024 indicated shifts were implemented if the one year indication was for a change of two or more territories or the 3 year average indication was one or more territories.

The table and chart below outline how the Modeled Residential exposure in billions of dollars, after tempering, has moved relative to the prior year's territory allocations.

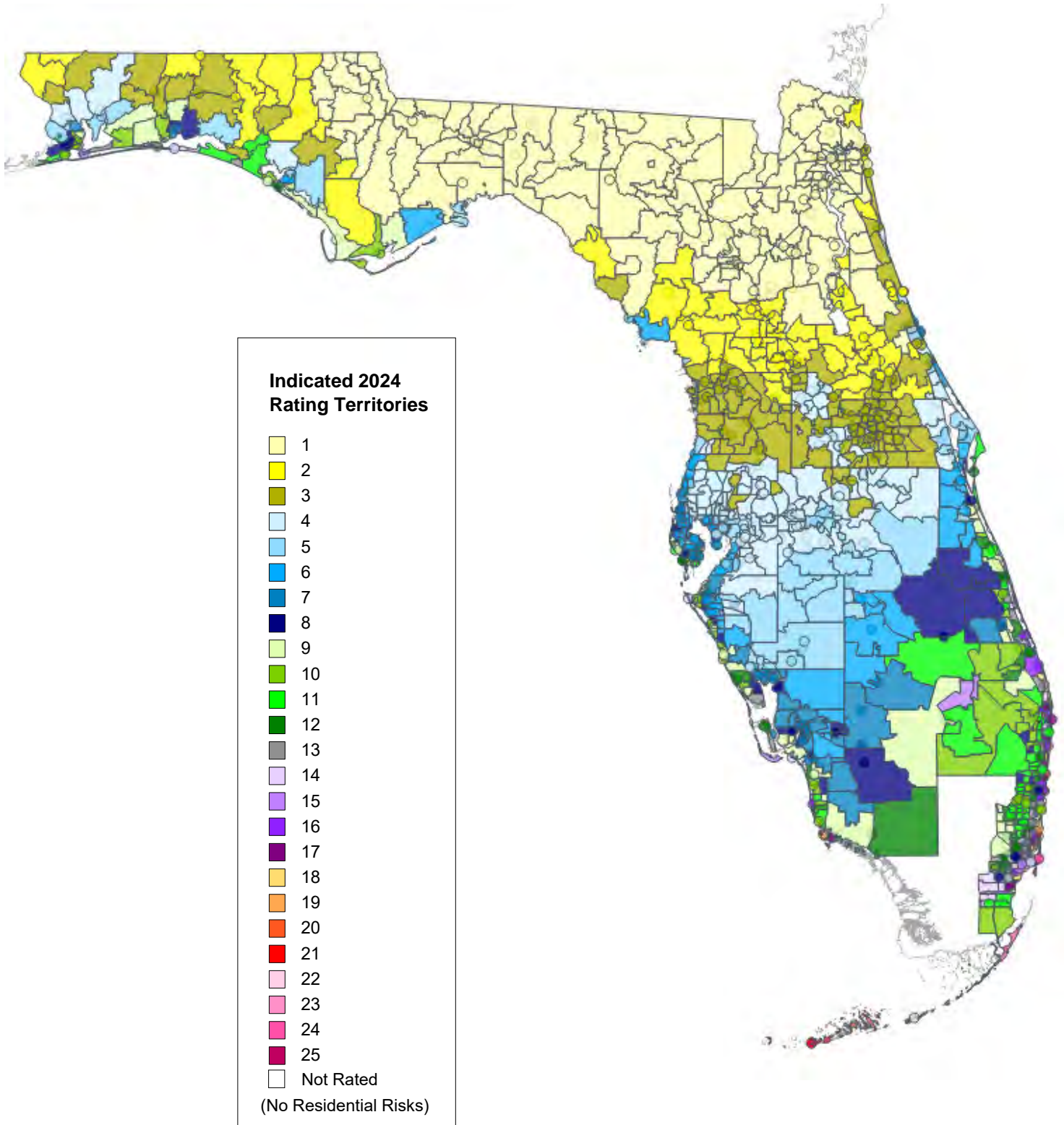
	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure	Residential Exposure
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Shift Up 1 Terr	133	638	30	0	-	4	-	-	63	4	776
Stayed the Same	1,065	858	830	1,609	1,643	1,007	1,664	1,612	1,718	2,199	1,740
Shift Down 1 Terr	271	9	692	18	31	745	135	264	246	64	40
Grand Total	1,469	1,505	1,552	1,628	1,674	1,756	1,799	1,876	2,026	2,266	2,556



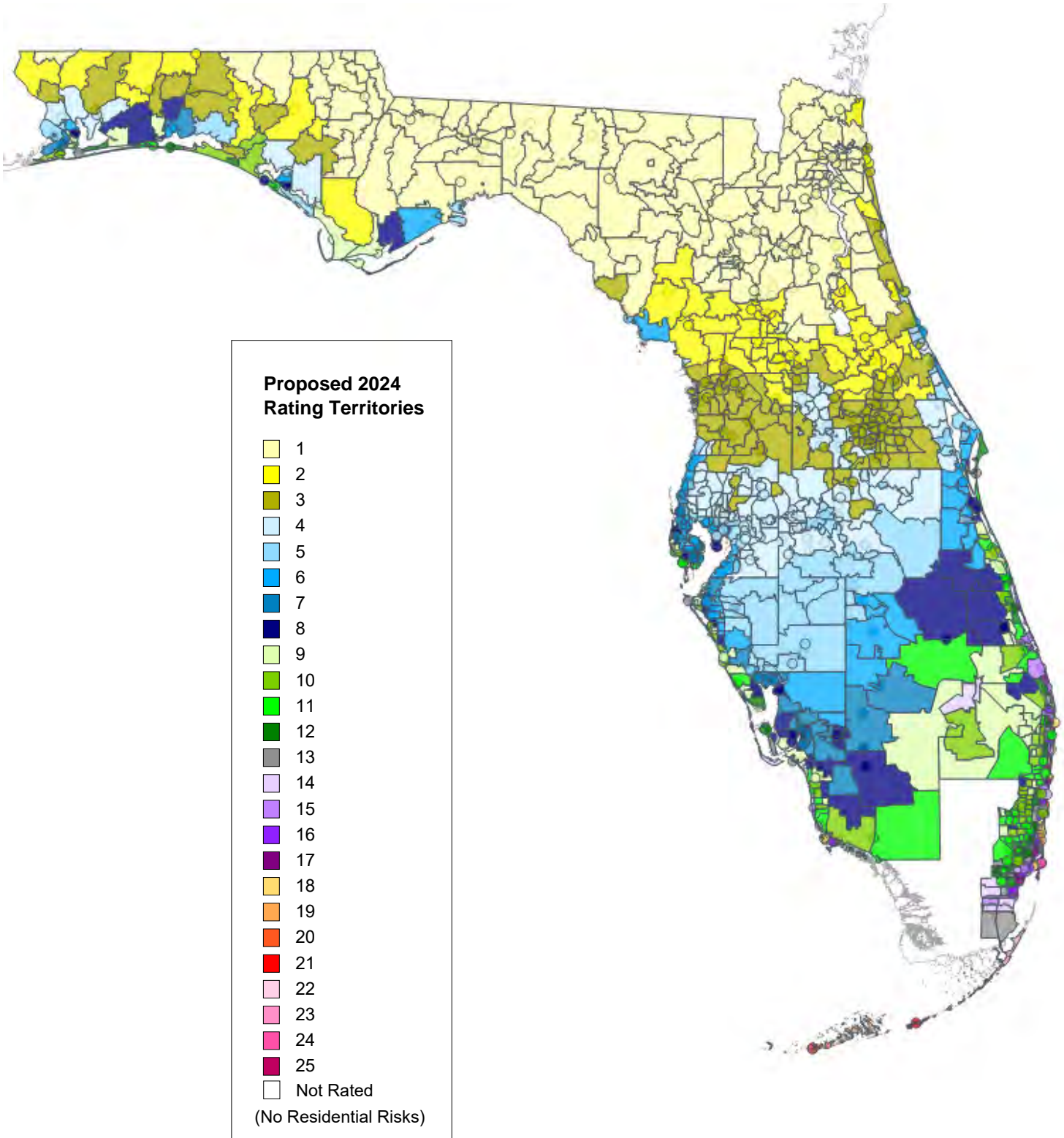
EXHIBIT

XIX

**Florida Hurricane Catastrophe Fund**  
**Indicated 2024 Rating Territories by 5-Digit ZIP Code**  
**Entire State**

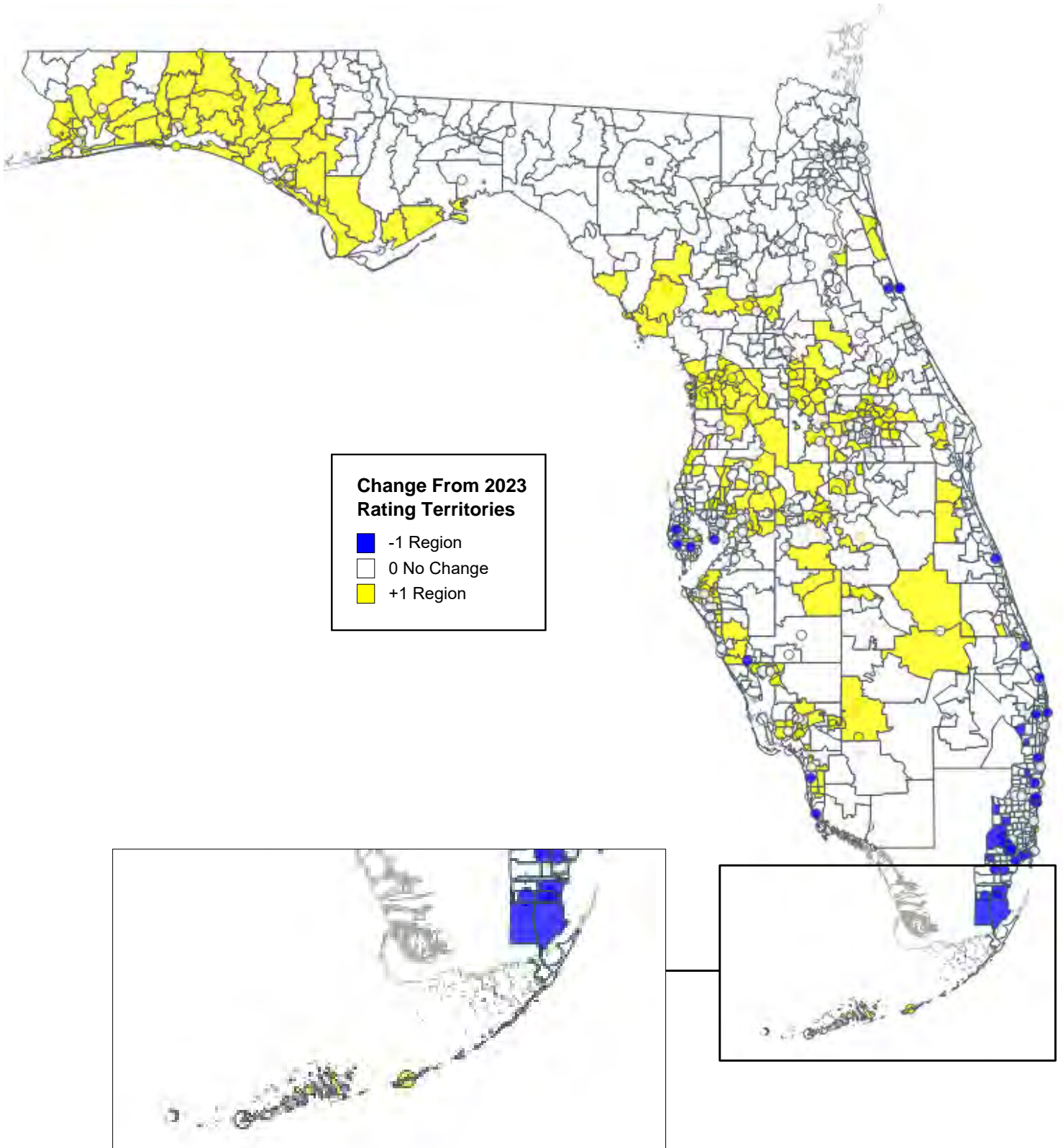


**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Entire State**



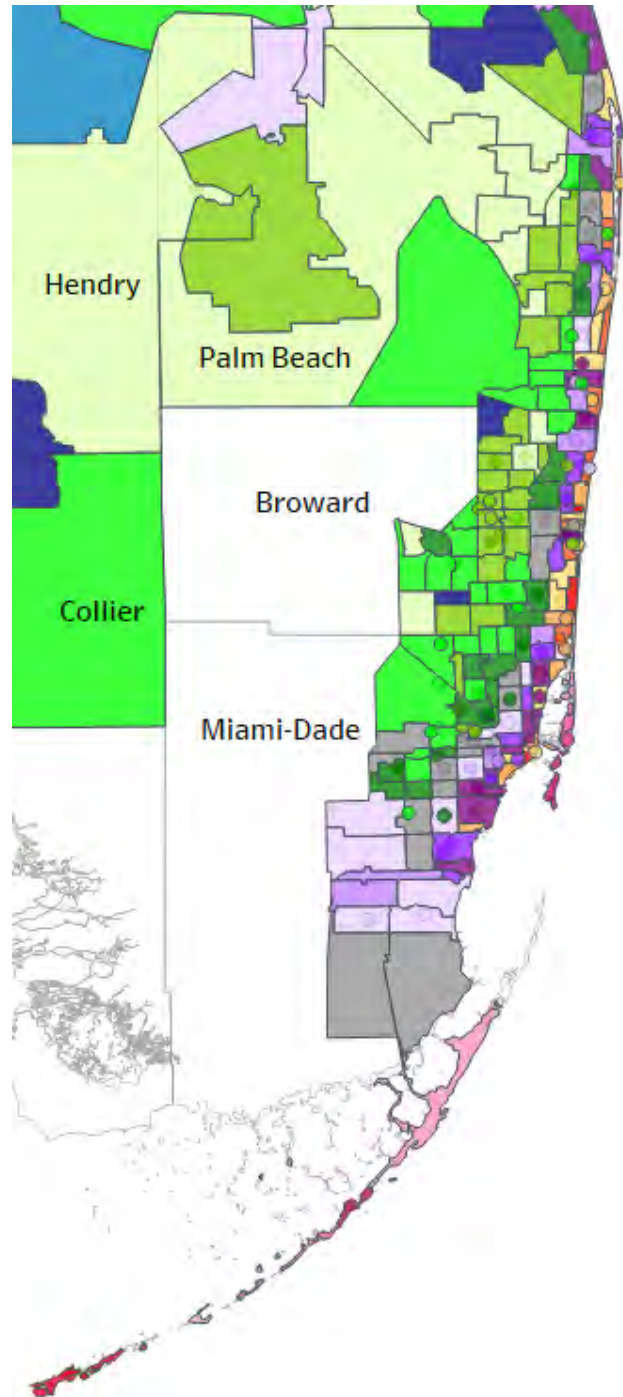
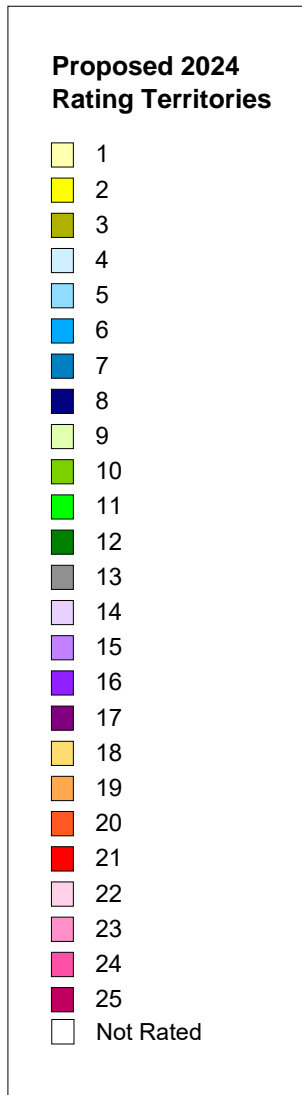


**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Entire State - Change From 2023 Territories**

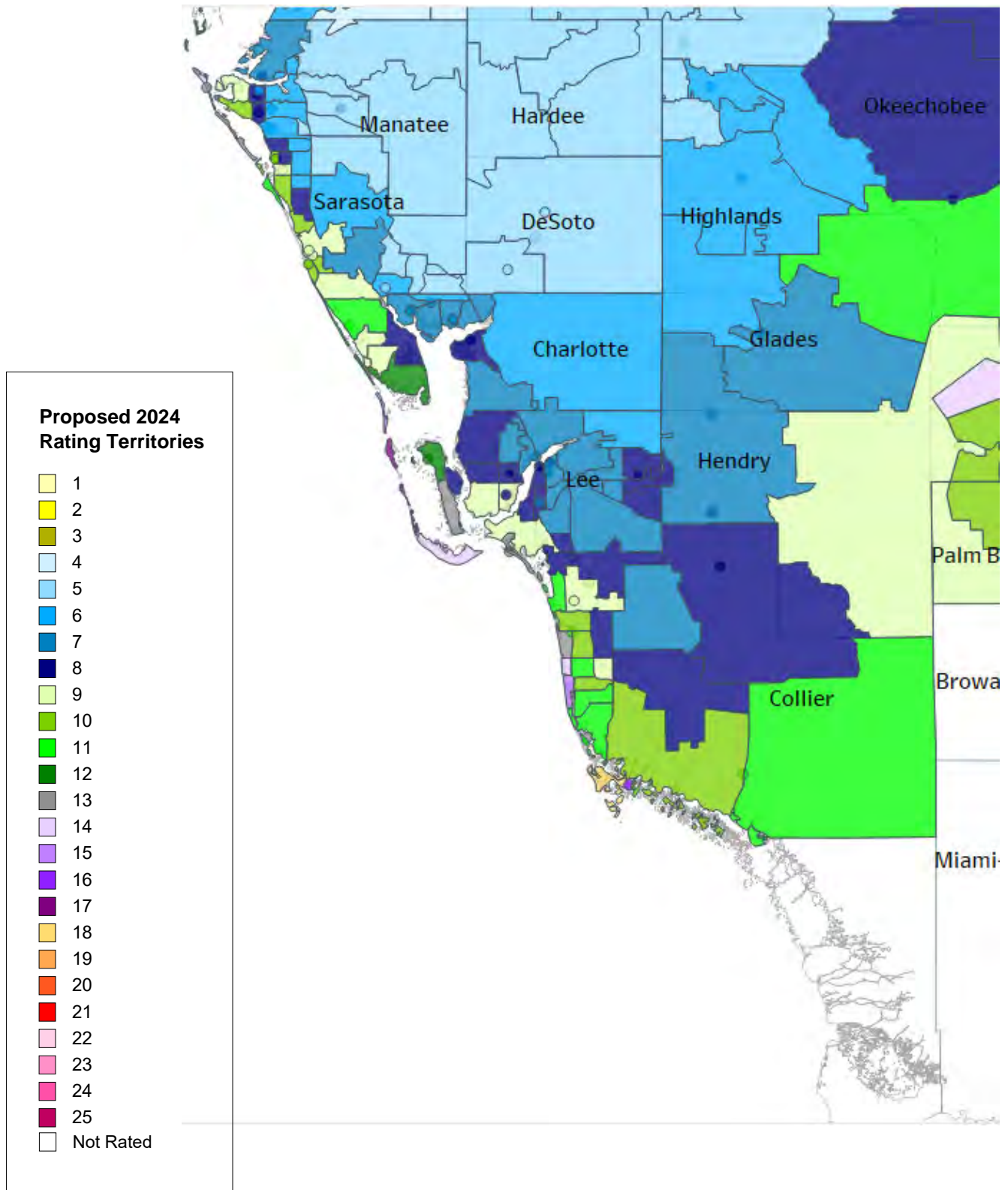




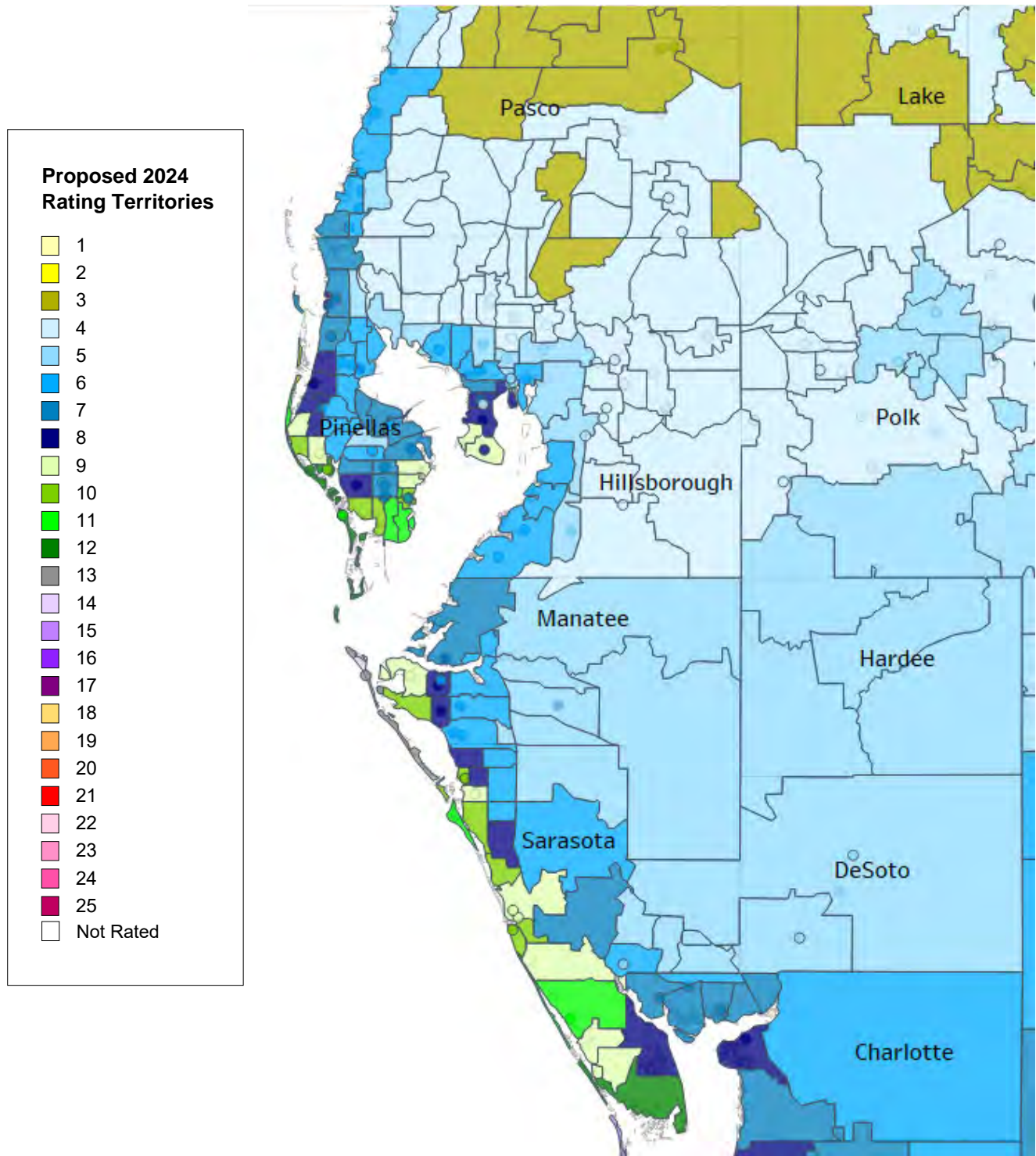
**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Miami and Surrounding Areas**



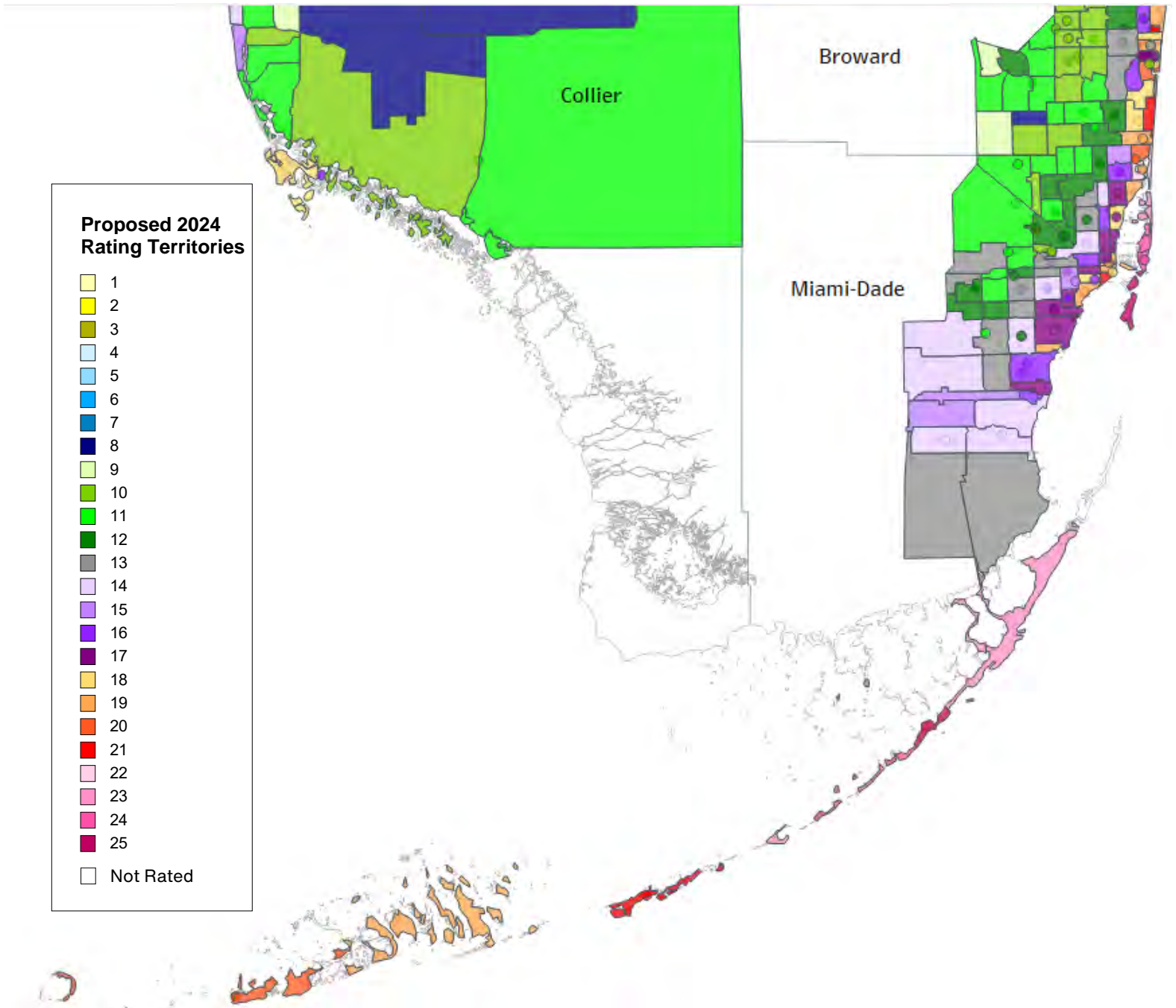
**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Fort Myers and Surrounding Areas**



**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Tampa/Saint Petersburg and Surrounding Areas**



**Florida Hurricane Catastrophe Fund**  
**Proposed 2024 Rating Territories by 5-Digit ZIP Code**  
**Florida Keys**



# Memo

To: Chris Spencer, SBA Executive Director  
From: Gina Wilson, Chief Operating Officer, FHCF  
Date: May 28, 2024  
Re: SBA Trustees Agenda Item - FHCF's 2024-2025 Reimbursement Premium Formula

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There are two Florida Hurricane Catastrophe Fund (FHCF) agenda items for the upcoming SBA Trustees meeting related to the FHCF Reimbursement Premium Formula. These items are as follows:

- Vote to approve the Contract Year 2024-2025 FHCF Reimbursement Premium Formula (unanimous vote of the Trustees required).
- Vote to file a Notice of Proposed Rule (Rule 19-8.028, Florida Administrative Code, Reimbursement Premium Formula) and to file for adoption if no hearing is timely requested or if a hearing is requested but no Notice of Change is needed.

## Statutory Requirements

Under subsection (5) of section 215.555, Florida Statutes:

- The premium formula must be developed by an **independent consultant** selected by the SBA;
- The premium formula must be used to determine the **actuarially indicated** premiums to be paid to the FHCF by participating insurers; and
- The premium formula must be approved by a **unanimous vote** of the Trustees.

## The Reimbursement Premium Formula Development Process

The reimbursement premium formula is detailed in a document provided by Paragon Strategic Solutions Inc. whose actuary, Andrew Rapoport, FCAS, MAAA, serves as the FHCF's independent consultant. The reimbursement premium formula development process also includes input from other members of Paragon's actuarial team and the actuary on the FHCF Advisory Council, Kathy Hurta. FHCF staff members also participate in order to provide information and monitor the process.



The basic process for developing the reimbursement premium formula has been in place since 1995. The process involves these steps:

- By September 1 of each year, insurers report their exposure data as of June 30 to the FHCF.
- The exposure data is trended (i.e., adjusted for such factors as exposure growth and changes in construction costs) and given to hurricane modelers to estimate losses.
  - By law, the FHCF must use hurricane models found acceptable by the Florida Commission on Hurricane Loss Projection Methodology (the Commission) to the extent feasible. The five models used have been found acceptable by the Commission based on the 2021 standards set by the Commission.
  - The models are used to determine the average annual hurricane loss. The results from the five models are weighted such that the models with the highest and lowest results count for 5% each, the next-highest and next-lowest count for 20% each, and the model with results in the middle counts for 50%. By limiting the impact of the outliers, this weighting scheme tends to create stability over time.
- To estimate losses in the aggregate layer of coverage, a projected aggregate industry retention is calculated according to statute, which requires the retention be adjusted annually to reflect exposure growth from 2004 to the contract year two years prior to this particular contract year.
- The loss only limit is grossed up using the average coverage level of 86.874% based on selections by participating insurers on March 1, 2024. The loss and loss adjustment expense layer is 86.874% of \$19,568,621,249 excess \$9,929,000,000.
- Adjustments are made to reflect other costs, including FHCF operating costs, pre-event note expenses and loss adjustment expenses (the statute provides for a loss adjustment expense allowance of 10% of reimbursed losses).
- Rates are then allocated by type of business, territory, construction type, and deductible, and then further adjusted to reflect mitigation classifications (year built, structure opening protection, and roof shape).
- Finally, the statutory cash buildup factor of 25% is applied.

### **Contract Year 2024-2025 Recommended Reimbursement Premium Formula**

	<b>2024 Contract Year Modeled</b>	<b>2023 Contract Year Actual</b>
<b>FHCF Coverage</b>		
Industry Retention	\$9.929 billion	\$9.465 billion
Limit	\$17 billion	\$17 billion
Average Coverage	86.87%	87.36%
 FHCF Premium Revenue	 \$1.518 billion	 \$1.513 billion
 Rate Change	 - 7.74%	 - 6.44%
Coverage Selection Change	- 0.56%	2.48%
Exposure Change	9.37%	13.45%
Premium Change	0.34%	8.78%
<b>Overall Average Rate Change</b>	<b>- 8.25%</b>	<b>- 4.12%</b>
 Projected Exposure Base	 \$3.615 trillion	 \$3.306 trillion

The FHCF coverage limit is \$17 billion excess of \$9.929 billion. The \$9.929 billion industry retention is \$4.5 billion adjusted for a 120.6% growth in exposure from 2004 to 2022. The FHCF limit is \$17 billion until there is sufficient estimated claims-paying capacity to fund \$17 billion of loss in the subsequent contract year. Since the \$17 billion subsequent season capacity is not available, the limit remains at \$17 billion.

The premium revenues are projected to slightly increase 0.34% from \$1.513 billion to \$1.518 billion.

The average rate decrease of 7.74% is for companies that do not change their coverage selection. After adjusting for individual company coverage selection changes from 2023 to 2024, the industry overall rate change is projected to decrease 8.25%.

The major factors affecting premium and rate changes include:

- Projected growth in exposure
- Decrease in modeled loss costs
- Technical change related to law and ordinance coverage

**Projected growth in exposure** – The FHCF trended exposure projections are used to estimate the amount of exposure and risk counts as of June 30 that will be reported by companies for Contract Year 2024-2025.

- Detailed exposure data as of 6/30/23 as reported through 10/24/23 by 140 participating insurers for Contract Year 2023-2024 was trended for one year.
- The projected exposure base of \$3.615 trillion for 2024 is \$309 billion or 9.37% higher than the 2023 actual exposure of \$3.306 trillion.
- For comparison purposes, trended exposure for 2023 was projected to increase 8.59%; however, the actual increase was 13.45%. A portion of the growth in exposure can be contributed to a 37.60% increase in commercial exposure.
- Actuaries are projecting that high inflation will continue in 2024 but at a lower rate than 2023. Trended amounts are a combination of inflation on existing policies and recognition of newer constructions.

- The methodology for allocating trends recognizes that most of the increase in exposure will be due to new construction (i.e., year built 2012 and subsequent).
- Exposure growth affects overall premium by type of business but not rates.

**Decrease in modeled loss costs** - Trended exposures and risk counts are given to the modelers to estimate the average annual loss.

- Modeled loss costs decreased 7.40% overall.
- Four models produced lower loss costs than in 2023 ratemaking and one model produced higher loss costs. The weighted average of the five models produced lower loss costs for 2024. The models recognize an increase in newer constructions, resulting in a better book of business overall.
- Although exposure is projected to increase, allocating exposure trends to newer constructions moderates the growth in modeled loss costs and better reflects the improvement in damageability levels due to new construction.
- The change in modeled loss costs affects overall premium and rates.

**Technical change related to law and ordinance coverage** – Models used in the 2024 ratemaking include losses related to law and ordinance either implicitly based on historical reported losses or explicitly in the modeled losses.

- There is a technical change in the ratemaking formula where an adjustment to modeled losses for law and ordinance coverage was reduced from 4.86% to 0%.
- This change reduces adjusted gross losses by 3.20%.
- Law and ordinance coverage provides an additional limit for the building to allow for extra costs to rebuild a property to code. Historically, the FHCF made an adjustment in ratemaking for the coverage since not all models recognized this type of loss.

In general, the impact of a decrease in rates will vary by policyholder and company. Some policyholders may see a change in their FHCF premium charge and others may not. The decreases in FHCF rates by 8.25% is an average decrease for all policy types reported from all insurance companies to the FHCF and cannot be applied to an individual policyholder's total premium. However, a general application of the rate decrease could provide perspective on the impact of a rate change. Premium paid by insurers to the FHCF represent approximately 7.20% or \$183 of the average personal residential premium of approximately \$2,542. Therefore, the decrease in rates by 8.25% could potentially translate to an average decrease of \$15.09 for personal residential homeowners' premiums.

It is also important to consider that the impact of a rate decrease can vary by type of business (i.e., type of policy) as shown on the following page:



			3/21/2024 Ratemaking Report (with actual 2024A Note Expense)		
			Rate	Exposure	Premium
20	Residential		-10.09%	10.00%	-1.10%
21	Tenants		-9.89%	7.00%	-3.58%
22	Condominiums		0.43%	7.00%	7.46%
23	Mobile Homes		-10.10%	7.00%	-3.81%
24	Commercial		6.06%	3.00%	9.24%
25	Total		-8.25%	9.37%	0.34%

**Rule 19-8.028, F.A.C., Reimbursement Premium Formula**  
**2024-2025 Contract Year**  
**Summary of Changes**  
*(As of February 27, 2024)*

**Rule 19-8.028, Reimbursement Premium Formula**

**(3)(b)** Adopts the FHCF Reimbursement Premium Formula for the 2024-2025 Contract Year (“Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 21, 2024”). Deletes as obsolete material existing language that adopted the FHCF Ratemaking Formula for Contract Year 2023-2024.

**(5)** Paragraph 5 is amended to remove the name and address of a specific FHCF Administrator as the referenced materials may be found on the FHCF’s website.

## Notice of Proposed Rule

### STATE BOARD OF ADMINISTRATION

RULE NO.: RULE TITLE:

19-8.028: Reimbursement Premium Formula

PURPOSE AND EFFECT: This rule is promulgated to implement Section 215.555, Florida Statutes, regarding the Florida Hurricane Catastrophe Fund, for the 2024-2025 contract year.

SUMMARY: In accordance with Section 215.555(5), Florida Statutes, proposed amended Rule 19-8.028, F.A.C., Reimbursement Premium Formula, adopts the 2024-2025 reimbursement premium formula for the Florida Hurricane Catastrophe Fund ("Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 21, 2024").

#### SUMMARY OF STATEMENT OF ESTIMATED REGULATORY COSTS AND LEGISLATIVE

#### RATIFICATION:

The Agency has determined that this will not have an adverse impact on small business or likely increase directly or indirectly regulatory costs in excess of \$200,000 in the aggregate within one year after the implementation of the rule. A SERC has not been prepared by the Agency.

The Agency has determined that the proposed rule is not expected to require legislative ratification based on the statement of estimated regulatory costs or if no SERC is required, the information expressly relied upon and described herein: Upon review of the proposed changes to this rule and the incorporated forms, the State Board of Administration of Florida has determined that the rule does not meet the requirements for ratification by the legislature. The changes to the rule do not have an adverse impact on small business and do not directly or indirectly increase regulatory costs in excess of \$200,000 in the aggregate within 1 year of implementation. The changes to the rule also do not directly or indirectly have an adverse impact on economic growth, private sector job creation or employment, or private sector investment, business competitiveness or innovation or increase regulatory costs, including any transactional costs, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule.

Any person who wishes to provide information regarding a statement of estimated regulatory costs, or provide a proposal for a lower cost regulatory alternative must do so in writing within 21 days of this notice.

RULEMAKING AUTHORITY: 215.555(3), F.S.

LAW IMPLEMENTED: 215.555(2), (3), (4), (5), (6), (7), F.S.

IF REQUESTED WITHIN 21 DAYS OF THE DATE OF THIS NOTICE, A HEARING WILL BE HELD AT THE DATE, TIME AND PLACE SHOWN BELOW (IF NOT REQUESTED, THIS HEARING WILL NOT BE HELD):

DATE AND TIME: July 10, 2024, 9:00 a.m. (ET) to conclusion of meeting.

PLACE: Conference Call in Number: 1(888) 585-9008, Participant Code 973-664-296.

Pursuant to the provisions of the Americans with Disabilities Act, any person requiring special accommodations to participate in this workshop/meeting is asked to advise the agency at least 7 days before the workshop/meeting by contacting: Mary Linzee Branham, Florida Hurricane Catastrophe Fund, 1801 Hermitage Blvd., Tallahassee, FL 32308, 850-413-1335, marylinzee.branham@sbafla.com. If you are hearing or speech impaired, please contact the agency using the Florida Relay Service, 1(800)955-8771 (TDD) or 1(800)955-8770 (Voice).

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE IS: Mary Linzee Branham at the number or email listed above.

THE FULL TEXT OF THE PROPOSED RULE IS:

#### **19-8.028 Reimbursement Premium Formula.**

(1) Purpose. This rule adopts the Premium Formula to determine the Actuarially Indicated Reimbursement Premium to be paid to the Florida Hurricane Catastrophe Fund, as required by Section 215.555(5)(b), F.S.

(2) Definitions. The definitions in the Reimbursement Contract for the applicable Contract Year also apply to this rule and the forms referenced in this rule. In addition, as used in this rule:

(a) "SBA" means the State Board of Administration of Florida.

(b) "Contract Year" is defined in Section 215.555(2), F.S.

(c) "Independent Consultant" means the independent individual, firm, or organization with which the SBA contracts to prepare the Premium Formula and any other actuarial services for the FHCF, as determined under the contract with the Consultant.

(3) The Premium Formula.

(a) The Formula for determining the Actuarially Indicated Reimbursement Premium to be paid to the Fund, as required by Section 215.555(5)(b), F.S., is the rate times the exposure per \$1,000 of insured value and this equals the Premium to be paid in dollars. The premium rates are determined by taking into account geographic location by zip code; construction type; policy deductible; type of insurance and other such factors deemed by the SBA to be appropriate. The Formula is developed by an Independent Consultant selected by the SBA, as required by Section 215.555(5)(b), F.S.

(b) For the 2024/2025 Contract Year, the Formula developed by the SBA's Independent Consultant, "Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 21, 2024, <http://www.flrules.org/Gateway/reference.asp?No=Ref-XXXXX>," as approved by the SBA, is hereby adopted and incorporated by reference into this rule. The premium rates are developed in accordance with the Premium Formula methodology approved by the SBA.

~~(b) For the 2023/2024 Contract Year, the Formula developed by the SBA's Independent Consultant, "Florida Hurricane Catastrophe Fund 2023 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 23, 2023, <http://www.flrules.org/Gateway/reference.asp?No=Ref-15496>," as approved by the SBA, is hereby adopted and incorporated by reference into this rule. The premium rates are developed in accordance with the Premium Formula methodology approved by the SBA.~~

(4) Special Circumstances.

(a) Allocation of Premium. Premiums paid to the FHCF with reference to property covered by Quota Share Primary Insurance Arrangements, as that phrase is defined in Section 627.351(6)(c)2.a.(I), F.S., will be allocated by the FHCF between the Company and Citizens in accordance with the percentages specified in the Quota Share Primary Insurance Arrangement for the purposes of premium billing, calculating retentions and determining reimbursement payments.

(b) Special Rating Circumstances. The Premium Formula for policies that, based upon sound actuarial principles, require individual ratemaking and which are not excluded by rule will be based on the use of computer modeling for each individual Company for which it is applicable, i.e., portfolio modeling. The Independent Consultant will recommend guidelines for individual Company portfolio reporting and modeling to estimate individual Company FHCF expected losses. Individual Company FHCF expected losses for portfolio modeling exposures will be loaded for investments and expenses on the same basis as the FHCF premium rates used for non-portfolio modeling exposures, but will also include a loading for the additional cost of individual Company modeling. The minimum exposure threshold for FHCF portfolio modeling rating will be sufficient to generate estimated FHCF premium greater than the cost of modeling and other considerations and will be calculated by the Independent Consultant for the separate coverage levels of 45%, 75%, and 90% using the premium rates established pursuant to subsection (3). The methodology used by the Independent Consultant will be based on sound actuarial principles to establish greater actuarial equity in the premium structure.

Special recognition is not given to Companies that do not have exposure for Covered Policies for an entire Contract Year, except for New Participants as required by Article X(1) and X(2) of the Reimbursement Contract.

(5) All the forms adopted and incorporated by reference in this rule may be obtained from the FHCF website at <http://fhcf.sbafla.com>, ~~or from the Florida Hurricane Catastrophe Fund Administrator, Paragon Strategic Solutions Inc., at 8200 Tower, 5600 West 83rd Street, Suite 1100, Minneapolis, MN 55437.~~

*Rulemaking Authority 215.555(3) FS. Law Implemented 215.555(2), (3), (4), (5), (6), (7) FS. History—New 9-20-99, Amended 7-3-00, 9-17-01, 7-17-02, 7-2-03, 7-29-04, 7-17-05, 7-6-06, 7-17-07, 6-16-08, 8-2-09, 7-8-10, 7-3-11, 6-25-12, 6-18-13, 6-10-14, 6-2-15, 5-18-16, 5-30-17, 8-1-18, 5-21-19, 9-17-19, 7-16-20, 6-23-21, 8-18-22, 7-12-23, X-XX-24.*

NAME OF PERSON ORIGINATING PROPOSED RULE: Gina Wilson, FHCF Chief Operating Officer, State Board of Administration of Florida.

NAME OF AGENCY HEAD WHO APPROVED THE PROPOSED RULE: The Trustees of the State Board of Administration of Florida.

DATE PROPOSED RULE APPROVED BY AGENCY HEAD: June 11, 2024

DATE NOTICE OF PROPOSED RULE DEVELOPMENT PUBLISHED IN FAR: March 7, 2024

**19-8.028 Reimbursement Premium Formula.**

(1) Purpose. This rule adopts the Premium Formula to determine the Actuarially Indicated Reimbursement Premium to be paid to the Florida Hurricane Catastrophe Fund, as required by Section 215.555(5)(b), F.S.

(2) Definitions. The definitions in the Reimbursement Contract for the applicable Contract Year also apply to this rule and the forms referenced in this rule. In addition, as used in this rule:

(a) “SBA” means the State Board of Administration of Florida.

(b) “Contract Year” is defined in Section 215.555(2), F.S.

(c) “Independent Consultant” means the independent individual, firm, or organization with which the SBA contracts to prepare the Premium Formula and any other actuarial services for the FHCF, as determined under the contract with the Consultant.

(3) The Premium Formula.

(a) The Formula for determining the Actuarially Indicated Reimbursement Premium to be paid to the Fund, as required by Section 215.555(5)(b), F.S., is the rate times the exposure per \$1,000 of insured value and this equals the Premium to be paid in dollars. The premium rates are determined by taking into account geographic location by zip code; construction type; policy deductible; type of insurance and other such factors deemed by the SBA to be appropriate. The Formula is developed by an Independent Consultant selected by the SBA, as required by Section 215.555(5)(b), F.S.

(b) For the 2024/2025 Contract Year, the Formula developed by the SBA’s Independent Consultant, “Florida Hurricane Catastrophe Fund 2024 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 21, 2024, <http://www.flrules.org/Gateway/reference.asp?No=Ref-XXXXX>,” as approved by the SBA, is hereby adopted and incorporated by reference into this rule. The premium rates are developed in accordance with the Premium Formula methodology approved by the SBA.

~~(b) For the 2023/2024 Contract Year, the Formula developed by the SBA’s Independent Consultant, “Florida Hurricane Catastrophe Fund 2023 Ratemaking Formula Report Presented to the State Board of Administration of Florida March 23, 2023, <http://www.flrules.org/Gateway/reference.asp?No=Ref-15496>,” as approved by the SBA, is hereby adopted and incorporated by reference into this rule. The premium rates are developed in accordance with the Premium Formula methodology approved by the SBA.~~

(4) Special Circumstances.

(a) Allocation of Premium. Premiums paid to the FHCF with reference to property covered by Quota Share Primary Insurance Arrangements, as that phrase is defined in Section 627.351(6)(c)2.a.(I), F.S., will be allocated by the FHCF between the Company and Citizens in accordance with the percentages specified in the Quota Share Primary Insurance Arrangement for the purposes of premium billing, calculating retentions and determining reimbursement payments.

(b) Special Rating Circumstances. The Premium Formula for policies that, based upon sound actuarial principles, require individual ratemaking and which are not excluded by rule will be based on the use of computer modeling for each individual Company for which it is applicable, i.e., portfolio modeling. The Independent Consultant will recommend guidelines for individual Company portfolio reporting and modeling to estimate individual Company FHCF expected losses. Individual Company FHCF expected losses for portfolio modeling exposures will be loaded for investments and expenses on the same basis as the FHCF premium rates used for non-portfolio modeling exposures, but will also include a loading for the additional cost of individual Company modeling. The minimum exposure threshold for FHCF portfolio modeling rating will be sufficient to generate estimated FHCF premium greater than the cost of modeling and other considerations and will be calculated by the Independent Consultant for the separate coverage levels of 45%, 75%, and 90% using the premium rates established pursuant to subsection (3). The methodology used by the Independent Consultant will be based on sound actuarial principles to establish greater actuarial equity in the premium structure.

Special recognition is not given to Companies that do not have exposure for Covered Policies for an entire Contract Year, except for New Participants as required by Article X(1) and X(2) of the Reimbursement Contract.

(5) All the forms adopted and incorporated by reference in this rule may be obtained from the FHCF website at <http://fhcf.sbafla.com>, ~~or from the Florida Hurricane Catastrophe Fund Administrator, Paragon Strategic Solutions Inc., at 8200 Tower, 5600 West 83rd Street, Suite 1100, Minneapolis, MN 55437.~~

*Rulemaking Authority 215.555(3) FS. Law Implemented 215.555(2), (3), (4), (5), (6), (7) FS. History—New 9-20-99, Amended 7-3-00, 9-17-01, 7-17-02, 7-2-03, 7-29-04, 7-17-05, 7-6-06, 7-17-07, 6-16-08, 8-2-09, 7-8-10, 7-3-11, 6-25-12, 6-18-13, 6-10-14, 6-2-15, 5-18-16, 5-30-17, 8-1-18, 5-21-19, 9-17-19, 7-16-20, 6-23-21, 8-18-22, 7-12-23, X-XX-24.*

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## **FLORIDA RETIREMENT SYSTEM DEFINED BENEFIT PLAN INVESTMENT POLICY STATEMENT**

### **I. DEFINITIONS**

**Absolute Real Target Rate of Return** - The total rate of return by which the FRS Portfolio must grow, in excess of inflation as reported by the U.S. Department of Labor, Bureau of Labor Statistics (Consumer Price Index – All Urban Consumers), in order to achieve the long-run investment objective.

**Asset Class** - An asset class is an aggregation of one or more portfolios with the same principal asset type.<sup>1</sup> For example, all of the portfolios whose principal asset type was stocks would be aggregated together as the Global Equity asset class. As such, it would contain primarily—but not exclusively—the principal asset type.

**Asset Type** - An asset type is a category of investment instrument such as common stock or bond.

**Portfolio** - A portfolio is the basic organization unit of the FRS Fund. Funds are managed within portfolios. A portfolio will typically contain one principal asset type (common stocks, for example), but may contain other asset types as well. The discretion for this mix of asset types is set out in guidelines for each portfolio.

### **II. OVERVIEW OF THE FRS AND SBA**

The State Board of Administration (Board) provides investment management of assets contributed and held on behalf of the Florida Retirement System (FRS). The investment of retirement assets is one aspect of the activity involved in the overall administration of the Florida Retirement System. The Division of Retirement (DOR), the administrative agency for the FRS, provides full accounting and administration of benefits and contributions, commissions actuarial studies, and proposes rules and regulations for the administration of the FRS. The State Legislature has the responsibility of setting contribution and benefit levels, and providing the statutory guidance for the administration of the FRS.

### **III. THE BOARD**

The State Board of Administration has the authority and responsibility for the investment of FRS assets. The Board consists of the Governor, as Chairman, the Chief Financial Officer, and the Attorney General. The Board has statutory responsibility for the investment of FRS assets, subject to limitations on investments as outlined in Section 215.47, Florida Statutes.

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<sup>1</sup> The Strategic Investments asset class is an exception, purposefully established to contain a variety of portfolios which may represent asset types and strategies not suitable for inclusion in other asset classes.

The Board shall discharge its fiduciary duties in accordance with the Florida statutory fiduciary standards of care as contained in Sections 215.44(2)(a), 215.47(10) and 112.662(1)-(3), Florida Statutes.

On August 23, 2022, the Board adopted a Resolution directing the following policy language be included in this Investment Policy Statement:

### 1. STANDARD OF CARE AND EVALUATION OF INVESTMENTS

- (a) The evaluation by the Board of an investment decision must be based only on pecuniary factors. As used in this section, “pecuniary factor” means a factor that the board prudently determines is expected to have a material effect on the risk and return of an investment based on appropriate investment horizons consistent with the fund’s investment objectives and funding policy. Pecuniary factors do not include the consideration of the furtherance of social, political, or ideological interests.
- (b) The board may not subordinate the interests of the participants and beneficiaries to other objectives and may not sacrifice investment return or take on additional investment risk to promote any non-pecuniary factors. The weight given to any pecuniary factor by the board should appropriately reflect a prudent assessment of its impact on risk and returns.
- (c) In the case of a conflict with this section and any other provision of Florida law, Florida law shall prevail.

### 2. PROXY VOTING - When deciding whether to exercise shareholder rights and when exercising such rights, including the voting of proxies, the board:

- (a) Must act prudently and solely in the interests of participants and beneficiaries and for the exclusive purpose of providing benefits to participants and beneficiaries and defraying the reasonable expenses of the Florida Retirement System Defined Benefit Pension Plan.
- (b) May not subordinate the interests of the participants and beneficiaries to other objectives and may not sacrifice investment return or take on additional investment risk to promote non-pecuniary factors.
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### 3. INTERNAL REVIEW

The State Board of Administration will organize and conduct a comprehensive review and prepare a report of the governance policies over the voting practices of the Florida Retirement System Defined Benefit Pension Plan, to include an operational review of decision-making in vote decisions and adherence to the fiduciary standards of the Fund. The State Board of Administration will ensure compliance with the updated Investment Policy Statement and adherence to the proxy voting requirements through the review process of this resolution. The State Board of Administration will submit its report to the Trustees no later than December 15, 2023.

The State Board of Administration will file and submit to the Governor, the Attorney General, the Chief Financial Officer, the President of the Senate and the Speaker of the House of Representatives a comprehensive report detailing and reviewing the governance policies concerning decision making in vote decisions and adherence to the fiduciary standards required under Section 112.662, Fla. Statutes, including the exercise of shareholder rights. The SBA will submit this report by December 15, 2023 and by December 15 of each odd-numbered year thereafter.

The Board delegates to the Executive Director the administrative and investment authority, within the statutory limitations and rules, to manage the investment of FRS assets. An Investment Advisory Council (IAC) is appointed by the Board. The IAC meets quarterly, and is charged with the review and study of general portfolio objectives, policies and strategies, including a review of investment performance. The IAC will review formal asset allocation studies every three-years or less on an as-needed basis.

The mission of the State Board of Administration is to provide superior investment management and trust services by proactively and comprehensively managing risk and adhering to the highest ethical, fiduciary and professional standards.

#### **IV. THE EXECUTIVE DIRECTOR**

The Executive Director is charged with the responsibility for managing and directing administrative, personnel, budgeting, and investment functions, including the strategic and tactical allocation of investment assets.

The Executive Director is charged with developing specific individual investment portfolio objectives and policy guidelines, and providing the Board with monthly and quarterly reports of investment activities.

The Executive Director has investment responsibility for maintaining diversified portfolios, and maximizing returns with respect to the broad diversified market standards of individual asset classes, consistent with appropriate risk constraints. The Executive Director will develop policies and procedures to:

- Identify, monitor and control/mitigate key investment and operational risks.
- Maintain an appropriate and effective risk management and compliance program that identifies, evaluates and manages risks within business units and at the enterprise level.
- Maintain an appropriate and effective control environment for SBA investment and operational responsibilities.
- Approve risk allocations and limits, including total fund and asset class risk budgets.

The Executive Director will appoint a Chief Risk and Compliance Officer, whose selection, compensation and termination will be affirmed by the Board, to assist in the execution of the responsibilities enumerated in the preceding list. For day-to-day executive and administrative purposes, the Chief Risk and Compliance Officer will proactively work with the Executive Director and designees to ensure that issues are promptly and thoroughly addressed by management. On at least a quarterly basis, the Chief Risk and Compliance Officer will provide reports to the Investment Advisory Council, Audit Committee and Board and is authorized to directly access these bodies at any time as appropriate to ensure the integrity and effectiveness of risk management and compliance functions.

Pursuant to written SBA policy, the Executive Director will organize an Investment Oversight Group(s) to regularly review, document and formally escalate guideline compliance exceptions and events that may have a material impact on the Trust Fund. The Executive Director is delegated the authority and responsibility to prudently address any such compliance exceptions, with input from the Investment Advisory Council and Audit Committee as necessary and appropriate, unless otherwise required in this Investment Policy Statement.

The Executive Director is responsible for evaluating the appropriateness of the goals and objectives in this Plan in light of actuarial studies and recommending changes to the Board when appropriate.

## **V. INVESTMENT OBJECTIVES**

The investment objective of the Board is to provide investment returns sufficient for the plan to be maintained in a manner that ensures the timely payment of promised benefits to current and future participants and keeps the plan cost at a reasonable level. To achieve this, a long-term real return approximating 4.8% per annum (compounded and net of investment expenses) should be attained. As additional considerations, the Board seeks to avoid excessive risk in long-term cost trends. To manage these risks, the volatility of annual returns should be reasonably controlled.

The Board's principal means for achieving this goal is through investment directives to the Executive Director. The main object of these investment directives is the asset class. The Board directs the Executive Director to manage the asset classes in ways that, in the Board's opinion, will maximize the likelihood of achieving the Board's investment objective within an appropriate risk management framework. The Board establishes asset classes, sets target allocations and reasonable ranges around them for each and establishes performance benchmarks for them. In addition, it establishes a performance benchmark for the total portfolio.

## **VI. TARGET PORTFOLIO AND ASSET ALLOCATION RANGES**

The Board's investment objective is an absolute one: achieve a specific rate of return, the absolute real target rate of return. In order to achieve it, the Board sets a relative objective for the Executive Director: achieve or exceed the return on a performance benchmark known as the Target Portfolio over time. The Target Portfolio is a portfolio composed of a specific mix of the authorized asset classes. The return on this portfolio is a weighted-average of the returns to passive benchmarks for

each of the asset classes. The expectation is that this return will equal or exceed the absolute real target rate of return long-term and will thus assure achievement of the Board's investment objective.

This relative return objective is developed in a risk management framework. Risk from the perspective of the Board is any shortfall of actual investment returns relative to the absolute real target rate of return over long periods of time, and the asset mix is developed to manage this risk. In selecting the Target Portfolio, the Board considers information from actuarial valuation reviews and asset/liability studies of the FRS, as well as asset class risk and return characteristics. In addition, the timing of cash demands on the portfolio to honor benefit payments and other liabilities are an important consideration. Potential asset mixes are thus evaluated with respect to their expected return, volatility, liquidity, and other risk and return measures as appropriate.

The Target Portfolio defined in Table 2 has a long-term expected compound annual real return that approximates the absolute real target rate of return. To achieve the absolute real target rate of return or actuarial return, material market risk must be borne (i.e., year to year volatility of returns). For example, in 2008 the Trust Fund's net managed real return was -26.81% compared to gains of 17.56% in 2009 and 21.48% in 2003. While downside risk is considerably greater over shorter horizons, the natural investment horizon for the Trust Fund is the long-term. Table 1 illustrates a modeled estimate of the Target Portfolio's potential range of real returns that could result over longer-term investment horizons. Over a 10-year investment horizon there is an 80 percent probability that the Target Portfolio will experience a compound annual real return between 0.1% and 9.2% and a 90 percent probability that the Target Portfolio will experience a compound annual real return between -1.4% and 10.6%.

**Table 1: Expected Risk in Target Portfolio's Real Returns**

Time Horizon	5 <sup>th</sup> Percentile Real Return	10 <sup>th</sup> Percentile Real Return	90 <sup>th</sup> Percentile Real Return	95 <sup>th</sup> Percentile Real Return
1 Year	-14.8%	-10.4%	18.8%	22.9%
3 Years	-6.3%	-3.9%	13.1%	15.4%
5 Years	-4.0%	-2.0%	11.1%	13.0%
7 Years	-2.5%	-0.9%	10.1%	11.6%
10 Years	-1.4%	0.1%	9.2%	10.6%

Although the Target Portfolio has an expected return and risk associated with it, it is important to note that this expected return is neither an explicit nor an implicit goal for the managers of the Florida Retirement System Trust Fund (FRSTF). These figures are used solely in developing directives for fund management that will raise the probability of success in achieving the absolute real target rate of return. The Executive Director is held responsible not for specifically achieving the absolute real target rate of return in each period, but rather for doing at least as well as the market using the Target Portfolio's mix of assets.

In pursuit of incremental investment returns, the Executive Director may vary the asset mix from the target allocation based on market conditions and the investment environment for the individual asset classes. The Executive Director shall adopt an asset allocation policy guideline which specifies the process for making these tactical decisions. The guideline shall concentrate on the analysis of economic conditions, the absolute values of asset class investments and the relative values between asset classes. The Board establishes ranges for tactical allocations, as shown in Table 2.

The Executive Director shall prudently execute the transition from the Target Asset Allocation in Table 2 of the Investment Policy Statement, effective January 17, 2023, to the New Target Asset Allocation in Table 2 below.

**Table 2: Authorized Asset Classes, Target Allocations and Policy Ranges**

Asset Class	Target Allocation	Policy Range Low	Policy Range High
Global Equity	45%	35%	60%
Fixed Income	21%	12%	30%
Active Credit	7%	2%	12%
Real Estate	12%	8%	20%
Private Equity	10%	6%	20%
Strategic Investments	4%	2%	14%
Cash Equivalents	1%	0.25%	5%
Total Fund	100%	--	--

For purposes of determining compliance with these policy ranges, an asset class is considered to be an aggregation of one or more portfolios with substantially the same principal asset type.<sup>2</sup> An asset type is a category of investment instrument such as common stock or bond. For example, all of the portfolios whose principal asset type is bonds would be aggregated together as the Fixed Income asset class. As such, it would contain primarily—but not exclusively—the principal asset type. As a standard management practice, portfolio managers are expected to meet their goals for all assets allocated to their portfolio.

It is expected that the FRS Portfolio will be managed in such a way that the actual allocation mix will remain within these ranges. Investment strategies or market conditions which result in an allocation position for any asset class outside of the enumerated ranges for a period exceeding thirty (30) consecutive business days shall be reported to the Board, together with a review of conditions causing the persistent deviation and a recommendation for subsequent investment action.

The asset allocation is established in concert with the investment objective, capital market expectations, projected actuarial liabilities, and resulting cash flows. Table 3 indicates estimated net cash flows (benefit payments less employer and employee contributions) and associated

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probabilities that are implicit in this policy statement, assuming the Legislature adheres to system funding provisions in current law. Additionally, the annualized income yield of the fund is projected to approximate 2% to 3%.

**Table 3: Estimated Net Cash Outflow (\$ millions/ % Fund)**

	In 5 Years		In 10 Years	
10 <sup>th</sup> Percentile	\$	7,367	3.62%	\$ 5,275 2.97%
25 <sup>th</sup> Percentile	\$	7,977	3.87%	\$ 7,497 3.49%
Median	\$	8,539	4.20%	\$ 9,744 3.99%
75 <sup>th</sup> Percentile	\$	9,080	4.59%	\$ 13,041 4.47%
90 <sup>th</sup> Percentile	\$	9,601	4.98%	\$ 13,149 4.91%

## VII. PERFORMANCE MEASUREMENT

Asset class performance is measured in accordance with a broad market index appropriate to the asset class. The indices identified in Table 4 are used as the primary benchmarks for the authorized asset classes.

**Table 4: Authorized Target Indices**

Asset Class	Index
Global Equity	A custom version of the MSCI All Country World Investable Market Index (ACWI IMI), in dollar terms, net of withholding taxes on non-resident institutional investors, adjusted to reflect securities and other investments prohibited by Florida law <u>and SBA policy</u> or that would be prohibited by Florida law if acquired as of the date of the measurement of such Index notwithstanding that the securities or investments were actually acquired before such date
Fixed Income	The Bloomberg U.S. Aggregate Bond Index
Active Credit	Floating based on public/private mix: (1) High Yield – Bloomberg <u>U.S.</u> High Yield Index; (2) Bank Loans – LSTA Leveraged Loan Index; (3) Emerging Market Debt, adjusted to reflect securities and other investments prohibited by Florida law and SBA policy – Bloomberg Emerging Market Local Currency Government 10% Country Capped, Bloomberg Emerging Market USD Sovereign, and Bloomberg Emerging Market USD Corporate; and (4) Private Credit - LSTA Leveraged Loan Index + 1.75%

Real Estate	The core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index – Open-ended Diversified Core Equity, NET of fees, weighted at 83.3%, and the non-core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index – Open-ended Diversified Core Equity, NET of fees, weighted at 16.7%, plus a fixed return premium of 150 basis points per annum <sup>3</sup>
Private Equity	Global Equity Target Index, plus a fixed premium return of 250 basis points per annum
Strategic Investments	Floating based on sub-category weights: (1) Hedge Funds - Secured Overnight Financing Rate (SOFR) + 3%; (2) Real Assets – CPI + 4%; (3) Insurance Linked Securities – Swiss RE CAT Bond Total Return Index; and (4) Opportunistic Strategies – Shall be assessed against an appropriate benchmark
Cash Equivalents	Bloomberg Barclays U.S. Treasury Bill: 1-3 Months Index

The return on the Target Portfolio shall be calculated as an average of the returns to the target indices indicated in Table 4 weighted by the target allocations indicated by Table 2, but adjusted for floating allocations. The policy allocations for the Active Credit and private market asset classes would all “float” against the public market asset classes (i.e., limited short-term liquidity available for rebalancing and benefit payments means that their policy allocations would equal their actual allocations) as identified in Table 5.

**Table 5: Allocations of Active Credit and Private Market (Real Estate, Private Equity and Strategic Investments) Under and Overweights to Public Market (Global Equity and Fixed Income) Table 2 Target Allocations**

Public Market Asset Classes	Float Allocation Limit	Private Market Asset Classes			
		Active Credit	Real Estate	Private Equity	Strategic Investments
Global Equity	N/A	67%	65%	100%	35%
Fixed Income	N/A	33%	35%	0%	65%

$$\begin{array}{c}
 \text{3} \quad \text{Core RE} \qquad \qquad \text{Non-Core RE} \\
 \underbrace{\hspace{1.5cm}} \quad \underbrace{\hspace{2.5cm}} \\
 (83.3\% * \text{NFI-ODCE}) + [16.7\% * (\text{NFI-ODCE} + 150 \text{ bps})]
 \end{array}$$



Measurement of asset allocation performance shall be made by comparing the actual asset allocation times the return for the appropriate indices to the target allocation times the index returns. For asset classes with floating allocations the basis of tactical measurement shall be the asset class's actual share.

Performance measurement of the effectiveness of the implementation of the Private Equity asset class shall be based on an internal rate of return (IRR) methodology, applied over significant periods of time. Performance measurement of the effectiveness of the implementation of the Private Equity, Strategic Investments, and Cash Equivalents asset classes shall be assessed relative to both the applicable index in Table 4 and:

- For Private Equity, the joint Cambridge Associates Global Private Equity and Venture Capital Index pooled return at peer group weights.
- For Strategic Investments, a weighted average of individual portfolios' benchmarks.
- For Cash Equivalents, the iMoneyNet First Tier Institutional Money Market Funds Net Index

## **VIII. ASSET CLASS PORTFOLIO MANAGEMENT**

### **General Asset Class and Portfolio Guidelines**

The Executive Director is responsible for developing asset class and individual portfolio policies and guidelines which reflect the goals and objectives of this Investment Policy Statement. In doing so, he is authorized to use all investment authority spelled out in Section 215.47, Florida Statutes, except as limited by this Plan or SBA Rules. The Executive Director shall develop guidelines for the selection and retention of portfolios, and shall manage all external contractual relationships in accordance with the fiduciary responsibilities of the Board.

All asset classes shall be invested to achieve or exceed the return on their respective benchmarks over a long period of time. To obtain appropriate compensation for associated performance risks:

- Public market asset classes shall be well diversified with respect to their benchmarks and have a reliance on low-cost passive strategies scaled according to the degree of efficiency in underlying securities markets, capacity in effective active strategies, and ongoing total fund liquidity requirements.
- Private Credit and Bank Loans (within the Active Credit asset class), Private Equity, Real Estate and Strategic Investments asset classes shall utilize a prudent process to maximize long-term access to attractive risk-adjusted investment opportunities through use of business partners with appropriate:
  - Financial, operational and investment expertise and resources;

- Alignment of interests;
- Transparency and repeatability of investment process; and
- Controls on leverage.

### **Strategic Investments Guidelines**

The objective of the asset class is to proactively identify and utilize non-traditional and multi-asset class investments, on an opportunistic and strategic basis, in order to accomplish one or more of the following:

- Reduce the volatility of FRS Pension Plan assets and improve the FRS Pension Plan's Sharpe Ratio, over five-year measurement periods.
- Outperform the FRS Pension Plan during periods of significant market declines.
- Increase investment flexibility across market environments in order to access evolving or opportunistic investments outside of traditional asset classes and effective risk-adjusted portfolio management strategies.

Strategic Investments may include, but not be limited to, direct investments authorized by s. 215.47, Florida Statutes or investments in capital commitment partnerships, hedge funds or other vehicles that make or involve non-traditional, opportunistic and/or long or short investments in marketable and nonmarketable debt, equity, and/or real assets (e.g., real estate, infrastructure, or commodities). Leverage may be utilized subject to appropriate controls.

### **Other Guidelines**

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2007-88, Laws of Florida, the "Protecting Florida's Investments Act." Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.473(6), Florida Statutes.

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2016-36, Laws of Florida, an act relating to companies that boycott Israel. Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.4725(5), Florida Statutes.

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2018-125, Laws of Florida, an act relating to state investments in or with the government of Venezuela. Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.475(3)(a), Florida Statutes.

Subsection 215.475(3)(a) Florida Statutes is consistent with the Resolution adopted by the Trustees of the Board on August 16, 2017. At that meeting, the Board also included in the Resolution the specific direction that the SBA include in this Investment Policy Statement upon review of the IAC in accordance with Section 215.475(2) Florida Statutes, the following: “The SBA will not vote in favor of any proxy resolution advocating the support of the Maduro Regime in Venezuela.”

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2024-187, Laws of Florida, an act relating to investments in certain Chinese companies (as defined therein). Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.4735(3), Florida Statutes.

## **IX. REPORTING**

The Board directs the Executive Director to coordinate the preparation of quarterly reports of the investment performance of the FRS by the Board's independent performance evaluation consultant.

The following formal periodic reports to the Board shall be the responsibility of the Executive Director:

- An annual report on the SBA and its investment portfolios, including that of the FRS.
- A monthly report on performance and investment actions taken.
- Special investment reports pursuant to Section 215.44-215.53, Florida Statutes.
- The reports listed in No. 3 above (Internal Review).

## **X. IMPLEMENTATION SCHEDULE**

This policy statement shall be effective ~~January 1, 2024~~ upon adoption by Trustees.

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## **FLORIDA RETIREMENT SYSTEM DEFINED BENEFIT PLAN INVESTMENT POLICY STATEMENT**

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The Executive Director has investment responsibility for maintaining diversified portfolios, and maximizing returns with respect to the broad diversified market standards of individual asset classes, consistent with appropriate risk constraints. The Executive Director will develop policies and procedures to:

- Identify, monitor and control/mitigate key investment and operational risks.
- Maintain an appropriate and effective risk management and compliance program that identifies, evaluates and manages risks within business units and at the enterprise level.
- Maintain an appropriate and effective control environment for SBA investment and operational responsibilities.
- Approve risk allocations and limits, including total fund and asset class risk budgets.

The Executive Director will appoint a Chief Risk and Compliance Officer, whose selection, compensation and termination will be affirmed by the Board, to assist in the execution of the responsibilities enumerated in the preceding list. For day-to-day executive and administrative purposes, the Chief Risk and Compliance Officer will proactively work with the Executive Director and designees to ensure that issues are promptly and thoroughly addressed by management. On at least a quarterly basis, the Chief Risk and Compliance Officer will provide reports to the Investment Advisory Council, Audit Committee and Board and is authorized to directly access these bodies at any time as appropriate to ensure the integrity and effectiveness of risk management and compliance functions.

Pursuant to written SBA policy, the Executive Director will organize an Investment Oversight Group(s) to regularly review, document and formally escalate guideline compliance exceptions and events that may have a material impact on the Trust Fund. The Executive Director is delegated the authority and responsibility to prudently address any such compliance exceptions, with input from the Investment Advisory Council and Audit Committee as necessary and appropriate, unless otherwise required in this Investment Policy Statement.

The Executive Director is responsible for evaluating the appropriateness of the goals and objectives in this Plan in light of actuarial studies and recommending changes to the Board when appropriate.

## **V. INVESTMENT OBJECTIVES**

The investment objective of the Board is to provide investment returns sufficient for the plan to be maintained in a manner that ensures the timely payment of promised benefits to current and future participants and keeps the plan cost at a reasonable level. To achieve this, a long-term real return approximating 4.8% per annum (compounded and net of investment expenses) should be attained. As additional considerations, the Board seeks to avoid excessive risk in long-term cost trends. To manage these risks, the volatility of annual returns should be reasonably controlled.

The Board's principal means for achieving this goal is through investment directives to the Executive Director. The main object of these investment directives is the asset class. The Board directs the Executive Director to manage the asset classes in ways that, in the Board's opinion, will maximize the likelihood of achieving the Board's investment objective within an appropriate risk management framework. The Board establishes asset classes, sets target allocations and reasonable ranges around them for each and establishes performance benchmarks for them. In addition, it establishes a performance benchmark for the total portfolio.

## **VI. TARGET PORTFOLIO AND ASSET ALLOCATION RANGES**

The Board's investment objective is an absolute one: achieve a specific rate of return, the absolute real target rate of return. In order to achieve it, the Board sets a relative objective for the Executive Director: achieve or exceed the return on a performance benchmark known as the Target Portfolio over time. The Target Portfolio is a portfolio composed of a specific mix of the authorized asset classes. The return on this portfolio is a weighted-average of the returns to passive benchmarks for



each of the asset classes. The expectation is that this return will equal or exceed the absolute real target rate of return long-term and will thus assure achievement of the Board's investment objective.

This relative return objective is developed in a risk management framework. Risk from the perspective of the Board is any shortfall of actual investment returns relative to the absolute real target rate of return over long periods of time, and the asset mix is developed to manage this risk. In selecting the Target Portfolio, the Board considers information from actuarial valuation reviews and asset/liability studies of the FRS, as well as asset class risk and return characteristics. In addition, the timing of cash demands on the portfolio to honor benefit payments and other liabilities are an important consideration. Potential asset mixes are thus evaluated with respect to their expected return, volatility, liquidity, and other risk and return measures as appropriate.

The Target Portfolio defined in Table 2 has a long-term expected compound annual real return that approximates the absolute real target rate of return. To achieve the absolute real target rate of return or actuarial return, material market risk must be borne (i.e., year to year volatility of returns). For example, in 2008 the Trust Fund's net managed real return was -26.81% compared to gains of 17.56% in 2009 and 21.48% in 2003. While downside risk is considerably greater over shorter horizons, the natural investment horizon for the Trust Fund is the long-term. Table 1 illustrates a modeled estimate of the Target Portfolio's potential range of real returns that could result over longer-term investment horizons. Over a 10-year investment horizon there is an 80 percent probability that the Target Portfolio will experience a compound annual real return between 0.1% and 9.2% and a 90 percent probability that the Target Portfolio will experience a compound annual real return between -1.4% and 10.6%.

**Table 1: Expected Risk in Target Portfolio's Real Returns**

Time Horizon	5 <sup>th</sup> Percentile Real Return	10 <sup>th</sup> Percentile Real Return	90 <sup>th</sup> Percentile Real Return	95th Percentile Real Return
1 Year	-14.8%	-10.4%	18.8%	22.9%
3 Years	-6.3%	-3.9%	13.1%	15.4%
5 Years	-4.0%	-2.0%	11.1%	13.0%
7 Years	-2.5%	-0.9%	10.1%	11.6%
10 Years	-1.4%	0.1%	9.2%	10.6%

Although the Target Portfolio has an expected return and risk associated with it, it is important to note that this expected return is neither an explicit nor an implicit goal for the managers of the Florida Retirement System Trust Fund (FRSTF). These figures are used solely in developing directives for fund management that will raise the probability of success in achieving the absolute real target rate of return. The Executive Director is held responsible not for specifically achieving the absolute real target rate of return in each period, but rather for doing at least as well as the market using the Target Portfolio's mix of assets.

In pursuit of incremental investment returns, the Executive Director may vary the asset mix from the target allocation based on market conditions and the investment environment for the individual asset classes. The Executive Director shall adopt an asset allocation policy guideline which specifies the process for making these tactical decisions. The guideline shall concentrate on the analysis of economic conditions, the absolute values of asset class investments and the relative values between asset classes. The Board establishes ranges for tactical allocations, as shown in Table 2.

The Executive Director shall prudently execute the transition from the Target Asset Allocation in Table 2 of the Investment Policy Statement, effective January 17, 2023, to the New Target Asset Allocation in Table 2 below.

**Table 2: Authorized Asset Classes, Target Allocations and Policy Ranges**

Asset Class	Target Allocation	Policy Range Low	Policy Range High
Global Equity	45%	35%	60%
Fixed Income	21%	12%	30%
Active Credit	7%	2%	12%
Real Estate	12%	8%	20%
Private Equity	10%	6%	20%
Strategic Investments	4%	2%	14%
Cash Equivalents	1%	0.25%	5%
Total Fund	100%	--	--

For purposes of determining compliance with these policy ranges, an asset class is considered to be an aggregation of one or more portfolios with substantially the same principal asset type.<sup>2</sup> An asset type is a category of investment instrument such as common stock or bond. For example, all of the portfolios whose principal asset type is bonds would be aggregated together as the Fixed Income asset class. As such, it would contain primarily—but not exclusively—the principal asset type. As a standard management practice, portfolio managers are expected to meet their goals for all assets allocated to their portfolio.

It is expected that the FRS Portfolio will be managed in such a way that the actual allocation mix will remain within these ranges. Investment strategies or market conditions which result in an allocation position for any asset class outside of the enumerated ranges for a period exceeding thirty (30) consecutive business days shall be reported to the Board, together with a review of conditions causing the persistent deviation and a recommendation for subsequent investment action.

The asset allocation is established in concert with the investment objective, capital market expectations, projected actuarial liabilities, and resulting cash flows. Table 3 indicates estimated net cash flows (benefit payments less employer and employee contributions) and associated

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<sup>2</sup> The Strategic Investments asset class is an exception, purposefully established to potentially contain a variety of portfolios which may represent asset types and strategies not suitable for inclusion in other asset classes.

probabilities that are implicit in this policy statement, assuming the Legislature adheres to system funding provisions in current law. Additionally, the annualized income yield of the fund is projected to approximate 2% to 3%.

**Table 3: Estimated Net Cash Outflow (\$ millions/ % Fund)**

	In 5 Years		In 10 Years	
10 <sup>th</sup> Percentile	\$	7,367	3.62%	\$ 5,275 2.97%
25 <sup>th</sup> Percentile	\$	7,977	3.87%	\$ 7,497 3.49%
Median	\$	8,539	4.20%	\$ 9,744 3.99%
75 <sup>th</sup> Percentile	\$	9,080	4.59%	\$ 13,041 4.47%
90 <sup>th</sup> Percentile	\$	9,601	4.98%	\$ 13,149 4.91%

## VII. PERFORMANCE MEASUREMENT

Asset class performance is measured in accordance with a broad market index appropriate to the asset class. The indices identified in Table 4 are used as the primary benchmarks for the authorized asset classes.

**Table 4: Authorized Target Indices**

Asset Class	Index
Global Equity	A custom version of the MSCI All Country World Investable Market Index (ACWI IMI), in dollar terms, net of withholding taxes on non-resident institutional investors, adjusted to reflect securities and other investments prohibited by Florida law and SBA policy or that would be prohibited by Florida law if acquired as of the date of the measurement of such Index notwithstanding that the securities or investments were actually acquired before such date
Fixed Income	The Bloomberg U.S. Aggregate Bond Index
Active Credit	Floating based on public/private mix: (1) High Yield – Bloomberg U.S. High Yield Index; (2) Bank Loans – LSTA Leveraged Loan Index; (3) Emerging Market Debt, adjusted to reflect securities and other investments prohibited by Florida law and SBA policy – Bloomberg Emerging Market Local Currency Government 10% Country Capped, Bloomberg Emerging Market USD Sovereign, and Bloomberg Emerging Market USD Corporate; and (4) Private Credit - LSTA Leveraged Loan Index + 1.75%

Real Estate	The core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index – Open-ended Diversified Core Equity, NET of fees, weighted at 83.3%, and the non-core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index – Open-ended Diversified Core Equity, NET of fees, weighted at 16.7%, plus a fixed return premium of 150 basis points per annum <sup>3</sup>
Private Equity	Global Equity Target Index, plus a fixed premium return of 250 basis points per annum
Strategic Investments	Floating based on sub-category weights: (1) Hedge Funds - Secured Overnight Financing Rate (SOFR) + 3%; (2) Real Assets – CPI + 4%; (3) Insurance Linked Securities – Swiss RE CAT Bond Total Return Index; and (4) Opportunistic Strategies – Shall be assessed against an appropriate benchmark
Cash Equivalents	Bloomberg Barclays U.S. Treasury Bill: 1-3 Months Index

The return on the Target Portfolio shall be calculated as an average of the returns to the target indices indicated in Table 4 weighted by the target allocations indicated by Table 2, but adjusted for floating allocations. The policy allocations for the Active Credit and private market asset classes would all “float” against the public market asset classes (i.e., limited short-term liquidity available for rebalancing and benefit payments means that their policy allocations would equal their actual allocations) as identified in Table 5.

**Table 5: Allocations of Active Credit and Private Market (Real Estate, Private Equity and Strategic Investments) Under and Overweights to Public Market (Global Equity and Fixed Income) Table 2 Target Allocations**

Public Market Asset Classes	Float Allocation Limit	Private Market Asset Classes			
		Active Credit	Real Estate	Private Equity	Strategic Investments
Global Equity	N/A	67%	65%	100%	35%
Fixed Income	N/A	33%	35%	0%	65%

$$\begin{array}{c}
 \text{3} \quad \text{Core RE} \qquad \qquad \text{Non-Core RE} \\
 \underbrace{\hspace{1.5cm}} \quad \underbrace{\hspace{2.5cm}} \\
 (83.3\% * \text{NFI-ODCE}) + [16.7\% * (\text{NFI-ODCE} + 150 \text{ bps})]
 \end{array}$$

Measurement of asset allocation performance shall be made by comparing the actual asset allocation times the return for the appropriate indices to the target allocation times the index returns. For asset classes with floating allocations the basis of tactical measurement shall be the asset class's actual share.

Performance measurement of the effectiveness of the implementation of the Private Equity asset class shall be based on an internal rate of return (IRR) methodology, applied over significant periods of time. Performance measurement of the effectiveness of the implementation of the Private Equity, Strategic Investments, and Cash Equivalents asset classes shall be assessed relative to both the applicable index in Table 4 and:

- For Private Equity, the joint Cambridge Associates Global Private Equity and Venture Capital Index pooled return at peer group weights.
- For Strategic Investments, a weighted average of individual portfolios' benchmarks.
- For Cash Equivalents, the iMoneyNet First Tier Institutional Money Market Funds Net Index

## **VIII. ASSET CLASS PORTFOLIO MANAGEMENT**

### **General Asset Class and Portfolio Guidelines**

The Executive Director is responsible for developing asset class and individual portfolio policies and guidelines which reflect the goals and objectives of this Investment Policy Statement. In doing so, he is authorized to use all investment authority spelled out in Section 215.47, Florida Statutes, except as limited by this Plan or SBA Rules. The Executive Director shall develop guidelines for the selection and retention of portfolios, and shall manage all external contractual relationships in accordance with the fiduciary responsibilities of the Board.

All asset classes shall be invested to achieve or exceed the return on their respective benchmarks over a long period of time. To obtain appropriate compensation for associated performance risks:

- Public market asset classes shall be well diversified with respect to their benchmarks and have a reliance on low-cost passive strategies scaled according to the degree of efficiency in underlying securities markets, capacity in effective active strategies, and ongoing total fund liquidity requirements.
- Private Credit and Bank Loans (within the Active Credit asset class), Private Equity, Real Estate and Strategic Investments asset classes shall utilize a prudent process to maximize long-term access to attractive risk-adjusted investment opportunities through use of business partners with appropriate:
  - Financial, operational and investment expertise and resources;

- Alignment of interests;
- Transparency and repeatability of investment process; and
- Controls on leverage.

### **Strategic Investments Guidelines**

The objective of the asset class is to proactively identify and utilize non-traditional and multi-asset class investments, on an opportunistic and strategic basis, in order to accomplish one or more of the following:

- Reduce the volatility of FRS Pension Plan assets and improve the FRS Pension Plan's Sharpe Ratio, over five-year measurement periods.
- Outperform the FRS Pension Plan during periods of significant market declines.
- Increase investment flexibility across market environments in order to access evolving or opportunistic investments outside of traditional asset classes and effective risk-adjusted portfolio management strategies.

Strategic Investments may include, but not be limited to, direct investments authorized by s. 215.47, Florida Statutes or investments in capital commitment partnerships, hedge funds or other vehicles that make or involve non-traditional, opportunistic and/or long or short investments in marketable and nonmarketable debt, equity, and/or real assets (e.g., real estate, infrastructure, or commodities). Leverage may be utilized subject to appropriate controls.

### **Other Guidelines**

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2007-88, Laws of Florida, the "Protecting Florida's Investments Act." Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.473(6), Florida Statutes.

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2016-36, Laws of Florida, an act relating to companies that boycott Israel. Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.4725(5), Florida Statutes.

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2018-125, Laws of Florida, an act relating to state investments in or with the government of Venezuela. Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.475(3)(a), Florida Statutes.

Subsection 215.475(3)(a) Florida Statutes is consistent with the Resolution adopted by the Trustees of the Board on August 16, 2017. At that meeting, the Board also included in the Resolution the specific direction that the SBA include in this Investment Policy Statement upon review of the IAC in accordance with Section 215.475(2) Florida Statutes, the following: “The SBA will not vote in favor of any proxy resolution advocating the support of the Maduro Regime in Venezuela.”

The Executive Director shall develop and implement policies as appropriate for the orderly and effective implementation of the provisions of Chapter 2024-187, Laws of Florida, an act relating to investments in certain Chinese companies (as defined therein). Actions taken and determinations made pursuant to said policies are hereby incorporated by reference into this Investment Policy Statement, as required by subsection 215.4735(3), Florida Statutes.

## **IX. REPORTING**

The Board directs the Executive Director to coordinate the preparation of quarterly reports of the investment performance of the FRS by the Board's independent performance evaluation consultant.

The following formal periodic reports to the Board shall be the responsibility of the Executive Director:

- An annual report on the SBA and its investment portfolios, including that of the FRS.
- A monthly report on performance and investment actions taken.
- Special investment reports pursuant to Section 215.44-215.53, Florida Statutes.
- The reports listed in No. 3 above (Internal Review).

## **X. IMPLEMENTATION SCHEDULE**

This policy statement shall be effective upon adoption by Trustees.

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## FLORIDA RETIREMENT SYSTEM

### Investment Plan Investment Policy Statement

#### I. PURPOSE

The Florida Retirement System Investment Plan Investment Policy Statement (IPS) serves as the primary statement of Trustee policy regarding their statutory responsibilities and authority to establish and operate an optional defined contribution retirement program for members of the Florida Retirement System. The IPS shall serve as a guiding document pertaining to investment matters with respect to the Investment Plan. The Trustees will strive to make investment decisions consistent with this IPS. Section 121.4501(14), Florida Statutes, directs the Trustees of the State Board of Administration to approve the IPS. The IPS will be reviewed annually and will be revised or supplemented as policies are changed or developed.

#### II. DEFINITIONS

- A. **Member** – An employee who enrolls in, or who defaults into, the Florida Retirement System Investment Plan, a member-directed 401(a) program, in lieu of participation in the defined benefit program of the Florida Retirement System, a terminated Deferred Retirement Option Program (DROP) member as described in section 121.4501(21), Florida Statutes, or an alternate payee of a member or employee.
- B. **Investment Product** – The result of a process that forms portfolios from securities and financial instruments in order to produce investment returns.
- C. **Investment Manager** – A private sector company or the State Board of Administration that provide one or more investment products.
- D. **Investment Funds** – One of the investment options that may be chosen by participants. A Fund may be an aggregate of one or more investment products.
- E. **Bundled Provider** - A private sector company that offers investment products, combined with recordkeeping and trading services, which are designed to meet individualized needs and requirements of plan participants, so as to afford value to participants not available through individual investment product.
- F. **Passively Managed Option** – An investment management strategy that intends to produce the same level and pattern of financial returns generated by a market benchmark index.
- G. **Actively Managed Option** – An investment management strategy that relies on security return predictions in an effort to out-perform the financial returns generated by a market benchmark index.
- H. **Performance Benchmark** – A market benchmark index that serves as the performance measurement criterion for investment options.

- I. **Investment Plan Administrator or Recordkeeper** – A private sector company that provides administrative services, including individual and collective recordkeeping and accounting, Internal Revenue Code (“IRC”) limit monitoring, enrollment, beneficiary designation and changes, disbursement of monies, and other centralized administrative functions.
- J. **Self-Directed Brokerage Account** – An alternative method for Investment Plan members to select various investments options otherwise not available in the Investment Plan.
- K. **Self-Direct Brokerage Account Provider** – A private sector company that provides access to a Self-Directed Brokerage Account to members of the FRS Investment Plan.

### **III.OVERVIEW OF THE INVESTMENT PLAN AND STATE BOARD OF ADMINISTRATION**

- A. The Investment Plan is a member-directed 401(a) program for employees who selected to participate, or who defaulted into the plan, in lieu of participation in the defined benefit program of the Florida Retirement System. Investment Plan benefits accrue in individual accounts that are member-directed, portable and funded by employee and employer contributions and earnings. In accordance with Section 121.4501(15)(b), Florida Statutes, members and beneficiaries bear the investment risks and reap the rewards that result when they exercise control over investments in their accounts. Fluctuations in investment returns directly affect members’ benefits.
- B. The State Board of Administration (Board), Division of Retirement, and affected employers administer the Investment Plan. The Board designs educational services to assist employers, eligible employees, members and beneficiaries. The State Legislature has the responsibility for setting contribution levels and providing statutory guidance for the administration of the Investment Plan.

### **IV.THE BOARD**

- A. The Board consists of the Governor, as Chairman, the Chief Financial Officer and the Attorney General. The Board shall establish an optional defined contribution retirement program for members of the Florida Retirement System and make a broad range of investment options, covering most major market segments, available to members. The Board makes the final determination as to whether any investment manager or product, third-party administrator, education vendor or investment guidance vendor shall be approved for the Plan.
- B. The Board shall discharge its fiduciary duties in accordance with the Florida statutory fiduciary standards of care as contained in Sections 121.4501(15)(a) and 112.656, Florida Statutes.
- C. The Board delegates to the Executive Director the administrative and investment authority, within the statutory limitations and rules, to manage the Investment Plan. The Board appoints a nine-member Investment Advisory Council (IAC). The IAC reviews the IPS and any proposed changes prior to its presentation to the Board of Trustees. The Council presents the results of its review to the Board of Trustees prior to the Trustees’ final approval of the statement or any changes.

## **V. THE EXECUTIVE DIRECTOR**

- A. The Executive Director is responsible for managing and directing administrative, personnel, budgeting and investment-related functions, including the hiring and termination of investment managers, bundled providers and products.
- B. The Executive Director is responsible for developing specific investment objectives and policy guidelines for investment options for the Investment Plan. The Executive Director is responsible for developing policies and procedures for selecting, evaluating, and monitoring the performance of investment managers and products to which employees may direct retirement contributions under the Investment Plan, and providing the Board with monthly and quarterly reports of investment activities.
- C. The Executive Director is responsible for maintaining an appropriate compliance program that ensures :
  - Compliance with contractual and investment guidelines of each investment manager;
  - Compliance with contractual provisions agreed to with the Investment Plan administrator and the custodian, and all other service providers to the Plan, to facilitate compliance with all legal requirements pertaining to the administration of the Plan, and compliance with all applicable administrative rules, SBA policies, and procedures; and
  - Compliance with reporting and valuation requirements.

In addition, the Executive Director is also responsible for maintaining diversified investment options, and maximizing returns with respect to the performance benchmarks of investment options offered in the Investment Plan line up, consistent with appropriate defined contribution plan design. Each investment option will avoid excessive risk and have a prudent degree of diversification relative to its broad market performance benchmark. The Executive Director will develop policies and procedures to:

- Identify and monitor manager performance and key investment and operational risks within the manager's business structure.
- Maintain an appropriate compliance program that ensures compliance with contractual and investment guidelines of each manager in the plan.
- Maintain an appropriate and effective oversight function within the Office of Defined Contribution Programs to ensure effective operational and administrative oversight.
- Approve fund allocations and limits for each fund-of-fund or Retirement Date Fund under the Investment Plan.

The Executive Director will appoint a Chief of Defined Contribution Programs, to assist in the execution of the responsibilities enumerated in the preceding paragraphs. For day-to-day executive and administrative purposes, the Chief of Defined Contribution Programs will proactively work with the Executive Director and designees to ensure that issues are promptly and thoroughly addressed by

management. On at least a quarterly basis, the Chief of Defined Contribution Programs will provide reports to the Investment Advisory Council, and to the Audit Committee and Board as requested.

To ensure compliance with the enumerated functions outlined above, at the request of the Executive Director, the SBA Chief Risk & Compliance Officer will conduct compliance reviews of Office of Defined Contribution Programs to ensure compliance with this Investment Policy Statement and any SBA related policies and procedures in place for the Investment Plan and will provide a report that details any adverse compliance exceptions to the Executive Director.

Pursuant to written SBA policy, the Executive Director will cause a regular review, documentation and formal escalation of any events that may have a material impact on the FRS Investment Plan Trust Fund. The Executive Director is delegated the authority and responsibility to prudently address any such events, with input from the Investment Advisory Council as necessary and appropriate, unless otherwise required in this Investment Policy Statement.

- D. The Executive Director shall adopt policies and procedures designed to prevent excessive member trading between investment options from negatively impacting other members.
- E. The Executive Director is responsible for periodically reviewing this IPS and recommending changes to the Board of Trustees when appropriate.

## **VI. INVESTMENT OBJECTIVES**

- A. The Investment Plan shall seek to achieve the following long-term objectives:
  - 1) Offer a diversified mix of low-cost investment options that span the risk-return spectrum and give members the opportunity to accumulate retirement benefits.
  - 2) Offer investment options that avoid excessive risk, have a prudent degree of diversification relative to broad market indices and provide a long-term rate of return, net of all expenses and fees that seek to achieve or exceed the returns on comparable market benchmark indices.
  - 3) Offer members meaningful, independent control over the assets in their account with the opportunity to:
    - a) Obtain sufficient information about the plan and investment alternatives to make informed investment decisions;
    - b) Direct contributions and account balances between approved investment options with a frequency that is appropriate in light of the market volatility of the investment options;
    - c) Direct contributions and account balances between approved investment options without the limitation of fees or charges; and
    - d) Remove accrued benefits from the plan without undue delay or penalties, subject to the contract and all applicable laws governing the operation of the Plan.

## **VII. MEMBER CONTROL AND PLAN FIDUCIARY LIABILITY**

- A. This IPS is structured to be consistent with the Legislature's intent to assign liability for members' investment losses to members and provide a safe harbor for Plan fiduciaries.
- B. In Sections 121.4501(8)(b)2. and 121.4501(15)(b), Florida law incorporates the federal law concept of participant control, established by regulations of the U.S. Department of Labor under section 404(c) of the Employee Retirement Income Security Act of 1974. The Investment Plan shall incorporate these concepts by providing Plan participants the opportunity to give investment instructions and obtain sufficient information to make informed investment decisions. The Investment Plan shall, in accordance with the 404(c) regulations and Florida law, provide members an opportunity to choose from a broad range of investment alternatives.
- C. If a member or beneficiary of the Investment Plan exercises control over the assets in his or her account, pursuant to section 404(c) regulations and all applicable laws governing the operation of the Plan, no Plan fiduciary shall be liable for any loss to a member's or beneficiary's account which results from such member's or beneficiary's exercise of control.
- D. The default investment option for FRS Investment Plan members that default into the plan or fail to make a selection of investment options shall be the FRS Retirement Date Fund (RDF), or Retirement Target Date Fund, that matches the year closest to the year each individual member reaches normal retirement age for the Florida Retirement System as defined in Section 121.021(29) Florida Statutes, which otherwise meets the requirements of a qualified default investment alternative pursuant to regulations issued by the U.S. Department of Labor. The default investment option for FRS Pension Plan DROP participants who rollover funds from their DROP account to the Investment Plan as permitted by section 121.4501(21), Florida Statutes, and fail to make a selection of investment options shall be the FRS Retirement Fund.

## **VIII. MEMBER EDUCATION AND INVESTMENT GUIDANCE**

- A. The education component of the Investment Plan shall be designed by the Board to assist employers, eligible employees, members, and beneficiaries in order to maintain compliance with section 404(c) regulations and to assist employees in their choice of defined benefit or defined contribution retirement programs. Educational services include, but are not limited to, disseminating educational materials; providing retirement planning education; explaining the differences between the defined benefit retirement plan and the defined contribution retirement plan; and offering financial planning guidance on matters such as investment diversification, investment risks, investment costs, and asset allocation.

For members of the Investment Plan, the following items must be made available to members in sufficient time to allow them an opportunity to make informed decisions regarding the management of their individual retirement account under the Plan:

- A description of all investment funds offered as an investment option under the Investment Plan including: general investment objectives, risk and return

characteristics, and type and diversification of assets, but excluding any investment instruments made available through a self-directed brokerage account.

- An explanation of how to give investment instructions and any limits or restrictions on giving instructions.
- A description of any transaction fees or expenses that are charged to the member's account in connection with purchases or sales of an investment fund.
- Investment summary fund profiles as defined at Sections 121.4501(15)(c), excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- Descriptions of the annual operating expenses for each investment alternative, such as investment management fees, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- The value of shares of all investment funds and a quarterly member statement that accounts for contributions, investment earnings, fees, penalties, or other deductions, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- Information concerning the past investment performance of each investment fund, net of expenses, and relative to appropriate market indices, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.

B. Consistent with Sections 121.4501(8)(b)1. and 121.4501(10)(b), Florida Statutes, the education component shall provide FRS members with impartial and balanced information about the Plan and investment choices. In addition, any approved education organization shall not be an approved investment provider or be affiliated with an approved investment provider. Educational materials shall be prepared under the assumption that the employee is an unsophisticated investor and all educational materials, including those distributed by bundled providers, shall be approved by the Board prior to dissemination. Members shall have the opportunity to choose from different levels of education services, as well as a variety of delivery methods and media. All educational services offered by investment product providers shall be provided on a fee-for-service basis.

C. The Board shall contract for the provision of low- or no-cost investment guidance to members that is supplemental to educational services and that may be paid for by those receiving the guidance. Investment guidance shall consist of impartial and balanced recommendations about investment choices consistent with Rule 19-13.004, F.A.C. Investment guidance provided to a member should be individualized and provided on a regular basis. Members have the opportunity to choose from different levels of customized investment guidance services, as well as a variety of delivery methods and media.

- D. Investment guidance for Investment Plan members will provide optimized combinations of available Investment Plan investment options and any personally owned non-Investment Plan member directed tax-deferred or taxable accounts.
- E. Investment guidance for Pension Plan members will provide optimized combinations of any available Pension Plan benefit and any personally owned specific investment options across member directed tax-deferred or taxable accounts.
- F. Bundled provider(s) selected to provide investment products for Investment Plan members shall not provide any member education services aimed at influencing the choice between the defined benefit and defined contribution plans of the Florida Retirement System. This education program will only be provided by the neutral education provider hired to do so by the Board.

## **IX. ROLES OF THE INVESTMENT PLAN ADMINISTRATOR AND BUNDLED PROVIDERS**

- A. The Board will select a single private party to serve as the administrator for the Investment Plan. The Board makes the final determination as to whether any administrator shall be approved for the Plan. Administrative services such as individual and collective recordkeeping and accounting, IRC limit monitoring, enrollment, beneficiary designation and changes, disbursement of benefits, and other centralized administrative functions shall be provided by the single administrator selected by the Board. The SBA retains the right to delineate through the contract the specific administrative services to be provided by the Bundled Provider. The SBA also retains the right, consistent with Section 121.4501(8)(a)1., Florida Statutes, to enter into a contract with the Division of Retirement for certain administrative services.
- B. Bundled provider(s) selected to provide investment products to members will provide administrative services that are uniquely relevant to the bundled provider mandate. The SBA shall specify the administrative services to be provided by the single administrator and the bundled provider in the solicitation documents and contracts for services.

## **X. INVESTMENT OPTIONS AND PERFORMANCE BENCHMARKS**

- A. The authorized categories of Investment Plan investment options are segmented into tiers, with each designed to meet the varying needs of different members as shown in IPS-Table 1. The Investment Plan investment options are contained in IPS-Table 2. The default option for members that fail to make a selection of investment options shall be the Retirement Date Fund (RDF) that matches the year closest to the year each individual member reaches the normal retirement age for the Florida Retirement System as defined in Section 121.021(29) Florida Statutes. The investment options can be constructed under a multiple manager framework of two or more investment managers, however, the number of investment options shall not exceed the “Maximum Number of Options” listed in IPS-Table 2 for each category, except to the extent that:
  - 1) Multiple investment options within the same category are simultaneously offered to facilitate a transitional mapping of contributions and account balances from a terminating option;

- 2) An investment option is temporarily closed to new contributions and account balance transfers.

**IPS-Table 1: Authorized Investment Categories**

Tier	Philosophy
Tier I- Asset Allocation-Target Date Funds	Allow members to choose a diversified investment portfolio that best fits their career time horizon until anticipated retirement date. TDFs seek growth of assets in earlier years of employment and gradually shift to income oriented options at retirement. Designed for members with little investment knowledge who want a professionally managed asset allocation with little input from the member. These options will be comprised of underlying investments in the Investment Plan's Tier II and Tier III Core Options.
Tier II- Passively-Managed Core Options	Allow members who wish some control over major investment category shifts to create their own portfolios based on broad, low-cost index funds that best fit their time horizon, risk tolerance and investment goals.
Tier III- Actively –Managed Core Options	Allow members who wish more control over all key investment allocation decisions to create their own portfolios based on investment options from active managers who seek returns above a performance benchmark and that members believe best fit their time horizon, risk tolerance and investment goals.
Tier IV- Retirement Annuity Options	Allow members leaving FRS employment a means by which they can create an income stream of their accumulated assets that can last over their remaining lifetimes.
Tier V- Self Directed Brokerage Account	Allows members interested in investments outside of Tiers I, II and III the opportunity to invest in a broad array of mutual funds, stocks, US Treasuries and other investment alternatives based on their time horizon, risk tolerance, investment goals and/or preferences.

**IPS-Table 2: Authorized Investment Options Representative Performance Benchmarks, Retiree Annuities and Self Directed Brokerage Account**

Investment Option Categories	Maximum Number of Options	Representative Performance Benchmarks
<b>Tier I: Target Date Funds</b>		
A series of asset allocation funds	11	Weighted Average of each Constituent Fund's Benchmarks



structured in 5-year increments along a “glidepath” as demonstrated in IPS Chart 1 below.		
<b>Tier II: Passively Managed Core Options</b>		
Enhanced U.S. Bond Index Fund	1	Bloomberg Barclays Aggregate Bond Index
Stock Market Index Fund	1	Russell 3000 Index
Foreign Stock Index Fund	1	MSCI All Country World Index ex U.S. IMI Index

<b>Tier III: Actively-Managed Core Options</b>		
Stable Value Fund	1	Custom Stable Value Benchmark
Inflation Sensitive Fund	1	Custom Multi-Asset Benchmark
Diversified Income Fund	1	Custom Diversified Income Benchmark
US Stock Fund	1	Russell 3000 Index
Foreign Stock Fund	1	MSCI All Country World Index ex US Index
Global Stock Fund	1	MSCI All Country World Index

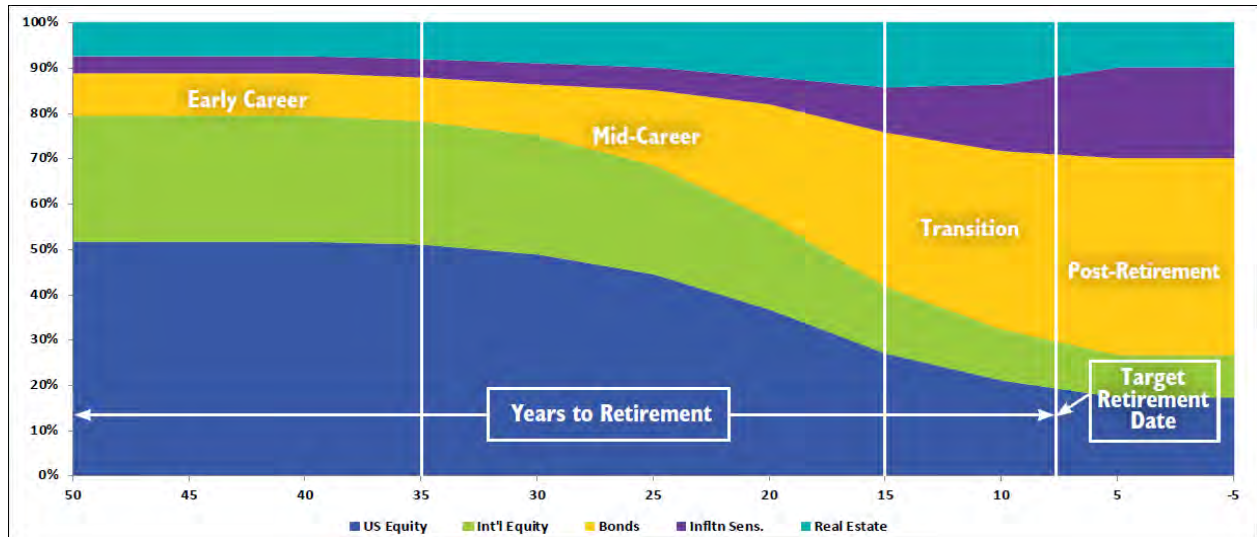
<b>Tier IV: Retiree Annuity Options</b>		(Section 121.591(1)(c), Florida Statutes)
Immediate and Deferred Annuities	Not Applicable	Specified by the Executive Director
<b>Tier V: Self-Directed Brokerage Account</b>	Not Applicable	Not applicable

- B. Investment options and investment products (i.e., that support Investment Funds that are composed of an aggregate of one or more investment products) may be provided by investment managers or bundled providers. Pursuant to Section 121.4501(9)(a), Florida Statutes, the Board shall select one or more providers who offer multiple investment products when such an approach is determined by the Board to afford value to members otherwise not available through individual investment products. Consistent with its fiduciary responsibilities, the Board is permitted by Section 121.4501(8)(h), to develop one or more investment products for the Investment Plan.
- C. Investment options may have performance benchmarks other than the “Representative Performance Benchmarks” listed in IPS-Table 2, but any alternative performance benchmark must be identified in the investment guidelines required under Section XI of this IPS and provide substantial coverage of the financial market segment defined by the corresponding Representative Performance Benchmark.
- D. Retirement Date Funds are only available as a weighted average of Tier II and III options. The Board shall establish procedures for initiating rebalancings per approved investment guidelines.

- E. With IAC review and input, the Executive Director shall periodically recommend changes to the authorized investment option categories in IPS-Tables 1 and 2, as modifications are appropriate. Any recommended modifications must be justified in terms of the incremental costs and benefits provided to members.

## **XI. GENERAL INVESTMENT OPTION GUIDELINES**

- A. The Executive Director is responsible for developing specific investment policies and guidelines for investment options, which reflect the goals and objectives of this IPS. In doing so, he is authorized to exercise and perform all duties set forth in Section 121.4501(9), Florida Statutes, except as limited by this IPS or Board Rules. General guidelines are as follows:
  - 1) The Retirement Date Funds are diversified portfolios designed to provide members with professionally managed investment vehicles that can grow assets over their career. The funds seek favorable long-term returns through investments in the Tier II and III Options according to the “glide path” allocation levels identified in IPS-Chart 1. Asset allocations will generally be held within a Current Operating Range (COR) of plus or minus 2% of their respective allocation target, but short-term deviations may occur. Optimized asset allocations for the Retirement Date Funds shall be established using methodology consistent with the guidance rendered by the Investment Plan’s investment consultant.

**IPS-Chart 1: Target Date Investment Funds Glidepath**

2) The Stable Value Fund seeks to provide maximum current income while maintaining stability of principal. The fund will be actively managed and will primarily invest in short-term fixed income securities designed to provide principal stability and a competitive yield. The stability of principal is guaranteed through Wrap Contracts with various high quality insurance companies and banks. The competitive yield is determined quarterly via a crediting rate derived from the book value yield of the underlying securities net of fees.

3) The U.S. Bond and Diversified Income funds seek high current income consistent with capital appreciation. The funds may be passively or actively managed and will primarily invest in securities contained in the benchmark, although other fixed income instruments which fit the funds' objectives may be selectively used to generate excess return, such as real estate, non-investment grade securities or securities issued by foreign entities. The funds' sensitivity to interest rate changes will closely approximate that of the performance benchmark.

4) The U.S. Stock funds seek capital appreciation and current income. The funds may be passively or actively managed and will primarily invest in equities contained in the benchmark. Other securities which fit the funds' objectives may be selectively used to generate excess return. The funds' investment process will not have a persistent bias toward the selection of securities that are predominantly in the growth or value style categories.

5) The Foreign Stock funds seek capital appreciation and current income. The funds may be passively or actively managed and will primarily invest in equities contained in the benchmark, although other securities which fit the funds' objectives may be selectively used to generate excess return, such as equity securities issued by corporations domiciled in emerging economies.

6) The Inflation Sensitive Fund seeks long-term real returns to preserve the future purchasing power of accumulated member benefits. The fund will be actively managed and will primarily invest in a diversified array of assets that may act as a hedge against inflationary pressures including, but not limited to, U.S. Treasury's inflation-indexed securities, commodities, real estate investment trusts, commercial real estate and other securities. The fund's sensitivity to interest rate changes and inflation will closely approximate that of the performance benchmark.

7) The Global Stock fund seeks capital appreciation and current income. The fund may be passively or actively managed and will primarily invest in equities contained in the benchmark, including equities domiciled in the United States, other developed and emerging economies although other securities which fit the funds' objectives may be selectively used to generate excess returns.

8) Each investment option must:

- a) Have a prudent degree of diversification relative to its performance benchmark;
- b) Be readily transferable from one Investment Plan account to another Investment Plan investment option or to private-sector or public-sector defined contribution plan accounts and self-directed individual retirement accounts;
- c) Allow transfers of members' balances into and out of the option at least daily, subject to the excessive trading policies of the providers and/or the SBA;
- d) Have no surrender fees or deferred loads/charges;
- e) Have no fees or charges for insurance features (e.g. mortality and expense risk charges);
- f) To the extent allowed by law, notwithstanding failure to meet one or more of the IPS Section XI(8)(b),(c)-(f) requirements, an option may be authorized if: (i) it produces significant and demonstrable incremental retirement benefits relative to other comparable products in the market place and comparable Tier I, Tier II, or Tier III options; and (ii) the incremental benefits are sufficient to offset all associated fees, charges and the expected economic cost of the variance(s) with the IPS Section XI(8)(b),(c)-(f) requirements. Comparability shall be based on the option's underlying investments within the broad categories of Money Market, U.S Fixed Income, U.S. Equities and Foreign Equities.

9) The annuity option offered in Tier IV must be provided by a provider with high independent ratings for financial strength and stability. Tier IV options may include immediate annuities with combinations of some of the following features:

- a) Single premium.
- b) Life or fixed period payouts.
- c) Single or joint life (survivors with an insurable interest).
- d) Complete or partial survivor benefits.
- e) Cash refund, installment refund or period certain features.
- f) Variable or fixed payments, non-participating, or income payable features.
- g) Deferred payments.

B. The long-term performance of each actively managed investment option is expected to exceed the returns on their performance benchmark, net of all fees and charges, while avoiding large year-to-

year deviations from the returns of the performance benchmark. The long-term performance of each passively managed investment option is expected to closely approximate returns on the performance benchmark, net of all fees and charges. Investment managers are authorized to prudently use options, futures, notional principal contracts or securities lending arrangements, in accordance with the fiduciary standards of care, as contained in Section 121.4501(15)(a), Florida Statutes, investment guidelines and related policies.

## **XII. INVESTMENT MANAGER SELECTION AND MONITORING GUIDELINES**

- A. The Executive Director shall develop policies and guidelines for the selection, retention and termination of investment managers, bundled providers and products, and shall manage all internal and external contractual relationships in accordance with the fiduciary responsibilities of the Board, this IPS and provisions of Sections 121.4501(8)(h) and 121.4501(9)(c), Florida Statutes.

When the Executive Director decides to terminate an investment fund in the Investment Plan, members will be granted an opportunity to direct their assets to other Investment Plan investment fund options prior to the investment fund termination. Assets that are not directed by members will be transferred or “mapped” to the investment fund(s) that the Executive Director deems appropriate. The mapping factors that will be consider include, but are not limited to, alignment of investment fund type (e.g., asset class, capitalization and style) and investment strategy (e.g., objectives, market focus, and implementation tactics).

- B. In the selection of investment managers, investment products or bundled providers, consideration shall be given to their effectiveness in minimizing the direct and indirect costs of transferring the total present value of accumulated benefit obligations for existing employees that choose membership in the Investment Plan from the Pension Plan trust to the Investment Plan trust.
- C. In the selection and monitoring of products from bundled providers, each proposed product will be evaluated on a stand-alone basis, pursuant to the requirement in Section 121.4501(9)(c)9., Florida Statutes. The cost-effectiveness of the levels of non-investment services supporting the products will also be evaluated relative to their benefits.
- D. In the selection, retention and termination of bundled providers and their proposed products and services, value, as that term is used in Section 121.4501(9)(a), Florida Statutes, shall be evaluated based on the value added to the process of accumulating retirement benefits for members. This evaluation shall consider the following factors in arriving at any staff recommendation:
- 1) Additional products or services that are not otherwise available to the members within the Plan;
  - 2) The type and quality of investment products offered;
  - 3) The type and quality of non-investment services offered; and
  - 4) Other significant elements that provide value to members, consistent with the mandates of Section 121.4501, Florida Statutes.
- E. On at least an annual basis, a review will be conducted of the performance of each approved investment manager and product and related organizational factors to ensure continued compliance

with established selection, performance and termination criteria, Board policy and procedures and all contractual provisions. The performance and termination criteria for each provider and investment product will be reflected in each employment contract.

- F. In addition to reviewing the performance of the Investment Plan's investment managers/options, the Executive Director will periodically review all costs associated with the management of the Investment Plan's investment options, including:
- 1) Expense ratios of each investment option against the appropriate peer group; and
  - 2) Costs to administer the Plan, including recordkeeping, account settlement (participant balance with that of investment), allocation of assets and earnings, and (when applicable) the proper use of 12b-1 fees to offset these fees.

### **XIII. SELF-DIRECTED BROKERAGE ACCOUNT (SDBA) PROVIDER SELECTION AND MONITORING GUIDELINES**

- A. The Executive Director shall develop policies and guidelines for the selection, retention and termination of a SDBA Provider and shall manage the contractual relationship in accordance with the fiduciary responsibilities of the Board, this IPS and provisions of Section 121.4501(9)(c), Florida Statutes.
- B. The SDBA shall be offered as a service to Investment Plan members to enable members to select investments otherwise not offered in the Plan.
- C. In selecting the SDBA Provider, the Executive Director shall consider the following:
- 1) Financial strength and stability as evidenced by the highest ratings assigned by nationally recognized rating services when comparing proposed providers that are so rated.
  - 2) Reasonableness of fees compared to other providers taking into consideration the quantity and quality of services being offered.
  - 3) Compliance with the Internal Revenue Code and all applicable federal and state securities laws.
  - 4) The methods available to members to interact with the provider; the means by which members may access account information, direct investment of funds, transfer funds, and to receive fund prospectuses and related investment materials as mandated by state and federal regulations.
  - 5) Ability to provide prompt, efficient and accurate responses to participant directions, as well as providing confirmations and quarterly account statements in a timely fashion.
  - 6) Process by which assets are invested, as well as any waiting periods when the monies are transferred.

- 7) Organizational factors, including, but not limited to, financial solvency, organizational depth, and experience in providing self-directed brokerage account services to public defined contribution plans.
  - 8) The self-directed brokerage account available under the most beneficial terms available to any customer.
  - 9) The provider will agree not to sell or distribute member lists generated through services rendered to the Investment Plan.
  - 10) The provider, as well as any of its related entities, may not offer any proprietary products as investment alternatives in the self-directed brokerage account.
- D. The Executive Director shall regularly monitor the selected provider to ascertain whether there is continued compliance with established selection criteria, board policy and procedures, state and federal regulations, and any contractual provisions.
- E. The Executive Director shall ensure that the SDBA Provider will include access to investment instruments offered through the self-directed brokerage account by providing connectivity with the following:
- 1) Stocks listed on a Securities Exchange Commission (SEC) regulated national exchange.
  - 2) Exchange Traded Funds (except for leveraged Exchange Traded Funds).
  - 3) Mutual Funds not offered in the Investment Plan.
  - 4) Fixed Income products.
- F. The Executive Director shall ensure that the self-directed brokerage account accessibility does not include the following as investment alternatives:
- 1) Illiquid investments;
  - 2) Over the Counter Bulletin Board (OTCBB) securities;
  - 3) Pink Sheet® (PS) securities;
  - 4) Leveraged Exchange Traded Funds;
  - 5) Direct Ownership of Foreign Securities;
  - 6) Derivatives, including, but not limited to futures and options contracts on securities, market indexes, and commodities;

- 7) Buying/Trading on Margin;
- 8) Limited Partnership Interests;
- 9) Investment Plan products;
- 10) Any investment that would jeopardize the Investment Plan's tax qualified status;
- 11) Master Limited Partnerships (MLPs);
- 12) Commodity ETFs (subject to UBIT);
- 13) Private Placements.

- G. The Executive Director shall establish procedures with the SDBA Provider and the Investment Plan Administrator to ensure that an Investment Plan member may participate in the self-directed brokerage account, if the member:
- 1) Maintains a minimum balance of \$5,000 in the products offered under the Investment Plan;
  - 2) Makes a minimum initial transfer of funds into the self-directed brokerage account of \$1,000;
  - 3) Makes subsequent transfers of funds into the self-directed brokerage account in amounts of \$1,000 or greater;
  - 4) Pays all trading fees, commissions, administrative fees and any other expenses associated with participating in the self-directed brokerage account;
  - 5) Does not violate any trading restrictions established by the provider, the Investment Plan, or state or federal law.
- H. The Executive Director shall establish procedures with the SDBA Provider and the Investment Plan Administrator to ensure that employer contributions and employee contributions shall be initially deposited into member's Investment Plan account and will then be made available for transfer to the member's SDBA.
- I. The Executive Director shall establish procedures with the SDBA Provider and the Investment Plan Administrator that distributions will not be processed directly from member's assets in the SDBA. Assets must first be transferred to Investment Plan products. A member can request a distribution from the Investment Plan once the transfer of the assets from the SDBA to the member's Investment Plan account and all Investment Plan distribution requirements are met.



- J. The Executive Director shall ensure that any member participating in the SDBA will be provided, at minimum, a quarterly statement that meets Financial Industry Regulatory Authority (FINRA) requirements which details member investments in the SDBA. The statement shall include, but is not limited to, member specific accounting of the investment instruments selected by a member, the net gains and losses, and buy/sell transactions. Additionally, a confirmation of trade statement will be sent for each transaction and all fees, charges, penalties and deductions associated with each transaction are netted in the trade and reflected in the transaction confirmation.
- K. The Executive Director shall develop appropriate communications to members participating in the SDBA that will notify members that the Board is not responsible for managing the SDBA beyond administrative requirements as established between the Board and SDBA Provider. As such, investment alternatives available through the SDBA have not been subjected to any selection process, are not monitored by the Board, require investment expertise to prudently buy, manage and/or dispose of, and have a risk of substantial loss. The communication shall also notify members that they are responsible for any and all administrative, investment, and trading fees associated with participating in the SDBA.
- L. The Executive Director shall ensure that the provider will deliver a prospectus or other information for the underlying investments available through the self-directed brokerage account as provided in Section 121.4501(15)(c)1. and 2. and in compliance with Federal laws.

#### **XIV. REPORTING**

- A. The Board directs the Executive Director to coordinate the preparation of quarterly reports of the investment performance of the Investment Plan by the Board's independent performance evaluation consultant.
- B. The following formal periodic reports to the Board shall be the responsibility of the Executive Director: an annual investment report, an annual financial report and a monthly performance report.

#### **XV. IMPLEMENTATION SCHEDULE**

This IPS shall be effective upon approval by the Trustees.

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## FLORIDA RETIREMENT SYSTEM

### Investment Plan Investment Policy Statement

#### I. PURPOSE

The Florida Retirement System Investment Plan Investment Policy Statement (IPS) serves as the primary statement of Trustee policy regarding their statutory responsibilities and authority to establish and operate an optional defined contribution retirement program for members of the Florida Retirement System. The IPS shall serve as a guiding document pertaining to investment matters with respect to the Investment Plan. The Trustees will strive to make investment decisions consistent with this IPS. Section 121.4501(14), Florida Statutes, directs the Trustees of the State Board of Administration to approve the IPS. The IPS will be reviewed annually and will be revised or supplemented as policies are changed or developed.

#### II. DEFINITIONS

- A. **Member** – An employee who enrolls in, or who defaults into, the Florida Retirement System Investment Plan, a member-directed 401(a) program, in lieu of participation in the defined benefit program of the Florida Retirement System, a terminated Deferred Retirement Option Program (DROP) member as described in section 121.4501(21), Florida Statutes, or an alternate payee of a member or employee.
- B. **Investment Product** – The result of a process that forms portfolios from securities and financial instruments in order to produce investment returns.
- C. **Investment Manager** – A private sector company or the State Board of Administration that provide one or more investment products.
- D. **Investment Funds** – One of the investment options that may be chosen by participants. A Fund may be an aggregate of one or more investment products.
- E. **Bundled Provider** - A private sector company that offers investment products, combined with recordkeeping and trading services, which are designed to meet individualized needs and requirements of plan participants, so as to afford value to participants not available through individual investment product.
- F. **Passively Managed Option** – An investment management strategy that intends to produce the same level and pattern of financial returns generated by a market benchmark index.
- G. **Actively Managed Option** – An investment management strategy that relies on security return predictions in an effort to out-perform the financial returns generated by a market benchmark index.
- H. **Performance Benchmark** – A market benchmark index that serves as the performance measurement criterion for investment options.

- I. **Investment Plan Administrator or Recordkeeper** – A private sector company that provides administrative services, including individual and collective recordkeeping and accounting, Internal Revenue Code (“IRC”) limit monitoring, enrollment, beneficiary designation and changes, disbursement of monies, and other centralized administrative functions.
- J. **Self-Directed Brokerage Account** – An alternative method for Investment Plan members to select various investments options otherwise not available in the Investment Plan.
- K. **Self-Direct Brokerage Account Provider** – A private sector company that provides access to a Self-Directed Brokerage Account to members of the FRS Investment Plan.

### **III.OVERVIEW OF THE INVESTMENT PLAN AND STATE BOARD OF ADMINISTRATION**

- A. The Investment Plan is a member-directed 401(a) program for employees who selected to participate, or who defaulted into the plan, in lieu of participation in the defined benefit program of the Florida Retirement System. Investment Plan benefits accrue in individual accounts that are member-directed, portable and funded by employee and employer contributions and earnings. In accordance with Section 121.4501(15)(b), Florida Statutes, members and beneficiaries bear the investment risks and reap the rewards that result when they exercise control over investments in their accounts. Fluctuations in investment returns directly affect members’ benefits.
- B. The State Board of Administration (Board), Division of Retirement, and affected employers administer the Investment Plan. The Board designs educational services to assist employers, eligible employees, members and beneficiaries. The State Legislature has the responsibility for setting contribution levels and providing statutory guidance for the administration of the Investment Plan.

### **IV.THE BOARD**

- A. The Board consists of the Governor, as Chairman, the Chief Financial Officer and the Attorney General. The Board shall establish an optional defined contribution retirement program for members of the Florida Retirement System and make a broad range of investment options, covering most major market segments, available to members. The Board makes the final determination as to whether any investment manager or product, third-party administrator, education vendor or investment guidance vendor shall be approved for the Plan.
- B. The Board shall discharge its fiduciary duties in accordance with the Florida statutory fiduciary standards of care as contained in Sections 121.4501(15)(a) and 112.656, Florida Statutes.
- C. The Board delegates to the Executive Director ~~& CIO~~ the administrative and investment authority, within the statutory limitations and rules, to manage the Investment Plan. The Board appoints a nine-member Investment Advisory Council (IAC). The IAC reviews the IPS and any proposed changes prior to its presentation to the Board of Trustees. The Council presents the results of its review to the Board of Trustees prior to the Trustees’ final approval of the statement or any changes.

## V. THE EXECUTIVE DIRECTOR ~~& CIO~~

- A. The Executive Director ~~& CIO~~ is responsible for managing and directing administrative, personnel, budgeting and investment-related functions, including the hiring and termination of investment managers, bundled providers and products.
- B. The Executive Director ~~& CIO~~ is responsible for developing specific investment objectives and policy guidelines for investment options for the Investment Plan. The Executive Director ~~& CIO~~ is responsible for developing policies and procedures for selecting, evaluating, and monitoring the performance of investment managers and products to which employees may direct retirement contributions under the Investment Plan, and providing the Board with monthly and quarterly reports of investment activities.
- C. The Executive Director ~~& CIO~~ is responsible for maintaining an appropriate compliance program that ensures :
- Compliance with contractual and investment guidelines of each investment manager;
  - Compliance with contractual provisions agreed to with the Investment Plan administrator and the custodian, and all other service providers to the Plan, to facilitate compliance with all legal requirements pertaining to the administration of the Plan, and compliance with all applicable administrative rules, SBA policies, and procedures; and
  - Compliance with reporting and valuation requirements.

In addition, the Executive Director ~~& CIO~~ is also responsible for maintaining diversified investment options, and maximizing returns with respect to the performance benchmarks of investment options offered in the Investment Plan line up, consistent with appropriate defined contribution plan design. Each investment option will avoid excessive risk and have a prudent degree of diversification relative to its broad market performance benchmark. The Executive Director ~~& CIO~~ will develop policies and procedures to:

- Identify and monitor manager performance and key investment and operational risks within the manager's business structure.
- Maintain an appropriate compliance program that ensures compliance with contractual and investment guidelines of each manager in the plan.
- Maintain an appropriate and effective oversight function within the Office of Defined Contribution Programs to ensure effective operational and administrative oversight.
- Approve fund allocations and limits for each fund-of-fund or Retirement Date Fund under the Investment Plan.

The Executive Director ~~& CIO~~ will appoint a Chief of Defined Contribution Programs, to assist in the execution of the responsibilities enumerated in the preceding paragraphs. For day-to-day executive and administrative purposes, the Chief of Defined Contribution Programs will proactively work with the Executive Director ~~& CIO~~ and designees to ensure that issues are promptly and thoroughly addressed by management. On at least a quarterly basis, the Chief of Defined

Contribution Programs will provide reports to the Investment Advisory Council, and to the Audit Committee and Board as requested.

To ensure compliance with the enumerated functions outlined above, at the request of the Executive Director ~~& CIO~~, the SBA Chief Risk & Compliance Officer will conduct compliance reviews of Office of Defined Contribution Programs to ensure compliance with this Investment Policy Statement and any SBA related policies and procedures in place for the Investment Plan and will provide a report that details any adverse compliance exceptions to the Executive Director ~~& CIO~~.

Pursuant to written SBA policy, the Executive Director ~~& CIO~~ will cause a regular review, documentation and formal escalation of any events that may have a material impact on the FRS Investment Plan Trust Fund. The Executive Director ~~& CIO~~ is delegated the authority and responsibility to prudently address any such events, with input from the Investment Advisory Council as necessary and appropriate, unless otherwise required in this Investment Policy Statement.

- D. The Executive Director ~~& CIO~~ shall adopt policies and procedures designed to prevent excessive member trading between investment options from negatively impacting other members.
- E. The Executive Director ~~& CIO~~ is responsible for periodically reviewing this IPS and recommending changes to the Board of Trustees when appropriate.

## VI. INVESTMENT OBJECTIVES

- A. The Investment Plan shall seek to achieve the following long-term objectives:
  - 1) Offer a diversified mix of low-cost investment options that span the risk-return spectrum and give members the opportunity to accumulate retirement benefits.
  - 2) Offer investment options that avoid excessive risk, have a prudent degree of diversification relative to broad market indices and provide a long-term rate of return, net of all expenses and fees that seek to achieve or exceed the returns on comparable market benchmark indices.
  - 3) Offer members meaningful, independent control over the assets in their account with the opportunity to:
    - a) Obtain sufficient information about the plan and investment alternatives to make informed investment decisions;
    - b) Direct contributions and account balances between approved investment options with a frequency that is appropriate in light of the market volatility of the investment options;
    - c) Direct contributions and account balances between approved investment options without the limitation of fees or charges; and
    - d) Remove accrued benefits from the plan without undue delay or penalties, subject to the contract and all applicable laws governing the operation of the Plan.

## **VII. MEMBER CONTROL AND PLAN FIDUCIARY LIABILITY**

- A. This IPS is structured to be consistent with the Legislature's intent to assign liability for members' investment losses to members and provide a safe harbor for Plan fiduciaries.
- B. In Sections 121.4501(8)(b)2. and 121.4501(15)(b), Florida law incorporates the federal law concept of participant control, established by regulations of the U.S. Department of Labor under section 404(c) of the Employee Retirement Income Security Act of 1974. The Investment Plan shall incorporate these concepts by providing Plan participants the opportunity to give investment instructions and obtain sufficient information to make informed investment decisions. The Investment Plan shall, in accordance with the 404(c) regulations and Florida law, provide members an opportunity to choose from a broad range of investment alternatives.
- C. If a member or beneficiary of the Investment Plan exercises control over the assets in his or her account, pursuant to section 404(c) regulations and all applicable laws governing the operation of the Plan, no Plan fiduciary shall be liable for any loss to a member's or beneficiary's account which results from such member's or beneficiary's exercise of control.
- D. The default investment option for FRS Investment Plan members that default into the plan or fail to make a selection of investment options shall be the FRS Retirement Date Fund (RDF), or Retirement Target Date Fund, that matches the year closest to the year each individual member reaches normal retirement age for the Florida Retirement System as defined in Section 121.021(29) Florida Statutes, which otherwise meets the requirements of a qualified default investment alternative pursuant to regulations issued by the U.S. Department of Labor. The default investment option for FRS Pension Plan DROP participants who rollover funds from their DROP account to the Investment Plan as permitted by section 121.4501(21), Florida Statutes, and fail to make a selection of investment options shall be the FRS Retirement Fund.

## **VIII. MEMBER EDUCATION AND INVESTMENT GUIDANCE**

- A. The education component of the Investment Plan shall be designed by the Board to assist employers, eligible employees, members, and beneficiaries in order to maintain compliance with section 404(c) regulations and to assist employees in their choice of defined benefit or defined contribution retirement programs. Educational services include, but are not limited to, disseminating educational materials; providing retirement planning education; explaining the differences between the defined benefit retirement plan and the defined contribution retirement plan; and offering financial planning guidance on matters such as investment diversification, investment risks, investment costs, and asset allocation.

For members of the Investment Plan, the following items must be made available to members in sufficient time to allow them an opportunity to make informed decisions regarding the management of their individual retirement account under the Plan:

- A description of all investment funds offered as an investment option under the Investment Plan including: general investment objectives, risk and return

characteristics, and type and diversification of assets, but excluding any investment instruments made available through a self-directed brokerage account.

- An explanation of how to give investment instructions and any limits or restrictions on giving instructions.
- A description of any transaction fees or expenses that are charged to the member's account in connection with purchases or sales of an investment fund.
- Investment summary fund profiles as defined at Sections 121.4501(15)(c), excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- Descriptions of the annual operating expenses for each investment alternative, such as investment management fees, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- The value of shares of all investment funds and a quarterly member statement that accounts for contributions, investment earnings, fees, penalties, or other deductions, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.
- Information concerning the past investment performance of each investment fund, net of expenses, and relative to appropriate market indices, excluding the prospectus or other information for the underlying investment instruments available through the self-directed brokerage account provided by the Plan.

B. Consistent with Sections 121.4501(8)(b)1. and 121.4501(10)(b), Florida Statutes, the education component shall provide FRS members with impartial and balanced information about the Plan and investment choices. In addition, any approved education organization shall not be an approved investment provider or be affiliated with an approved investment provider. Educational materials shall be prepared under the assumption that the employee is an unsophisticated investor and all educational materials, including those distributed by bundled providers, shall be approved by the Board prior to dissemination. Members shall have the opportunity to choose from different levels of education services, as well as a variety of delivery methods and media. All educational services offered by investment product providers shall be provided on a fee-for-service basis.

C. The Board shall contract for the provision of low- or no-cost investment guidance to members that is supplemental to educational services and that may be paid for by those receiving the guidance. Investment guidance shall consist of impartial and balanced recommendations about investment choices consistent with Rule 19-13.004, F.A.C. Investment guidance provided to a member should be individualized and provided on a regular basis. Members have the opportunity to choose from different levels of customized investment guidance services, as well as a variety of delivery methods and media.



- D. Investment guidance for Investment Plan members will provide optimized combinations of available Investment Plan investment options and any personally owned non-Investment Plan member directed tax-deferred or taxable accounts.
- E. Investment guidance for Pension Plan members will provide optimized combinations of any available Pension Plan benefit and any personally owned specific investment options across member directed tax-deferred or taxable accounts.
- F. Bundled provider(s) selected to provide investment products for Investment Plan members shall not provide any member education services aimed at influencing the choice between the defined benefit and defined contribution plans of the Florida Retirement System. This education program will only be provided by the neutral education provider hired to do so by the Board.

## **IX. ROLES OF THE INVESTMENT PLAN ADMINISTRATOR AND BUNDLED PROVIDERS**

- A. The Board will select a single private party to serve as the administrator for the Investment Plan. The Board makes the final determination as to whether any administrator shall be approved for the Plan. Administrative services such as individual and collective recordkeeping and accounting, IRC limit monitoring, enrollment, beneficiary designation and changes, disbursement of benefits, and other centralized administrative functions shall be provided by the single administrator selected by the Board. The SBA retains the right to delineate through the contract the specific administrative services to be provided by the Bundled Provider. The SBA also retains the right, consistent with Section 121.4501(8)(a)1., Florida Statutes, to enter into a contract with the Division of Retirement for certain administrative services.
- B. Bundled provider(s) selected to provide investment products to members will provide administrative services that are uniquely relevant to the bundled provider mandate. The SBA shall specify the administrative services to be provided by the single administrator and the bundled provider in the solicitation documents and contracts for services.

## **X. INVESTMENT OPTIONS AND PERFORMANCE BENCHMARKS**

- A. The authorized categories of Investment Plan investment options are segmented into tiers, with each designed to meet the varying needs of different members as shown in IPS-Table 1. The Investment Plan investment options are contained in IPS-Table 2. The default option for members that fail to make a selection of investment options shall be the Retirement Date Fund (RDF) that matches the year closest to the year each individual member reaches the normal retirement age for the Florida Retirement System as defined in Section 121.021(29) Florida Statutes. The investment options can be constructed under a multiple manager framework of two or more investment managers, however, the number of investment options shall not exceed the “Maximum Number of Options” listed in IPS-Table 2 for each category, except to the extent that:
  - 1) Multiple investment options within the same category are simultaneously offered to facilitate a transitional mapping of contributions and account balances from a terminating option;

- 2) An investment option is temporarily closed to new contributions and account balance transfers.

**IPS-Table 1: Authorized Investment Categories**

Tier	Philosophy
Tier I- Asset Allocation-Target Date Funds	Allow members to choose a diversified investment portfolio that best fits their career time horizon until anticipated retirement date. TDFs seek growth of assets in earlier years of employment and gradually shift to income oriented options at retirement. Designed for members with little investment knowledge who want a professionally managed asset allocation with little input from the member. These options will be comprised of underlying investments in the Investment Plan's Tier II and Tier III Core Options.
Tier II- Passively-Managed Core Options	Allow members who wish some control over major investment category shifts to create their own portfolios based on broad, low-cost index funds that best fit their time horizon, risk tolerance and investment goals.
Tier III- Actively –Managed Core Options	Allow members who wish more control over all key investment allocation decisions to create their own portfolios based on investment options from active managers who seek returns above a performance benchmark and that members believe best fit their time horizon, risk tolerance and investment goals.
Tier IV- Retirement Annuity Options	Allow members leaving FRS employment a means by which they can create an income stream of their accumulated assets that can last over their remaining lifetimes.
Tier V- Self Directed Brokerage Account	Allows members interested in investments outside of Tiers I, II and III the opportunity to invest in a broad array of mutual funds, stocks, US Treasuries and other investment alternatives based on their time horizon, risk tolerance, investment goals and/or preferences.

**IPS-Table 2: Authorized Investment Options Representative Performance Benchmarks, Retiree Annuities and Self Directed Brokerage Account**

Investment Option Categories	Maximum Number of Options	Representative Performance Benchmarks
<b>Tier I: Target Date Funds</b>		
A series of asset allocation funds	11	Weighted Average of each Constituent Fund's Benchmarks

structured in 5-year increments along a “glidepath” as demonstrated in IPS Chart 1 below.		
<b>Tier II: Passively Managed Core Options</b>		
Enhanced U.S. Bond Index Fund	1	Bloomberg Barclays Aggregate Bond Index
Stock Market Index Fund	1	Russell 3000 Index
Foreign Stock Index Fund	1	MSCI All Country World Index ex U.S. IMI Index

<b>Tier III: Actively-Managed Core Options</b>		
Stable Value Fund	1	Custom Stable Value Benchmark
Inflation Sensitive Fund	1	Custom Multi-Asset Benchmark
<del>Diversified Income Fund</del> <del>Core Plus Bond Fund</del>	1	<del>Custom Diversified Income Benchmark</del> <del>Bloomberg Barclays Aggregate Bond Index</del>
US Stock Fund	1	Russell 3000 Index
Foreign Stock Fund	1	MSCI All Country World Index ex US Index
Global Stock Fund	1	MSCI All Country World Index

<b>Tier IV: Retiree Annuity Options</b>		(Section 121.591(1)(c), Florida Statutes)
Immediate and Deferred Annuities	Not Applicable	Specified by the Executive Director <del>&amp; CIO</del>
<b>Tier V: Self-Directed Brokerage Account</b>	Not Applicable	Not applicable

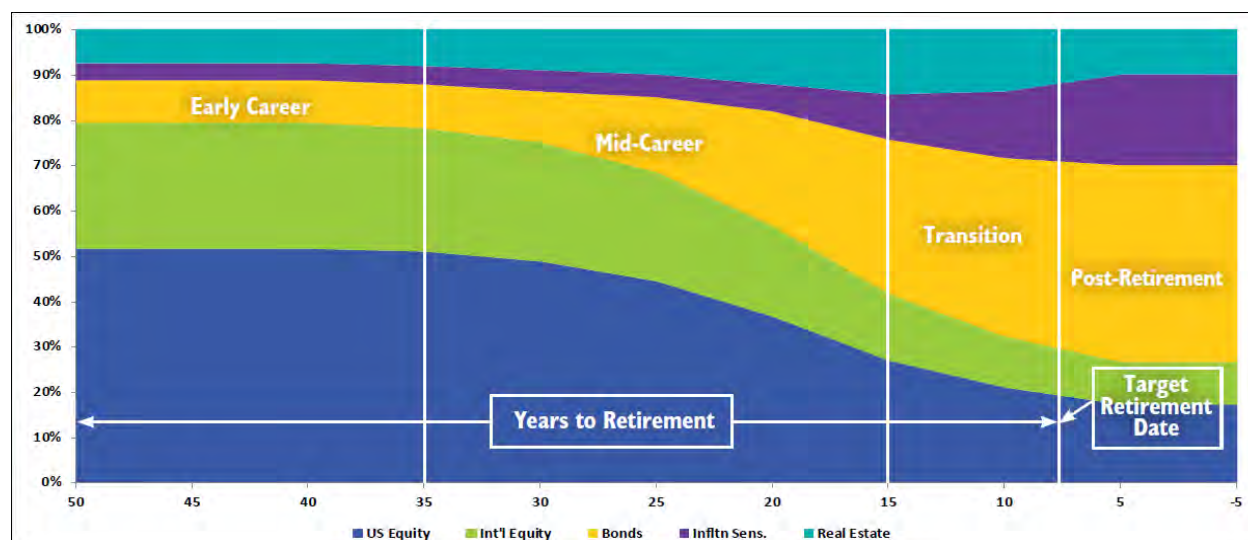
- B. Investment options and investment products (i.e., that support Investment Funds that are composed of an aggregate of one or more investment products) may be provided by investment managers or bundled providers. Pursuant to Section 121.4501(9)(a), Florida Statutes, the Board shall select one or more providers who offer multiple investment products when such an approach is determined by the Board to afford value to members otherwise not available through individual investment products. Consistent with its fiduciary responsibilities, the Board is permitted by Section 121.4501(8)(h), to develop one or more investment products for the Investment Plan.
- C. Investment options may have performance benchmarks other than the “Representative Performance Benchmarks” listed in IPS-Table 2, but any alternative performance benchmark must be identified in the investment guidelines required under Section XI of this IPS and provide substantial coverage of the financial market segment defined by the corresponding Representative Performance Benchmark.

- D. Retirement Date Funds are only available as a weighted average of Tier II and III options. The Board shall establish procedures for initiating rebalancings per approved investment guidelines.
- E. With IAC review and input, the Executive Director ~~& CIO~~ shall periodically recommend changes to the authorized investment option categories in IPS-Tables 1 and 2, as modifications are appropriate. Any recommended modifications must be justified in terms of the incremental costs and benefits provided to members.

## **XI. GENERAL INVESTMENT OPTION GUIDELINES**

- A. The Executive Director ~~& CIO~~ is responsible for developing specific investment policies and guidelines for investment options, which reflect the goals and objectives of this IPS. In doing so, he is authorized to exercise and perform all duties set forth in Section 121.4501(9), Florida Statutes, except as limited by this IPS or Board Rules. General guidelines are as follows:
  - 1) The Retirement Date Funds are diversified portfolios designed to provide members with professionally managed investment vehicles that can grow assets over their career. The funds seek favorable long-term returns through investments in the Tier II and III Options according to the “glide path” allocation levels identified in IPS-Chart 1. Asset allocations will generally be held within a Current Operating Range (COR) of plus or minus 2% of their respective allocation target, but short-term deviations may occur. Optimized asset allocations for the Retirement Date Funds shall be established using methodology consistent with the guidance rendered by the Investment Plan’s investment consultant.

**IPS-Chart 1: Target Date Investment Funds Glidepath**



2) The Stable Value Fund seeks to provide maximum current income while maintaining stability of principal. The fund will be actively managed and will primarily invest in short-term fixed income securities designed to provide principal stability and a competitive yield. The stability of principal is guaranteed through Wrap Contracts with various high quality insurance companies and banks. The competitive yield is determined quarterly via a crediting rate derived from the book value yield of the underlying securities net of fees.

3) The U.S. Bond and Diversified Income funds seek high current income consistent with capital appreciation. The funds may be passively or actively managed and will primarily invest in securities contained in the benchmark, although other fixed income instruments which fit the funds' objectives may be selectively used to generate excess return, such as real estate, non-investment grade securities or securities issued by foreign entities. The funds' sensitivity to interest rate changes will closely approximate that of the performance benchmark.

4) The U.S. Stock funds seek capital appreciation and current income. The funds may be passively or actively managed and will primarily invest in equities contained in the benchmark. Other securities which fit the funds' objectives may be selectively used to generate excess return. The funds' investment process will not have a persistent bias toward the selection of securities that are predominantly in the growth or value style categories.

5) The Foreign Stock funds seek capital appreciation and current income. The funds may be passively or actively managed and will primarily invest in equities contained in the benchmark, although other securities which fit the funds' objectives may be selectively used to generate excess return, such as equity securities issued by corporations domiciled in emerging economies.

6) The Inflation Sensitive Fund seeks long-term real returns to preserve the future purchasing power of accumulated member benefits. The fund will be actively managed and will primarily invest in a diversified array of assets that may act as a hedge against inflationary pressures including, but not limited to, U.S. Treasury's inflation-indexed securities, commodities, real estate investment trusts, commercial real estate and other securities. The fund's sensitivity to interest rate changes and inflation will closely approximate that of the performance benchmark.

7) The Global Stock fund seeks capital appreciation and current income. The fund may be passively or actively managed and will primarily invest in equities contained in the benchmark, including equities domiciled in the United States, other developed and emerging economies although other securities which fit the funds' objectives may be selectively used to generate excess returns.

8) Each investment option must:

- a) Have a prudent degree of diversification relative to its performance benchmark;
- b) Be readily transferable from one Investment Plan account to another Investment Plan investment option or to private-sector or public-sector defined contribution plan accounts and self-directed individual retirement accounts;
- c) Allow transfers of members' balances into and out of the option at least daily, subject to the excessive trading policies of the providers and/or the SBA;
- d) Have no surrender fees or deferred loads/charges;
- e) Have no fees or charges for insurance features (e.g. mortality and expense risk charges);
- f) To the extent allowed by law, notwithstanding failure to meet one or more of the IPS Section XI(8)(b),(c)-(f) requirements, an option may be authorized if: (i) it produces significant and demonstrable incremental retirement benefits relative to other comparable products in the market place and comparable Tier I, Tier II, or Tier III options; and (ii) the incremental benefits are sufficient to offset all associated fees, charges and the expected economic cost of the variance(s) with the IPS Section XI(8)(b),(c)-(f) requirements. Comparability shall be based on the option's underlying investments within the broad categories of Money Market, U.S Fixed Income, U.S. Equities and Foreign Equities.

9) The annuity option offered in Tier IV must be provided by a provider with high independent ratings for financial strength and stability. Tier IV options may include immediate annuities with combinations of some of the following features:

- a) Single premium.
- b) Life or fixed period payouts.
- c) Single or joint life (survivors with an insurable interest).
- d) Complete or partial survivor benefits.
- e) Cash refund, installment refund or period certain features.
- f) Variable or fixed payments, non-participating, or income payable features.
- g) Deferred payments.

B. The long-term performance of each actively managed investment option is expected to exceed the returns on their performance benchmark, net of all fees and charges, while avoiding large year-to-

year deviations from the returns of the performance benchmark. The long-term performance of each passively managed investment option is expected to closely approximate returns on the performance benchmark, net of all fees and charges. Investment managers are authorized to prudently use options, futures, notional principal contracts or securities lending arrangements, in accordance with the fiduciary standards of care, as contained in Section 121.4501(15)(a), Florida Statutes, investment guidelines and related policies.

## **XII. INVESTMENT MANAGER SELECTION AND MONITORING GUIDELINES**

- A. The Executive Director ~~& CIO~~ shall develop policies and guidelines for the selection, retention and termination of investment managers, bundled providers and products, and shall manage all internal and external contractual relationships in accordance with the fiduciary responsibilities of the Board, this IPS and provisions of Sections 121.4501(8)(h) and 121.4501(9)(c), Florida Statutes.

When the Executive Director ~~& CIO~~ decides to terminate an investment fund in the Investment Plan, members will be granted an opportunity to direct their assets to other Investment Plan investment fund options prior to the investment fund termination. Assets that are not directed by members will be transferred or “mapped” to the investment fund(s) that the Executive Director ~~& CIO~~ deems appropriate. The mapping factors that will be consider include, but are not limited to, alignment of investment fund type (e.g., asset class, capitalization and style) and investment strategy (e.g., objectives, market focus, and implementation tactics).

- B. In the selection of investment managers, investment products or bundled providers, consideration shall be given to their effectiveness in minimizing the direct and indirect costs of transferring the total present value of accumulated benefit obligations for existing employees that choose membership in the Investment Plan from the Pension Plan trust to the Investment Plan trust.
- C. In the selection and monitoring of products from bundled providers, each proposed product will be evaluated on a stand-alone basis, pursuant to the requirement in Section 121.4501(9)(c)9., Florida Statutes. The cost-effectiveness of the levels of non-investment services supporting the products will also be evaluated relative to their benefits.
- D. In the selection, retention and termination of bundled providers and their proposed products and services, value, as that term is used in Section 121.4501(9)(a), Florida Statutes, shall be evaluated based on the value added to the process of accumulating retirement benefits for members. This evaluation shall consider the following factors in arriving at any staff recommendation:
- 1) Additional products or services that are not otherwise available to the members within the Plan;
  - 2) The type and quality of investment products offered;
  - 3) The type and quality of non-investment services offered; and
  - 4) Other significant elements that provide value to members, consistent with the mandates of Section 121.4501, Florida Statutes.
- E. On at least an annual basis, a review will be conducted of the performance of each approved investment manager and product and related organizational factors to ensure continued compliance



with established selection, performance and termination criteria, Board policy and procedures and all contractual provisions. The performance and termination criteria for each provider and investment product will be reflected in each employment contract.

F. In addition to reviewing the performance of the Investment Plan's investment managers/options, the Executive Director ~~& CIO~~ will periodically review all costs associated with the management of the Investment Plan's investment options, including:

- 1) Expense ratios of each investment option against the appropriate peer group; and
- 2) Costs to administer the Plan, including recordkeeping, account settlement (participant balance with that of investment), allocation of assets and earnings, and (when applicable) the proper use of 12b-1 fees to offset these fees.

### **XIII. SELF-DIRECTED BROKERAGE ACCOUNT (SDBA) PROVIDER SELECTION AND MONITORING GUIDELINES**

A. The Executive Director ~~& CIO~~ shall develop policies and guidelines for the selection, retention and termination of a SDBA Provider and shall manage the contractual relationship in accordance with the fiduciary responsibilities of the Board, this IPS and provisions of Section 121.4501(9)(c), Florida Statutes.

B. The SDBA shall be offered as a service to Investment Plan members to enable members to select investments otherwise not offered in the Plan.

C. In selecting the SDBA Provider, the Executive Director ~~& CIO~~ shall consider the following:

- 1) Financial strength and stability as evidenced by the highest ratings assigned by nationally recognized rating services when comparing proposed providers that are so rated.
- 2) Reasonableness of fees compared to other providers taking into consideration the quantity and quality of services being offered.
- 3) Compliance with the Internal Revenue Code and all applicable federal and state securities laws.
- 4) The methods available to members to interact with the provider; the means by which members may access account information, direct investment of funds, transfer funds, and to receive fund prospectuses and related investment materials as mandated by state and federal regulations.
- 5) Ability to provide prompt, efficient and accurate responses to participant directions, as well as providing confirmations and quarterly account statements in a timely fashion.
- 6) Process by which assets are invested, as well as any waiting periods when the monies are transferred.



- 7) Organizational factors, including, but not limited to, financial solvency, organizational depth, and experience in providing self-directed brokerage account services to public defined contribution plans.
  - 8) The self-directed brokerage account available under the most beneficial terms available to any customer.
  - 9) The provider will agree not to sell or distribute member lists generated through services rendered to the Investment Plan.
  - 10) The provider, as well as any of its related entities, may not offer any proprietary products as investment alternatives in the self-directed brokerage account.
- D. The Executive Director ~~& CIO~~ shall regularly monitor the selected provider to ascertain whether there is continued compliance with established selection criteria, board policy and procedures, state and federal regulations, and any contractual provisions.
- E. The Executive Director ~~& CIO~~ shall ensure that the SDBA Provider will include access to investment instruments offered through the self-directed brokerage account by providing connectivity with the following:
- 1) Stocks listed on a Securities Exchange Commission (SEC) regulated national exchange.
  - 2) Exchange Traded Funds (except for leveraged Exchange Traded Funds).
  - 3) Mutual Funds not offered in the Investment Plan.
  - 4) Fixed Income products.
- F. The Executive Director ~~& CIO~~ shall ensure that the self-directed brokerage account accessibility does not include the following as investment alternatives:
- 1) Illiquid investments;
  - 2) Over the Counter Bulletin Board (OTCBB) securities;
  - 3) Pink Sheet® (PS) securities;
  - 4) Leveraged Exchange Traded Funds;
  - 5) Direct Ownership of Foreign Securities;
  - 6) Derivatives, including, but not limited to futures and options contracts on securities, market indexes, and commodities;

- 7) Buying/Trading on Margin;
- 8) Limited Partnership Interests;
- 9) Investment Plan products;
- 10) Any investment that would jeopardize the Investment Plan's tax qualified status;
- 11) Master Limited Partnerships (MLPs);
- 12) Commodity ETFs (subject to UBIT);
- 13) Private Placements.

- G. The Executive Director ~~& CIO~~ shall establish procedures with the SDBA Provider and the Investment Plan Administrator to ensure that an Investment Plan member may participate in the self-directed brokerage account, if the member:
- 1) Maintains a minimum balance of \$5,000 in the products offered under the Investment Plan;
  - 2) Makes a minimum initial transfer of funds into the self-directed brokerage account of \$1,000;
  - 3) Makes subsequent transfers of funds into the self-directed brokerage account in amounts of \$1,000 or greater;
  - 4) Pays all trading fees, commissions, administrative fees and any other expenses associated with participating in the self-directed brokerage account;
  - 5) Does not violate any trading restrictions established by the provider, the Investment Plan, or state or federal law.
- H. The Executive Director ~~& CIO~~ shall establish procedures with the SDBA Provider and the Investment Plan Administrator to ensure that employer contributions and employee contributions shall be initially deposited into member's Investment Plan account and will then be made available for transfer to the member's SDBA.
- I. The Executive Director ~~& CIO~~ shall establish procedures with the SDBA Provider and the Investment Plan Administrator that distributions will not be processed directly from member's assets in the SDBA. Assets must first be transferred to Investment Plan products. A member can request a distribution from the Investment Plan once the transfer of the assets from the SDBA to the member's Investment Plan account and all Investment Plan distribution requirements are met.

- J. The Executive Director ~~& CIO~~ shall ensure that any member participating in the SDBA will be provided, at minimum, a quarterly statement that meets Financial Industry Regulatory Authority (FINRA) requirements which details member investments in the SDBA. The statement shall include, but is not limited to, member specific accounting of the investment instruments selected by a member, the net gains and losses, and buy/sell transactions. Additionally, a confirmation of trade statement will be sent for each transaction and all fees, charges, penalties and deductions associated with each transaction are netted in the trade and reflected in the transaction confirmation.
- K. The Executive Director ~~& CIO~~ shall develop appropriate communications to members participating in the SDBA that will notify members that the Board is not responsible for managing the SDBA beyond administrative requirements as established between the Board and SDBA Provider. As such, investment alternatives available through the SDBA have not been subjected to any selection process, are not monitored by the Board, require investment expertise to prudently buy, manage and/or dispose of, and have a risk of substantial loss. The communication shall also notify members that they are responsible for any and all administrative, investment, and trading fees associated with participating in the SDBA.
- L. The Executive Director ~~& CIO~~ shall ensure that the provider will deliver a prospectus or other information for the underlying investments available through the self-directed brokerage account as provided in Section 121.4501(15)(c)1. and 2. and in compliance with Federal laws.

#### **XIV. REPORTING**

- A. The Board directs the Executive Director ~~& CIO~~ to coordinate the preparation of quarterly reports of the investment performance of the Investment Plan by the Board's independent performance evaluation consultant.
- B. The following formal periodic reports to the Board shall be the responsibility of the Executive Director: an annual investment report, an annual financial report and a monthly performance report.

#### **XV. IMPLEMENTATION SCHEDULE**

This IPS shall be effective upon approval by the Trustees.

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**Investment Policy Statement  
Local Government Surplus Funds Trust Fund (Non-Qualified)**

***I. Purpose and Scope***

The purpose of this Investment Policy Statement (“Policy”) is to set forth the investment objective, investment strategies, and authorized portfolio securities for the Local Government Surplus Funds Trust Fund (“Florida PRIME”). The Policy also describes the risks associated with an investment in Florida PRIME.

***II. Overview of Florida PRIME***

The Local Government Surplus Funds Trust Fund was created by an Act of the Florida Legislature effective October 1, 1977 (Chapter 218, Part IV, Florida Statutes). The State Board of Administration (“SBA”) is charged with the powers and duties to administer and invest Florida PRIME, in accordance with the statutory fiduciary standards of care as contained in Section 215.47(10), Florida Statutes. The SBA has contracted with Federated Investment Counseling (the “Investment Manager”) to provide investment advisory services for Florida PRIME.

Florida PRIME is governed by Chapters 215 and 218, Florida Statutes, and Chapter 19-7 of the Florida Administrative Code (collectively, “Applicable Florida Law”).

***III. Roles and Responsibilities***

The Board of Trustees of the SBA (“Trustees”) consists of the Governor, as Chairman, the Chief Financial Officer, as Treasurer, and the Attorney General, as Secretary. The Trustees will annually certify that Florida PRIME is in compliance with the requirements of Chapter 218, Florida Statutes, and that the management of Florida PRIME is in accord with best investment practices.

The Trustees delegate the administrative and investment authority to manage Florida PRIME to the Executive Director of the SBA, subject to Applicable Florida Law. The Trustees appoint an Investment Advisory Council. The Council will, at least annually, review this Policy and any proposed changes prior to its presentation to the Trustees and will undertake other duties set forth in Applicable Florida Law.

***IV. Amortized Cost Accounting***

In March 1997, the Governmental Accounting Standards Board (“GASB”) issued Statement 31, titled “Accounting and Financial Reporting for Certain Investments and for External Investment Pools.” GASB 31 applies to Florida PRIME.

GASB 31 outlines the two options for accounting and reporting for money market investment pools as either “2a-7 like” or fluctuating net asset value (“NAV”). GASB 31 describes a “2a-7 like” pool as an “external investment pool that is not registered with the Securities and Exchange Commission (“SEC”) as an investment company, but nevertheless has a policy that it will, and does, operate in a manner consistent with Rule 2a-7 under the Investment Company Act of 1940 (the “1940 Act”).” Rule 2a-7 is the rule that permits money market funds to use amortized cost to maintain a constant NAV of \$1.00 per share, provided that such funds meet certain conditions.

In December 2015, GASB issued Statement 79, “Certain External Investment Pools and Pool Participants,” which delinks the accounting treatment of external investment pools from Rule 2a-7, and establishes criteria for the use of amortized cost to value portfolio assets of an external pool. GASB 79

also made clear that rounding unit value up or down to the nearest penny to maintain a stable NAV of \$1.00 per share for issuances and redemptions of units is an operational decision for an external investment pool, rather than an accounting matter. GASB 79 also specifies, however, that seeking to maintain a stable price of \$1.00 per share is one of the criteria that an external investment pool must meet as a condition to valuing all portfolio assets at amortized cost for financial reporting purposes.

Florida PRIME will seek to operate in a manner consistent with the criteria and requirements in GASB 79, including diversification, credit quality and maturity conditions. Accordingly, it is thereby permitted to value portfolio assets at amortized cost method.

#### ***V. Investment Objective***

The primary investment objectives for Florida PRIME, in priority order, are safety, liquidity, and competitive returns with minimization of risks. Investment performance of Florida PRIME will be evaluated on a monthly basis against the Standard & Poor's U.S. AAA & AA Rated GIP All 30 Day Net Yield Index. While there is no assurance that Florida PRIME will achieve its investment objectives, it endeavors to do so by following the investment strategies described in this Policy.

#### ***VI. Investment Strategies & Specific Limitations***

The Investment Manager will invest Florida PRIME's assets in short-term, high-quality fixed income securities. All Florida PRIME assets (100 percent) will be U.S. dollar-denominated. To be considered high-quality, a security must be rated in the highest short-term rating category by one or more nationally recognized statistical rating organizations ("NRSROs"), or be deemed to be of comparable quality thereto by the Investment Manager, subject to Section 215.47(1)(j), Florida Statutes. The Investment Manager also may enter into special transactions for Florida PRIME, like repurchase agreements. Each repurchase agreement counterparty must have an explicit issuer or counterparty credit rating in the highest short-term rating category from Standard & Poor's. Certain of the fixed income securities in which Florida PRIME invests pay interest at a rate that is periodically adjusted ("Adjustable Rate Securities").

The Investment Manager will manage credit risk by purchasing only high quality securities. The Investment Manager will perform a credit analysis to develop a database of issuers and securities that meet the Investment Manager's standard for minimal credit risk. The Investment Manager monitors the credit risks of all Florida PRIME's portfolio securities on an ongoing basis by reviewing periodic financial data, issuer news and developments, and ratings of certain NRSROs. The Investment Manager will utilize a "new products" or similar committee to review and approve new security structures prior to an investment of Florida PRIME's assets in such securities. The Investment Manager will periodically consider and follow best practices in connection with minimal credit risk determinations (e.g., such as those described in Appendix I of the Investment Company Institute's 2009, *Report of the Money Market Working Group*).

The Investment Manager will manage interest rate risk by purchasing only short-term fixed income securities. The Investment Manager will target a dollar-weighted average maturity range for Florida PRIME based on its interest rate outlook. The Investment Manager will formulate its interest rate outlook by analyzing a variety of factors, such as current and expected U.S. economic growth; current and expected interest rates and inflation; and the Federal Reserve Board's monetary policy. The Investment Manager will generally shorten Florida PRIME's dollar-weighted average maturity when it expects interest rates to rise and extend Florida PRIME's dollar-weighted average maturity when it expects interest rates to fall. In order to meet the investment grade ratings criteria of Standard & Poor's for a pool, the remaining maturity of securities purchased by the Investment Manager shall not exceed 762 days for government floating rate notes/variable rate notes and will not exceed 397 days for all other securities; provided, however, that if not required by the ratings criteria of the applicable NRSRO that is providing an investment grade rating to the pool and to the extent consistent with the portfolio criteria of GASB 79,

longer term floating rate/variable rate notes that are U.S. government securities may be owned by Florida PRIME.

The Investment Manager will exercise reasonable care to maintain (i) a dollar weighted average maturity (“DWAM”) of 60 days or less; and (ii) a maximum weighted average life (WAL) within the range of 90-120 days, depending on the levels of exposure and ratings of certain Adjustable Rate Securities. The maximum WAL will depend upon the percentage exposures to government and non-government Adjustable Rate Securities, with sovereign (government) Adjustable Rate Securities rated AA- and higher allowed a 120-day limit, and non-sovereign (corporate) Adjustable Rate Securities (and sovereign Adjustable Rate Securities rated below AA-) restricted to a 90-day limit. The portfolio’s maximum WAL will be based on a weighted average of the percentage exposures to each type of floating-rate instrument.

For purposes of calculating DWAM, the maturity of an Adjustable Rate Security generally will be the period remaining until its next interest rate adjustment. For purposes of calculating WAL, the maturity of an Adjustable Rate Security will be its stated final maturity, without regard to interest rate adjustments; accordingly, the WAL limitation could serve to restrict Florida PRIME’s ability to invest in Adjustable Rate Securities.

The Investment Manager will exercise reasonable care to limit exposure to not more than 25% of Florida PRIME’s assets in a single industry sector, with the exception that the Investment Manager may invest more than 25% in the financial services industry sector, which includes banks, broker-dealers, and finance companies. This higher limit is in recognition of the large outstanding value of money fund instruments issued by financial services firms. Government securities are not considered to be an industry.

The Investment Manager will exercise reasonable care to not acquire a security, other than (i) a Daily Liquid Asset, if immediately after the acquisition Florida PRIME would have invested less than 10% of its total assets in Daily Liquid Assets; (ii) a Weekly Liquid Asset, if immediately after the acquisition Florida PRIME would have invested less than 30% of its total assets in Weekly Liquid Assets. Daily Liquid Assets include cash, direct obligations of the U.S. government and securities that convert to cash in one business day. Weekly Liquid Assets include cash, direct obligations of the U.S. government, certain government securities with remaining maturities of 60 business days or less and securities that convert to cash in five business days.

Florida PRIME shall seek to hold liquid assets sufficient to meet reasonably foreseeable redemptions, based upon knowledge of the expected cash needs of participants.

The Investment Manager will exercise reasonable care to not acquire securities that cannot be sold or disposed of in the ordinary course of business within five business days at approximately the value ascribed to them by Florida PRIME if, immediately after the acquisition, Florida PRIME would have invested more than 5% of its total assets in such securities.

In buying and selling portfolio securities for Florida PRIME, the Investment Manager will comply with (i) the diversification, maturity and credit quality criteria in GASB 79, (ii) the requirements imposed by any NRSRO that rates Florida PRIME to ensure that it maintains a AAAM rating (or the equivalent) and (iii) the investment limitations imposed by Section 215.47, Florida Statutes except to the extent, as permitted by Section 215.44(3), the trust instrument of Florida PRIME and this investment policy statement specifically authorize investments in addition to those authorized by Section 215.47.

The Investment Manager generally will comply with the following diversification limitations that are additional to those set forth in GASB 79. First, at least 50% of Florida PRIME assets will be invested in securities rated “A-1+” or those deemed to be of comparable credit quality thereto by the Investment Manager (i.e., so long as such deeming is consistent with the requirements of the NRSRO’s AAAM (or equivalent) rating criteria), subject to Section 215.47(1)(j), Florida Statutes. The Investment Manager will

document each instance in which a security is deemed to be of comparable credit quality and its basis for such a determination. Second, exposure to any single non-governmental issuer (other than a money market mutual fund) will not exceed 5% and exposure to any single money market mutual fund will not exceed 10% of Florida PRIME assets.

### ***VII. Portfolio Securities and Special Transactions***

The Investment Manager will purchase only fixed income securities for Florida PRIME, and may engage in special transactions, for any purpose that is consistent with Florida PRIME's investment objective.

Fixed income securities are securities that pay interest, dividends or distributions at a specified rate. The rate may be a fixed percentage of the principal or adjusted periodically. In addition, the issuer of a short-term fixed income security must repay the principal amount of the security, normally within a specified time. The fixed income securities in which Florida PRIME may invest include corporate debt securities, bank instruments, asset backed securities, U.S. Treasury securities, U.S. government agency securities, insurance contracts, municipal securities, foreign securities, mortgage backed securities, and shares of money market mutual funds. Florida PRIME is also permitted to buy such fixed income securities that require Florida PRIME to be a qualified institutional buyer as long as the securities held by Florida PRIME are in excess of \$100,000,000.

Special transactions are transactions into which Florida PRIME may enter, including, but not limited to, repurchase agreements and delayed delivery transactions.

For a more detailed description of Florida PRIME's portfolio securities and special transactions, please see "Additional Information Regarding Florida PRIME's Principal Securities" at Appendix A.

### ***VIII. Risks Associated with Florida PRIME***

An investment in Florida PRIME is subject to certain risks. Any investor in Florida PRIME should specifically consider, among other things, the following principal risks before making a decision to purchase shares of Florida PRIME.

#### ***Risk that Florida PRIME will not Maintain a Stable Net Asset Value***

Although the Investment Manager attempts to manage Florida PRIME such that it maintains a stable NAV of \$1.00 per share, there is no guarantee that it will be able to do so. Florida PRIME is not registered under the 1940 Act or regulated by the SEC.

#### ***Interest Rate Risks***

The prices of the fixed income securities in which Florida PRIME will invest rise and fall in response to changes in the interest rates paid by similar securities. Generally, when interest rates rise, prices of fixed income securities fall. However, market factors, such as demand for particular fixed income securities, may cause the price of certain fixed income securities to fall while the price of other securities rise or remain unchanged. Interest rate changes have a greater effect on the price of fixed income securities with longer maturities.

#### ***Credit Risks***

Credit risk is the possibility that an issuer of a fixed income security held by Florida PRIME will default on the security by failing to pay interest or principal when due. If an issuer defaults, Florida PRIME will lose money.



### *Liquidity Risks*

Trading opportunities are more limited for fixed income securities that are not widely held. These features make it more difficult to sell or buy securities at a favorable price or time. Consequently, Florida PRIME may have to accept a lower price to sell a security, sell other securities to raise cash or give up an investment opportunity, any of which could have a negative effect on Florida PRIME's performance.

### *Concentration Risks*

A substantial part of Florida PRIME may be comprised of securities issued by companies in the financial services industry, companies with similar characteristics, or securities credit enhanced by banks or companies with similar characteristics. As a result, Florida PRIME may be more susceptible to any economic, business, or political risks or other developments that generally affect finance companies. Developments affecting companies in the financial services industry or companies with similar characteristics might include changes in interest rates, changes in the economic cycle affecting credit losses and regulatory changes.

### *Risks of Foreign Investing*

Foreign securities pose additional risks because foreign economic or political conditions may be less favorable than those of the United States. Securities in foreign markets also may be subject to taxation policies that reduce returns for U.S. investors.

### *Call Risks*

If a fixed income security is called, Florida PRIME may have to reinvest the proceeds in other fixed income securities with lower interest rates, higher credit risks or other less favorable characteristics.

### *Prepayment Risks*

Unlike traditional fixed income securities, which pay a fixed rate of interest until maturity (when the entire principal amount is due), payments on asset-backed securities include both interest and a partial payment of principal. Partial payment of principal may be comprised of scheduled principal payments as well as unscheduled payments from voluntary prepayment, refinancing, or foreclosure of the underlying loans. If Florida PRIME receives unscheduled prepayments, it may have to reinvest the proceeds in other fixed income securities with lower interest rates, higher credit risks or other less favorable characteristics.

### *Risks Associated with Amortized Cost Method of Valuation*

Florida PRIME will use the amortized cost method to determine the value of its portfolio securities. Under this method, portfolio securities are valued at the acquisition cost as adjusted for amortization of premium or accumulation of discount rather than at current market value. Accordingly, neither the amount of daily income nor the NAV is affected by any unrealized appreciation or depreciation of the portfolio. In periods of declining interest rates, the indicated daily yield on shares computed by dividing the annualized daily income on Florida PRIME's portfolio by the NAV, as computed above, may tend to be higher than a similar computation made by using a method of valuation based on market prices and estimates. In periods of rising interest rates, the opposite may be true.

### *Changing Distribution Level Risk*

There is no guarantee that Florida PRIME will provide a certain level of income or that any such income will exceed the rate of inflation. Further, Florida PRIME's yield will vary. A low interest rate environment may prevent Florida PRIME from providing a positive yield or paying expenses out of current income.

Throughout this section, it shall be understood that actions described as being taken by Florida PRIME refer to actions taken by the Investment Manager on behalf of Florida PRIME.

For additional information regarding Florida PRIME's principal securities and associated risks, please see Appendix A.

### ***IX. Controls and Escalation Procedures***

Section 218.409(2), Florida Statutes requires this Policy to document a system of internal controls designed to prevent the loss of public funds arising from fraud, employee error, misrepresentation by third parties, unanticipated changes in financial markets, or imprudent actions by employees and officers of the board or a professional money management firm. The controls include formal escalation reporting guidelines for all employees to address material impacts on Florida PRIME that require reporting and action.

The SBA has engaged BNY Mellon ("Custodian") to provide asset safekeeping, custody, fund accounting and performance measurement services to Florida PRIME. The Custodian will mark to market the portfolio holdings of Florida PRIME on a daily basis and will daily communicate both amortized cost price and mark to market price, so that the SBA and the Investment Manager can monitor the deviations between the amortized cost price and market price. By contractual agreement, the Investment Manager will reconcile accounting and performance measurement reports with the Custodian on at least a monthly basis, under the supervision of the SBA.

The NRSRO that rates Florida PRIME will perform regular independent surveillance of Florida PRIME. The SBA and an independent investment consultant will regularly monitor the Investment Manager with respect to performance and organizational factors according to SBA manager monitoring policies.

The SBA and third parties used to materially implement Florida PRIME will maintain internal control, fraud and ethics policies and procedures designed to prevent the loss of public funds.

The Executive Director will develop policies and procedures to:

- Identify, monitor and control/mitigate key investment and operational risks.
- Maintain an appropriate and effective risk management and compliance program that identifies, evaluates and manages risks within business units and at the enterprise level.
- Maintain an appropriate and effective control environment for SBA investment and operational responsibilities.
- Approve risk allocations and limits, including total fund and asset class risk budgets.

The Executive Director will appoint a Chief Risk and Compliance Officer, whose selection, compensation and termination will be affirmed by the Board, to assist in the execution of the responsibilities enumerated in the preceding list. For day-to-day executive and administrative purposes, the Chief Risk and Compliance Officer will proactively work with the Executive Director and designees to ensure that issues are promptly and thoroughly addressed by management. On at least a quarterly basis, the Chief Risk and Compliance Officer will provide reports to the Investment Advisory Council, Audit Committee and Board, and is authorized to directly access these bodies at any time as appropriate to ensure the integrity and effectiveness of risk management and compliance functions.

Pursuant to written SBA policy, the Executive Director will organize an Investment Oversight Group to regularly review, document and formally escalate compliance exceptions and events that may have a material impact on Florida PRIME. The Investment Oversight Group will meet as necessary based on the occurrence and resolution of compliance exceptions or upon the occurrence of a material event. Minutes of any meeting held by the Investment Oversight Group and a listing of meeting participants shall be timely posted on the Florida PRIME website.

The SBA and the Investment Manager have an affirmative duty to immediately disclose any material impact on Florida PRIME to the participants, including, but not limited to:

1. When the deviation between the market value and amortized cost of Florida PRIME exceeds 0.25%, according to pricing information provided by the Custodian, the Investment Manager will establish a formal action plan. The Investment Oversight Group will review the formal action plan and prepare a recommendation for the Executive Director's consideration.
2. When the deviation between the market value and amortized cost of Florida PRIME exceeds 0.50%, according to pricing information provided by the Custodian, the Executive Director will promptly consider what action, if any, will be initiated. Where the Executive Director believes the extent of any deviation from Florida PRIME's amortized cost price per share may result in material dilution or other unfair results to investors or existing shareholders, he will cause Florida PRIME to take such action as he deems appropriate to eliminate or reduce to the extent reasonably practicable such dilution or unfair results.
3. The Investment Manager will perform daily compliance monitoring to ensure that investment practices comply with the requirements of this Policy, according to documented compliance procedures. The Investment Manager will provide regular compliance reports and will communicate compliance exceptions within 24 hours of identification to the Investment Oversight Group. Additionally, the Investment Oversight Group will periodically conduct independent compliance reviews.
4. In the event that a security receives a credit rating downgrade and ceases to be in the highest rating category, or the Investment Manager determines that the security is no longer of comparable quality to the highest short-term rating category (in either case, a "Downgrade"), the Investment Manager will reassess whether the security continues to present minimal credit risk and will cause Florida PRIME to take any actions determined by the Investment Manager to be in the best interest of Florida PRIME; provided however, that the Investment Manager will not be required to make such reassessments if Florida PRIME disposes of the security (or the security matures) within five business days of the Downgrade.
5. In the event that a security no longer meets the criteria for purchase due to default, event of insolvency, a determination that the security no longer presents minimal credit risks, or other material event ("Affected Security"), the Investment Manager must dispose of the security as soon as practical, consistent with achieving an orderly disposition of the security, by sale, exercise of a demand feature or otherwise, and the requirements of GASB 79. An Affected Security may be held only if the Executive Director has determined, based upon a recommendation from the Investment Manager and the Investment Oversight Group, that it would not be in the best interest of Florida PRIME to dispose of the security taking into account market conditions that may affect an orderly disposition.
6. The Investment Manager will monthly stress test Florida PRIME and at least quarterly report the results of the stress tests to the Investment Oversight Group. Stress tests must be conducted for at least the following events, or combinations of events (i) a change in short-term interest rates; (ii) an increase in net shareholder redemptions; (iii) downgrades or defaults; and (iv)

changes between a benchmark overnight interest rate and the interest rates on securities held by Florida PRIME.

The Investment Manager will at least annually provide the Investment Oversight Group with: (i) their documented compliance procedures; (ii) an assessment of Florida PRIME's ability to withstand events reasonably likely to occur in the coming year and (iii) their list of NRSROs utilized as a component of the credit risk monitoring process.

The Executive Director's delegated authority as described in this section is intended to provide him with sufficient authority and operating flexibility to make professional investment decisions in response to changing market and economic conditions. Nonetheless, the Trustees will at least monthly review and approve management summaries of material impacts on Florida PRIME, any actions or escalations taken thereon, and carry out such duties and make such determinations as are otherwise necessary under applicable law, regulation or rule.

Pursuant to Florida law, the Auditor General will conduct an annual financial audit of Florida PRIME, which will include testing for compliance with this Policy.

#### ***X. Deposits and Withdrawals***

Investors should refer to the separate Florida PRIME Operating Procedures for detailed descriptions regarding how to make deposits in and withdrawals from Florida PRIME, including (1) any fees and limitations that may be imposed with respect thereto; and (2) reports provided to participants.

#### ***XI. Management Reporting***

The Executive Director will be responsible for providing the formal periodic reports to the Trustees, legislative committees and other entities:

1. An annual report on the SBA and its investment portfolios, including that of Florida PRIME.
2. A monthly report on performance and investment actions taken.
3. Special reports pursuant to Chapter 218, Florida Statutes.

**Appendix A**  
**Additional Information Regarding Florida PRIME's Principal Securities**

Throughout this appendix it shall be understood that actions described as being taken by Florida PRIME refer to actions taken by the Investment Manager on behalf of Florida PRIME.

**FIXED INCOME SECURITIES**

**Corporate Debt Securities**

Corporate debt securities are fixed income securities issued by businesses. Notes, bonds, debentures and commercial paper are the most prevalent types of corporate debt securities. Florida PRIME also may purchase interests in bank loans to companies.

**COMMERCIAL PAPER**

Commercial paper is an issuer's obligation with a maturity of generally less than 270 days. Companies typically issue commercial paper to pay for current expenditures. Most issuers constantly reissue their commercial paper and use the proceeds (or bank loans) to repay maturing paper. If the issuer cannot continue to obtain liquidity in this fashion, its commercial paper may default.

**DEMAND INSTRUMENTS**

Demand instruments are corporate debt securities that the issuer must repay upon demand. Other demand instruments require a third party, such as a dealer or bank, to repurchase the security for its face value upon demand. Florida PRIME treats demand instruments as short-term securities, even though their stated maturity may extend beyond one year.

**Bank Instruments**

Bank instruments are unsecured interest bearing deposits with banks. Bank instruments include, but are not limited to, bank accounts, time deposits, certificates of deposit and banker's acceptances. Yankee instruments are denominated in U.S. dollars and issued by U.S. branches of foreign banks. Eurodollar instruments are denominated in U.S. dollars and issued by non-U.S. branches of U.S. or foreign banks.

Florida PRIME will not invest in instruments of domestic and foreign banks and savings and loans unless they have capital, surplus, and undivided profits of over \$100,000,000, or if the principal amount of the instrument is insured by the Bank Insurance Fund or the Savings Association Insurance Fund which are administered by the Federal Deposit Insurance Corporation. These instruments may include Eurodollar Certificates of Deposit, Yankee Certificates of Deposit, and Euro-dollar Time Deposits.

Florida PRIME shall further limit its investments in bank instruments consistent with the requirements of GASB 79.

**Asset Backed Securities**

Asset backed securities are payable from pools of obligations, most of which involve consumer or commercial debts. However, almost any type of fixed income assets (including other fixed income securities) may be used to create an asset backed security. Asset backed securities may take the form of commercial paper, notes or pass-through certificates.

## **Government Securities**

Government security means any security issued or guaranteed as to principal or interest by the United States, or by a person controlled or supervised by and acting as an instrumentality of the Government of the United States pursuant to authority granted by the Congress of the United States; or any certificate of deposit for any of the foregoing.

### **U.S. Treasury Securities**

U.S. Treasury securities are direct obligations of the federal government of the United States. U.S. Treasury securities are generally regarded as having the lowest credit risks.

### **Agency Securities**

Agency securities are issued or guaranteed by a federal agency or other government sponsored entity (GSE) acting under federal authority. Some GSE securities are supported by the full faith and credit of the United States. These include securities issued by the Government National Mortgage Association, Small Business Administration, Farm Credit System Financial Assistance Corporation, Farmer's Home Administration, Federal Financing Bank, General Services Administration, Department of Housing and Urban Development, Export-Import Bank, Overseas Private Investment Corporation, and Washington Metropolitan Area Transit Authority.

Other GSE securities receive support through federal subsidies, loans or other benefits. For example, the U.S. Treasury is authorized to purchase specified amounts of securities issued by (or otherwise make funds available to) the Federal Home Loan Bank System, Federal Home Loan Mortgage Corporation, Federal National Mortgage Association, Student Loan Marketing Association, and Tennessee Valley Authority in support of such obligations.

A few GSE securities have no explicit financial support, but are regarded as having implied support because the federal government sponsors their activities. These include securities issued by the Farm Credit System, Financing Corporation, and Resolution Funding Corporation.

Investors regard agency securities as having low credit risks, but not as low as Treasury securities. Florida PRIME treats mortgage-backed securities guaranteed by a GSE as if issued or guaranteed by a federal agency. Although such a guarantee protects against credit risks, it does not reduce market risks.

## **Insurance Contracts**

Insurance contracts include guaranteed investment contracts, funding agreements and annuities. Florida PRIME treats these contracts as fixed income securities.

## **Municipal Securities**

Municipal securities are issued by states, counties, cities and other political subdivisions and authorities.

## **Foreign Securities**

Foreign securities are U.S. dollar-denominated securities of issuers based outside the United States. Florida PRIME considers an issuer to be based outside the United States if:

- it is organized under the laws of, or has a principal office located in, another country;
- the principal trading market for its securities is in another country; or

- it (or its subsidiaries) derived in its most current fiscal year at least 50% of its total assets, capitalization, gross revenue or profit from goods produced, services performed or sales made in another country.

### **Mortgage Backed Securities**

Mortgage backed securities represent interests in pools of mortgages. The mortgages that comprise a pool normally have similar interest rates, maturities and other terms. Mortgages may have fixed or adjustable interest rates. Interests in pools of adjustable rate mortgages are known as ARMs.

### **Zero Coupon Securities**

Certain of the fixed income securities in which Florida PRIME invests are zero coupon securities. Zero coupon securities do not pay interest or principal until final maturity, unlike debt securities that provide periodic payments of interest (referred to as a "coupon payment"). Investors buy zero coupon securities at a price below the amount payable at maturity. The difference between the purchase price and the amount paid at maturity represents interest on the zero coupon security. Investors must wait until maturity to receive interest and principal, which increases the interest rate and credit risks of a zero coupon security.

### **Callable Securities**

Certain of the fixed income securities in which Florida PRIME invests are callable at the option of the issuer. Callable securities are subject to reinvestment risks.

### **144A Securities**

The SBA has determined that Florida PRIME constitutes (i) an "accredited investor" as defined in Rule 501(a)(7) promulgated under the Securities Act of 1933, as amended (the "Securities Act"), as long as Florida PRIME has total assets in excess of \$5,000,000, (ii) a "qualified purchaser" as defined in Section 2(a)(51)(A)(iv) of the 1940 Act, as long as Florida PRIME in the aggregate owns and invests on a discretionary basis not less than \$25,000,000 in investments, and (iii) a "qualified institutional buyer" as defined in Rule 144(a)(1) promulgated under the Securities Act, as long as Florida PRIME in the aggregate owns and invests on a discretionary basis at least \$100,000,000 in securities.

### **Money Market Mutual Funds**

Florida PRIME may invest in shares of registered investment companies that are money market mutual funds, including those that are affiliated with the Investment Manager, as an efficient means of implementing its investment strategies and/or managing its uninvested cash. These other money market mutual funds are managed independently of Florida PRIME and incur additional fees and/or expenses that would, therefore, be borne indirectly by Florida PRIME in connection with such investment. However, the Investment Manager believes that the benefits and efficiencies of this approach should outweigh the potential additional fees and/or expenses. The Investment Manager must obtain prior written consent of the SBA to invest Florida PRIME in money market mutual funds that are "affiliated persons" of the Investment Manager.

### **SPECIAL TRANSACTIONS**

The Investment Manager on behalf of Florida PRIME may engage in the following special transactions.



### **Repurchase Agreements**

A repurchase agreement is a transaction in which Florida PRIME buys a security from a dealer or bank and agrees to sell the security back at a mutually agreed-upon time and price. The repurchase price exceeds the sale price, reflecting Florida PRIME's return on the transaction. This return is unrelated to the interest rate on the underlying security. Florida PRIME will enter into repurchase agreements only with banks and other recognized financial institutions, such as securities dealers, deemed creditworthy by the Investment Manager. The securities that are subject to the repurchase transactions are limited to securities in which Florida PRIME would be permitted to invest, except that such securities may have a maturity longer than would otherwise be permitted for Florida PRIME to own.

Florida PRIME's custodian or subcustodian will take possession of the securities subject to repurchase agreements. The Investment Manager or subcustodian will monitor the value of the underlying security each day to ensure that the value of the security always equals or exceeds the repurchase price.

Repurchase agreements are subject to credit risks.

### **Delayed Delivery Transactions**

Delayed delivery transactions, including when-issued transactions, are arrangements in which Florida PRIME buys securities for a set price, with payment and delivery of the securities scheduled for a future time. During the period between purchase and settlement, no payment is made by Florida PRIME to the issuer and no interest accrues to Florida PRIME. Florida PRIME records the transaction when it agrees to buy the securities and reflects their value in determining the price of its units. Settlement dates may not be more than seven business days after entering into these transactions; nonetheless, the market values of the securities bought may vary from the purchase prices. Therefore, delayed delivery transactions create interest rate risks for Florida PRIME. Delayed delivery transactions also involve credit risks in the event of a counterparty default.

### **Asset Coverage**

In order to secure its obligations in connection with special transactions, Florida PRIME will either own the underlying assets, enter into an offsetting transaction or set aside readily marketable securities with a value that equals or exceeds Florida PRIME's obligations. Unless Florida PRIME has other readily marketable assets to set aside, it cannot trade assets used to secure such obligations without terminating a special transaction. This may cause Florida PRIME to miss favorable trading opportunities or to realize losses on special transactions.





# State Board of Administration

Proposed Budget

2024/25

June 12, 2024

# State Board of Administration Proposed Budget FY2024-25

**SBA Operations  
FRS Investment Plan  
Florida Hurricane Catastrophe Fund**

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**Division of Bond Finance  
Florida Prepaid College Board**

**June 12, 2024**

# State Board of Administration Proposed Budget FY2024-25

## **SBA – Introduction**

- Constitutionally-created entity that provides investment management and trust services
  - Over \$257 billion total assets under management
  - Largest mandate is the \$197 billion Florida Retirement System Trust Fund
  - Administers the FRS Investment Plan and the Florida Hurricane Catastrophe Fund (FHCF)
- Division of Bond Finance and Florida Prepaid College Board are administratively housed, but report to separate boards
- Operating Budget
  - Must be annually approved by the Trustees
  - SBA, FRS Investment Plan, Florida Hurricane Catastrophe Fund, Division of Bond Finance and Florida Prepaid College Board are presented separately herein

# State Board of Administration

## Proposed Budget FY2024-25

### Summary of SBA-Administered Budgets

Budget Entity	Proposed Budget	% Increase
SBA Operating	\$75,632,865	9.3%
FRS Investment Plan	\$33,450,827	4.2%
FHCF	\$12,378,917	1.7%
Division of Bond Finance	\$6,322,285	2.9%
Florida Prepaid College Board	\$60,413,239	4.4%

SBA Operating  
Proposed FY2024-25 Budget  
June 12, 2024

# SBA Operating

## Proposed Budget Detail by Line Item

Description	9 New FTE's		
	Fiscal Year 2023-2024	Fiscal Year 2024-2025	% Change
<b>FTE</b>	<b>226.75</b>	<b>235.75</b>	
<b>Salary &amp; Benefits</b>	<b>\$45,274,617</b>	<b>\$49,812,902</b>	<b>10.0%</b>
<b>Salary Subtotal</b>	<b>\$32,837,598</b>	<b>\$36,221,298</b>	<b>10.3%</b>
Salaries	25,451,598	29,137,598	
New Positions/Salary Adj.	784,000	1,126,700	
Recruitment & Retention Rate	2,902,000	1,982,000	
Leave Liability Payments & Incentive Reserve	3,600,000	3,850,000	
Moving Expense Stipend	100,000	125,000	
<b>Benefit Subtotal</b>	<b>\$12,437,018</b>	<b>\$13,591,604</b>	<b>9.3%</b>
Social Security	2,355,745	2,593,246	
Retirement	5,031,078	5,732,004	
Health Insurance	4,700,886	4,880,367	
Life Insurance	11,074	11,461	
Disability Insurance	11,655	12,899	
Dental Insurance	326,580	361,627	
<b>Other Personal/Contractual Svcs</b>	<b>\$18,244,208</b>	<b>\$19,927,536</b>	<b>9.2%</b>
Temporary Employment	153,560	130,560	
Other Contractual Services	18,090,648	19,796,976	
<b>Expense</b>	<b>\$5,400,091</b>	<b>\$5,543,286</b>	<b>2.7%</b>
Repairs & Maintenance	897,369	546,825	
Rental of Building/Equipment	1,785,180	1,908,276	
Travel	1,141,426	1,279,821	
Training	235,386	276,493	
SBA Group Training/Employee Reimburse	252,970	309,290	
Communications	271,500	249,448	
Freight & Postage	45,000	60,000	
Insurance & Surety Bonds	100,000	160,000	
Ofc Materials/Supplies/Equipment	226,184	222,033	
Other Charges & Obligations	412,676	502,300	
Printing	22,400	18,800	
Unemployment Compensation	10,000	10,000	
<b>Other Capital Outlay</b>	<b>\$250,850</b>	<b>\$349,141</b>	<b>39.2%</b>
Furniture & Equipment	250,850	349,141	
<b>TOTALS</b>	<b>\$69,169,766</b>	<b>\$75,632,865</b>	<b>9.3%</b>

### NOTES:

- Total budget increase of 9.3% comprised of 4.9% salaries and benefits, 1.6% for nine (9) new FTEs, and 2.8% operating costs.
- Salaries – \$3.4 million (10.3%) increase; Salary budget includes \$1.46 million (5.0%) Recruitment & Retention rate and \$524 thousand (1.8%) Other Adjustments to mitigate human capital risk.
- Benefits – \$1.2 million (9.3%) increase primarily due to the increases in retirement contribution rates.
- Other Contractual Services – \$1.7 million (9.2%) increase due to IT contract services/ licensing costs and implementation of strategic initiatives.
- Expense – \$143 thousand (2.7%) increase includes rental rate increases along with cost adjustments for insurance, travel/training and investment research services.
- Other Capital Outlay – \$98 thousand (39.2%) increase due primarily to a Fiscal Year 2024-25 office space expansion.

\*The SBA is authorized to spend up to an additional \$500,000 through the end of Fiscal Year 2024-25, to accommodate expansion, if additional space becomes available within the Hermitage Centre.

FRS Investment Plan  
Proposed FY2024-25 Budget  
June 12, 2024

# FRS Investment Plan

## Proposed Budget Detail by Line Item

Description	Fiscal Year 2023-2024	Fiscal Year 2024-2025	% Change
<b>FTE</b>	<b>8</b>	<b>8</b>	
<b>Salary &amp; Benefits</b>	<b>\$1,790,591</b>	<b>\$1,877,371</b>	<b>4.8%</b>
<b>Salary Subtotal</b>	<b>\$1,238,973</b>	<b>\$1,367,973</b>	<b>10.4%</b>
Salaries	1,029,973	1,151,973	
New Positions/Salary Adj.	—	—	
Recruitment & Retention Rate	59,000	66,000	
Leave Liability Payments & Incentive Reserve	150,000	150,000	
<b>Benefit Subtotal</b>	<b>\$488,618</b>	<b>\$509,398</b>	<b>4.3%</b>
Social Security	99,116	103,004	
Retirement	207,935	224,101	
Health Insurance	169,000	169,000	
Life Insurance	387	387	
Disability Insurance	521	547	
Dental Insurance	11,660	12,359	
<b>Other Personal/Contractual Svcs</b>	<b>\$25,098,493</b>	<b>\$26,033,630</b>	<b>3.7%</b>
Temporary Employment	20,000	20,000	
Other Contractual Services	24,528,493	25,447,130	
SBA Administrative Fee	550,000	566,500	
<b>Expense</b>	<b>\$126,494</b>	<b>\$122,682</b>	<b>(3.0)%</b>
Repairs & Maintenance	2,000	2,000	
Rental of Building/Equipment	44,594	45,932	
Travel	40,050	35,200	
Agency Directed Training	4,800	4,500	
Insurance & Surety Bonds	1,250	1,250	
Ofc Materials/Supplies/Equipment	6,500	6,500	
Other Charges & Obligations	6,300	6,300	
Printing	21,000	21,000	
<b>Other Capital Outlay</b>	<b>\$8,500</b>	<b>\$8,500</b>	<b>0.0%</b>
Furniture & Equipment	8,500	8,500	
<b>Total Approved Operating Budget</b>	<b>\$27,024,077</b>	<b>\$28,042,183</b>	<b>3.8%</b>
<b>Projected Spending from Forfeiture Account*</b>	<b>5,067,650</b>	<b>5,408,644</b>	<b>6.7%</b>
<b>TOTALS</b>	<b>\$32,091,728</b>	<b>\$33,450,827</b>	<b>4.2%</b>

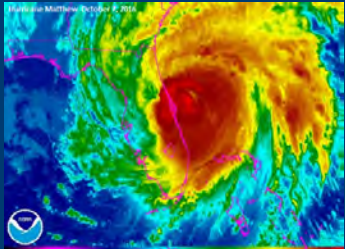
### NOTES:

- Total FRS Investment Plan expenses estimated at \$33.5 million for FY2024-25, an increase of less than \$2 million (4.2%) over FY2023-24.
- Expenditures from the Administrative Trust Fund (operating budget) estimated at \$28.0 million (3.8% increase over FY2023-24), plus projected expenditures of \$5.4 million (6.7%) increase from FY2023-24 Forfeiture Account.
- Salary budget includes \$66,000 (5.7%) Recruitment & Retention salary rate to mitigate human capital risk; and resources to fully fund potential incentive reserve and leave expenses for retiring/terminating staff.
- Benefits include the increase in retirement contribution rates pursuant to Chapter 2024-92, Laws of Florida.

\* The SBA is requesting authority to spend up to the amount in forfeiture funds realized, which may be more or less than the \$5,408,644 estimated for FY2024-25. To the extent actual forfeiture funds realized differs from the amount estimated, the difference will be spent from or retained in the operating budget as the case may be.







# Florida Hurricane Catastrophe Fund

## Proposed FY2024-25 Budget

### June 12, 2024

# Florida Hurricane Catastrophe Fund

## Proposed Budget Detail by Line Item

Description	1 New FTE		% Change
	Fiscal Year 2023-2024	Fiscal Year 2024-2025	
<b>FTE</b>	<b>14</b>	<b>15</b>	
<b>Salary &amp; Benefits</b>	<b>\$2,602,372</b>	<b>\$3,019,008</b>	<b>16.0%</b>
<b>Salary Subtotal</b>	<b>\$1,857,402</b>	<b>\$2,176,902</b>	<b>17.2%</b>
Salaries	1,709,402	1,807,402	
New Positions/Salary Adj.	—	148,500	
Recruitment & Retention Rate	98,000	104,000	
Leave Liability Payments	50,000	117,000	
<b>Benefit Subtotal</b>	<b>\$744,971</b>	<b>\$842,107</b>	<b>13.0%</b>
Social Security	128,980	159,009	
Retirement	288,296	329,618	
Health Insurance	305,161	327,855	
Life Insurance	677	725	
Disability Insurance	723	824	
Dental Insurance	21,134	24,076	
<b>Other Personal/Contractual Svcs</b>	<b>\$9,028,460</b>	<b>\$8,811,971</b>	<b>(2.4)%</b>
Other Contractual Services	9,028,460	8,811,971	
<b>Expense</b>	<b>\$528,389</b>	<b>\$536,937</b>	<b>1.6%</b>
Rental of Building/Equipment	85,782	88,330	
Travel (excl Methodology Commission)	96,200	96,200	
Agency Directed Training	14,750	18,750	
Methodology Commission Travel	300,738	300,738	
Insurance & Surety Bonds	3,519	3,519	
Ofc Materials/Supplies/Equipment	11,500	11,500	
Other Charges & Obligations	6,300	6,300	
Printing	9,600	11,600	
<b>Other Capital Outlay</b>	<b>\$11,000</b>	<b>\$11,000</b>	<b>0.0%</b>
Furniture & Equipment	11,000	11,000	
<b>TOTAL BUDGET</b>	<b>\$12,170,221</b>	<b>\$12,378,917</b>	<b>1.7%</b>

### NOTES:

- Total Proposed Operating Budget of \$12.4 million is less than a \$210,000 increase over FY2023-24 and assumes no major hurricanes in the upcoming fiscal year.
- Total Budget is less than 1% of projected annual insurers' premiums, which fund operating expenses.
- Salary budget increase includes a Recruitment & Retention rate of \$104,000 (5.7% of salaries), as well as one (1) new FTE.
- Benefits include the increase in retirement contribution rates pursuant to Chapter 2024-92, Laws of Florida.
- \$216,000 (2.4)% decrease in Other Personal/Contractual Services is primarily attributed to completion of a project for migrating the claims system to the cloud which mitigated the increase of contractual costs for Financial Advisors and Administrative/Actuarial services.
- No increase in Travel costs for the Methodology Commission to conduct on-site reviews of hurricane and flood models.

Division of Bond Finance  
Proposed FY2024-25 Budget  
June 12, 2024

# Division of Bond Finance

## Proposed Budget Detail by Line Item

Description	Fiscal Year 2023-2024	Fiscal Year 2024-2025	% Change
<b>FTE</b>	<b>17</b>	<b>17</b>	
<b>Salary &amp; Benefits</b>	<b>\$3,608,174</b>	<b>\$3,783,526</b>	<b>4.9%</b>
<b>Salary Subtotal</b>	<b>\$2,678,879</b>	<b>\$2,833,259</b>	<b>5.8%</b>
Salaries	2,195,822	2,327,571	
Recruitment & Retention Rate	131,749	139,654	
Leave Liability Payments & Incentive Reserve	351,308	366,034	
<b>Benefit Subtotal</b>	<b>\$929,294</b>	<b>\$950,267</b>	<b>2.3%</b>
Social Security	199,624	194,805	
Retirement	382,891	407,309	
Health Insurance	323,046	323,046	
Life Insurance	822	822	
Disability Insurance	931	987	
Dental Insurance	21,980	23,298	
<b>Contractual Svcs</b>	<b>\$2,083,274</b>	<b>\$2,081,088</b>	<b>(0.1)%</b>
Temporary Employment	61,200	61,200	
Other Contractual Services	1,876,074	1,869,508	
SBA Administration Fee	146,000	150,380	
<b>Expense</b>	<b>\$387,870</b>	<b>\$392,171</b>	<b>1.1%</b>
Repairs & Maintenance	8,500	8,500	
Rental of Building/Equipment	164,678	169,429	
Travel	67,000	67,000	
Training & Development	7,500	7,500	
Communications	57,810	57,810	
Freight & Postage	9,500	9,500	
Insurance & Surety Bonds	3,177	3,177	
Ofc Materials/Supplies/Equipment	36,625	36,625	
Other Charges & Obligations	21,080	21,080	
Printing	12,000	11,550	
<b>Other Capital Outlay</b>	<b>\$65,500</b>	<b>\$65,500</b>	<b>—%</b>
Furniture & Equipment	65,500.00	65,500	
<b>TOTALS</b>	<b>\$6,144,818</b>	<b>\$6,322,285</b>	<b>2.9%</b>

### NOTES:

- Proposed Budget of \$6.3M represents an increase of \$177,467 (2.9%) from the FY2023-24 Budget.
- Budget is based on 20 potential transactions, 8 (or 16%) less than projected in the FY2023-24 Budget.
- Salary category includes Recruitment & Retention rate of 6%.
- Benefits include the increase in retirement contribution rates pursuant to Chapter 2024-92, Laws of Florida.
- No new positions requested.

Florida Prepaid College Board  
Proposed FY2024-25 Budget  
June 12, 2024

# Florida Prepaid College Board Proposed Budget Detail by Line Item

Description	Fiscal Year 2023-2024	Fiscal Year 2024-2025	% Change
<b>FTE</b>	<b>20</b>	<b>20</b>	
<b>Salaries &amp; Benefits</b>	<b>\$3,873,751</b>	<b>\$4,164,001</b>	<b>7.5%</b>
<b>Salary Subtotal</b>	<b>\$2,683,984</b>	<b>\$2,916,751</b>	<b>8.7%</b>
Salaries	2,508,886	2,637,425	
Recruitment & Retention Rate	128,539	232,767	
Leave Liability Payments	46,559	46,559	
<b>Benefit Subtotal</b>	<b>\$1,189,767</b>	<b>\$1,247,250</b>	<b>4.8%</b>
Social Security	187,081	204,546	
Retirement	515,212	553,240	
Health Insurance	453,872	453,872	
Life Insurance	967	967	
Disability Insurance	1,055	1,148	
Dental Insurance	31,581	33,476	
<b>Other Personal/Contractual Svcs</b>	<b>\$45,486,047</b>	<b>\$47,752,714</b>	<b>5.0%</b>
Temporary Employment	101,088	105,233	
Other Contractual Services	45,384,959	47,647,481	
<b>Expense</b>	<b>\$353,620</b>	<b>\$355,424</b>	<b>0.5%</b>
Repairs & Maintenance	5,000	5,000	
Rental of Building/Equipment	160,250	160,250	
Travel	37,519	39,057	
Communications	73,500	73,500	
Freight & Postage	4,705	4,705	
Agency Directed Training	6,480	6,746	
Insurance & Surety Bonds	15,000	15,000	
Ofc Materials/Supplies/Equipment	10,666	10,666	
Other Charges & Obligations	30,500	30,500	
Printing	10,000	10,000	
<b>Other Capital Outlay</b>	<b>\$8,141,100</b>	<b>\$8,141,100</b>	<b>—%</b>
Furniture & Equipment	41,100	41,100	
Intangible Cap. Assets/Software =>4M	8,100,000	8,100,000	
<b>TOTALS</b>	<b>\$57,854,518</b>	<b>\$60,413,239</b>	<b>4.4%</b>

## NOTES:

**Fiscal Year 2024-25 Total Budget** - increased by \$2.6 million (4.4%) from the FY2023-24 budget.

- \$1.7 million increase for recurring items.
- \$870 thousand increase for non-recurring items.

**Salaries & Benefits:** Increased by \$290,250 (7.5%) as follows

- \$128,539 to incorporate last year's Recruitment and Retention into the Salaries budget.
- \$104,228 for Recruitment & Retention, to mitigate human capital risk:
  - \$96,461 to fill two vacant positions in support of CRM/Record Keeping system.
  - \$7,767 for maintaining prior year percentage of Recruitment and Retention.
- \$57,483 in Benefits to reflect costs for insurance, social security, and retirement contributions projected for FY2024-25.

**Other Personal/Contractual Services:** Increased by \$2,266,667 (5.0%) as follows:

- \$4,145 for Temporary Employment and \$9,299 for Legal services to adjust for the effects of inflation (based on average CPI for calendar year 2023).
- \$1,537 for Audit Services and \$7,188 for Actuarial Services due to a contractual rate increase.
- \$319,498 for Marketing to offset inflation related cost increases.
- \$1,925,000 for Records Administration to support the cost of the transition /development of a new CRM/Record Keeping system.
  - \$1,055,000-recurring
  - \$870,000-non-recurring

**Expense:** Increased by \$1,804 (0.5%) as follows:

- Increased Travel by \$1,538 and Training by \$266 to adjust for the effects of inflation (based on average CPI for calendar year 2023).

Note: To enhance the customer experience, modernize system architecture, and reduce risk, the Board has approved funding for the purchase, development, and testing of a new Customer Resource Management/Record Keeping System. The proposed budget includes \$870 thousand in nonrecurring Other Contractual Services and \$8.1 million in nonrecurring Other Capital Outlay budget authority, as applicable, for such costs.

## **State Board of Administration**

### **Authority & Governance**

The original State Board of Administration (SBA) was created by statute in 1929 as the fiscal agent for counties and special road and bridge districts for the purpose of paying debt service on their bonds. The SBA was later established as a constitutional body corporate in 1942 by Article IX, Section 16 of the 1885 Constitution of the State of Florida, for the purpose of administering the Second Gas Tax for the benefit of Florida counties and county road bonds. As a result of a constitutional amendment, the Governor as chair, the Chief Financial Officer, and the Attorney General serve as the three-member body corporate, collectively known as the Board of Trustees.

Pursuant to Section 215.44, Florida Statutes, except when otherwise specifically provided by the State Constitution and subject to any limitations of the trust agreement related to a trust fund, the SBA shall invest all of the funds of the Florida Retirement System Trust Fund and all other funds specifically required by law to be invested by the Board pursuant to Sections 215.44 – 215.53, Florida Statutes, to the fullest extent that is consistent with cash requirements, trust agreements, and the objectives of the fund. The Trustees have statutory authority to invest assets and discharge their duties in compliance with certain fiduciary standards of loyalty, care and prudence that are incorporated into Sections 121.4501(15) and 215.47(10)(a) and (b), Florida Statutes. Section 215.441, Florida Statutes provides for the appointment of an Executive Director by the Trustees. As authorized by Section 215.52, Florida Statutes, the Trustees have adopted Rules 19-3.016 and 19-3.0161, Florida Administrative Code, which provide delegation of authority to the Executive Director with respect to most investment and operational decisions of the SBA. The Executive Director is held to the same fiduciary standards as the Trustees and the Trustees establish broad investment policy guidelines through Investment Policy Statements. An Investment Advisory Council (IAC), appointed by the Trustees, provides advice on investment policy and strategy.

Section 215.44(2), Florida Statutes provides for an Audit Committee appointed by the Trustees to assist them in fulfilling oversight responsibilities, serving as an independent and objective party to monitor processes for financial reporting, internal controls and risk assessment, audit processes, and compliance with laws, rules, and regulations, plus directing the efforts of the Board's independent external auditors and the Board's internal audit staff. The Chief Audit Executive & Inspector General reports functionally to the Audit Committee and administratively to the SBA Executive Director. The SBA Executive Director authorizes salary changes for the Chief Audit Executive & Inspector General in consultation with the Audit Committee. The SBA is also subject to review by the Auditor General of Florida, Office of Program Policy Analysis & Government Accountability, Office of Internal Audit, General Counsel and Chief Ethics Officer, Chief Risk & Compliance Office, and the Florida Legislature. The Florida Legislature provides for the operational flexibility required to meet the SBA's specialized responsibilities and fiduciary duties, relative to other public entities. The SBA has a measurable bottom line and benchmarks against which success and accountability can be assessed.

## **Primary Purpose**

The SBA fulfills a critical role for the State of Florida as a multi-asset class investment management organization investing and safe-guarding assets on behalf of over 25 mandates and other trusts. A mandate is an investment responsibility established as a direct requirement of Florida law. Trusts are investment responsibilities allowed under law and established pursuant to a trust agreement with a client. The SBA invests in all major public and private market asset classes, including U.S. and international stocks and bonds, inflation-protected securities, direct-owned real estate, private equity limited partnerships, and other opportunistic and strategic investments.

### **Major asset management responsibilities include:**

- The FRS Pension Plan Trust Fund, one of the world's largest and financially healthiest public pension funds.
- The FRS Investment Plan, a defined contribution 401(k)-like alternative to the FRS Pension Plan (originally created under the 2000 Public Employee Optional Retirement Program [PEORP] legislation).
- Florida PRIME (a.k.a., Local Government Surplus Funds Trust Fund), an investment pool with primary investment objectives, in priority order, of safety, liquidity, and competitive returns with minimization of risks. All units of local government in Florida may invest their surplus operating funds in Florida PRIME.
- Investment of the operating funds and other financial resources of the Florida Hurricane Catastrophe Fund and related entities.

### **Additional responsibilities that do not directly involve asset management include:**

- Providing retirement planning support to approximately 645,000 active members of the Florida Retirement System through the MyFRS Financial Guidance Program originating under the 2000 PEORP legislation.
- Administering the Florida Hurricane Catastrophe Fund (FHCF) and its associated programs, including the SBA Finance Corporation and the Insurance Capital Build-up Incentive Program.
- Serving as an investment consultant to retirement programs administered by other state agencies including the State of Florida Deferred Compensation Program and State University System Optional Retirement Program.
- Administering all debt service funds for bonds issued pursuant to the State Bond Act, as well as serving as trustee and escrow agent for bonds issued by the Division of Bond Finance.
- Providing administrative support for the Division of Bond Finance and the Florida Prepaid College Board Programs.
- Providing administrative support to the Audit Committee and the Investment Advisory Council

## **Operational Structure**



The Executive Director and staff (258 total FTE) manage the day-to-day operations of the SBA. The SBA Executive Director approves compensation for all employees (unless otherwise stipulated herein) pursuant to authority granted in Florida Administrative Code Rule 19-3.016. The SBA staff consists primarily of executive, investment, financial/accounting, operational, and administrative professionals focused on safeguarding and prudently growing the assets of the FRS Pension Plan and the other assets entrusted to it over the long-term. The SBA is committed to providing superior investment and trust services while adhering to the highest ethical, fiduciary, and professional standards of care.

### **Budget Entities**

The SBA Operating Budget includes resources to perform functional responsibilities for all but the following programs, which have their own budgets and underlying funding sources:

- FRS Investment Plan
- Florida Hurricane Catastrophe Fund
- Division of Bond Finance (Reports to other Boards)
- Florida Prepaid College Board (Reports to other Boards)

## **Florida Retirement System (FRS) Investment Plan**

### **Authority & Governance**

The 2000 Florida Legislature created the FRS Investment Plan within the Florida Retirement System (FRS). The Investment Plan (operationally referred to as the Office of Defined Contribution Programs) is administered by the State Board of Administration (SBA) and is governed by the Trustees pursuant to Section 121.4501(8), Florida Statutes. The Legislature established the Investment Plan Trust Fund in Section 121.4502, Florida Statutes.

### **Primary Purpose**

The Office of Defined Contribution Programs serves two primary purposes for the state:

- 1) The FRS Investment Plan. This is the 401(a) defined contribution plan that employees may choose in lieu of the FRS Pension Plan (the traditional defined benefit plan) or the default plan enrollment for employees that do not make an active choice by their enrollment deadline. Investment Plan benefits accrue in individual member accounts that are participant-directed, portable, and funded by employee and employer contributions and earnings. The Office of Defined Contribution Programs is also responsible for the FRS retirement plan choice enrollments.
- 2) The MyFRS Financial Guidance Program. These are the educational resources that support employees' choice between retirement plans and provide approximately 645,000 employees with the information necessary to make informed decisions about choices within their Plan and in preparation for retirement.

### **Operational Structure**

The Office of Defined Contribution Programs, which includes FRS Investment Plan administrative costs and the Financial Guidance Program costs, are budgeted and accounted for separately from the SBA operating budget. Beginning its 23<sup>rd</sup> full year of operations (including the initial choice period in Fiscal Year 2002-2003), the SBA has been responsible for the day-to-day management of the Investment Plan and the MyFRS Financial Guidance Program within the Office of Defined Contribution Programs. The Office of Defined Contribution Programs is operationally supported by employer contribution rates adopted each fiscal year by the Florida Legislature and “forfeited account balances” accumulated in the Forfeiture Account. FRS Investment Plan expenses for recordkeeping, asset custody and educational services can be paid out of the Forfeiture Account, consistent with SBA policy and IRS requirements.

Under subsection 121.4501(6), Florida Statutes, unvested balances are forfeited by terminating members who take a distribution of their vested balance, outside of exceptions provided in the statute, or who terminate employment with an unvested balance and do not return to FRS employment within five years. The enacting legislation [HB 2393, found at Ch. 2000-169, Laws of Florida] required the SBA to obtain a “favorable determination letter and a favorable private

letter ruling from the Internal Revenue Service.” As stated in Section 121.4502, Florida Statutes, the forfeiture account is created to hold the assets derived from the forfeiture of benefits by participants. Pursuant to a private letter ruling from the Internal Revenue Service, the forfeiture account may be used only for paying expenses of the Florida Retirement System Investment Plan and reducing future employer contributions to the program. Consistent with Rulings 80-155 and 74-340 of the Internal Revenue Service, unallocated reserves within the forfeiture account must be used as quickly and as prudently as possible considering the SBA’s fiduciary duty. Expected withdrawals from the account must endeavor to reduce the account to zero each fiscal year.

The SBA has partnered with external service providers for the majority of Investment Plan and Financial Guidance Program functions. Eight FTEs, including the Chief of Defined Contribution Programs perform daily oversight and monitoring of external relationships to ensure compliance with contractual obligations, general contract administration, management of programs subject to goals and objectives established by the Trustees, and program compliance with applicable state and federal laws.

## **Florida Hurricane Catastrophe Fund**

### **Authority and Governance**

The Florida Hurricane Catastrophe Fund (FHCF) is a tax-exempt trust fund created in November 1993 during a Special Session of the Legislature in the aftermath of Hurricane Andrew. The FHCF was created in Section 215.555, Florida Statutes with the purpose of improving the availability and affordability of property insurance in Florida by providing reimbursements to insurers for a portion of their catastrophic hurricane losses. Also included in provisions of Section 215.555, Florida Statutes, is the creation of a not-for-profit public benefits corporation, known as the State Board of Administration Finance Corporation, governed by the Board of Directors. The FHCF is under the direction and control of the State Board of Administration (SBA), guided by the same trustee leadership of the Governor, Chief Financial Officer, and Attorney General. A nine-member Advisory Council (consisting of an actuary, a meteorologist, an engineer, a representative of insurers, a representative of insurance agents, a representative of reinsurers, and three consumers who are representative of other affected professions and industries) was established to provide the SBA with information and advice.

Funding for the administration of the FHCF is provided for in Section 215.555, Florida Statutes. Financing for the FHCF is obtained from a combination of three sources: 1) reimbursement premiums charged to participating insurers, 2) investment earnings, and 3) emergency assessments levied against all property and casualty lines of business in the state, including surplus lines, but excluding workers' compensation, federal flood, accident and health insurance, and medical malpractice premiums. Monies in the FHCF may not be expended, loaned, or appropriated except to pay obligations of the FHCF from reimbursement contracts entered into under subsection (4), payment of debt service on revenue bonds issued under subsection (6), costs of the mitigation program under subsection (7), costs of procuring reinsurance, and costs of administration of the FHCF. The SBA invests the monies of the FHCF pursuant to Sections 215.44-215.52, Florida Statutes. Earnings from all investments are retained in the FHCF except for monies appropriated for mitigation which is limited to 35% of investment earnings and a minimum of \$10 million annually.

### **Primary Purpose**

The purpose of the FHCF is to protect and advance the State's interest in maintaining insurance capacity in Florida. The FHCF program fulfills a unique and critical role for the state of Florida by serving as a state-administered reinsurance type of program and is mandatory for authorized residential property insurers writing covered policies in the state of Florida. The FHCF functions in a public-private partnership type of role with insurers, which preserves the private sector's role as the primary risk bearer. Insurers who write residential property insurance in Florida are required to enter into a reimbursement contract with the SBA, to report their exposures, to pay premiums, and to report losses by calendar year-end or at other times as required by the SBA. The FHCF provides very economical coverage for insurers writing residential insurance in the state. The cost of FHCF coverage is typically less than the cost of private reinsurance due to the FHCF's tax-exempt status, low administrative costs, and lack of a profit or risk-load. In the event of insufficient

funds to meet obligations under the reimbursement agreements, the State Board of Administration Finance Corporation has the ability to issue tax-exempt post-event revenue bonds. The FHCF is obligated to pay losses to participating insurers only to the extent of the FHCF's actual claims-paying capacity up to a statutory limit for any single contract year.

### **Operational Structure**

The Chief Operating Officer of the Florida Hurricane Catastrophe Fund manages the day-to-day operations of the FHCF, assisted by staff (14 total FTE). The FHCF staff manages substantial program responsibilities with additional support from external service providers. Responsibilities include, but are not limited to, proposing legislation; responding to legislative requests; implementing legislation; rulemaking; providing information to participating insurers; conducting insurer training workshops; managing and executing the Exposure and Claims Examination Programs; processing and approving loss reimbursement payment requests; finalizing all claims and losses through a commutation process; determining bonding capacity; issuing revenue bonds; collecting emergency assessments pledged to debt service; raising capital in the financial markets to increase claims paying ability; evaluating risk transfer options; executing risk transfer agreements; staffing the activities of the State Board of Administration Finance Corporation including complying with the covenants of all outstanding Bonds and Notes; preparing financial statements and revenue projections; coordinating the activities of a number of external service providers; meeting and discussing policy issues with the FHCF Advisory Council; providing travel, expenses and staff support to the Florida Commission on Hurricane Loss Projection Methodology, which determines and develops the standards and the review process that is the basis for evaluating hurricane and flood models used in residential ratemaking in Florida; and administering the SBA Insurance Capital Build-up Incentive Program.

## **Division of Bond Finance**

### **Authority and Governance**

Legal authority for the Division of Bond Finance is provided for in the state Constitution (primarily Articles VII and XII), the State Bond Act (Sections 215.57-215.83, Florida Statutes), the Bond Validation Act (Chapter 75, Florida Statutes) and various implementing sections of the Florida Statutes. The Division of Bond Finance (the “Division”) was created in 1969 and was transferred to the State Board of Administration from the Department of General Services in 1992. The Division is organized into three sections that report to a Division Director, who in turn reports to the Governor and Cabinet. The three sections are Bond Programs and Arbitrage Compliance, Legal, and Administrative.

### **Primary Purpose**

The Division of Bond Finance provides the financial, legal, and marketing services necessary for the issuance, sale, and maintenance of bonds. In addition to performing financial analyses, structuring bond issues, and conducting bond sales, the Division also collects, maintains, and disseminates information on bonds issued by units of local government; administers the Private Activity Bond Allocation Program as required by federal law; and is responsible for ensuring that all tax-exempt bonds issued by the State and its agencies comply with federal arbitrage laws.

The proceeds of bonds issued by the Division are used to finance schools, roads, bridges, rights-of-way, prisons, state office buildings, land acquisition, pollution control facilities, water management projects, and university parking garages, dormitories, and student activity facilities. The state entities for which the Division issues bonds include the Departments of Education, Transportation, Management Services, Corrections, Environmental Protection, and the Board of Governors of the State University System.

### **Operational Structure**

The Division has 17 FTE. Fifteen FTE are allocated to the Bond Programs, Legal, and Administrative functions within the Division and are operationally supported by the Bond Fee Trust Fund. Bond program staff performs the financial and analytical services for bond issues, legal staff performs legal services associated with the issuance of bonds and ongoing federal disclosure requirements, and administrative staff provide planning, support, and coordination for the Division. Two positions are allocated to Arbitrage Compliance, operationally supported by the Arbitrage Compliance Trust Fund. Arbitrage staff monitor bonds issued by the Division for compliance with federal arbitrage regulations in accordance with the 1986 Tax Reform Act.

Revenue for Division programs is derived from fees collected at the closings of bond issues or transactions, a fee associated with private activity bond allocation, and fees for arbitrage compliance monitoring. Fees are charged in accordance with a schedule adopted by the Division as required by Sections 215.65(3), 159.811(1) and 215.655(2), Florida Statutes.

## **Florida Prepaid College Board**

### **Authority and Governance**

Sections 1009.97-1009.984, Florida Statutes, establish the Florida Prepaid College Board ("Board") as a corporate body with all the powers to administer the Stanley G. Tate Prepaid College Program ("Prepaid Program") and the Florida College Savings Program ("Savings Plan"). For purposes of Article IV of the State Constitution, the Board is assigned to and administratively housed within the State Board of Administration (SBA), but independently exercises the powers and duties specified in the statutes.

The seven-member Board is composed of the Attorney General, the Chief Financial Officer, the Chancellor of the Board of Governors, the Chancellor of the Division of Florida Colleges, or their designees, and three members appointed by the Governor. Each member appointed by the Governor serves 3-year terms and is subject to confirmation by the Senate.

### **Primary Purpose**

The Florida Prepaid College Board is committed to helping Floridians save for higher education expenses. The Board offers plans under both the Prepaid Program and the Savings Plan to help families save for the various costs of attending college.

The Prepaid Program became operational in 1988 and allows Florida families to prepay the cost for college tuition, required fees and dormitory housing for their children and grandchildren. When the families' children or grandchildren attend college, the Board will pay the Florida public college or university the actual fees assessed by the institution at the time of admission. Should the student elect to attend a private college, an out-of-state college or an eligible technical school, the Board will pay the value of the student's plan at the time of admission.

The Savings Plan was implemented in 2002, following federal enactment of Section 529 of the Internal Revenue Service Code. The Savings Plan allows Florida families to defer income taxes on investment earnings, and if the earnings are used for qualified education expenses, the earnings are tax-free. Families may choose to invest in an enrollment year option (asset allocation becomes more conservative as the student gets closer to attending college), professionally designed portfolios (maintain static asset allocations), and/or individual funds options (allow for the development of a portfolio that provides diversity while meeting the families risk level). Families also decide how much and how often they want to save for college. The funds accumulated in each family's account can be used for any qualified college expense including tuition, fees, housing, books, food and even graduate or professional school, in Florida or out-of-state.

### **Organization Overview**

The Board establishes policy and actively oversees the investment and financial performance of the programs. The Board has authorized 20 FTE, including the Executive Director, to oversee the day-to-day operations of the Board and its programs.

In order to perform its responsibilities in the most effective and efficient manner, the Board contracts with various private companies to provide professional support services for both of its programs, including actuarial services, investment management services, records administration services, financial services and legal services. The Board's operational costs are funded by investment earnings and fees; it does not receive State general revenue to fund its general and administrative expenses.



**FLORIDA PREPAID COLLEGE BOARD**  
**BUDGET GUIDELINES**  
**EFFECTIVE DATE: MARCH 19, 2024**

---

The Florida Prepaid College Board (Board) has established the following Budget Guidelines to support implementation of budgetary policy and strategy for the expense categories listed below.

- A. SALARIES** – This expense category includes salaries, recruitment and retention, and nonrecurring compensation (e.g., leave liability payouts).

To ensure sufficient budget authority is available to recruit and retain a high-performing and highly-skilled staff, unless good cause is shown otherwise, at a minimum, at least once every three years the Florida Prepaid College Board ("Board") shall have a recruitment and retention report prepared by an independent third-party with recognized expertise for preparing such a report. The report shall include a compensation framework with minimum, mid-point and maximum salary ranges for all Board staff positions. On an annual basis, the Board may apply an inflation adjustment to the compensation framework. The Executive Director shall utilize the compensation framework as a guideline for assigning Board staff positions to approved pay grades (see TABLE A) but shall have the flexibility to make adjustments when deemed to be in the best interests of the Board.

With regard to the Executive Director's salary, Board members, Florida Prepaid College Foundation board members, and Florida ABLE, Inc. Board members shall, at least annually, be given the opportunity to evaluate the performance of the Executive Director and submit the results to an independent third-party. The independent third-party is responsible for compliance with Sunshine Law retention requirements. The independent third-party shall compile the individual evaluation results and send them anonymously to the Board Chairman with a copy to all other Board members. The Board Chairman shall review the compiled evaluation results and discuss them with the Executive Director. Based on the compiled evaluation results, the Board Chairman may increase the salary of the Executive Director by up to 4%. In no event shall the salary of the Executive Director exceed the maximum of the pay range established for the position. The Executive Director shall inform each Board member of any increase to his or her salary in advance of the next quarterly Board meeting following the increase.

This budget line item may be reasonably adjusted by the Executive Director, after consultation with the Chairman, to reflect any salaries changes resulting from the legislative session or from discussions with the State Board of Administration (SBA) Trustees and/or their staff prior to submission to the SBA Trustees for approval.

- B. BENEFITS** – This expense category includes all benefit costs, including social security, retirement, health insurance, life insurance, disability insurance, and dental insurance for the Board’s authorized FTEs.

This budget line item may be adjusted by the Executive Director to reflect any benefits changes resulting from the legislative session or from the SBA Trustees.

- C. OTHER PERSONAL SERVICES** – This expense category includes the annual cost of each contract for services that the Board has previously approved and executed. Each contract includes a negotiated fixed price; however, budget increases and decreases may be necessary for those contracts that are activity driven. For example, as the total number of Prepaid plan contracts increase, the total cost for records administration services will also increase. Contracts that are not activity driven (i.e., legal services, investment consultant services, actuarial services, financial audit services) only increase or decrease with proposed changes in the scope of services or by cost of living adjustments as provided for in the contract.

Below is a description for each budget line item included in this category:

- 1. TEMPORARY EMPLOYMENT** – Provides funding for employing part-time assistants, including interns. These assistants provide clerical support services, fiscal assistance and conduct research on customer accounts, as necessary.
- 2. FINANCIAL AUDITS** – Provides funding for the annual financial statement audit of the Prepaid College Trust Fund and the Florida Prepaid College Foundation.
- 3. ACTUARIAL** – Provides funding for actuarial services (pricing, adequacy reserve review, etc.) for the Florida Prepaid College Plan.
- 4. INVESTMENT CONSULTANT** – Provides funding for investment consulting services (investment performance review, manager searches, etc.) for the Prepaid College Plan and for the 529 Savings Plan.

5. **CYBERSECURITY CONSULTANT** – Provides funding for technology strategy and cybersecurity consulting services for the Prepaid College Board and its direct support organizations, as applicable.
  6. **LEGAL SERVICES** – Provides funding for legal services, including court reporting, for both the Prepaid College Plan and the 529 Savings Plan.
  7. **MARKETING** – Provides funding for all marketing related activities such as advertising, creative, digital and social media services in addition to public relations, partnerships, and events services. An Annual Marketing Plan to allocate this budget line item is developed and presented at the June Board meeting.
  8. **OTHER CONTRACTUAL SERVICES** – Provides funding for other contractual services that is not included in a specific budget line item but may become necessary.
  9. **RECORDS ADMINISTRATION** – Provides funding for records administration services for the Prepaid College Plan, the 529 Savings Plan, and the Florida Prepaid College Foundation.
  10. **TRUSTEE SERVICES** – Provides funding for custody services and securities lending services for both the Prepaid College Plan and the 529 Savings Plan.
  11. **ADMINISTRATIVE OVERHEAD COSTS** – Provides funding for administrative overhead costs for both direct and indirect charges for services provided to the Board by the SBA. These services include general administration and personnel services including payroll, staff training, local and out-bound long distance telephone services, postage, reproduction services, computer services, office supplies, short-term investment services, and office support services.
- D. **EXPENSES** – This budget category provides for the day-to-day operational expenses of the Board office.

Below is a description for each budget line item included in this category:

1. **REPAIRS & MAINTENANCE** – Provides funding for maintenance and service agreements on computers and equipment (copiers, fax machine, etc.).
2. **RENTAL OF BUILDING** – Provides funding for the Board office's rent. The SBA currently leases space to house the Board staff.

- 3. RENTAL OF EQUIPMENT** – Provides funding for the costs for rental of equipment.
  - 4. TRAVEL** – Provides funding for in-state and out-of-state travel for Board members and for the staff.
  - 5. TRAINING & DEVELOPMENT** – Provides funding for staff registration fees for training, regardless of training venue or medium (live, in-person, classroom, webinars, conferences, workshops, software).
  - 6. COMMUNICATIONS / TOLL-FREE TELEPHONES** – Provides funding primary for the prompter for the Board's toll-free lines. The telephone prompter currently provides for a single toll-free telephone number, which prompts callers to select from a menu. Callers have the option to press 1, to speak with customer service about opening a new account; press 2, to speak with customer service about the Florida Prepaid College Plan; and press 3, to speak to customer service about the Florida 529 Savings Plan.
  - 7. FREIGHT / POSTAGE** – Provides funding for freight and postage charges not provided by the SBA.
  - 8. GENERAL LIABILITY CLAIMS** – Provides funding to the Division of Risk Management for casualty insurance premiums.
  - 9. OFFICE MATERIALS & SUPPLIES** – Provides funding for the costs for office consumables and non-capitalizable materials, supplies, and equipment not included in the SBA overhead fee.
  - 10. OTHER CHARGES & OBLIGATIONS** – Provides funding for any additional expenses not covered under the other categories. Includes items like membership/subscription fees and domain renewals.
  - 11. PRINTING** – Provides funding for the costs for routine printing charges and posting of public meetings on the Florida Administrative Register (FAR).
- E. OTHER CAPITAL OUTLAY** – This budget category provides for the fixed asset purchases of the Board.

Below is a description for each budget line item included in this category:

- 1. Office Furniture & Equipment >=\$1,000** – Provides funding for the costs of furniture and equipment for the Board office.

2. **Software/Implementation (Nonrecurring)** – Provides funding for the research, analysis, development, testing, and/or purchase of critical information systems that are required to operate the Board's programs, including expenditures for third-party consultants.

F. **NON-BUDGETED** – As the normal course of business, the Board may incur costs outside of those budgeted above. Non-budgeted expenditures are costs that are variable, based on a driver(s) that is difficult to predict each year for planning purposes.

The following are the authorized for payment as non-budgeted expenditure types:

1. **MANAGEMENT FEES** – Payment for investment manager services.
2. **BANKING/LOCKBOX FEES** – Payments for banking / lockbox services, such as deposits, receipts, and ACH processing.
3. **PLANS/CONTRIBUTIONS** – Payment for the promotional purchase of Prepaid Plans or Savings Program contributions approved by the Board.

## TABLE A

The following pay grades for Board staff positions are established pursuant to the March 2024 Recruitment and Retention Report prepared by Mercer. As recommended by Mercer, the Executive Director position shall be classified as a Pay Grade 16.

Grade	Min	Mid	Max
1	\$36,300	\$45,400	\$54,500
2	\$41,800	\$52,200	\$62,600
3	\$48,000	\$60,000	\$72,000
4	\$55,200	\$69,000	\$82,800
5	\$63,400	\$79,300	\$95,200
6	\$73,000	\$91,200	\$109,400
7	\$83,900	\$104,900	\$125,900
8	\$97,400	\$121,700	\$146,000
9	\$113,000	\$141,200	\$169,400
10	\$131,000	\$163,800	\$196,600
11	\$160,800	\$201,000	\$241,200
12	\$184,000	\$230,000	\$276,000
13	\$207,200	\$277,500	\$310,800
14	\$260,000	\$325,000	\$390,000
15	\$294,500	\$387,000	\$441,700
16	\$366,000	\$457,000	\$548,000



**STATE BOARD OF ADMINISTRATION  
OF FLORIDA**

**1801 HERMITAGE BOULEVARD, SUITE 100  
TALLAHASSEE, FLORIDA 32308  
(850) 488-4406**

**POST OFFICE BOX 13300  
32317-3300**

**RON DESANTIS  
GOVERNOR  
CHAIR**

**JIMMY PATRONIS  
CHIEF FINANCIAL OFFICER**

**ASHLEY MOODY  
ATTORNEY GENERAL**

**LAMAR TAYLOR  
INTERIM EXECUTIVE DIRECTOR &  
CHIEF INVESTMENT OFFICER**

Date: May 13, 2024  
To: Board of Trustees  
From: Sam McCall, Audit Committee Chair *Smc*  
Subject: Quarterly Audit Committee Report

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The State Board of Administration's Audit Committee met on May 13, 2024. Please see the attached agenda for the items discussed. Also please see the attached Office of Internal Audit & Inspector General Quarterly Report presented to the Audit Committee at the meeting.

**STATE BOARD OF ADMINISTRATION**  
**Audit Committee Open Meeting**  
**Agenda**  
**May 13, 2024**  
**10:00 A.M. – Conclusion of Business**

1. Call to Order
2. Approve minutes of open meeting held on February 26, 2024
3. SBA Update: Investment performance, risks, opportunities and challenges
  - Executive Director status report/update
  - Chief Investment Officer status report/update
4. Chief Risk & Compliance Officer Quarterly Report
  - Public Market Compliance Presentation
5. Office of Internal Audit & Inspector General Quarterly Report
6. Proposed Annual Audit Plan FY 2024-25
7. Proposed Internal Audit Budget FY 2024-25
8. Other items of interest
9. Closing remarks of the Audit Committee Chair and Members
10. Adjournment





# Office of Internal Audit & Inspector General (OIA&IG) Quarterly Report to the Audit Committee

May 13, 2024

# Table of Contents

<b>Status of the FY 2023-24 Annual Audit Plan</b>	• Internal Audit and Advisory Engagements	4
	• Special Projects, Risk Assessment, Annual Audit Plan & QAR	5
	• External Engagement Oversight	6
<b>Completed Projects &amp; Status of Management Action Plans/ Recommendations</b>	• Futures Rolling Flash Audit	8
	• Real Estate Credit Facility Operational Audit	9
	• Incentive Compensation Operational Audit	10
	• Status of Management Action Plans – Audit Projects	11
	• Status of Recommendations – Advisory Projects	14
<b>Inspector General Report</b>	• Inspector General Update	15
<b>Other Items</b>	• Other Items for Discussion	17

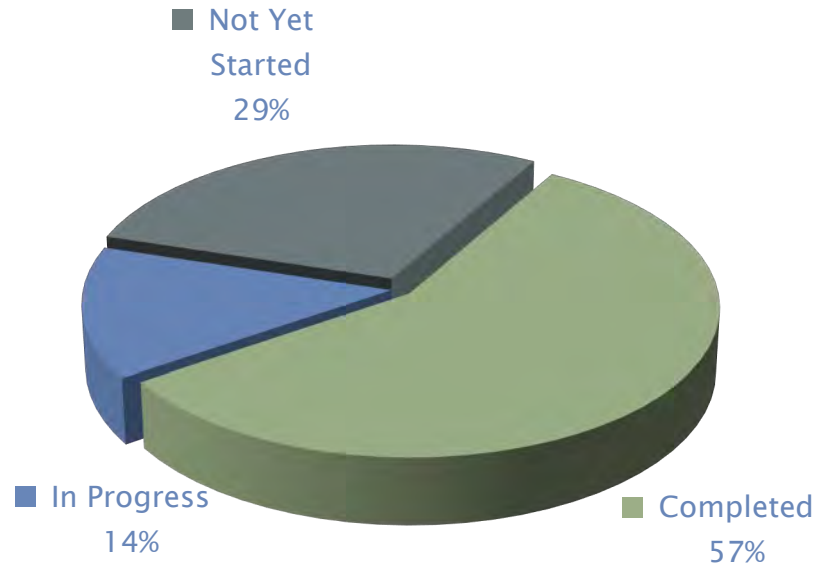
<b>Appendices</b>	Open Audit Recommendations and Action Plans	Appendix A
	Futures Rolling Flash Audit Report	Appendix B
	Real Estate Credit Facility Operational Audit Report	Appendix C
	Incentive Compensation Operational Audit Report	Appendix D

# Status of the FY 2023–2024 Annual Audit Plan



# Status of the FY 2023–24 Annual Audit Plan

## Internal Audit and Advisory Engagements

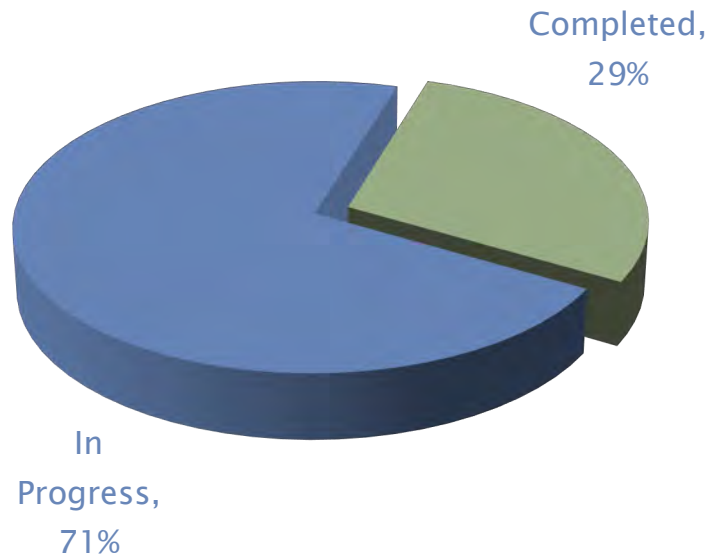


Highlighted: Completed since prior quarterly report.

<u>Projects Status</u>	<u>Type</u>	<u>Planned Timing</u>
<b>Completed</b>		
Public Market Manager Search/Selection (GE/FI)	OIA&IG Operational Audit	Q1
Periodic Follow-up	OIA&IG Follow-up Audit	Q1-Q2
Periodic Follow-up	OIA&IG Follow-up Audit	Q2-Q3
Vendor Management	OIA&IG Operational Audit	Q1
Real Estate Credit Facility Program	OIA&IG Operational Audit	Q1-Q2
Cloud Computing	OIA&IG Advisory	Q1-Q3
Incentive Compensation	OIA&IG Operational Audit	Q4
Futures Rolling	OIA&IG Flash Audit	Q3
<b>In Progress</b>		
Human Resources and Payroll	OIA&IG Operational Audit	Q1-Q3
CIS/CSC Framework	OIA&IG Advisory	Q3-Q4
<b>Not Started</b>		
Critical Programming/"Shadow" IT	OIA&IG Advisory	Q3
Account Opening Workflow	OIA&IG Advisory	Q3
Securities Settlement, Clearing, Corp Actions	OIA&IG Operational Audit	Q4
Other Flash Audits	OIA&IG Operational Audit	Q1-Q4

# Status of the FY 2023–24 Annual Audit Plan

- ▶ Special Projects, Risk Assessments, Annual Audit Plan and QAR



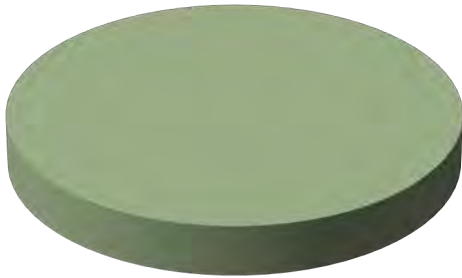
Highlighted: Completed since prior quarterly report.

<u>Project Status</u>	<u>Type</u>	<u>Planned Timing</u>
<b>Completed</b>		
Annual Risk Assessment	OIA&IG Risk Assessment	Q3-Q4
Annual Audit Plan	OIA&IG Risk Assessment	Q4
<b>In Progress</b>		
Meradia Phase 2 - Middle Office Modernization Project	OIA&IG Special Projects	Q1-Q4
AuditBoard Configuration Updates and New Templates	OIA&IG Special Projects	Q1-Q4
Continuous Risk Assessment	OIA&IG Risk Assessment	Q1-Q4
Complimentary User Entity Control Testing Validation	OIA&IG Special Projects	Q1-Q4
Annual Quality Assessment Review - Self-Assessment	OIA&IG Quality Assurance	Q4

# Status of the FY 2023–24 Annual Audit Plan

## ► External Engagement Oversight

■ Completed  
100%



Highlighted: Completed since  
prior quarterly report.

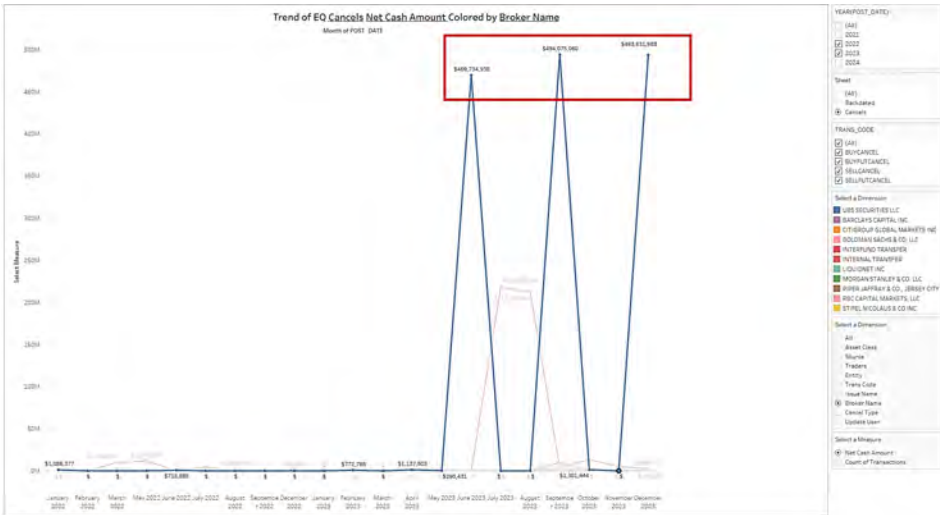
<u>Project Status</u>	<u>Service Provider</u>	<u>Type</u>	<u>Planned Timing</u>
<b>Completed</b>			
AG Financial Systems – PSFS, Eagle, PRIME	Auditor General	External Operational Audit	Q2-Q3
Florida Retirement System (FRS) Trust Fund	Crowe	External Financial Statement Audit for FY22-23	Q1-Q2
FRS Investment Plan Trust Fund	Crowe	External Financial Statement Audit for FY22-23	Q1-Q2
Florida Hurricane Catastrophe Fund	Crowe	External Financial Statement Audit for FY22-23	Q1-Q2
Network Security Assessment, outsourced	Peraton	External IT Assessment	Q1-Q2
Florida PRIME Financial Statement Audit	Auditor General	External Financial Statement Audit for FY22-23	Q1-Q2
Florida Growth Fund Initiative	OPPAGA	External Review	Q1-Q3
AG Operational Audit – FHCF	Auditor General	External Operational Audit	Q1-Q2
AG Statewide Financial Statement Audit	Auditor General	External Financial Statement Audit for FY22-23	Q1-Q3
<b>In Progress</b>			
None			
<b>Not Started</b>			
None			

# Completed Projects & Status of Management Action Plans/Recommendations >>

# Futures Rolling Flash Audit

About Flash Audit:  
A flash audit is an abbreviated audit that only covers one, or few, focused controls or areas and is much shorter than a traditional audit. It allows more flexibility to dynamically provide assurance in real-time as risks present themselves.

## Project Identification & Scope

- Source: Quarterly continuous risk assessment
- 
- Scope: Futures contracts rolling process performed by Global Equity front office

## Key Controls

Observed From	# of Key Controls	Legend for Control Effectiveness Rating
Continuous Risk Assessment	1	Effective
Real-time Process Walkthrough	4	In Place and Designed Effectively <sup>1</sup>
Total Key Controls	5	

<sup>1</sup> Because these key controls were not directly related to the audit objectives, we did not perform further testing for operational effectiveness.

## Reportable Findings

Priority	Description	Status	Target Date
Low	Establish a rule to Alert Global Equity of "Unreasonable" Variation between Filled Price and Opening Price	In progress	09-30-2024



# Real Estate Credit Facility Program Audit

**Executive Summary:** We completed the review of the Real Estate Credit Facility Program (RE CFP) process (the Audit), assessing the design and operating effectiveness of certain key controls as of November 30, 2023. In certain cases, we reviewed information subsequent to our cut-off date to provide updated information. The Audit included an examination of:

- (a) Due diligence and underwriting for new loan requests
- (b) Monitoring and governance of the overall CFP, including effectiveness of program and downstream loans
- (c) Oversight of the loan administrator, including ongoing operational due diligence
- (d) Contract negotiation process and key terms
- (e) Ongoing collection and payment of loans, with the exception of wire processes that are the same as normal wire procedure
- (f) Reporting processes and supporting accounting controls, with focus on new processes
- (g) Monitoring of compliance to loan covenants and SBA policies and guidelines

Legend for Control Effectiveness Rating	Key Controls
Effective	26
Improvement Needed	1
Not Effective	1
Not Tested (tested in other audits, etc.)	various controls <sup>1</sup>
Total Key Controls	28
<sup>1</sup> Various controls on liquidity management, cash movement, reporting, and vendor management have been tested as a part of previous audits and were not included in the scope of our audit.	

Based on the procedures performed, we are of the opinion that processes are in place, operational, and provide reasonable assurance that RE CFP processes are in compliance with applicable guidelines. However, the review did result in one high risk area finding detailed below where processes or controls could be strengthened:

Reportable Findings			
Risk	Description	Status	Target Date
High	Enhance the oversight of Loan Administrator’s operations and controls	In progress	06/30/2025

Additionally, the Audit resulted in 2 medium and 2 low risk observations. Management has agreed to implement action plans for all observations (except for 1 medium-risk observation, which has been mitigated through alternative means) and is working to implement appropriate process changes to mitigate the risks identified.

# Incentive Compensation Operational Audit

**Executive Summary:** We completed the review of the incentive compensation process (the Audit), assessing the design and operating effectiveness of certain key controls related to approximately \$2 million in incentive compensation payments for the fiscal year ended June 30, 2023. The Audit was undertaken in using external consultants with industry experts from Weaver and included an examination of:

- (a) The governance structure over relevant plans, policies, and procedures
- (b) Determination of eligible positions for incentive compensation
- (c) Verification of compliance with prerequisites for incentive eligibility
- (d) Assessment of adherence with relevant governing documents
- (e) Timeliness, accuracy and security of payments

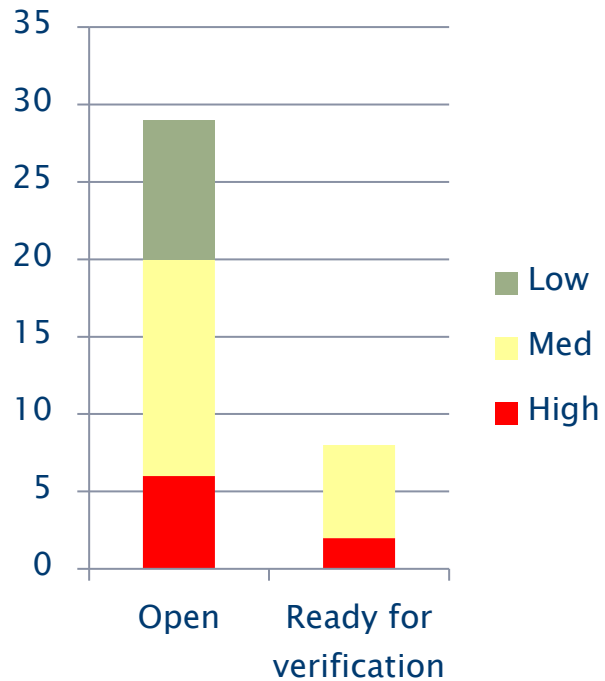
Legend for Control Effectiveness Rating	Key Controls
Effective	9
Improvement Needed	6
Not Effective	1
Not Tested (tested in other audits, etc.)	6
Total Key Controls	22

Based on the procedures performed, we are of the opinion that processes are in place, operational, and provide reasonable assurance that payments made by SBA under the Plans for the fiscal year ended June 20, 2023, are in compliance with applicable guidelines. However, the review did result in two high risk areas findings detailed below where processes or controls could be strengthened which are detailed in the table below.

Reportable Findings			
Risk	Description	Status	Target Date
High	No policy on minimum control measures for critical spreadsheets	In Progress	9/30/2024
High	Inadequate encryption of emails with sensitive information sent outside the SBA network	Complete	N/A

Additionally, the Audit resulted in 2 medium and 2 low risk observations. Management has agreed to all recommendations (except for one medium-risk issue which management has risk-accepted) and is working to implement appropriate process changes to mitigate the risks identified.

# Status of Management Action Plans–Audits



Report Title	Report Date	Risk Rating for Open Recs			Status		
		High	Med	Low	Open	Ready for verification	Verified during Qtr
Private Equity Operational Audit 2021	9/9/2021		1	1	2		
Derivatives Collateral and Cash Management Operational Audit	3/31/2022			1	1		
Performance Reports for Alternative Investments Operational Audit	9/19/2022	2	1		3		
Cybersecurity Incident Response Plan Operational Audit	5/10/2023		2	1	3		
Real Estate Externally Managed Portfolios Search and Selection Audit	5/31/2023		1		1		
Public Market Manager Search and Selection Audit	9/8/2023			1	1		
AG IT Operational Audit 2023	11/1/2023		2			2	
AG IT Operational Audit 2023 – Confidential	11/1/2023		5		3	2	
AG FHCF Operational Audit and Follow-up 2023	11/20/2023		1			1	
Vendor Management Operational Audit	12/19/2023		2		1	1	
Real Estate Credit Facility Operational Audit	4/30/2024	1	1	2	4		
Futures Rolling Flash Audit	4/30/2024			1	1		
Incentive Compensation Operational Audit	5/3/2024	5	4	2	9	2	
		8	20	9	29	8	
		22%	54%	24%	78%	22%	

For details, see [Appendix A](#).

Changes highlighted in yellow

Management Action Plans relate to findings from audits performed by internal **or external** auditors. The OIA&IG monitors and performs follow-up procedures on the management action plans in accordance with the IIA Standard 2500. A1. In certain cases, follow-up procedures are performed by external auditors.

# Status of Recommendations – Advisory Projects

Report Title	Report Date	Status			
		Open	Closed per Mgmt	<u>Closed by Peraton</u> <sup>2</sup>	<u>Closed per OIA&amp;IG Risk Assessment</u> <sup>1</sup>
Security Configuration and Vulnerability Management Advisory <sup>1</sup>	8/3/2021	3			
Identity and Access Management Advisory <sup>1</sup>	9/27/2022	3			1
Network Security Assessment 2022 (Peraton) <sup>2</sup>	11/14/2022	1	25		
Governance, Risk Management, and Compliance Assessment (Funston) <sup>1</sup>	6/26/2023	17	11		3
Network Security Assessment 2023 (Peraton) <sup>2</sup>	11/9/2023	13	16		
Cloud Computing Advisory <sup>1</sup>	5/6/2024	2	1		
		39	53		

Changes highlighted in yellow

*Advisory Recommendations made by OIA&IG or external consultants resulting from an assessment of a program or activity such as governance, risk management, compliance, ethics, etc. The OIA&IG monitors the disposition of these recommendations in accordance with the IIA Standard 2500.C1.“*

<sup>1</sup>At the advice of the Audit Committee, the OIA&IG closes Advisory Recommendations that management represented as “complete” once the OIA&IG has considered those in the risk assessment, which is reviewed quarterly by the OIA&IG.

<sup>2</sup>Recommendations will be reviewed for remediation and closure as part of the subsequent Network Security Assessment.

# Inspector General Report >>

# Inspector General Update

- The Chief Audit Executive & Inspector General is responsible for investigations regarding the following:
  - Fraud
  - Theft
  - Internal control failures
  - Allegations of non-compliance with laws and/or policies
- Since July 2006, the SBA has utilized an independent provider for its Fraud Hotline services. Through an 800 number, SBA employees, service providers, and others may anonymously report tips or information related to fraud, theft, or financial misconduct. The telephone number and information is prominently displayed on the SBA intranet home page. Online reporting is also available. Additionally, the hotline information is available on the SBA internet site as part of the SBA contact page. In late September 2021, the SBA transitioned to a new hotline service provider, EthicsGlobal.
- Any complaint, including whistleblower complaints, received through the anonymous hotline or other means, will be documented in a log of all complaints received through the OIA&IG Office or the General Counsel & Chief Ethics Office. The log will indicate which complaints, if any, are considered whistleblower complaints. As of December 2023, pertinent investigable complaints made to the Senior Operating Officer-HR will also be logged in accordance with the change in the Discrimination and Harassment Prevention and Complaint Process (Policy 10-254) to include ***“Upon receipt of the complaint, the SOO-HR or Director of HR will notify General Counsel & Chief Ethics Officer and Chief Audit Executive & Inspector General. The Chief Audit Executive & Inspector General will maintain a log of all complaints.”***
- During the quarter, no complaints were received via the hotline or other means. *(See the next slide for the complaint log statistics.)*

# Complaint Log Statistics (From 4 / 1 / 22 through present)

# Received via hotline	# Received via other means	# Relevant to the SBA with investigations conducted	# Considered whistleblower complaints	# Closed with violations	# Closed with no violations
3	4	5	0	0	5

No change since the prior quarter’s report. Confirmed with the General Counsel & Chief Ethics Officer and the Senior Operating Officer – Human Resources that no complaints were received in their respective areas of responsibilities.

Other OIA&IG Activities >>



# Other Items for Discussion

- Audit Committee 2024 Meeting Dates
  - August 12
  - November 18
- New Certifications in OIA&IG
  - Elizabeth McGuire - CFA
  - Kim Stirner - CIG
- New standards released in January 2024 effective in 2025
  - OIA&IG is adopting new standards during the course of 2024
  - OIA&IG will perform self-assessment as compared to new standards
  - Training by IIA on new standards being held at the SBA in June for OIA&IG
- Upcoming in 2024 - APPFA conference in Tallahassee
  - Conference will be held at the AC Hotel Nov 4-7, 2024

# Questions/Comments

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STATE BOARD OF ADMINISTRATION  
OF FLORIDA

1801 HERMITAGE BOULEVARD, SUITE 100  
TALLAHASSEE, FLORIDA 32308  
(850) 488-4406

POST OFFICE BOX 13300  
32317-3300

RON DESANTIS  
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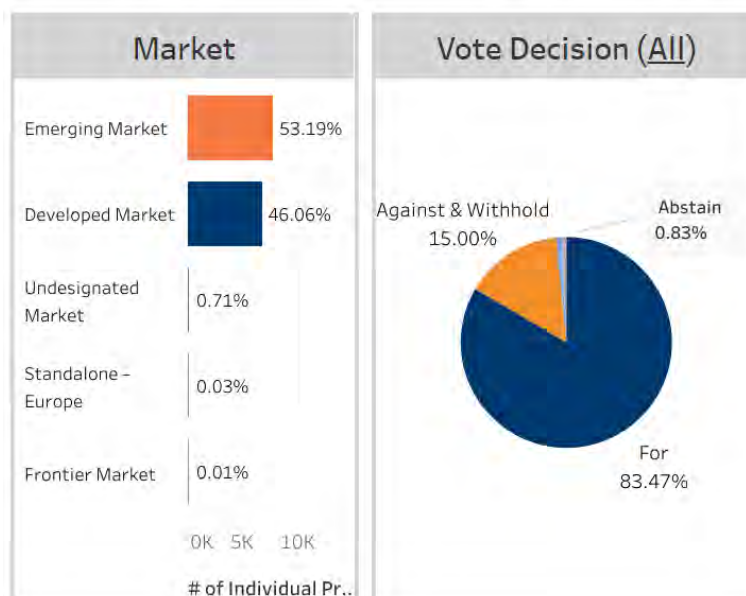
CHRIS SPENCER  
EXECUTIVE DIRECTOR

MEMORANDUM

**To:** Chris Spencer  
**From:** Michael McCauley  
**Date:** May 22, 2024  
**Subject:** Quarterly Standing Report - Investment Programs & Governance (IP&G)

GLOBAL PROXY VOTING & OPERATIONS

During the first quarter of 2024, SBA staff cast votes at 2,002 meetings worldwide, voting on ballot items including director elections, audit firm ratification, executive compensation plans, mergers & acquisitions, and a variety of other management and shareowner proposals. These votes involved 14,503 distinct voting items—voting 83.5% “For” and 15% “Against/Withheld,” with the remaining 1.5% involving abstentions. Of all votes cast, 14.9% were “Against” the management-recommended vote. SBA proxy voting occurred in forty-nine countries, with the top five by meeting volume comprised of South Korea (521), China (392), India (284), United States (202), Japan (195). The charts below detail the market segment and summary breakdown of all proxy votes made between January 1, 2024, and March 31, 2024:



CORPORATE GOVERNANCE & PROXY VOTING OVERSIGHT GROUP

The most recent meeting of the Corporate Governance & Proxy Voting Oversight Group (Proxy Committee) occurred on March 28, 2024, and the next meeting will be held on June 20, 2024. The Proxy Committee continues to review ongoing governance issues including the volume and trends for recent SBA proxy votes, company-specific voting scenarios, corporate governance policies, governance-related investment factors, major

regulatory developments and individual company research related to the Protecting Florida's Investments Act (PFIA), and other statutory investment restrictions related to China, Israel, and Venezuela.

### **LEADERSHIP & SPEAKING EVENTS**

Staff periodically participates in investor and corporate governance conferences and other meetings. Typically, these events include significant involvement by the largest asset owners and managers, corporate directors, senior members of management, and other key investor or regulatory stakeholders. The following items detail involvement at events that occurred most recently:

- In March, SBA staff participated in CII's Spring Conference, which covered a wide variety of corporate governance and proxy voting topics. Staff was also re-elected to the Council's Board of Directors and appointed as Public Funds Co-Chair. The SBA has been an active member of CII for over 35 years. Related to the organization's current search for a new Executive Director, SBA staff participated in several other Search Committee meetings during the quarter, both virtually and in-person.
- In March, just prior to CII's Spring Conference, SBA staff participated in an industry roundtable discussion hosted by Tumelo, including major asset owners and managers focused on the challenges and opportunities of pass-through proxy voting. Tumelo is a fintech company enabling pass-through proxy voting and other voting related "expression of wish" options for investors. Based on technological and operational advancements, there are now at least four large global asset managers embracing greater voting choice for a wide variety of clients.
- In March, just after the CII's Spring Conference concluded, SBA staff participated in a meeting of its Proxy Voter Group, discussing a range of topics including share class-by-class vote disclosure, evaluating executive compensation plans, and pre-meeting vote disclosure. CII's Proxy Voter Group brings together asset owners and asset managers' proxy voting and stewardship professionals for candid, peer-to-peer conversations of timely topics.

### **ACTIVE OWNERSHIP & CORPORATE ENGAGEMENT**

The SBA actively engages portfolio companies throughout the year, addressing corporate governance concerns, reviewing forthcoming proxy voting items, and seeking opportunities to improve alignment with the interests of our beneficiaries. Since early March 2024, SBA staff conducted engagement meetings with several companies owned (or with investor groups owning companies) within Florida Retirement System (FRS) portfolios, including the JLens Investor Network (RTX Co.), IBM, and several companies under examination with potentially scrutinized business operations in Iran.

### **HIGHLIGHTED PROXY VOTES**

**The Walt Disney Co. (DIS)**—for its April 3, 2024, contested shareowner meeting, SBA staff voted approximately 1.81 million shares in support of a majority of management's director nominees. The director election was contested, with two separate dissident slates from Triam Partners and Blackwells. Given the similarities between the business strategies and operational activities of both the incumbent management and that of Triam Partner's proposal, the dissident's support for current CEO Bob Iger, a lack of compelling rationale to make board changes at this point in time, and more recent improving business execution and stock price movement, SBA staff voted in support of all management nominees, with the exception of director Lagomasino (as Chair of the Compensation Committee amid concerns about pay design) and director Rice (for serving on too many boards simultaneously). The contested election was estimated to be the most expensive proxy contest in U.S. corporate

history, costing \$70 million. Disney has a remarkably high retail ownership segment (~30%), which raised the cost of investor outreach for both the company and the dissident.

Trian, for a second time in a year, proposed two nominees: Nelson Peltz and former Disney Chief Financial Officer Jay Rasulo. In their February 12, 2024, letter, Trian argued that Disney needs new independent directors to improve the board's, "focus, alignment and accountability." The activist said that its nominees seek to better align the interests of executives with shareholders and hold the leadership team accountable for lackluster performance. In early 2023, Disney outlined a plan to "succeed at succession," reignite its creative engine and to achieve profitability in the streaming business. Trian noted that the company's "stock price is lower now than a year ago, its streaming business lost another \$1.7 billion, 2024 earnings per share estimates are down nearly 20% [and] two of Disney's last five movies have failed to turn a profit." Trian and its affiliated investors owned over \$3 billion in Disney stock and were the company's fifth largest shareowner at the time of the proxy contest.

Trian proposed numerous changes to the firm's executive compensation structures and pay design: 1) raising the award thresholds of LTIP performance objectives (they believe the Compensation Committee has set them below historical averages and their expected level); and 2) simplify the AIP by orienting more towards growth metrics. In a February 12th letter to shareowners, DIS management argued that none of Trian and Blackwells' nominees "possess the appropriate range of talent, skill, perspective and/or expertise to effectively support Disney's building priorities in the face of continuing industry-wide challenges."

ValueAct, which positions itself as more CEO-friendly and reluctant to wage proxy fights than other activist hedge funds, and other notable industry figures and market pundits signaled their support for incumbent management and CEO Bob Iger, including George Lucas, Jamie Dimon, and Jeffrey Sonnenfeld. Disney's long-term total stock return (TSR) has clearly been poor over multiple time-periods, underperforming both sector peers and large company indices. However, shorter-term business performance and total stock returns over the last six months have started to improve, with an approximate 33% return year to date over the voting date. Several stock analyst upgrades have also occurred, and the firm's turnaround plan is gaining traction.

The two largest proxy advisors, Glass, Lewis & Co. (GLC) and Institutional Shareholder Services (ISS) were split on their recommendations. GLC suggested shareowners vote FOR the incumbent management nominees, with no support for dissident nominees, based on the following key thesis: "Ultimately, we believe that burgeoning inflection proves sufficient here. Prior succession imbroglio notwithstanding, our engagement with Disney did not leave us with the impression that the board was lacking in focus or that Bob Iger's second stint as Disney's CEO is mired in a slapdash series of confused or poorly conceived initiatives. Much to the contrary, we believe there exists adequate cause to suggest Mr. Iger's return to the role has been accompanied by an appropriately sober assessment of Disney's recent failings and a correlated series of programs intended to remediate the Company's less favorable footing, as further backed by board and executive refreshment and what we consider to be reasonably constructive engagement with other active investors."

On the other side, ISS recommended shareowners vote FOR Nelson Peltz and WITHHOLD on Maria Elena Lagomasino, based on the following key thesis: "Because the company has made positive changes to its board as well as operational changes that have been well received by the market, we recognize that some shareholders may feel that the company has sufficiently course corrected. These investors have likely drawn comfort from Iger's return." ISS went on to state, "Moreover, multi-year concerns surrounding Lagomasino's role as a compensation committee member strengthen the case that Peltz's addition, on balance, would appear a net positive." Although no longer used by SBA staff for proxy analysis, Strive Advisory recommended shareowners WITHHOLD support for numerous directors and other ballot items based on a simplistic view that management

has displayed an “anti-fiduciary” policy stance on several issues. SBA staff engaged both Disney’s Investor Relations staff as well as staff at Trian Partners about the proxy vote.

All incumbent nominees were re-elected, with CEO Iger receiving approximately 94% support. Notably, Nelson Peltz received about 31% support from the voted shares. Nominee Lagomasino received the lowest level of support among any of the continuing directors, with only 63% of the voted shares. Disney reportedly gained the support among its largest shareowners, including BlackRock, Vanguard, T. Rowe, and State Street Advisors. The proxy contest was the most visible contested meeting to date to use the so-called universal proxy card—whereby all investors can mix and match individual director voting across both the management and dissident(s) slates. The remaining ballot items fell in management’s favor, with its say-on-pay item receiving just under 80% support, and the two shareholder proposals receiving each less than 30% support. Since the proxy contest, the firm’s stock price has decreased about 12%.

**Norfolk Southern Corp. (NSC)**—for the company’s May 9, 2024, annual meeting, the SBA voted 277,824 shares of NSC, representing approximately \$64 million, in favor of all seven dissident shareowner nominees. NSC has had persistent operational problems, lagging efficiency measures, a significant deterioration in stock price performance, and several corporate governance concerns. Director elections were contested, with a dissident slate of seven nominees from Ancora Group (Ancora), owner of approximately 0.4% of NSC’s outstanding shares. This contested election was unusual in that a majority of the incumbent board was targeted with no control-share premium applied. Ancora focused its engagement with the company on management’s implementation of precision-scheduled railroading (“PSR”), which has surfaced in historical proxy contests and investor activity at Canadian Pacific (CP) in 2012 and at CSX in 2017. In the CP and CSX scenarios, SBA staff voted to support dissident candidate slates and PSR strategies in general, with favorable ex-post stock and financial performance at both companies. NSC’s long term total stock return (TSR) has been poor over multiple time-periods, underperforming both sector peers and the leading company in the sector. NSC’s operational performance has also been poor, lagging industry averages, with a deteriorating overall safety record occurring alongside the notable 2023 derailment in East Palestine, Ohio.

For these performance reasons, four of the largest proxy advisors in the U.S. recommended clients vote FOR a subset or the full slate of dissident nominees. Glass, Lewis & Co. (GLC) recommended shareowners vote FOR most of the incumbent management nominees along with six of the seven dissident nominees. GLC supported its recommendation by stating, “Based on our review, we believe the operating performance of the Company has been consistently worse than its peers for an extended period.” GLC went on to state, “Investors who support Ancora’s campaign will likely view the initial focus on a PSR-driven network redesign as a positive first step, as a successful redesign could yield improved asset utilization and greater efficiencies, thereby contributing to increased shareholder value.”

Institutional Shareholder Services (ISS) recommended shareowners vote FOR most of the incumbent management nominees along with five of the seven dissident nominees—recommending investors withhold from nominees Atkins (due to over-boarding) and Barber (due to concerns about disruption as he is the CEO candidate from the dissident side). In its supporting analysis, ISS said, “Replacing Miles, Thompson, and Scanlon with dissident nominees possessing deep expertise in railroad operations and safety (Sameh Fahmy, Gilbert Lamphere, and William Clyburn) would remove the majority of the cohort most responsible for the board’s disconnect with shareholders, while infusing needed independence and a diversity of perspective on key strategy, operational, and regulatory matters.” ISS went on to state, “It is important to recognize that the dissident has also articulated a plan that appears logical (the underlying model has been implemented successfully at other Class I railroads) and has assembled a credible management team that features a COO with

proven experience.” Separately, Ancora received the support of a sizable proportion of the company’s unionized workforce, including the Brotherhood of Locomotive Engineers and Trainmen Division of the International Brotherhood of Teamsters.

In addition to the board nominees, SBA staff voted FOR ratifying the company’s external auditor, voted AGAINST their say-on-pay executive compensation, and voted FOR both shareowner proposals covering improved lobbying reporting as well as the repeal of bylaw amendments since last summer. The company indicated shareowners voted to elect ten of NSC’s nominees, including CEO Alan Shaw, and Ancora winning three seats (nominees Clyburn, Fahmy and Lamphere) out of their seven nominees. The company commented, “moving forward, we will continue building on the significant progress Alan Shaw, John Orr, and the entire team have already achieved.” Ancora stated, “given that we have no standstill agreement and a clear mandate from a critical mass of shareholders, we [sic] will continue to hold Shaw to account and push for the appointment of a qualified operator who can actually drive shareholder value.” Since the proxy contest, the firm’s stock price has been flat.

## **REGULATORY AND MARKET DEVELOPMENTS**

### **Platform for Trading Proxy Voting Rights Shutting Down**

The Shareholder Vote Exchange, a fintech startup that sought to let investors sell their proxy voting rights, is winding down its operations, stating, “After much deliberation, we ultimately realized that scaling SVE to its full potential is not something that we can achieve.” Founded in 2021, the California-based startup created a website that ran auctions for the proxy voting rights tied to shareowner meetings of publicly traded companies. Investors were allowed to earn money on owned stocks by selling the security’s proxy voting rights to other market participants. Critics of the service warned it could increase the risk of manipulation in corporate proxy battles and potentially lead to a breach of fiduciary responsibilities.

### **SEC Rule Regulating Proxy Advisors Declared Invalid**

A federal court invalidated a 2020 Securities and Exchange Commission (SEC) rule that extended regulatory authority over firms providing proxy voting advice, like Institutional Shareholder Services (ISS) and Glass, Lewis & Co. The SEC’s amendment to include proxy voting advice under the definition of “solicit” and “solicitation” was deemed unlawful and beyond its statutory authority. Despite a 2022 SEC repeal of some requirements, the court ruled it insufficient. Large investors depend on proxy advisory firms for analysis on corporate proxy votes, which has increased their influence. Business groups opposing the SEC’s 2022 rollback sought to maintain the 2020 regulations, alleging that proxy firms improperly affect vote outcomes, particularly on ESG matters. ISS and Glass Lewis dispute these claims. The 2020 rule mandated public disclosures and anti-fraud measures for proxy advisors. However, the SEC’s 2022 revisions, led by Chair Gary Gensler, removed requirements for simultaneous disclosure of voting advice to clients and companies and the obligation to share company feedback on advice with investors. ISS, arguing that its advice is not a solicitation, had sued the SEC over this interpretation. Pending appeals from the National Association of Manufacturers (NAM) and the US Chamber of Commerce argue the SEC overstepped its authority in the 2022 reversals. The court’s decision underscores that the definition of “solicit” at the time of the Exchange Act’s enactment in 1934 did not include independent voting advice for a fee. Both NAM and the SEC plan to appeal the decision, which consolidated their cases. The conflict highlights ongoing debates over the regulation of proxy advisory firms and their role in corporate governance.

### **SEC Finalizes Climate Disclosure Rule**

On March 6, 2024, the SEC published its final rules on climate disclosure for public companies. The rules, approved on a 3-2 party-line vote by SEC Commissioners, aim to standardize climate-related disclosures and enhance transparency, aiding investors in comparing companies’ climate-related risks and their potential

financial impacts. The new rules aim to enhance transparency regarding climate-related risks and their financial impacts on public companies—with required disclosures included in specific SEC filings, such as annual reports and registration statements.

The final rules do not require the disclosure of so-called “Scope 3” emissions, which are indirect emissions resulting from a company’s activities but occur from sources not owned or controlled by the company (e.g., supply chain emissions). This was a controversial aspect due to measurement difficulties. Companies are only required to report “Scope 1” (direct emissions) and “Scope 2” (indirect emissions from purchased energy) if they are deemed material—meaning the disclosures are necessary if they significantly impact the company’s business strategy, operations, or financial condition. Small and emerging growth companies are exempt from these requirements, and larger companies will start compliance in 2025, with a gradual phase-in for others. Companies are not required to include climate-related disclosures in a separate section; they can embed the information within existing sections of their reports. Based on the Task Force on Climate-Related Financial Disclosures (TCFD), companies must disclose: 1) the impact or potential impact of climate-related risks on business strategy, operations, or financial condition; 2) material Scope 1 and 2 greenhouse gas (GHG) emission data; 3) board of directors’ oversight of climate-related risks; 4) processes for managing these risks; 5) climate-related targets and progress if deemed material.

The rules have faced legal challenges from various groups, including companies and environmental organizations. Despite the legal roadblocks, many companies are establishing internal controls and procedures to comply with the new requirements. As well, the global trend toward improved climate-related disclosures continues, driven by regulations both in the U.S. and internationally.

### **SEC Rejecting More Shareholder Proposals**

A review by the Shareholder Rights Group indicates the SEC has increased the rate at which it provides “no-action” relief for companies filing to exclude shareholder proposals (SHPs) from their proxy statements. From November 1, 2023, to May 1, 2024, the SEC supported company requests to exclude SHPs about 68% of the time, with a significant rise in the number of requests leading to more exclusions. This informal review process allows the SEC staff to decide whether a shareholder proposal can be excluded under SEC Rule 14a-8. In this period, 259 no-action decisions were issued, compared to 167 the previous year. Exclusions have nearly doubled, with the proportion of granted exclusion requests rising from 56% last year to 68% this year. Many climate and social proposals were excluded for being overly detailed or micromanaging. For instance, proposals for detailed greenhouse gas emissions breakdowns and disclosures of union suppression expenses were excluded on these grounds. Interestingly, there were no challenges based on the irrelevance of proposals, despite claims that shareowner proposals often lack relevance. The increase in exclusions suggests the SEC Staff is responsive to market feedback. However, for investors, the exclusion of proposals addressing material issues is viewed as a setback by some, potentially hindering risk management and governance improvements. Despite elevated shareholder proposal submission levels over the last 3 years, there are still approximately two out of 3 SHPs excluded from corporate proxy ballots.





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OF FLORIDA

1801 HERMITAGE BOULEVARD, SUITE 100  
TALLAHASSEE, FLORIDA 32308  
(850) 488-4406

POST OFFICE BOX 13300  
32317-3300

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## MEMORANDUM

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**To:** SBA Trustees  
Chris Spencer, Incoming Executive Director

**From:** Maureen M. Hazen, General Counsel & Chief Ethics Officer

**Date:** May 21, 2024

**Subject:** Office of General Counsel: Standing Report  
For Period February 22, 2024 – May 17, 2024

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*Maureen M. Hazen*

### SBA Agreements.

During the period covered by this report, the General Counsel's Office drafted, reviewed and negotiated: (i) 25 new agreements – including 1 new Global Equity investment manager agreement; 8 new Private Equity investments (including 2 co-investments); 4 new Strategic Investments; and 12 Real Estate investment transactions (including 3 loans under the Master Credit Facility); 2 new Investment Management Agreements for the DC Program; and 1 new Master Forwards Trading Agreement for Fixed Income; (ii) 234 contract amendments, addenda or renewals, including 56 amendments to the Investment Management Agreements for the Global Equity and Fixed Income asset classes to incorporate Section 215.4735, Fla. Stat. (2024), limiting investments in Chinese companies; and (iii) 3 terminations.

### SBA Litigation.

(a) Passive. As of April 30, 2024, the SBA was monitoring (as an actual or putative passive member of the class) 658 securities class actions. During the period from February 1 – April 30, 2024, the SBA collected recoveries in the amount of \$628,527.06 as a passive member in 30 securities class actions.

(b) FRS Investment Plan. During the period covered by this report, the General Counsel's Office monitored and/or managed the following cases for the Florida Retirement System Investment Plan (the "Investment Plan"). The SBA issued 1 Final Order, received notice of filing

of 4 new cases and continued to litigate 8 cases that were pending during the periods covered by previous reports (including 1 appellate case).

**Other Matters.**

(a) Public Records. During the period covered by this report (through April 30, 2024), the General Counsel's Office received 34 new public records requests and provided responses to 35 requests and continues to work on 2 open requests.

(b) SBA Rule Activities. During the period covered by this report, the SBA engaged in the following rules activities:

(i) Rules for the FRS Investment Plan:

A. Rule Chapter 19-11, F.A.C: Revisions are in process for the following rules:

- 19-11.001 Definitions
- 19-11.002 Beneficiary Designations and Distributions for FRS Investment Plan
- 19-11.003 Distributions from FRS Investment Plan Accounts
- 19-11.004 Excessive Trading in the FRS Investment Plan
- 19-11.006 Enrollment Procedures for New Hires
- 19-11.007 Second Election Enrollment Procedures for the Florida Retirement System Retirement Programs
- 19-11.008 Forfeitures
- 19-11.009 Reemployment with an FRS-Participating Employer after Retirement
- 19-11.012 Rollovers or Plan to Plan Transfers to or from the FRS Investment Plan
- 19-11.014 Benefits Payable for Investment Plan Disability and In-Line-of-Duty Death Benefits

The Notice of Development of Rulemaking for the above rules was filed in the November 16, 2023 issue of Florida Administrative Register ("FAR"). At the December 19, 2023 Trustees meeting, the Trustees gave approval to file the rules for notice and further to file the rules for adoption if no member of the public timely requests a rule hearing related to the rules. The rules then were filed with the Office of Fiscal Accountability and Regulatory Reform ("OFARR") to ensure OFARR had no concerns. OFARR did not have any substantive comments. As such, a Notice of Proposed Rulemaking ("NOPR") was filed with FAR on February 21, 2024, and the rules also were submitted to the Joint Administrative Procedures Committee ("JAPC") for approval. JAPC did not have any comments, and no member of the public requested a rule hearing. The rules were filed for adoption on April 2, 2024 and approved, on the date of filing, by the Bureau of Administrative Code, with an effective date of April 22, 2024.

The proposed changes made are as follows:

Rule 19-11.001- Definitions.

Rule 19-11.001 is being amended to update the definition of an exempt transaction to include rollovers of eligible funds; to update the age by which plan members must take Required Minimum Distributions once they terminate employment; to add a definition for “volunteer services;” and to make some editorial revisions.

Rule 19-11.002- Beneficiary Designations and Distributions for FRS Investment Plan.

Rule 19-11.002 is being amended to adopt the latest version of the FRS Investment Plan Beneficiary Designation Form; to set forth the most recent versions of the General Retirement Plan Enrollment Form and the 2nd Election Enrollment Form; and to provide that if a member’s spouse either cannot be located or refuses to sign the acknowledgement of beneficiary designation form, then the member may request that the requirement of the acknowledgement be waived by providing an affidavit setting forth the particular facts and circumstances.

19-11.003-Distributions from FRS Investment Plan Accounts

Rule 19-11.003 is being amended to update instructions as to how a copy of Internal Revenue Code Section 401(a)(9) may be obtained from the Internal Revenue Service website; to update the age by which plan members must take Required Minimum Distributions once they terminate employment; and to update examples showing how certain distributions to members could be invalid.

19-11.004-Excessive Trading in the FRS Investment Plan

Rule 19-11.004 is being amended to update how to obtain copies of the SEC regulations on excessive trading; and to update the examples for market timing trades and roundtrip trades.

Rule 19-11.006- Enrollment Procedures for New Hires.

Rule 19-11.006 is being amended to adopt the latest versions of the various enrollment forms.

Rule 19-11.007- Second Election Enrollment Procedures for the Florida Retirement System Retirement Programs.

Rule 19-11.007 is being amended to adopt the latest versions of the 2nd election enrollment forms.

Rule 19-11.008- Forfeitures.

Rule 19-11.008 is being amended to state that if a member, who transferred from the Pension Plan to the Investment Plan before vesting in the Pension Plan benefit leaves FRS employment, the member will be entitled to employee contributions plus any vested Investment Plan benefit.

However, if the member takes a distribution of any Investment Plan funds, the member will immediately be considered “retired” and will forfeit any unvested Pension Plan funds, as well as any earnings on such funds and any service credit related thereto.

Rule 19-11.009- Reemployment with an FRS-Participating Employer after Retirement.

Rule 19-11.009 is being amended to provide that a member who participates in an FRS-participating employer’s volunteer programs within the first 12-month period following termination still will be eligible to receive retirement benefits; and to adopt the latest version of the Certification Form that is used to prevent the hiring of ineligible retirees.

Rule 19-11.012- Rollovers or Plan to Plan Transfers to or from the FRS Investment Plan.

Rule 19-11.012, F.A.C. is being amended to adopt the latest version of the applicable rollover form.

19-11.014- Benefits Payable for Investment Plan Disability and In-Line-Of-Duty-Death Benefits

Rule 19-11.014 is being amended to update a statutory cite.

B. Rule 19-9.001 F.A.C.:

After receiving approval from OFARR, a Notice of Development of Rulemaking for Rule 19-9.001, F.A.C.-Investment Policy Statement, was filed in the Florida Administrative Register (“FAR”) on May 13, 2024. The purpose of the proposed rule amendment is to adopt the latest version of the Florida Retirement System Investment Plan Investment Policy Statement, as approved by the Trustees on March 26, 2024. The Investment Policy Statement was amended to reflect the fact that the State Board of Administration now is authorized to develop one or more investment products for the FRS Investment Plan. Further, the list of investment alternatives that may not be offered through the self-directed brokerage account has been expanded. At the June 11, 2024 Trustees Meeting, the Trustees will consider approving the filing of a Notice of Proposed Rule for the amendments.

(ii) Rules for the CAT Fund:

Rule 19-8.028, F.A.C.: A Notice of Development of Rulemaking for Rule 19-8.028, FAC-Reimbursement Premium Formula Contract, was filed in the March 7, 2024 issue of FAR. In accordance with Section 215.555(5), Florida Statutes, the proposed amendments to the rule are required to adopt the 2023-2024 reimbursement premium formula as set forth in the Florida Hurricane Catastrophe Fund 2024 Rulemaking Formula Report presented to the SBA on March 21, 2024. At the June 11, 2024 Trustees Meeting, the Trustees will be asked to approve the filing of a Notice of Proposed Rule for the amendments.

May 22, 2024

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(c) Fiduciary Training. During the period covered by this report, the General Counsel's Office conducted 3 sessions of in-person fiduciary training. All SBA employees are required to complete the training.

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**MEMORANDUM**

DATE: May 1, 2024

TO: Lamar Taylor, Interim Executive Director & CIO

FROM: Sooni Raymaker, Chief Risk & Compliance Officer *SR*

SUBJECT: Trustee and Audit Committee Report – May 2024

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The following is a summary report of Risk Management and Compliance (RMC) activities and initiatives completed or in progress since the last dated report of February 2024 to the current period. All RMC activities, reviews, controls, and processes are continuing to operate effectively and as expected during this reporting period.

The role of the RMC unit is to assist the Executive Director & CIO in maintaining an appropriate and effective risk management and compliance program to identify, monitor and mitigate key investment and operational risks. RMC plays a critical role in developing and enhancing the enterprise-wide system of internal controls. RMC proactively works with the Executive Director & CIO and designees to ensure issues are promptly and thoroughly addressed by management.

SBA senior management has created a culture of risk management and compliance through the governance structure, allocation of budgetary resources, policies and associated training and awareness. Management is committed to ethical practices and to serving the best interests of the SBA's clients.

**Compliance Exceptions**

No material compliance exceptions were reported during the period.

**Enterprise Risk Management (ERM)**

Response Plans and associated performance and risk metrics developed by designated risk owners and ERM from the last quarter have been updated. All metrics are as expected with no observed concerns. Plans are based on the major business model functions of Enterprise Oversight & Governance, Investment Management, and Organizational Operations. Plans include vital functions for each high-level process, vital signs (metrics), risk assessment results, risk tolerance levels, and current controls or activity to help mitigate those risks. Additionally, ERM has completed control validations on investment approvals and related funds transfers and actively continues building an assurance map of enterprise controls across the first, second, and third lines of defense. ERM is also participating in the organizational cloud migration of SharePoint system workflows to ensure controls and policy requirements are

reflected in automated workflows. The Risk and Compliance Committee is scheduled to meet on May 1. The risk metrics and assurance map will be discussed along with reports from Internal Audit, General Counsel, and Operational Due Diligence.

### **Trading and Investment Oversight Group (TOG)**

On April 25, 2024, TOG conducted its quarterly oversight meeting and reviewed internal trading activity, compliance reports, trading counterparty oversight updates and other standard trading information reports.

Last quarter, TOG created a Permitted Securities Working Group. The group includes representation from General Counsel, Global Equity, Fixed Income, and RMC. The group met several times and reviewed each security and associated statutory authorization noted by the public market staff and verified by General Counsel staff. The Group presented a final list for TOG approval and final review by the General Counsel's office.

### **External Manager Operational Due Diligence (ODD)**

During this reporting period, the ODD team reviewed and commented on 13 consultant operational due diligence reports on investment managers as part of the investment approval process, which represents approximately \$3.6 billion in potential investments. The team reviewed three real estate property acquisitions which represents approximately \$186 million in new investments. Three real estate credit facility loans were reviewed which represent approximately \$154 million. Twelve new consultant ODD reports were added to the Manager Operational Risk Oversight page for use by the asset classes since the last meeting.

The annual certification for external investment managers was requested in early April, with a deadline of May 31, 2024.

Mercer and the ODD team conducted three ODD reviews during this period. Additionally, the ODD team participated in four consultant interviews and three Fixed Income Core manager search interviews during the period.

### **Public Market Compliance (PMC)**

During the reporting period, PMC reviewed 7 investment guidelines for internal and external accounts, which included the onboarding of 4 new public market portfolios.

For the SharePoint Migration to Cloud, PMC worked with Project Management and IT staff to convert the current Exceptions Workflow and Monthly IOG Workflow. PMC staff attended weekly check-in meetings to ensure tasks were completed in accordance with the project timeline. Testing has been completed for both workflows and is pending deployment by IT.

Kickoff for the Charles River upgrade from version 21R3 to 23R2 began on February 7<sup>th</sup>. PMC was heavily involved in testing and participated in daily calls discussing issues and progress of the project. Testing by PMC involved the review and confirmation of access and functionality in the new environment. Additionally, compliance rules were tested to ensure they work correctly in the new version. Despite an



access issue that temporarily prevented PMC from having the capability to test compliance rules in UAT, PMC was able to complete testing by the April 26 deadline. Parallel testing began on April 29. The new version, 23R2, is scheduled to Go-Live on May 6, 2024.

### **Performance Reporting & Analytics (PRA)**

As reported previously, the SBA has enlisted the services of a consultant (Meradia) to assess investment performance, performance attribution, and risk analytics processes, among other items, to support the organization's strategic goals. The purpose of this engagement is to identify areas of improvement and opportunities within the SBA architecture to bolster investment performance and analytics. Another objective of this project is to enhance quantitative decision-making by expanding analytics for portfolio construction, monitoring, and refining core key performance indicators. In addition, the project aims to improve operating effectiveness by evaluating the systems architecture, enhancing data management practice, and reducing technical debt.

This quarter, The PRA team primarily focused on the Investment Policy Statement changes while maintaining momentum on the Eagle Access project with Meradia. The PRA team undertook the task of transferring over 200 portfolios from the Strategic Investments asset class to the new Private Credit asset class. This was done manually under the current on-premises environment.

Additionally, the PRA team established over 35 composites, each added individually to the database, and created and implemented new quality daily and monthly checks and reports to reflect the changes of the Investment Policy Statement.

Moreover, the PRA Team, in collaboration with Meradia and Eagle SMEs, has been conducting tests on complex calculations such as Policy Weights to ensure those calculations can be performed automatically in PACE. During Model Office 2, PRA validated and confirmed that PACE does have the capability to execute them. As a result, PRA will be incorporating those calculations, alongside others, into PACE. The PRA team continues having discussions on information delivery and establishing a road map to achieve the objectives of the SBA.

### **Policy Administration**

During the review period, six internal policies were revised. The Risk Budget, Rebalancing and Liquidity Management, and the Private Equity Allocation policies were all updated for consistency with the FRS Defined Benefit Investment Policy Statement, which became effective 1/1/2024. The Trading Counterparty Management - Public Market Asset Classes policy (Counterparty policy) was revised to update certain responsibilities associated with daily counterparty monitoring and the review of credit standards for Direct Issuers. A provision was also added to permit the execution of swaps on a Swap Execution Facility with counterparties other than those on the authorized list. The Trading, Investment Oversight and Compliance policy was revised to include the annual requirement for the Trading Oversight Group approval of the Designated Futures, Options, and Swaps Exchanges Markets list, which was previously included in the Counterparty policy. Finally, the Investment Valuation policy was also revised to update its three attachments, which include the custodian Global Pricing Guidelines, the SBA's Internal Pricing Hierarchy, and the Valuation Procedures for Private Market investments.

Three investment guidelines were revised to update portfolio parameters such as benchmarks, risk profiles, and maturity constraints for the Florida Hurricane Catastrophe Fund Operating Liquidity and Claims Paying portfolios, as well as for the SBA Finance Corporation Pre-Event 2020A fund. New investment guidelines were implemented for the SBA Finance Corporation Pre-Event 2020A Transition portfolio, which will hold securities slated for the payment of debt service, and for the SBA Finance Corporation Pre-Event 2024A fund, which will be used to pay hurricane claims and debt service on the pre-event bonds, as needed.

Two new investment guidelines were also implemented for the Fixed Income Policy Transition Account 4 and Account 5. These accounts will be utilized to manage large rebalancing and other asset allocation transitions. No revisions to internal policies or guidelines were made due to the implementation of the revised FRS Investment Plan Investment Policy Statement, which became effective on 3/26/2024.

### **Regulatory and Statutory Reporting**

The *SBA Statutory and Regulatory Reporting Requirements with Calendar Due Dates* spreadsheet was further developed and distributed to affected business units monthly for responses to demonstrate compliance with each reporting or disclosure obligation. During this reporting period, RMC and fourteen other SBA teams reviewed and confirmed the completion of 42 regulatory and statutory obligations. Many of the obligations are derived from Florida Statutes and Administrative Code and the remaining obligations are primarily derived from regulatory bodies such as the Securities Exchange Commission, Commodity Futures Trading Commission, and other foreign regulatory bodies.

A summary of some major statutory reporting activity includes: the Annual Investment Report; the Trustee Quarterly Report; Certification and Disclosure requirements for investment advisers and manager; OPPAGA's Analysis of technology and growth funds; Annual Financial Audit of Florida PRIME; and Comprehensive report detailing adherence to fiduciary standards. Other reports include quarterly 13F and 13G forms filed with the SEC, which include holdings in certain public equity securities.

### **Personal Investment Activity (PIA)**

During the period (February 1 – April 29), there were 288 requests for pre-clearance by SBA employees, with 217 being approved, 50 being denied (due to blackout restrictions), and 21 being retracted (not traded). There were 4 violations during the period. Two violations were the result of trades being executed in a different account than what was approved on the pre-clearance requests. The other two violations were the result of employees failing to pre-clear prior to transacting with their broker.

MINUTES  
INVESTMENT ADVISORY COUNCIL  
March 12, 2024

A hybrid meeting of the Investment Advisory Council (IAC) was held on Tuesday, March 12, 2024, via Microsoft Teams. The attached transcript of the March 12, 2024, meeting is hereby incorporated into these minutes by this reference.

Members Present:

<u>Attended In Person:</u>	<u>Attended Virtually:</u>	<u>Not In Attendance</u>
John Goetz	Ken Jones	Freddie Figgers
Vinny Olmstead	Peter Jones	
Tere Canida	Pat Neal	
Gary Wendt	Peter Collins	
SBA Employees:	Lamar Taylor	Paul Groom
	Jim Treanor	John Benton
	Trent Webster	Tim Taylor
	Todd Ludgate	John Bradley
	Dan Beard	Lynne Gray
	Michael Fogliano	
Consultants:	Richard Brown, Townsend	Eileen Neill, Verus
	Seth Marcus, Townsend	Marc Gesell, Verus
	Jeff Leighton, Townsend	Katie Comstock, Aon

WELCOME/CALL TO ORDER/ELECTION OF OFFICERS/APPROVAL OF MINUTES

John Goetz, Chair, called the meeting to order at 11:02am. John nominated Ken Jones as the next Chair. Senator Neal seconded the nomination. All in favor. Ken Jones was elected Chair. John explained that he would be Acting Chair for the remainder of the meeting since Ken was attending virtually. Ken expressed his excitement and gratitude for the opportunity and thanked Senator Neal for his service on the IAC. Senator Neal praised the SBA staff and expressed his regret at having to leave the IAC.

Ken Jones nominated Peter Jones as the next Vice-Chair. Senator Neal seconded the nomination. All in favor. Peter Jones was elected Vice-Chair. Peter thanked Ken for the opportunity. John echoed Ken's gratitude toward Senator Neal and wished him well.

John requested a motion to approve the December 12, 2023, IAC meeting minutes. Tere Canida moved to approve the minutes. The motion was seconded. All in favor. The December 12, 2023, IAC meeting minutes were approved.

OPENING REMARKS/REPORTS

Lamar Taylor, Interim Executive Director & CIO, reminded all attending virtually to identify themselves when speaking. He then thanked Senator Neal for his service on the IAC. Lamar provided a

brief update on performance, stating that the FRS Pension Plan was up 7.4%, 138 bps behind the benchmark CYTD. Performance through the end of calendar year 2023 was up 11.4%, 190 bps behind benchmark. Lamar explained that this is due to private market lags, primarily from Private Equity, though he noted that the 10-year return for Private Equity is double that of the public markets.

Lamar summarized the recent changes to the asset allocation, noting the transition would take time to complete. Regarding the search for the new Senior Investment Officer of Real Estate, Lamar stated that they have narrowed the applicant pool to four candidates, two of which are internal.

Lamar discussed recent legislation that will prohibit the SBA from owning Chinese state-owned entities, requiring that the SBA divest from these entities by September 1, 2025. He noted that the SBA's exposure in these entities is under \$300 million. Lamar answered questions from IAC members. Ken Jones requested that a list of the entities be provided to IAC members. After Gary Wendt requested an explanation regarding the Total Fund's underperformance, John Goetz suggested that a simplified attribution report be provided to the IAC. On a final note, Lamar mentioned that a proposal to reintroduce the cost-of-living adjustment into the Pension Plan did not pass this year.

#### ASSET ALLOCATION TRANSITION UPDATE

Jim Treanor, Deputy Chief Investment Officer, provided an overview of the changes to the asset allocation. He explained that the Active Credit asset class will be a combination of Private Credit, which is currently in Strategic Investments, and Multi-Asset Credit. Jim stated that this transition was being conducted methodically over time, noting that this has been a good time to reallocate Global Equity as the market has been up.

Jim briefly went over the new benchmarks for the asset classes. He then discussed asset allocation as of February 29, 2024, market close. He noted that Strategic Investments will be breaking out into the Active Credit asset class effective April 1<sup>st</sup>. Jim and Trent Webster, Senior Investment Officer – Strategic Investments, answered a question from John Goetz regarding the Active Credit asset class.

#### REAL ESTATE ASSET CLASS REVIEW

Paul Groom, Deputy Executive Director/Acting Senior Investment Officer – Real Estate, provided an overview of Real Estate's role in the Total Fund, benchmark, team, and investment vehicles. He discussed the Private Real Estate portfolio construction and how risk is managed within the portfolio. Paul also discussed Real Estate's consultant, Townsend; the investment process; target allocation; and the portfolio. Paul answered a question from Ken Jones. Regarding performance, Real Estate outperformed the benchmark over all time periods. Paul noted that performance was down 8.3% over the 1-year period due to the repricing of real estate. Paul; Lynne Gray, Senior Portfolio Manager; Michael Fogliano, Senior Portfolio Manager; and Seth Marcus, Townsend, answered a question from Vinny Olmstead regarding the portfolio's outperformance. Paul explained how returns varied by property type, after which there was discussion among the Real Estate team, Lamar Taylor, and IAC members regarding geographic and property type exposure. Paul briefly discussed the portfolio's contributors/detractors, property type and geographic diversification, 2023 investment activity, leverage, the credit facility program, capital markets, and valuations/transactions. Lamar, Michael, and Lynne answered questions from IAC members.

Seth Marcus, Townsend, explained how their focus is on long-term strategies. He discussed attractive opportunities including non-traditional property types. Seth provided an overview of how the

Real Estate program has evolved over the last 20 years, stating that alternatives are the next growth strategy. He also explained that they have been looking at non-core opportunistic strategies.

Jeff Leighton, Townsend, stated that as of the end of September 2023, the Real Estate portfolio had outperformed the benchmark by 110 bps over the 5-year period. He discussed annualized income and appreciation, noting that Real Estate has been meeting its objective of generating attractive risk-adjusted returns. Jeff also explained that there has been total value creation of \$19.4 billion since inception of the Real Estate program.

Seth Marcus answered a question from John Goetz regarding the Real Estate program relative to peers. Lamar Taylor explained that with the recent 2% increase in Real Estate's target allocation, specifically in non-core strategies, there is room to take advantage of new opportunities.

#### PORTFOLIO CONCENTRATION RISK

Eileen Neill, Verus, explained that most of the time, index concentration is normal and a reflection of the economy that is thriving. She provided background on capital market theories and industry best practices, explaining why a cap-weighted benchmark is used for Global Equity. Eileen showed that U.S. equity market concentration is average compared to international markets. She discussed factors that have contributed to shifts in the S&P 500 top 10's sector composition over the last 30 years, and explained that there is diversification within those sectors, including among the Magnificent 7.

Marc Gesell, Verus, provided a comparison of cap-weighted vs equal-weighted benchmarks, providing an overview of historical relative performance. He explained that when performing an analysis of historical shock factors on current index holdings, the equal-weighted index showed larger drawdowns than the cap-weighted index. Marc also compared the relative risk-efficiency of the two, explaining that the equal-weighted has not been any more risk-efficient than the cap-weighted index.

Eileen Neill stated that they recommend staying the course and explained that diverting from the cap-weighted structure would come with its own risks. She noted that the Global Equity asset class could implement an equal-weighted strategy as an active management strategy.

Lamar Taylor, Interim Executive Director & CIO, discussed how the SBA mitigates the equity concentration risk through Global Equity's portfolio construction, Global Equity's active management, and the Total Fund asset allocation. Lamar explained how Global Equity's Dedicated Global strategy can diversify against any underperformance by the Magnificent 7. He also underscored Verus' points of healthy vs unhealthy concentration and that utilizing active management to divert from the cap-weighted benchmark would require further analysis. Lamar and Tim Taylor, Senior Investment Officer – Global Equity, answered a question from John Goetz.

#### ASSET CLASS SIO UPDATES

Tim Taylor, Senior Investment Officer – Global Equity, explained that 2023 was a strong year for the markets and noted that the benchmark is up 6% CYTD 2024. He explained that because it was such a strong year for the markets, he was not disappointed about Global Equity's underperformance over both Q4 2023 and the 1-year period. Tim then discussed active aggregate performance and current initiatives, including the implementation of the new asset allocation.

Trent Webster, Senior Investment Officer – Strategic Investments, provided an overview of Strategic Investment's performance and recent activity. He discussed the new portfolio construction and

current portfolio allocation and answered a question from John Goetz. Trent also provided a brief update on Multi-Asset Credit, noting that the plan is to start with passive allocations.

Todd Ludgate, Senior Investment Officer – Fixed Income, discussed Fixed Income's outperformance over all time periods and noted that the strong performance has continued into 2024. He also discussed portfolio positioning and portfolio risk. Todd explained that there is still uncertainty regarding rates with Fed cut expectations declining. Todd also provided a brief review of 2023.

John Bradley, Senior Investment Officer – Private Equity, explained that Private Equity deal activity rebounded in 4Q23. He also noted that 2023 marked the 7<sup>th</sup> consecutive year that the program was self-funding. John discussed Private Equity's strong performance over the long-term and noted that while the 1-year period underperformed due to swings in the public market benchmark and a lag in valuations, the performance is in line with that of industry peers. John answered a question from John Goetz and provided a review of commitment activity in 2023.

Dan Beard, Chief of Defined Contribution Programs, stated that assets had increased to \$16.3 billion as of March 11<sup>th</sup> market close. Regarding performance as of February 29<sup>th</sup>, he stated that it was 8.95% FYTD (15bps below benchmark), 15.79% over the 1-year period (32bps above benchmark), and 7.04% since inception (28bps above benchmark). Dan then discussed the Investment Plan's assets and the MyFRS Financial Guidance Program's activity over 2023.

#### MAJOR MANDATE PERFORMANCE REVIEW

Katie Comstock, Aon, provided an overview of the performance of the FRS Pension Plan, the FRS Investment Plan, the Florida Hurricane Catastrophe Fund, and Florida PRIME.

#### AUDIENCE COMMENTS/CLOSING REMARKS/ADJOURN

Senator Neal remarked on his enjoyment of his time with the IAC. There being no further questions or items for discussion, the meeting was adjourned at 2:33pm.



Ken Jones, Chair



Date



# First Quarter 2024 Major Mandates Performance Review

State Board of Administration of  
Florida

June 10, 2024

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# Executive Summary

Quarter Ending 3/31/2024

- Each of the major mandates produced favorable returns relative to the respective benchmarks over the short- and long-term trailing periods as of March 31, 2024
- The Pension Plan outperformed its Performance Benchmark over the trailing three-, five-, ten-, and fifteen- year periods.
- The FRS Investment Plan outperformed the Total Plan Aggregate Benchmark over the trailing one-, five-, and ten-year periods.
- The CAT Funds' performance is strong over long-term periods
- Florida PRIME has continued to outperform its benchmark over both short- and long-term time periods.

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# Pension Plan: Executive Summary

As of 3/31/2024

- The Pension Plan assets totaled \$196.5 billion as of March 31, 2024, which represents a \$6.1 billion increase since last quarter.
- The Pension Plan trailed its benchmark over the one-year, however, has outperformed over the trailing three, five, and ten years.
- Relative to the Absolute Nominal Target Rate of Return, the Pension Plan outperformed over the trailing quarter, one-year, five-year, ten-year and and underperformed over the trailing three-year period.
- The Pension Plan has exposure across six broad asset classes, and each asset class is well-diversified.
  - Public market asset class investments do not significantly deviate from their broad market-based benchmarks, e.g., sectors, market capitalizations, global regions, credit quality, duration, and security types.
  - Private market asset classes are well-diversified by vintage year, geography, property type, sectors, investment vehicle/asset type, and investment strategy.
  - Asset allocation is monitored daily to ensure that the actual asset allocation of the Pension Plan remains close to the long-term policy targets set forth in the Investment Policy Statement.
- Aon Investment Consulting and SBA staff revisit the plan design annually through informal and formal asset allocation and asset liability reviews.
- Adequate liquidity exists within the asset allocation to pay the monthly obligations of the Pension Plan consistently and on a timely basis.



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## FRS Pension Plan Change in Market Value

Periods Ending 3/31/2024

Summary of Cash Flows		
	Fourth Quarter	Fiscal YTD*
<b>Beginning Market Value</b>	\$190,429,563,717	\$185,709,266,761
<b>+/- Net Contributions/(Withdrawals)</b>	\$(1,522,315,141)	\$(5,086,628,022)
<b>Investment Earnings</b>	\$7,618,376,060	\$15,902,985,897
<b>= Ending Market Value</b>	\$196,525,624,636	\$196,525,624,636
<b>Net Change</b>	\$6,096,060,919	\$10,816,357,875

\*Period July 2023 – March 2024



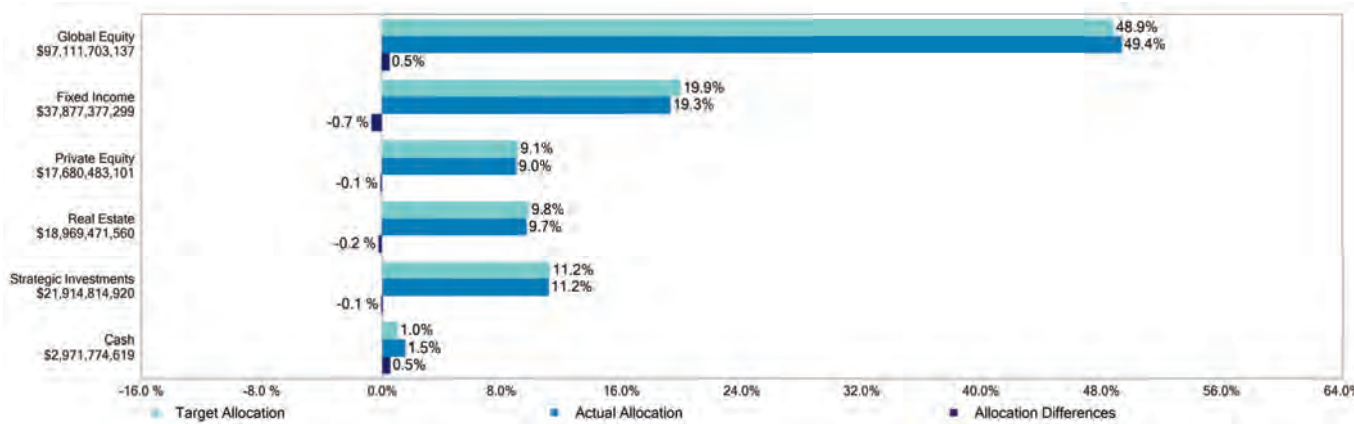
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# Asset Allocation as of 3/31/2024

Total Fund Assets = \$196.5 Billion

	Market Value \$	Current Allocation %	Target Allocation %	Minimum Allocation %	Maximum Allocation %
Total Fund	196,525,624,636	100.0	100.0		
Global Equity	97,111,703,137	49.4	48.9	45.0	70.0
Fixed Income	37,877,377,299	19.3	19.9	10.0	26.0
Private Equity	17,680,483,101	9.0	9.1	2.0	12.0
Real Estate	18,969,471,560	9.7	9.8	4.0	16.0
Strategic Investments	21,914,814,920	11.2	11.2	0.0	16.0
Cash	2,971,774,619	1.5	1.0	0.3	5.0



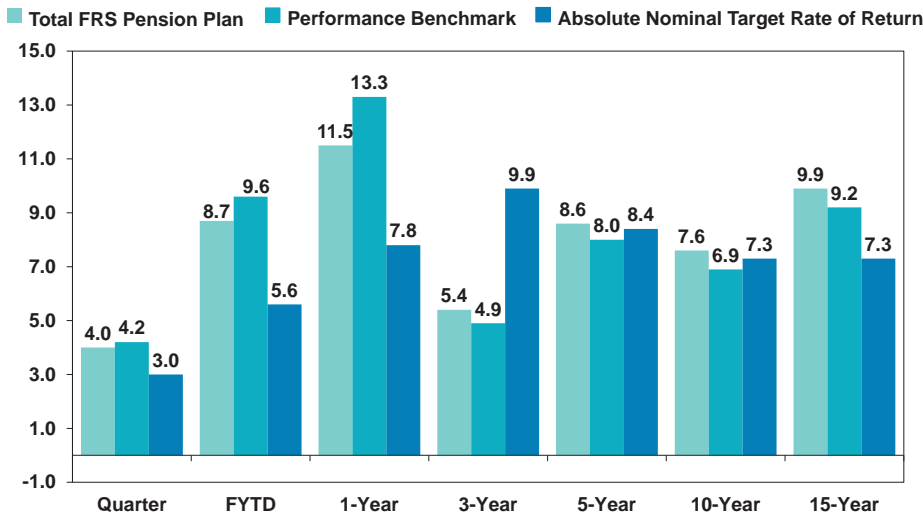
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# FRS Pension Plan Investment Results

Periods Ending 3/31/2024



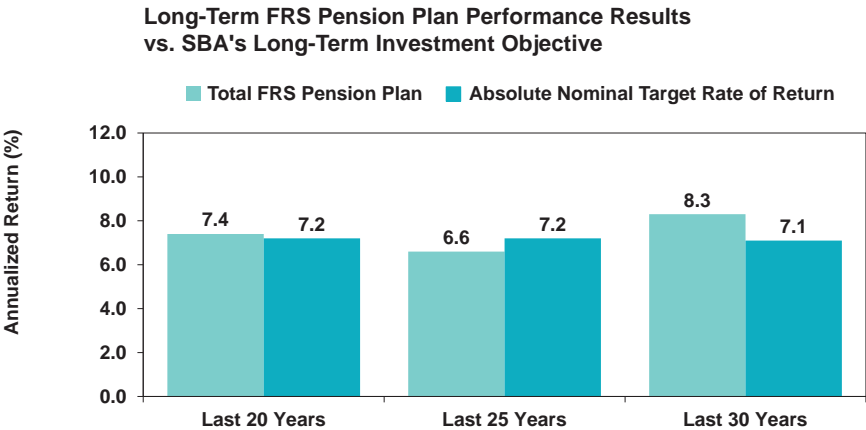
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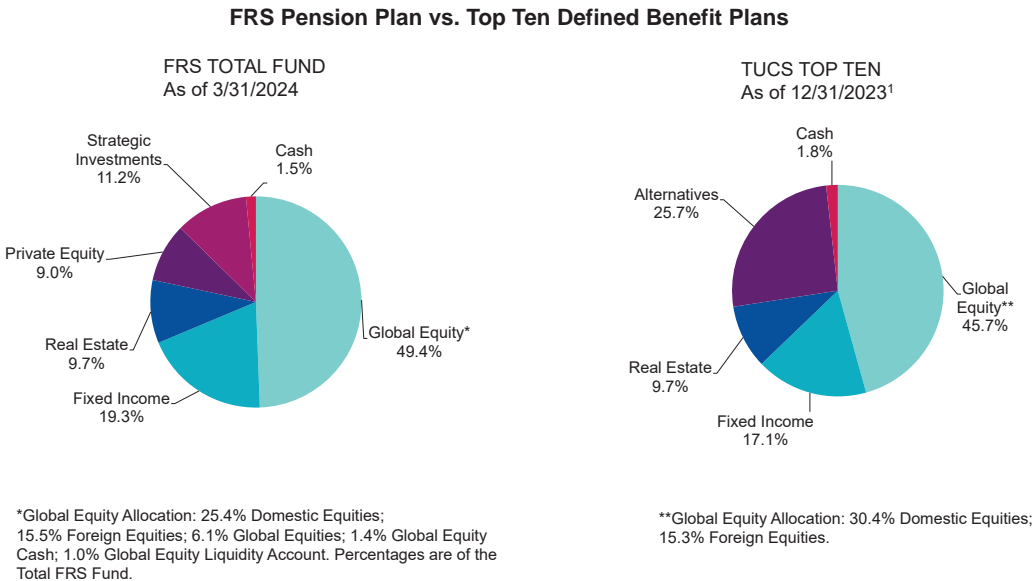
8

# FRS Pension Plan Investment Results

Periods Ending 3/31/2024



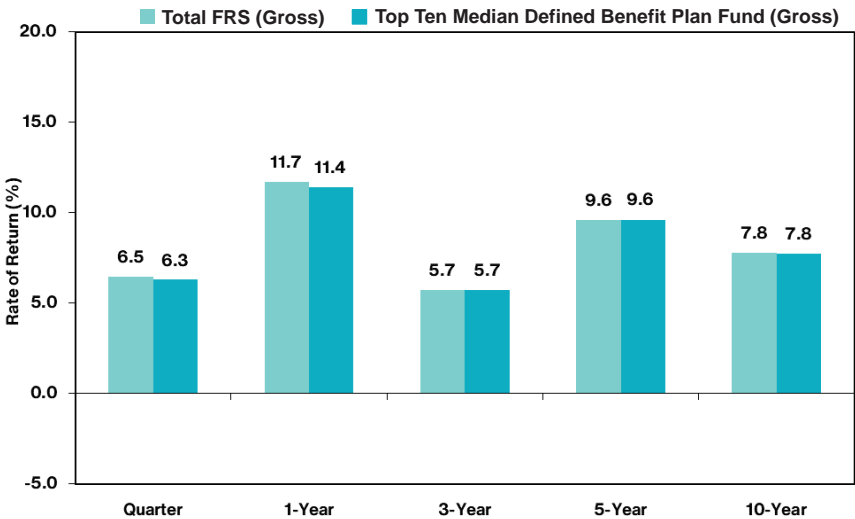
## Comparison of Asset Allocation (TUCS Top Ten)



Note: The data set includes \$1,932 billion in total assets. The median fund size was \$180 billion and the average fund size was \$193 billion.  
 Note: Due to rounding, percentage totals displayed may not sum perfectly.  
<sup>1</sup>TUCS Data as of 3/31/24 not available at time of reporting

# FRS Results Relative to TUCS Top Ten Defined Benefit Plans

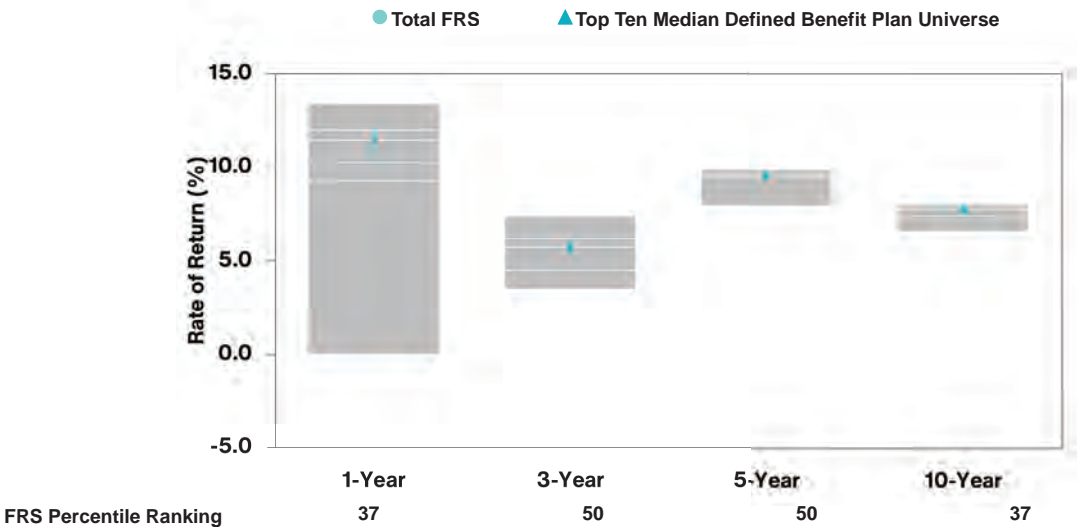
Periods Ending 12/31/2023<sup>1</sup>



Note: The data set includes \$1,956 billion in total assets. The median fund size was \$161 billion and the average fund size was \$195 billion.  
 Note: Due to rounding, percentage totals displayed may not sum perfectly.  
<sup>1</sup>TUCS Data as of 3/31/24 not available at time of reporting

# Top Ten Defined Benefit Plans FRS Universe Comparison (TUCS)

Periods Ending 12/31/23<sup>1</sup>



Note: The data set includes \$1,956 billion in total assets. The median fund size was \$161 billion and the average fund size was \$195 billion.  
<sup>1</sup>TUCS Data as of 3/31/24 not available at time of reporting

# Investment Plan: Executive Summary

- The FRS Investment Plan outperformed the Total Plan Aggregate Benchmark over the trailing quarter-, one-, five-, and ten-year periods. This indicated strong relative performance of the underlying fund options in which participants are electing to invest in.
- The FRS Investment Plan's total expense ratio is in line with peer defined contribution plans, based on year-end 2022 data. The total FRS Investment Plan expense ratio includes investment management fees, as well as administration, communication and education costs. Communication and education costs are not charged to FRS Investment Plan members; however, these and similar costs may be charged to members of plans within the peer group.
- Management fees are lower than the median as represented by Morningstar's mutual fund universe for every investment category with the exception of Inflation Protected Securities.
- The FRS Investment Plan offers an appropriate number of fund options that span the risk and return spectrum.
- The Investment Policy Statement is revisited periodically to ensure that the structure and guidelines of the FRS Investment Plan are appropriate, taking into consideration the FRS Investment Plan's goals and objectives.



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# Total Investment Plan Returns & Cost

## Periods Ending 3/31/2024\*

	One-Year	Three-Year	Five-Year	Ten-Year
<b>FRS Investment Plan</b>	<b>16.1%</b>	<b>4.7%</b>	<b>8.1%</b>	<b>7.0%</b>
<i>Total Plan Aggregate Benchmark**</i>	16.0	5.0	8.0	6.8
FRS Investment Plan vs. Total Plan Aggregate Benchmark	0.1	(0.3)	0.1	0.2

## Periods Ending 12/31/2022\*\*\*

	Five-Year Average Return****	Five-Year Net Value Added	Expense Ratio
<b>FRS Investment Plan</b>	<b>4.4%</b>	<b>-0.3%</b>	<b>0.27%*****</b>
<i>Peer Group</i>	4.8	0.1	0.24
FRS Investment Plan vs. Peer Group	-0.4	-0.2	0.00

\*Returns shown are net of fees.

\*\*Aggregate benchmark returns are an average of the individual portfolio benchmark returns at their actual weights.

\*\*\*Source: 2023 CEM Benchmarking Report. Peer group for the Five-Year Average Return and Value Added represents the U.S. Median plan return based on the CEM 2023 Survey that included 120 U.S. defined contribution plans with assets ranging from \$114 million to \$63.2 billion. Peer group for the Expense Ratio represents a custom peer group for FSBA of 18 DC plans including corporate and public plans with assets between \$3.4 - \$26.9 billion.

\*\*\*\*Returns shown are gross of fees.

\*\*\*\*\*The total FRS Investment Plan expense ratio includes investment management fees, as well as administration, communication and education costs. These latter costs are not charged to FRS Investment Plan members; however, these and similar costs may be charged to members of plans within the peer group utilized above.



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## CAT Fund: Executive Summary

- Returns are modest given the current high-rate environment and previously low interest rate environment.
- All CAT Funds are adequately diversified across issuers within the short-term bond market.
- The Investment Portfolio Guidelines appropriately constrain the CAT Funds to invest in short-term and high-quality bonds to minimize both interest rate and credit risk.
- Adequate liquidity exists to address the cash flow obligations of the CAT Funds.
- The Investment Portfolio Guidelines are revisited periodically to ensure that the structure and guidelines of the CAT Funds are appropriate, taking into consideration the CAT Funds' goals and objectives.

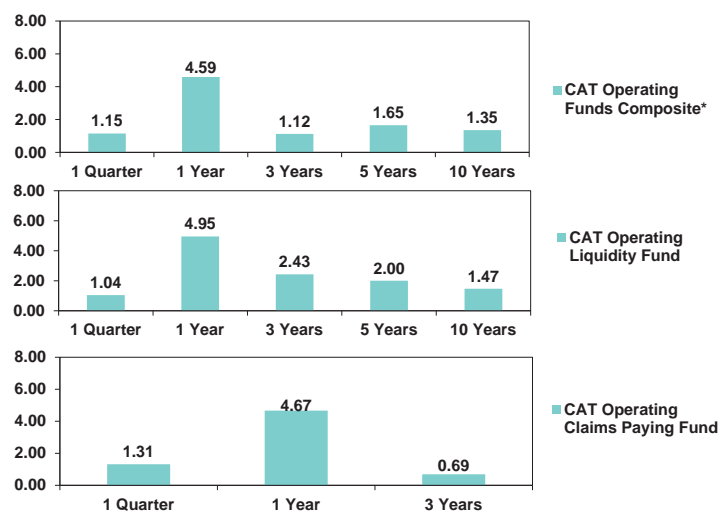


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## CAT Operating Funds Investment Results

Periods Ending 3/31/2024



\*CAT Operating Funds: Beginning March 2008, the returns for the CAT Operating Funds reflect marked-to-market returns. Prior to that time, cost-based returns are used. Beginning February 2018, the CAT Operating Funds were split into two different sub funds, the CAT Fund Operating Liquidity Fund and the CAT Fund Operating Claims Paying Fund. Performance for each sub fund is shown below.



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# Florida PRIME: Executive Summary

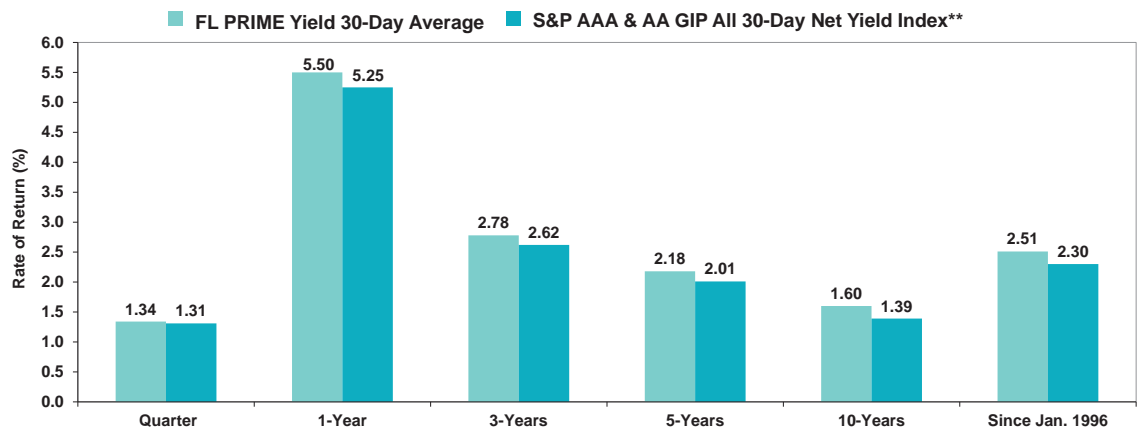
- The purpose of Florida PRIME is safety, liquidity, and competitive returns with minimal risk for participants.
- The Investment Policy Statement appropriately constrains Florida PRIME to invest in short-term and high-quality bonds to minimize both interest rate and credit risk.
- Florida PRIME is adequately diversified across issuers within the short-term bond market, and adequate liquidity exists to address the cash flow obligations of Florida PRIME.
- Performance of Florida PRIME has been strong over short- and long-term time periods, outperforming its performance benchmark over the trailing one-, three-, five-, and ten-year time periods.
- As of March 31, 2024, the total market value of Florida PRIME was \$27.3 billion.
- Aon Investments USA Inc., in conjunction with SBA staff, compiles an annual best practices report that includes a full review of the Investment Policy Statement, operational items, and investment structure for Florida PRIME.



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## Florida PRIME Investment Results

Periods Ending 3/31/2024



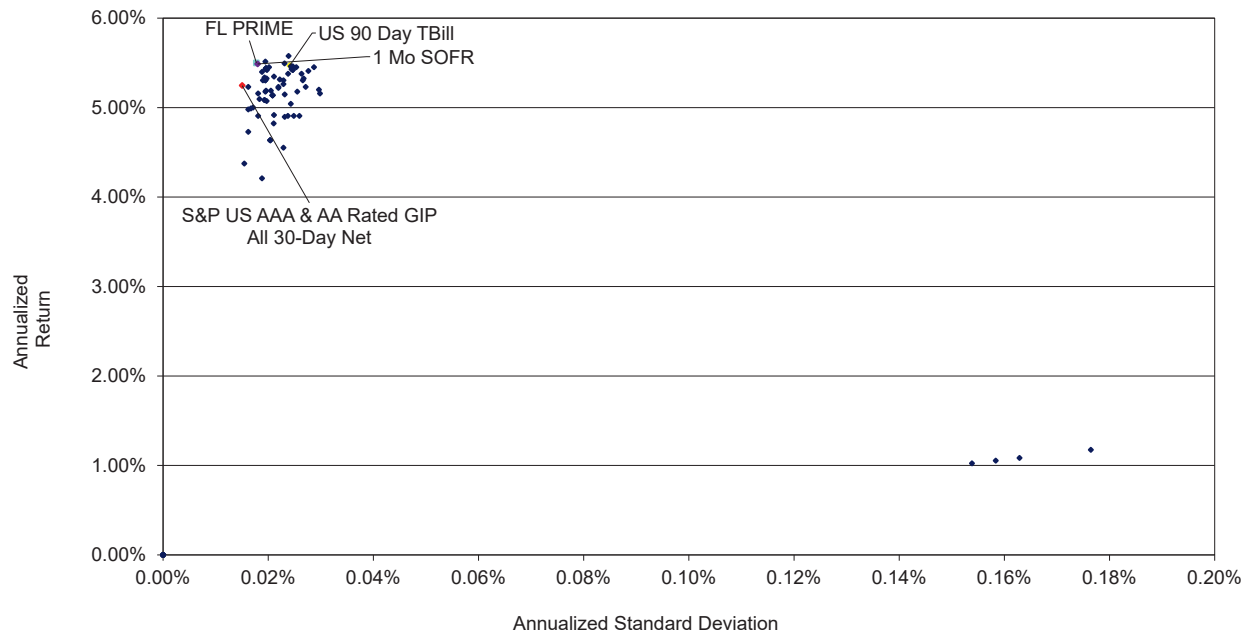
\*Returns less than one year are not annualized.  
\*\*S&P AAA & AA GIP All 30-Day Net Yield Index for all time periods shown.



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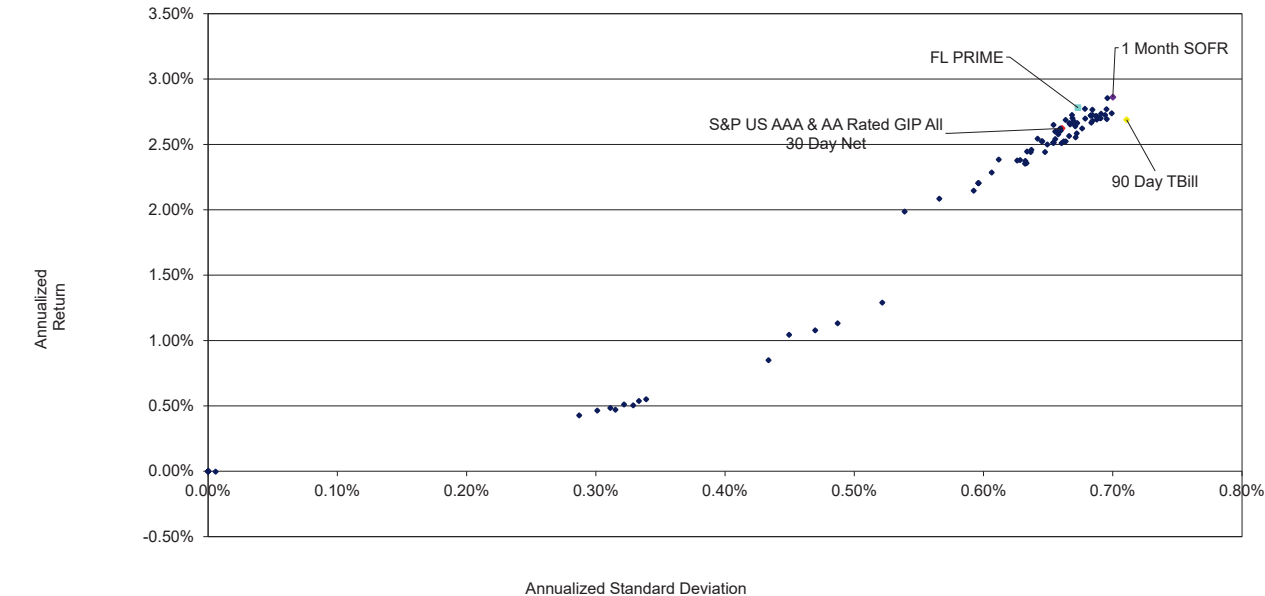
# Florida PRIME Risk vs. Return

## 1 Years Ending 3/31/2024



# Florida PRIME Risk vs. Return

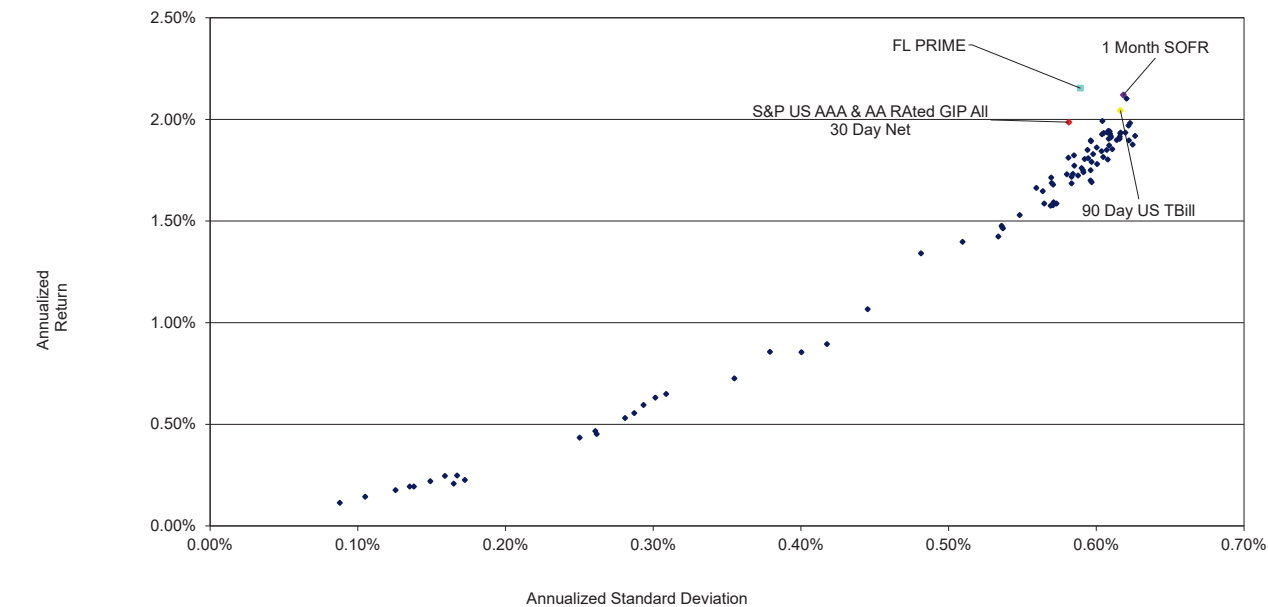
## 3 Years Ending 3/31/2024





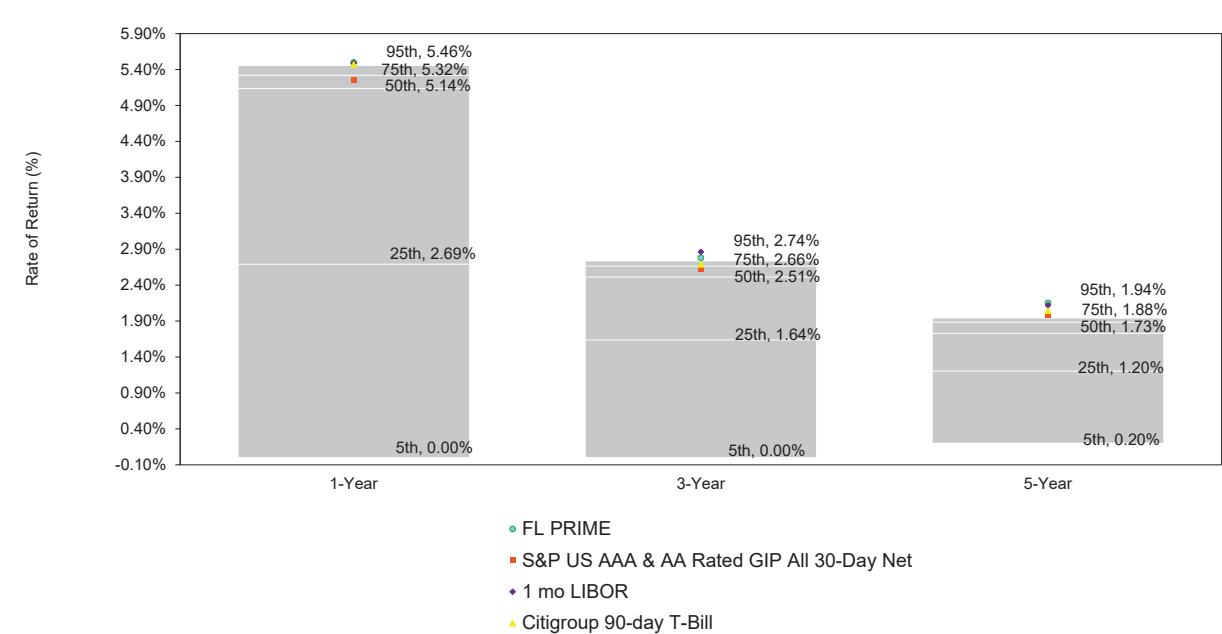
# Florida PRIME Risk vs. Return

## 5 Years Ending 3/31/2024



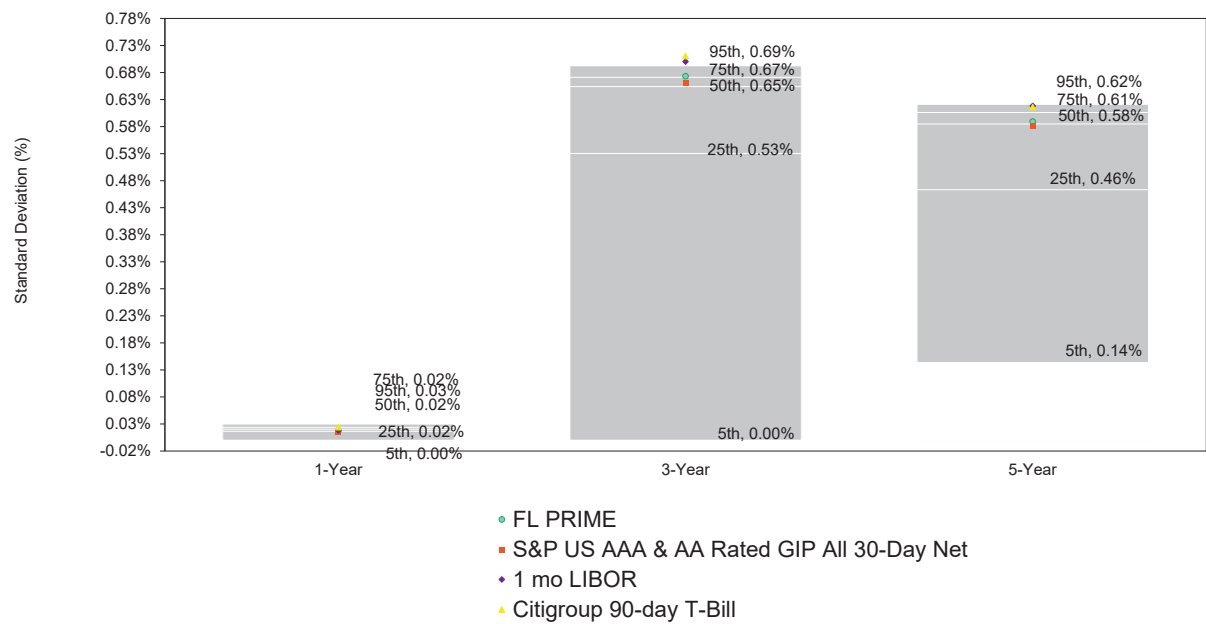
# Return Distribution

## Periods Ending 3/31/2024



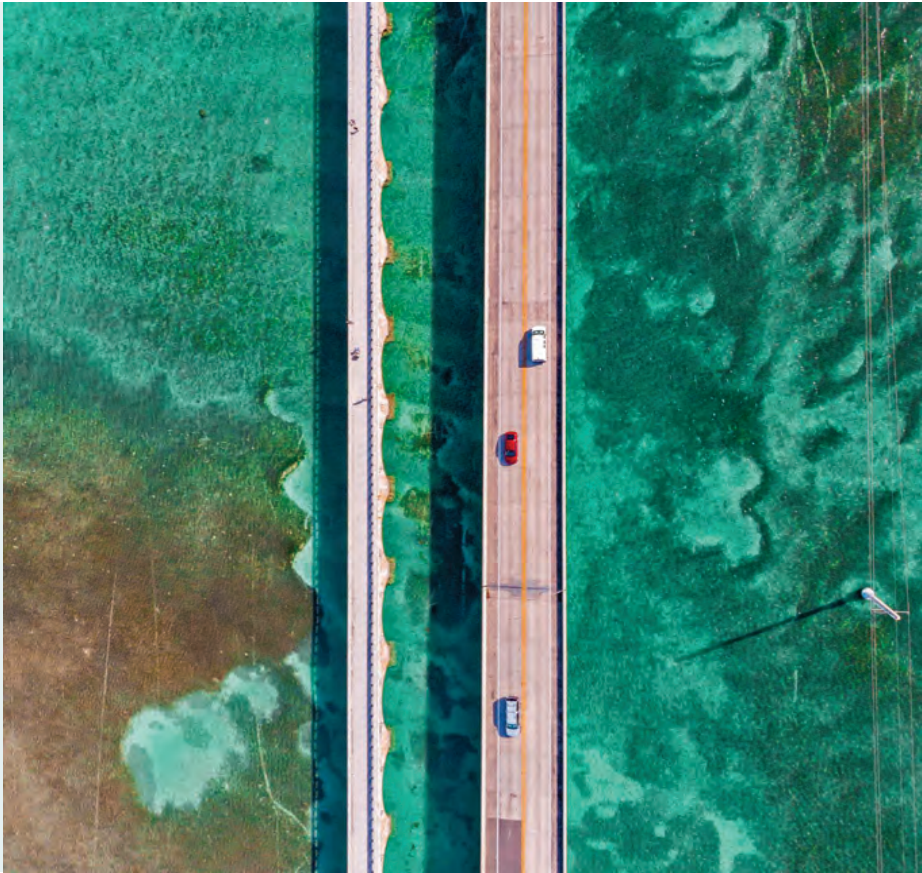
# Standard Deviation Distribution

## Periods Ending 3/31/2024



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Appendix



FRS Investment Plan Costs

Investment Category	Investment Plan Fee*	Median Mutual Fund Fee**
Domestic Equity	0.20%	0.85%
International & Global Equity	0.29%	0.85%
Diversified Bonds	0.14%	0.50%
Target Date	0.17%	0.26%
Stable Value	0.08%	0.47%
Inflation Protected Securities	0.36%	0.39%

\*Average fee of multiple products in category as of 3/31/2024.

\*\*Source: Aon's mutual fund expense analysis as of 3/31/2024.



# Investment Plan Fiscal Year End Assets Under Management



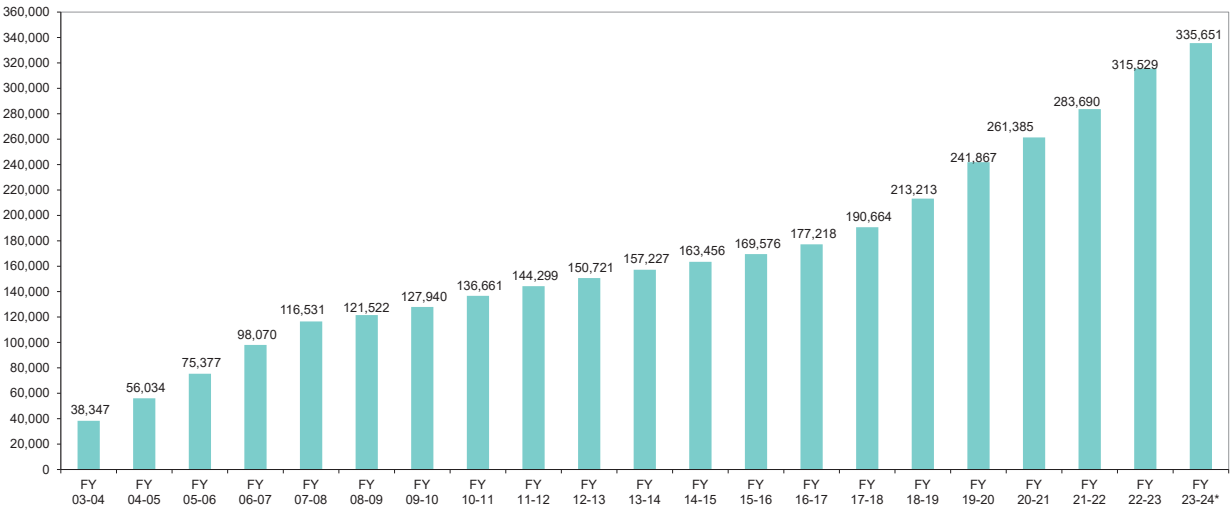
\*Period Ending 3/31/2024

Source: Investment Plan Administrator



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# Investment Plan Membership



\*Period Ending 3/31/2024

Source: Investment Plan Administrator



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# Florida Hurricane Catastrophe Funds Background and Details

- The purpose of the Florida Hurricane Catastrophe Fund (FHCF) is to provide a stable, ongoing and timely source of reimbursement to insurers for a portion of their hurricane losses.
- The CAT Operating Funds, along CAT 2020 A Fund are internally managed portfolios.
  - CAT 2013 A Fund was liquidated during 4Q 2020
  - CAT 2016 A Fund was liquidated during 3Q 2021
- As of March 31, 2024, the total value of:
  - The CAT Operating Funds was \$11.3 billion
  - The CAT 2020 A Fund was \$2.3 billion
- History of the CAT Funds Benchmarks: *Beginning February 2018, the CAT Fund Operating Liquidity Fund was benchmarked to the B of A Merrill Lynch 3-6 Month U.S. Treasury Bill Index, and the CAT Fund Operating Claims Paying Fund benchmarked to a blend of 35% of the Bank of America Merrill Lynch 1-3 Year AA U.S. Corporate Bond Index and 65% of Bank of America Merrill Lynch 1-3 Year U.S. Treasury Index. Beginning January 2021, the CAT Fund Operating Liquidity Fund was benchmarked to Bloomberg U.S. Treasuries Bills 3-6 Months & U.S. Treasury Bills 6-9 Months Custom Blend Index. This benchmark is comprised of 60% off the 3-6 month U.S. Treasury Bills and 40% 6-9 month U.S. Treasury Bills., and the CAT Fund Operating Claims Paying Fund is benchmarked Bloomberg U.S. Treasury 1-3 Years & Corporate AA+ ex 144A Reg S Custom Blend Index. This benchmark is comprised of 65% 1-3 year Treasury and 35% of 1-3 year Corporate AA or better excluding 144A and Reg S Securities.*

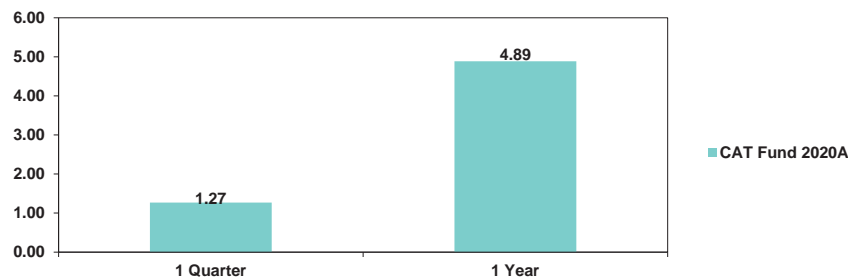


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## CAT 2020 A Funds Investment Results

Period Ending 3/31/2024



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# CAT Operating Funds Characteristics

Period Ending 3/31/2024

Maturity Analysis	
1 to 30 Days	49.39%
31 to 60 Days	4.83
61 to 90 Days	4.70
91 to 120 Days	3.15
121 to 150 Days	2.06
151 to 180 Days	2.52
181 to 270 Days	11.05
271 to 365 Days	8.55
366 to 455 Days	7.16
>= 456 Days	6.59
<b>Total % of Portfolio:</b>	<b>100.00%</b>

Bond Rating Analysis	
AAA	60.87%
AA	9.64
A	29.49
Baa	0.00
Other	0.00
<b>Total % of Portfolio</b>	<b>100.00%</b>



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# CAT 2020 A Fund Characteristics

Period Ending 3/31/2024

Maturity Analysis	
1 to 30 Days	35.87%
31 to 60 Days	10.37
61 to 90 Days	28.85
91 to 120 Days	16.41
121 to 150 Days	0.68
151 to 180 Days	5.71
181 to 270 Days	0.42
271 to 365 Days	0.00
366 to 455 Days	1.69
>= 456 Days	0.00
<b>Total % of Portfolio:</b>	<b>100.00%</b>

Bond Rating Analysis	
AAA	56.69%
AA	3.69
A	39.62
Baa	0.00
Other	0.00
<b>Total % of Portfolio</b>	<b>100.00%</b>



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# Florida PRIME Characteristics

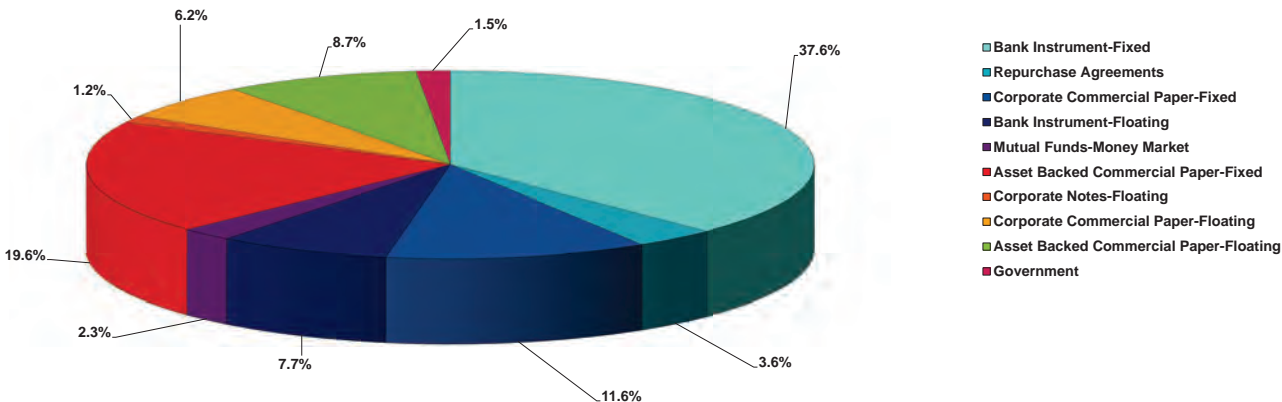
## Quarter Ending 3/31/2024

As of 3/31/2024	First Quarter	Fiscal YTD*
Opening Balance	\$27,847,195,537	\$21,469,384,429
Participant Deposits	\$7,735,475,837	\$33,300,698,441
Gross Earnings	\$391,395,893	\$994,251,774
Participant Withdrawals	(\$8,541,595,380)	(28,328,500,920)
Fees	(\$2,172,753)	(5,534,589)
Closing Balance	\$27,430,299,134	\$27,430,299,134
Change	(\$416,896,403)	\$5,960,914,705

\*Period July 2023 – March 2024

# Florida PRIME Characteristics

## Quarter Ending 3/31/2024



# Florida PRIME Characteristics

## Period Ending 3/31/2024

Effective Maturity Schedule	
1-7 Days	61.8%
8 - 30 Days	8.0%
31 - 90 Days	17.3%
91 - 180 Days	5.6%
181+ Days	7.3%
<b>Total % of Portfolio:</b>	<b>100.0%</b>

S & P Credit Quality Composition	
A-1+	55.4%
A-1	44.6%
<b>Total % of Portfolio:</b>	<b>100.0%</b>



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Aon Investments USA Inc.  
200 E. Randolph Street  
Suite 700  
Chicago, IL 60601  
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# Quarterly Investment Review

FRS Pension Plan

First Quarter 2024

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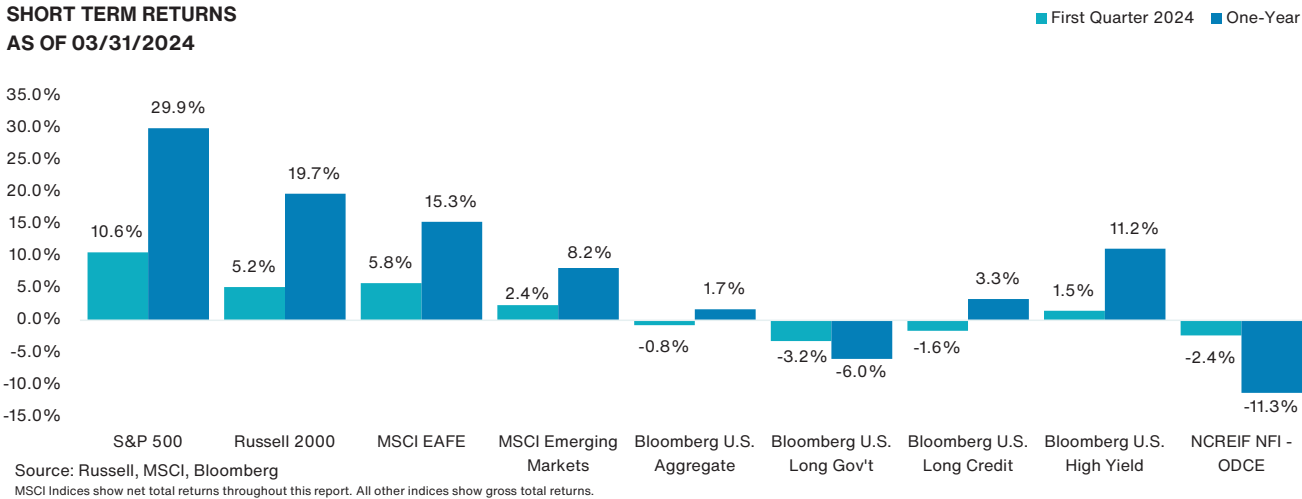
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Market Environment



Market Highlights

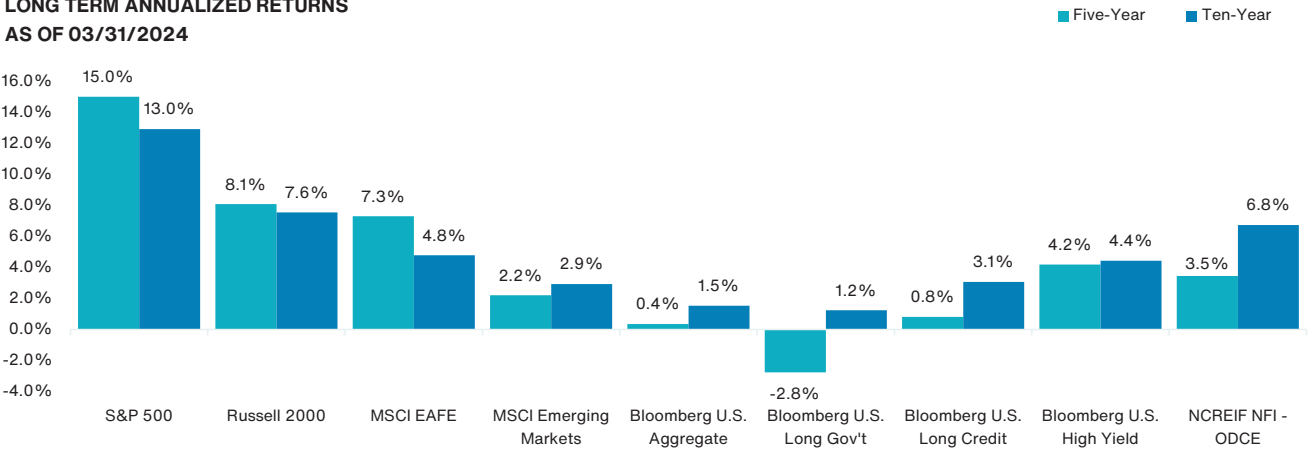


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# Market Highlights

## LONG TERM ANNUALIZED RETURNS AS OF 03/31/2024



Source: Russell, MSCI, Bloomberg

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# Market Highlights

Returns of the Major Capital Markets					
	First Quarter	YTD	1-Year	3-Year <sup>1</sup>	Period Ending 03/31/2024
					5-Year <sup>1</sup> 10-Year <sup>1</sup>
Equity					
MSCI All Country World IMI	7.72%	7.72%	22.45%	6.31%	10.57% 8.43%
MSCI All Country World	8.20%	8.20%	23.22%	6.96%	10.92% 8.66%
Dow Jones U.S. Total Stock Market	10.05%	10.05%	29.35%	9.63%	14.23% 12.24%
Russell 3000	10.02%	10.02%	29.29%	9.78%	14.34% 12.33%
S&P 500	10.56%	10.56%	29.88%	11.49%	15.05% 12.96%
Russell 2000	5.18%	5.18%	19.71%	-0.10%	8.10% 7.58%
MSCI All Country World ex-U.S. IMI	4.33%	4.33%	13.20%	1.72%	6.00% 4.32%
MSCI All Country World ex-U.S.	4.69%	4.69%	13.26%	1.94%	5.97% 4.25%
MSCI EAFE	5.78%	5.78%	15.32%	4.78%	7.33% 4.80%
MSCI EAFE (Local Currency)	9.96%	9.96%	18.82%	9.43%	9.36% 7.66%
MSCI Emerging Markets	2.37%	2.37%	8.15%	-5.05%	2.22% 2.95%
Equity Factors					
MSCI World Minimum Volatility (USD)	5.81%	5.81%	11.85%	5.54%	6.61% 8.33%
MSCI World High Dividend Yield	5.79%	5.79%	14.31%	7.11%	8.21% 7.04%
MSCI World Quality	11.70%	11.70%	34.17%	12.41%	16.20% 13.33%
MSCI World Momentum	20.21%	20.21%	36.51%	8.46%	13.31% 12.37%
MSCI World Enhanced Value	7.03%	7.03%	21.67%	7.47%	8.42% 6.48%
MSCI World Index Growth	10.28%	10.28%	31.48%	9.15%	15.36% 12.31%
MSCI USA Minimum Volatility (USD)	7.69%	7.69%	16.72%	8.29%	9.30% 11.00%
MSCI USA High Dividend Yield	8.14%	8.14%	16.36%	7.95%	8.82% 9.99%
MSCI USA Quality	12.92%	12.92%	39.31%	13.51%	17.32% 15.20%
MSCI USA Momentum	20.31%	20.31%	37.54%	7.16%	12.56% 13.72%
MSCI USA Enhanced Value	7.84%	7.84%	20.36%	4.99%	9.48% 8.93%
MSCI USA Equal Weighted	8.23%	8.23%	22.39%	6.90%	11.58% 10.34%
MSCI USA Growth	11.72%	11.72%	39.63%	11.86%	18.96% 16.04%

Returns of the Major Capital Markets					
	First Quarter	YTD	1-Year	3-Year <sup>1</sup>	Period Ending 03/31/2024
					5-Year <sup>1</sup> 10-Year <sup>1</sup>
Fixed Income					
Bloomberg Global Aggregate	-2.08%	-2.08%	0.49%	-4.73%	-1.17% -0.07%
Bloomberg U.S. Aggregate	-0.78%	-0.78%	1.70%	-2.46%	0.36% 1.54%
Bloomberg U.S. Long Gov't	-3.24%	-3.24%	-6.03%	-8.01%	-2.77% 1.25%
Bloomberg U.S. Long Credit	-1.65%	-1.65%	3.31%	-4.26%	0.83% 3.08%
Bloomberg U.S. Long Gov't/Credit	-2.41%	-2.41%	-1.15%	-6.04%	-0.62% 2.32%
Bloomberg U.S. TIPS	-0.08%	-0.08%	0.45%	-0.53%	2.49% 2.21%
Bloomberg U.S. High Yield	1.47%	1.47%	11.15%	2.19%	4.21% 4.44%
Bloomberg Global Treasury ex U.S.	-3.81%	-3.81%	-2.75%	-7.65%	-3.41% -1.68%
JP Morgan EMBI Global (Emerging Market	1.40%	1.40%	9.53%	-1.10%	0.93% 2.85%
Commodities					
Bloomberg Commodity Index	2.19%	2.19%	-0.56%	9.11%	6.38% -1.56%
Goldman Sachs Commodity Index	10.36%	10.36%	11.14%	18.05%	7.83% -2.93%
Hedge Funds					
HFRI Fund-Weighted Composite <sup>2</sup>	4.52%	4.52%	11.68%	4.11%	6.92% 4.93%
HFRI Fund of Funds <sup>2</sup>	4.17%	4.17%	9.68%	2.86%	5.00% 3.59%
Real Estate					
NAREIT U.S. Equity REITS	-0.20%	-0.20%	10.54%	4.14%	4.15% 6.61%
NCREIF NFI - ODCE	-2.37%	-2.37%	-11.29%	3.37%	3.46% 6.76%
FTSE Global Core Infrastructure Index	1.80%	1.80%	4.50%	2.88%	4.73% 6.69%
Private Equity					
Burgiss Private iQ Global Private Equity <sup>3</sup>			2.47%	19.41%	15.14% 14.53%

MSCI Indices show net total returns throughout this report. All other indices show gross total returns.

<sup>1</sup> Periods are annualized.

<sup>2</sup> Latest 5 months of HFR data are estimated by HFR and may change in the future.

<sup>3</sup> Burgiss Private iQ Global Private Equity data is as at June 30, 2023

Source: Russell, MSCI, Bloomberg

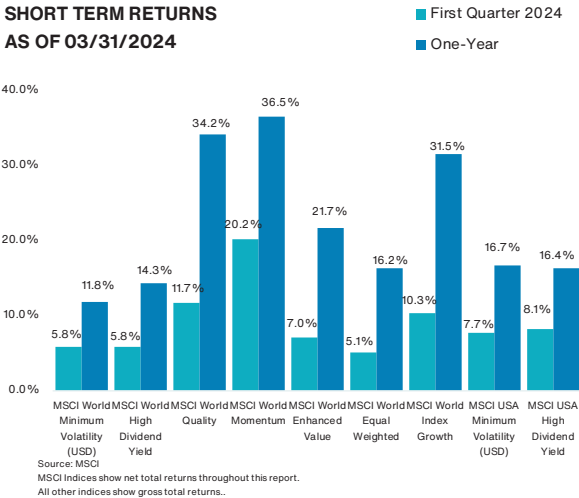
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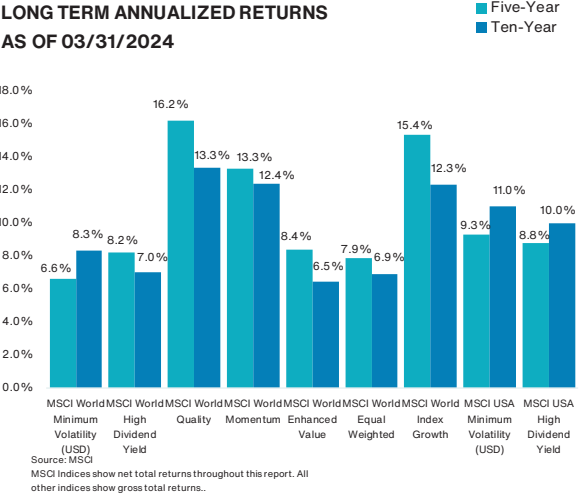
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# Factor Indices

SHORT TERM RETURNS  
AS OF 03/31/2024



LONG TERM ANNUALIZED RETURNS  
AS OF 03/31/2024



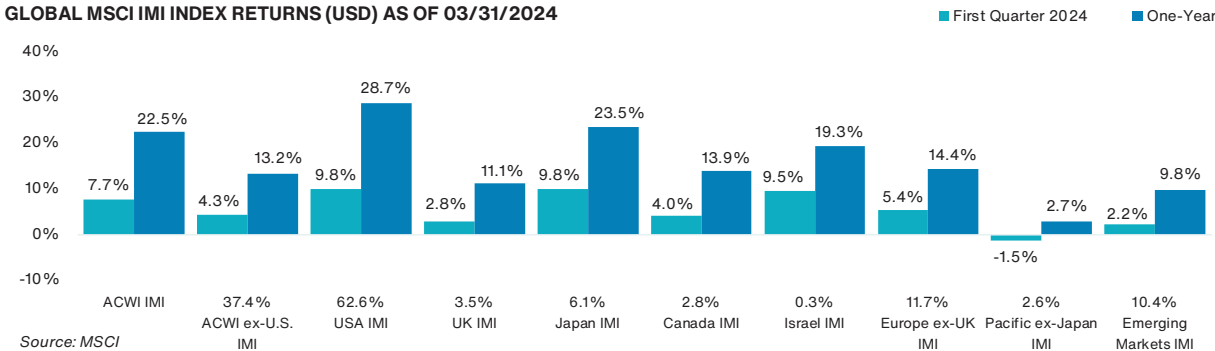
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# Global Equity Markets

GLOBAL MSCI IMI INDEX RETURNS (USD) AS OF 03/31/2024



- In Q1 2024, global equity markets appreciated significantly. The S&P 500 Index surpassed the 5000 level for the first time, driven by a positive earnings season expectations, easing inflation data, signs of economic resilience, and rallies from the tech giants. Volatility rose slightly during the quarter as the CBOE Volatility Index (VIX) rose to 13 in Q1 from 12.5 in the previous quarter, below its 20-year average of 19.1.
- Across international markets, all regions (except for Pacific ex-Japan) posted positive returns. U.S. equities posted strong returns over the quarter with major contributions coming from the Communication Services sector (14.3%).
- Pacific ex-Japan IMI was the worst performer with a return of -1.5% over the quarter. Materials (-9.7%) and Real Estate (-2.8%) weighed over Pacific ex-Japan equities.

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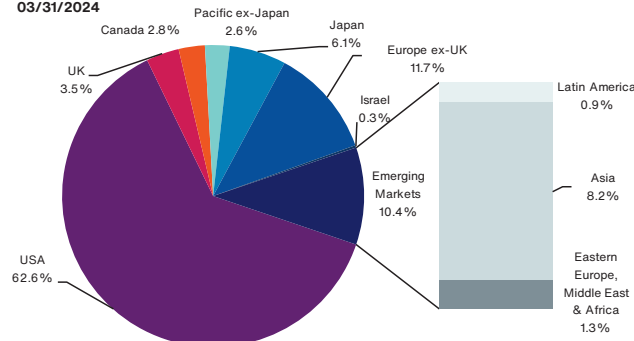


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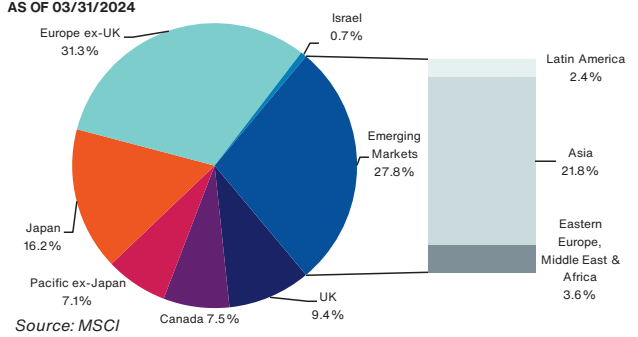
# Global Equity Markets

Below is the country/region breakdown of the global and international equity markets as measured by the MSCI All Country World IMI Index and the MSCI All Country World ex-U.S. IMI Index, respectively.

MSCI ALL COUNTRY WORLD IMI INDEX GEOGRAPHIC ALLOCATION AS OF 03/31/2024



MSCI ALL COUNTRY WORLD EX-U.S. IMI INDEX GEOGRAPHIC ALLOCATION AS OF 03/31/2024



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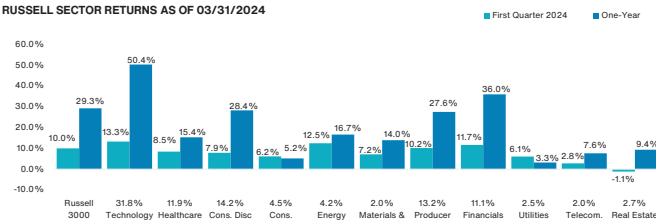
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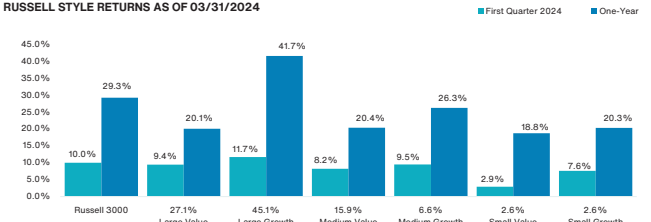
# U.S. Equity Markets

- U.S. equities had a positive quarter with the S&P 500 Index rising by 10.6% amidst anticipated interest rate cuts in 2024 and easing inflation.
- U.S. President Joe Biden signed a \$1.2 trillion spending bill to avert a partial government shutdown. The bill will keep the U.S. government funded until September 2024. Meanwhile, the U.S. Senate approved a \$95 billion national security funding bill, which includes funding for Ukraine, Israel, and Taiwan. The bill's future is uncertain as it needs approval from the Republican-led House of Representatives.
- U.S. economic growth was 3.4% quarter-on-quarter at annualized rates in the fourth quarter, slightly higher than economists' forecasts of 3.3%. Continued growth in consumer spending remains the main driver.
- The Russell 3000 Index rose 10.0% during the first quarter and 29.3% on a one-year basis. Technology (13.3%) and Energy (12.5%) were the best performers while Real Estate (-1.1%) and Telecommunications (2.8%) were the worst performers.
- On a style basis, growth outperformed value across market capitalizations over the quarter. Large-cap stocks outperformed Medium and Small-cap stocks in both growth and value styles over the quarter.

RUSSELL SECTOR RETURNS AS OF 03/31/2024



RUSSELL STYLE RETURNS AS OF 03/31/2024



Source: Russell Indexes

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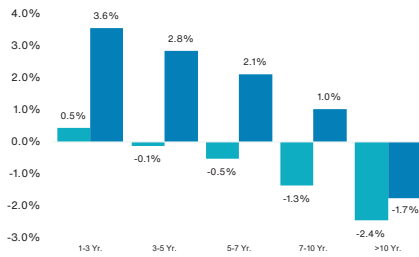
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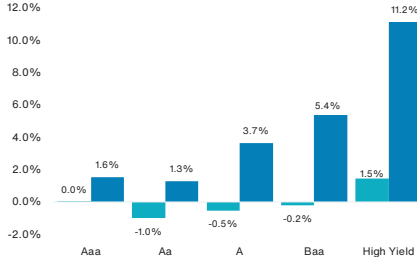
# U.S. Fixed Income Markets

BLOOMBERG AGGREGATE RETURNS BY MATURITY AS OF 03/31/2024



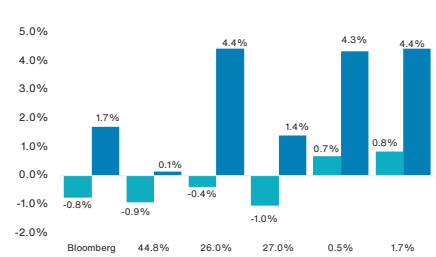
Source: FactSet

BLOOMBERG AGGREGATE RETURNS BY QUALITY AND HIGH YIELD RETURNS AS OF 03/31/2024



Source: FactSet

BLOOMBERG AGGREGATE RETURNS BY SECTOR AS OF 03/31/2024



Source: FactSet

- The U.S. Federal Reserve (Fed) kept its interest rate unchanged at 5.25%-5.5%. The Federal Open Market Committee (FOMC) does not expect it will be appropriate to reduce the target range until it has gained greater confidence that inflation is moving sustainably towards 2%. According to the latest Fed "dot plot", the FOMC members see three, quarter-point cuts this year.
- The Bloomberg U.S. Aggregate Bond Index was down 0.8% over the quarter but was up 1.7% on a one-year basis.
- Across durations, all maturities (except for 1-3 years) finished the quarter in negative territory with longer maturities falling more.
- Within investment-grade bonds, higher-quality issues generally underperformed lower-quality issues, with Aa-rated bonds comparatively falling more. Aaa-rated bonds were flat during the quarter. High yield bonds rose by 1.5%. On a one-year basis, high yield bonds outperformed indicating an increase in risk appetite.

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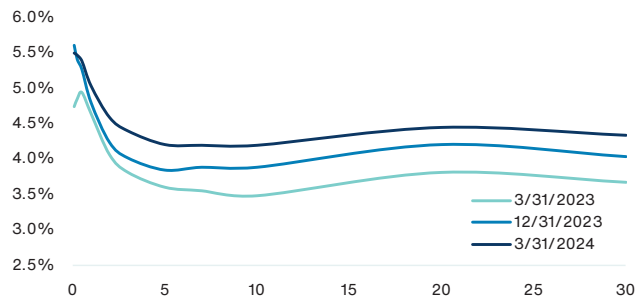
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# U.S. Fixed Income Markets

U.S. TREASURY YIELD CURVE



Source: U.S. Department of Treasury

U.S. 10-YEAR TREASURY AND TIPS YIELDS



Source: U.S. Department of Treasury

- U.S. Treasury yields generally rose across maturities as the yield curve shifted upwards over the quarter. The 10-year Treasury yield rose by 32bps to 4.2%, and the 30-year Treasury yield rose by 31bps to 4.34% over the quarter.
- U.S. headline consumer price inflation (CPI) increased to 3.2% year-on-year in February. It exceeded economists' expectations and the previous month's reading of 3.1%. Meanwhile, U.S. core inflation, which excludes energy and food prices, reduced to 3.8% year-on-year in February, down from the previous month's 3.9% but higher than economists' expectations of 3.7%.
- The 10-year TIPS yield rose by 16bps over the quarter to 1.88%.

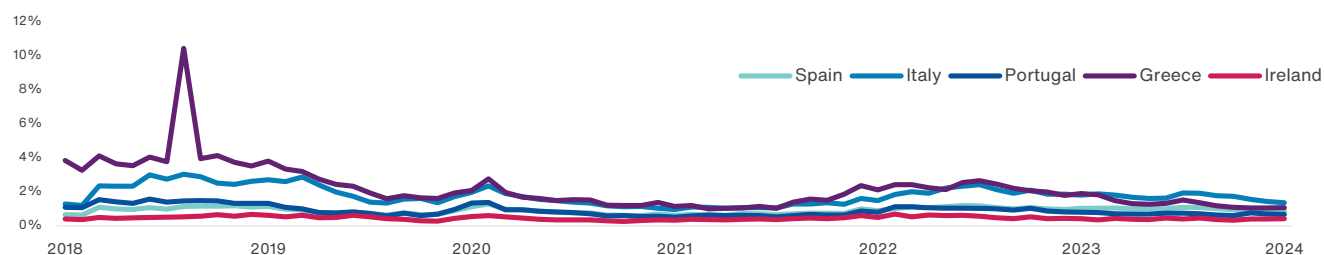
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# European Fixed Income Markets

EUROZONE PERIPHERAL BOND SPREADS (10-YEAR SPREADS OVER GERMAN BUNDS)



Source: FactSet

- European government bond spreads over 10-year German bunds generally narrowed across the Euro Area (except for Portugal and Ireland). The European Central Bank (ECB) kept its interest rate unchanged at an all-time high of 4.0% as it lowered its annual inflation forecast. The Governing Council (GC) is determined to ensure that inflation returns to its 2% medium-term target in a timely manner. Based on its current assessment, the GC considers restricting key ECB interest rates for a sufficiently long duration, will make a substantial contribution to this goal.
- Irish and Portuguese government bond yields rose by 38bps and 37bps to 2.73% and 2.98%, respectively over the quarter while Italian government bond yields fell by 8bps to 3.66%. Greek and Spanish government bond yields rose by 27bps and 20bps to 3.37% and 3.15%, respectively over the quarter.
- German bund yields rose by 30bps to 2.3% over the quarter.
- Eurozone headline inflation slowed as the CPI rose 2.6% year-on-year in February, down from the previous month's rate of 2.8% but higher than market expectations of 2.5%. Core inflation slowed to 3.1% in the year to February, down from January's 3.3% but higher than economists' forecast of 2.9%.

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## Credit Spreads

Spread (bps)	3/31/2024	12/31/2023	3/31/2023	Quarterly Change (bps)	One-Year
U.S. Aggregate	39	42	57	-3	-18
Long Gov't	0	2	2	-2	-2
Long Credit	109	117	159	-8	-50
Long Gov't/Credit	57	62	86	-5	-29
MBS	49	47	63	2	-14
CMBS	96	126	142	-30	-46
ABS	55	68	85	-13	-30
Corporate	90	99	138	-9	-48
High Yield	299	323	455	-24	-156
Global Emerging Markets	260	294	352	-34	-92

FactSet, Bloomberg

- Credit markets rose amid increasing risk tolerance sentiment, with spreads generally narrowing.
- Global Emerging Markets and CMBS spreads narrowed by 34bps and 30bps, respectively. Meanwhile, MBS spreads widened by 2bps.

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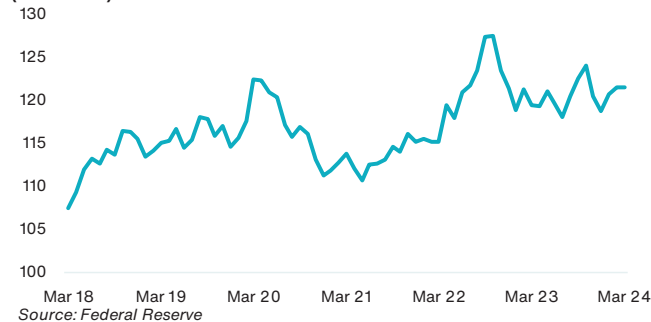
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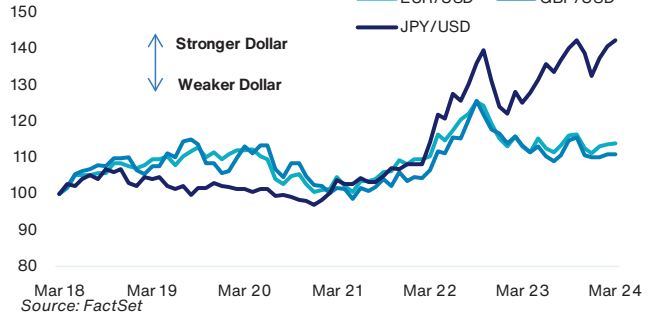


# Currency

TRADE WEIGHTED U.S. DOLLAR INDEX  
(2006 = 100)



U.S. DOLLAR RELATIVE TO EUR, GBP AND JPY REBASED TO 100  
AT 03/31/2018



- The U.S. Dollar appreciated against all major currencies over the quarter. On a trade-weighted basis, the U.S. dollar appreciated by 2.4%.
- Sterling depreciated by 0.9% against the U.S. dollar. The Bank of England (BoE) kept its interest rate stable at 5.25% for the fifth consecutive meeting. The Monetary Policy Committee (MPC) voted eight to one to maintain the current interest rate. One member was in favor of a 25bps rate cut. The MPC indicated that monetary policy will need to remain restrictive for sufficiently long to return inflation to the 2% target sustainably in the medium term.
- The U.S. dollar appreciated by 2.3% against the euro and by 7.4% against the yen.

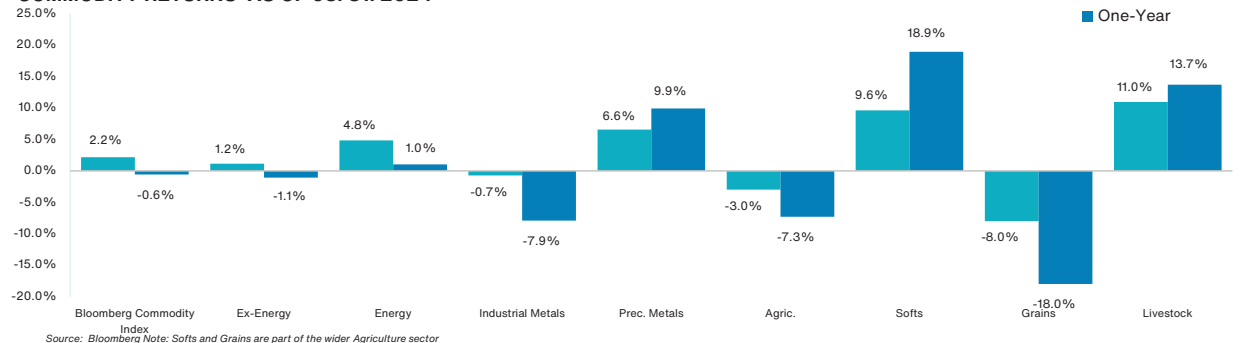
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# Commodities

COMMODITY RETURNS AS OF 03/31/2024



- Commodity prices rose over the quarter with the Bloomberg Commodity Index rising by 2.2% for the quarter.
- The Energy sector was up by 4.8% over the quarter and 1% on a one-year basis. The price of WTI crude oil was significantly up by 16.1% to U.S.\$83/BBL.
- Livestock rose the most over the quarter at 11.0%.
- The grain sector was the worst performer with a return of -8.0% over the quarter.

Past performance is no guarantee of future results. Indices cannot be invested in directly. Unmanaged index returns assume reinvestment of any and all distributions and do not reflect fees and expenses. Please see appendix for index definitions and other general disclosures.

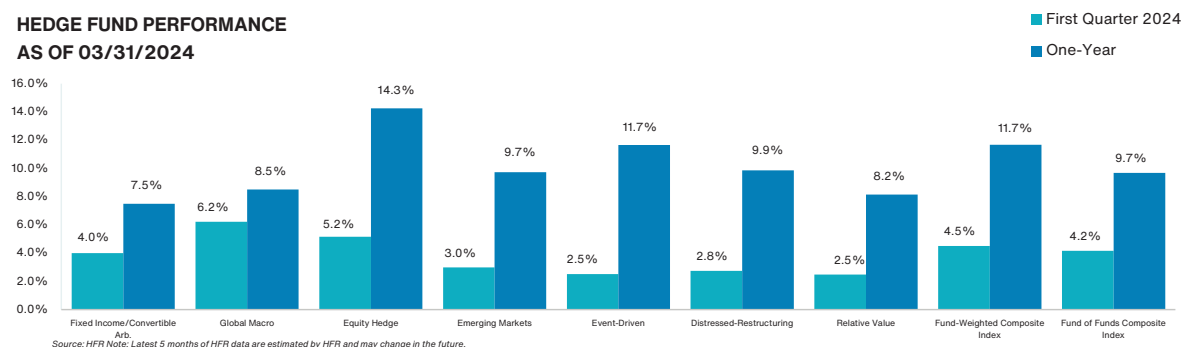
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# Hedge Funds Market Overview

## HEDGE FUND PERFORMANCE AS OF 03/31/2024



- Hedge fund performance was positive over the quarter.
- The HFRI Fund-Weighted Composite and HFRI Fund of Funds Composite Index produced returns of 4.5% and 4.2% over the quarter, respectively.
- Over the quarter, Global Macro was the best performer with a return of 6.2%.
- Relative Value was the worst performer with a return of 2.5% over the quarter.
- On a one-year basis, Equity Hedge has outperformed all other strategies whilst Fixed Income/Convertible Arbitrage has performed the worst.

Past performance is no guarantee of future results. Indices cannot be invested in directly. Unmanaged index returns assume reinvestment of any and all distributions and do not reflect fees and expenses. Please see appendix for index definitions and other general disclosures.

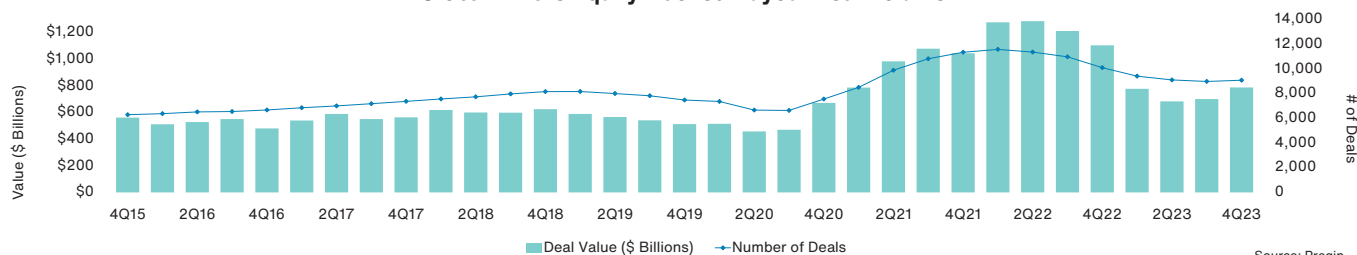
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# Private Equity Overview – Fourth Quarter 2023

## LTM Global Private Equity-Backed Buyout Deal Volume



- **Fundraising:** In 2023, \$1.1 trillion was raised by 2,544 funds, which was a decrease of 14.4% on a capital basis and a decrease of 41.1% by number of funds over the prior year. Dry powder stood at \$3.2 trillion at the end of the year, an increase of 15.9% and 39.4% compared to year-end 2022 and the five-year average, respectively.<sup>1</sup>
- **Buyout:** Global private equity-backed buyout deals totaled \$788.6 billion in 2023, which was a decrease on a capital basis of 28.6% compared to 2022 but 30.6% higher compared to the five-year average.<sup>1</sup> During the year, the median purchase price multiple for all North American and European private equity buyouts was 10.9x EBITDA, down from 12.5x in 2022 and down from the five-year average (12.0x). The median purchase price multiple for North American PE buyouts ended the year at 11.8x EBITDA, while European LBO transactions ended the year at 10.2x EBITDA.<sup>2</sup> Globally, buyout exit value totaled \$444.7 billion across 2,077 deals during the year, down from \$498.4 billion in value from 2,030 deals during 2022.<sup>1</sup>
- **Venture:** During the year, an estimated 15,766 venture-backed transactions totaling \$170.6 billion were completed, which was a decrease on both a capital and deal count basis over the prior year's total of \$242.2 billion across 17,592 deals. This was also a decrease of 19.5% compared to the five-year average of \$212.0 billion. Total U.S. venture-backed exit value decreased during the year, totaling approximately \$61.5 billion across an estimated 1,129 completed transactions, compared to \$78.6 billion across 1,401 exits in 2022. This was meaningfully below the \$796.8 billion of exit value from 1,990 transactions during 2021.<sup>3</sup>

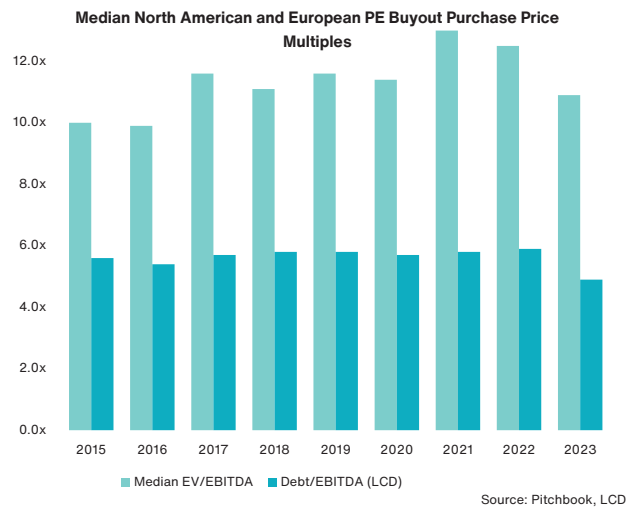
Sources: 1 Preqin 2 Pitchbook/LCD 3 PitchBook/NVCA Venture Monitor 4 Fitch Ratings 5 Jefferies  
Notes: FY=Fiscal year ended 12/31; YTD=Year to date; LTM=Last 12 months (aka trailing 12 months); PPM=Purchase Price Multiples: Total Purchase Price ÷ EBITDA.

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# Private Equity Overview (cont.)



- Mezzanine:** 28 funds closed on \$38.6 billion during the year. This was an increase from the prior year's total of \$27.1 billion raised by 52 funds and represented an increase of 72.6% from the five-year average of \$22.4 billion. Estimated dry powder was \$65.5 billion at the end of 2023, up from \$57.7 billion at the end of the prior year.<sup>1</sup>
- Distressed Debt/Special Situations:** The TTM U.S. high-yield default rate was 3.0% as of December 2023, which was up from December 2022's TTM rate of 1.3%. Fitch expects the high-yield default rate to continue trending higher through 2024, with forecasted default rates of 5.0% to 5.5%.<sup>4</sup> During the year, \$53.2 billion was raised by 61 funds, down from the \$62.8 billion raised by 70 funds during 2022. Dry powder was estimated at \$164.0 billion at the end of Q4 2023, which was down 1.4% from Q4 2022. This remained above the five-year average level of \$142.1 billion.<sup>1</sup>
- Secondaries:** 58 funds raised \$93.8 billion during 2023, up substantially from the \$36.2 billion raised by 70 funds in 2022. This was an increase compared to the five-year average of \$42.0 billion.<sup>1</sup> The average discount rate for LP buyout and venture capital portfolios finished the year at 9.0% and 32.0%, respectively.<sup>5</sup>
- Infrastructure:** \$77.6 billion of capital was raised by 84 funds in 2023 compared to \$177.0 billion of capital raised by 159 partnerships in 2022. Infrastructure funds are staying in market longer, with 55.2% of closed funds fundraising for two years or more. Infrastructure managers completed 2,067 deals for an aggregate deal value of \$308.2 billion in 2023 compared to 2,652 deals totaling \$420.4 billion in 2022.<sup>1</sup>
- Natural Resources:** During 2023, 27 funds closed on \$10.5 billion compared to 39 funds totaling \$5.7 billion in 2022. 277 energy and utilities deals were completed in 2023 totaling \$40.0 billion, an increase compared to 237 completed deals totaling \$36.7 billion in 2022.<sup>1</sup>

Sources: 1 Preqin 2 Pitchbook/LCD 3 PitchBook/NVCA Venture Monitor 4 Fitch Ratings 5 Jefferies



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## Total Fund



## Highlights

### Executive Summary

- The Total Fund outperformed the Performance Benchmark over the trailing three-, five-, and ten-year periods.
- Performance relative to peers is also competitive over short- and long-term time periods.
- The Pension Plan is well-diversified across six broad asset classes, and each asset class is also well-diversified.
- Public market asset class investments do not significantly deviate from their broad market based benchmarks, e.g., sectors, market capitalizations, global regions, credit quality, duration, and security types.
- Private market asset classes are well-diversified by vintage year, geography, property type, sectors, investment vehicle/asset type, or investment strategy.
- Asset allocation is monitored on a daily basis to ensure the actual asset allocation of the plan remains close to the long-term policy targets set forth in the Investment Policy Statement.
- Aon Investments and SBA staff revisit the plan design annually through informal and formal asset allocation and asset liability reviews.
- Adequate liquidity exists within the asset allocation to pay the monthly obligations of the Pension Plan consistently and on a timely basis.

### Performance Highlights

- The Total Fund outperformed the Performance Benchmark over the trailing three-, five-, and ten-year periods.

### Asset Allocation

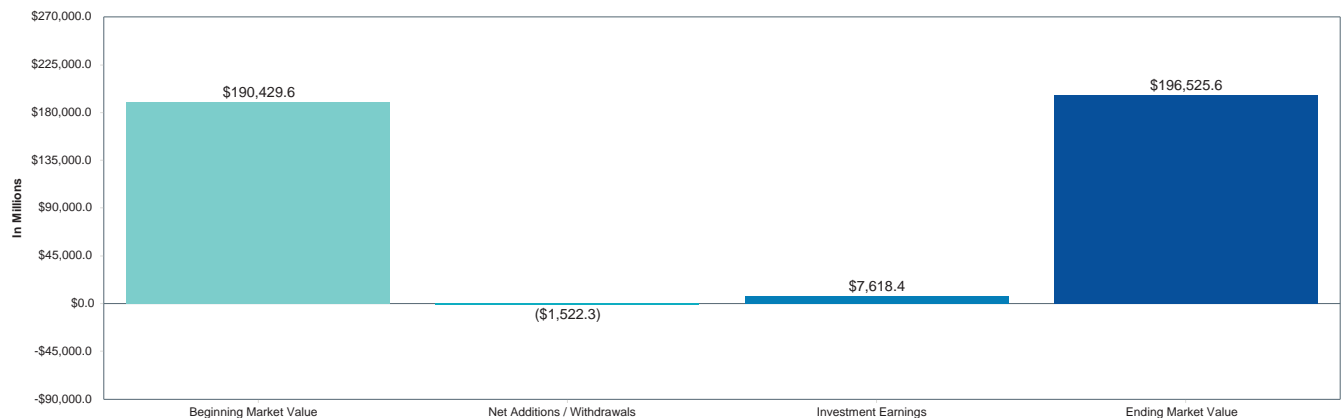
- The Fund assets total \$196.5 billion as of March 31, 2024, which represents a \$6.1 billion increase since last quarter.
- Actual allocations for all asset classes were within their respective policy ranges and in line with the current policy at quarter-end.

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## Total Plan Asset Summary

As of March 31, 2024



Summary of Cash Flows		
	1 Quarter	Fiscal YTD*
<b>Total Fund</b>		
Beginning Market Value	190,429,563,717	185,709,266,761
+ Additions / Withdrawals	-1,522,315,141	-5,086,628,022
+ Investment Earnings	7,618,376,060	15,902,985,897
<b>= Ending Market Value</b>	<b>196,525,624,636</b>	<b>196,525,624,636</b>

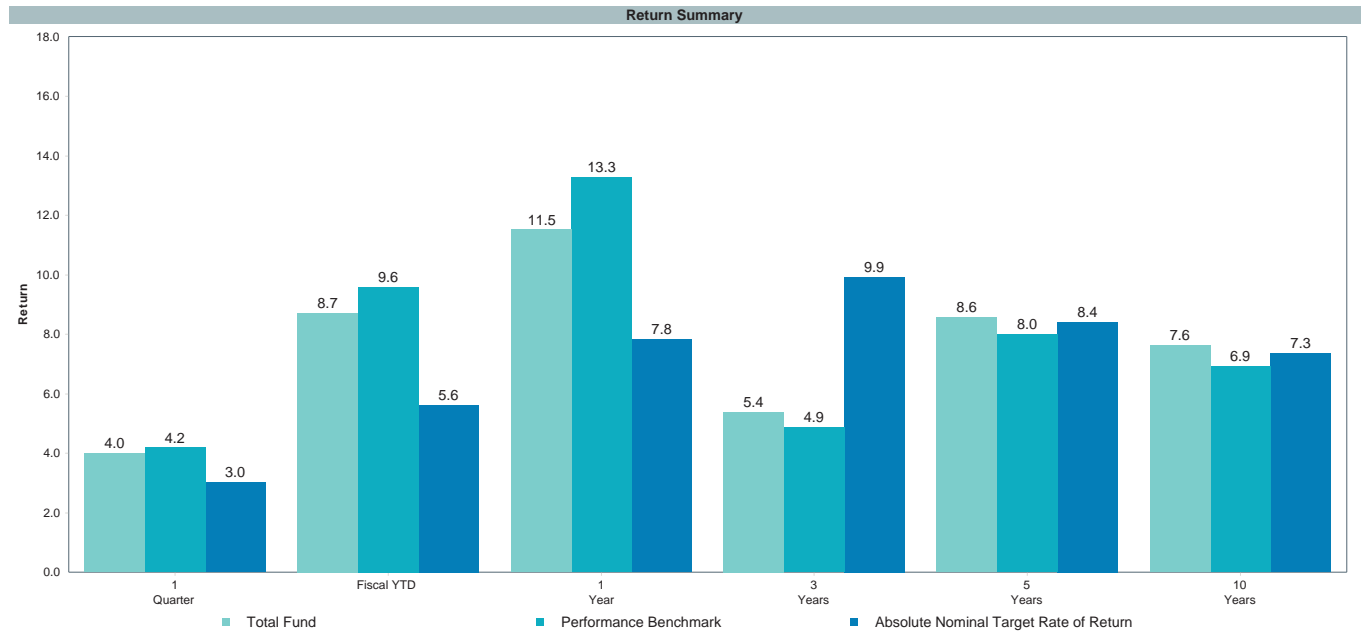
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\*Period July 2023 - Present

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# Total Plan Performance Summary

As of March 31, 2024



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## Asset Allocation & Performance

As of March 31, 2024

	Allocation			Performance %					
	Market Value \$	%	Policy %	1 Quarter	Fiscal YTD	1 Year	3 Years	5 Years	10 Years
<b>Total Fund</b>	<b>196,525,624,636</b>	<b>100.0</b>	<b>100.0</b>	<b>4.0 (45)</b>	<b>8.7 (51)</b>	<b>11.5 (51)</b>	<b>5.4 (23)</b>	<b>8.6 (17)</b>	<b>7.6 (16)</b>
Performance Benchmark				4.2 (34)	9.6 (26)	13.3 (24)	4.9 (40)	8.0 (37)	6.9 (40)
Absolute Nominal Target Rate of Return				3.0 (82)	5.6 (99)	7.8 (96)	9.9 (1)	8.4 (21)	7.3 (26)
<b>Global Equity*</b>	<b>97,111,703,137</b>	<b>49.4</b>	<b>48.9</b>	<b>8.0</b>	<b>15.9</b>	<b>22.6</b>	<b>6.3</b>	<b>10.9</b>	<b>8.9</b>
Asset Class Target				7.7	15.7	22.5	6.3	10.6	8.5
<b>Domestic Equities</b>	<b>49,885,447,629</b>	<b>25.4</b>		<b>10.1</b>	<b>19.4</b>	<b>29.2</b>	<b>10.0</b>	<b>14.3</b>	<b>12.2</b>
Asset Class Target				10.0	19.3	29.3	9.8	14.3	12.3
<b>Foreign Equities</b>	<b>30,464,592,121</b>	<b>15.5</b>		<b>5.0</b>	<b>10.7</b>	<b>13.5</b>	<b>1.1</b>	<b>6.6</b>	<b>5.0</b>
Asset Class Target				4.3	10.6	13.3	1.7	6.0	4.4
<b>Global Equities</b>	<b>11,957,638,490</b>	<b>6.1</b>		<b>8.7</b>	<b>16.6</b>	<b>23.2</b>	<b>7.4</b>	<b>10.4</b>	<b>8.7</b>
Benchmark				8.6	16.7	24.5	8.0	11.7	9.2
<b>Fixed Income</b>	<b>37,877,377,299</b>	<b>19.3</b>	<b>19.9</b>	<b>0.0</b>	<b>3.8</b>	<b>3.1</b>	<b>-1.3</b>	<b>1.0</b>	<b>1.7</b>
Asset Class Target				-0.5	3.0	2.2	-1.7	0.6	1.4
<b>Private Equity</b>	<b>17,680,483,101</b>	<b>9.0</b>	<b>9.1</b>	<b>1.5</b>	<b>3.3</b>	<b>2.9</b>	<b>14.1</b>	<b>17.5</b>	<b>15.9</b>
Asset Class Target				8.3	17.1	24.8	9.1	13.5	11.4
<b>Real Estate</b>	<b>18,969,471,560</b>	<b>9.7</b>	<b>9.8</b>	<b>-2.8</b>	<b>-5.0</b>	<b>-7.8</b>	<b>5.7</b>	<b>5.0</b>	<b>7.4</b>
Asset Class Target				-4.9	-8.2	-10.9	3.8	3.3	6.3
<b>Strategic Investments</b>	<b>21,914,814,920</b>	<b>11.2</b>	<b>11.2</b>	<b>2.7</b>	<b>6.7</b>	<b>8.3</b>	<b>8.1</b>	<b>7.5</b>	<b>7.0</b>
Short-Term Target				3.1	7.8	10.8	7.8	8.0	6.2
<b>Cash**</b>	<b>2,971,774,619</b>	<b>1.5</b>		<b>1.1</b>	<b>4.0</b>	<b>4.7</b>	<b>1.9</b>	<b>1.6</b>	<b>1.2</b>
Bloomberg 1-3 Year Gov/Credit Index				0.4	3.9	3.5	0.2	1.4	1.3

Benchmark and universe descriptions can be found in the Appendix.

\* Global Equity became an asset class in July 2010. The historical return series prior to July 2010 was derived from the underlying Domestic Equities, Foreign Equities, and Global Equities components.

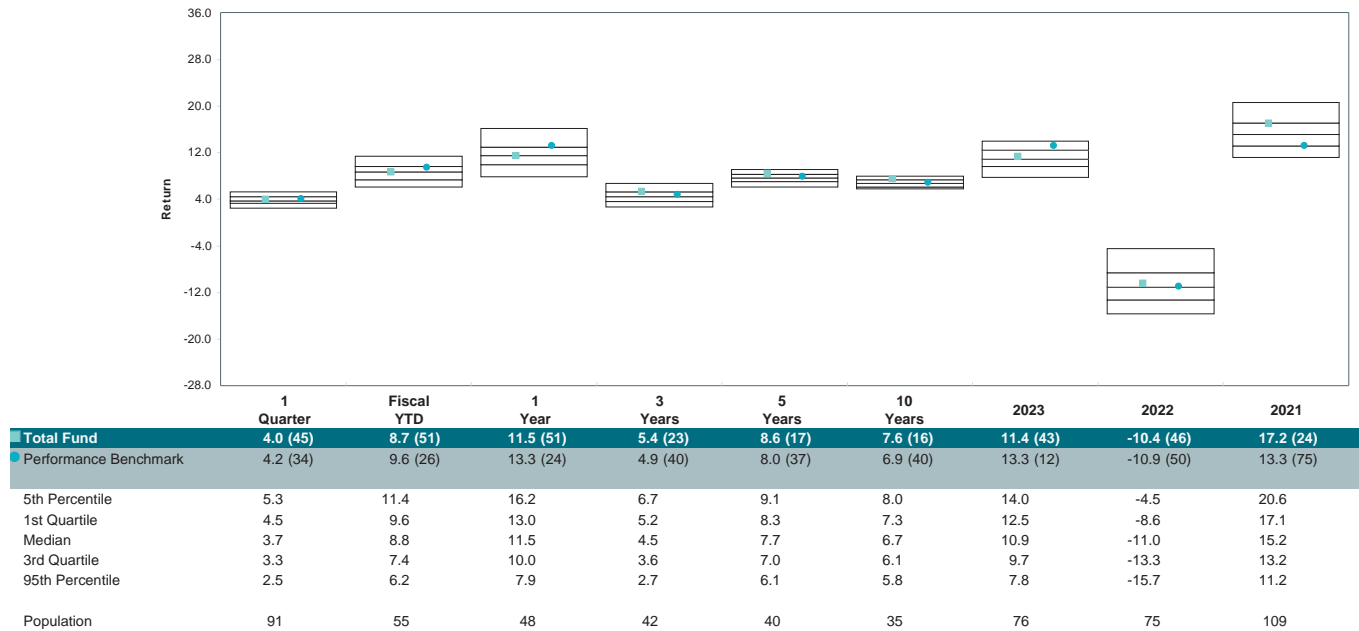
\*\*Performance for the Cash & Central Custody and Enhanced Cash Composite is shown.

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# Plan Sponsor Peer Group Analysis

As of March 31, 2024



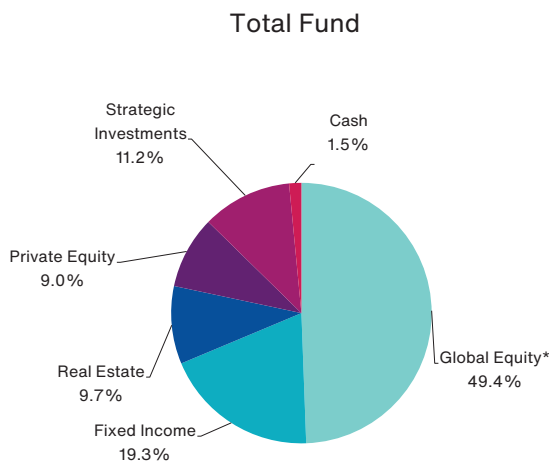
Parenttheses contain percentile rankings.  
Universe: All Public Plans > \$1B-Total Fund



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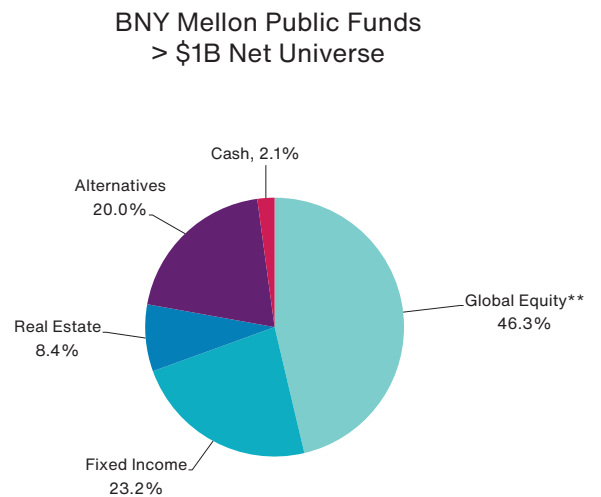
## Universe Asset Allocation Comparison<sup>1</sup>

As of March 31, 2024



\*Global Equity Allocation: 25.4% Domestic Equities; 15.5% Foreign Equities; 6.1% Global Equities; 1.4 Global Equity Cash; 1.0% Global Equity Liquidity Account. Percentages are of the Total FRS Fund.

<sup>1</sup>Allocations may not sum too 100.0% due to rounding.



\*\*Global Equity Allocation: 29.3% Domestic Equities; 17.0% Foreign Equities.

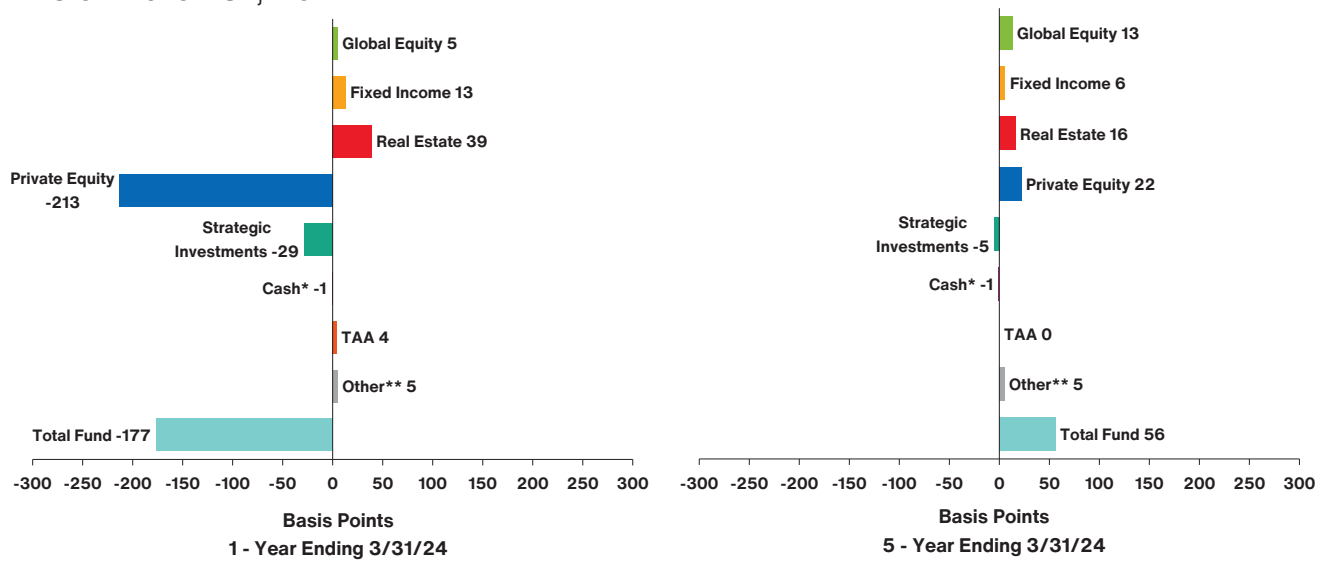


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# Attribution

As of March 31, 2024



\*Cash AA includes Cash and Central Custody, Securities Lending Account income from 12/2009 to 3/2013 and unrealized gains and losses on securities lending collateral beginning June 2013, TF STIPFRS NAV Adjustment Account, and the Cash Expense Account.  
 \*\*Other includes transition accounts, liquidity portfolios, accounts outside of C&CC, and unexplained differences due to methodology.

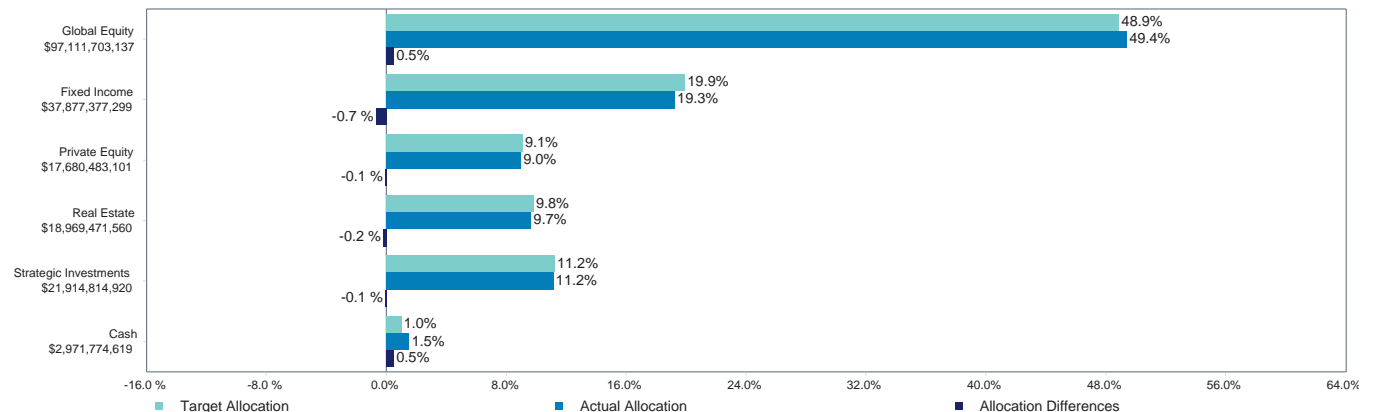


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# Asset Allocation Compliance

As of March 31, 2024

	Market Value \$	Current Allocation %	Target Allocation %	Minimum Allocation %	Maximum Allocation %
<b>Total Fund</b>	<b>196,525,624,636</b>	<b>100.0</b>	<b>100.0</b>		
Global Equity	97,111,703,137	49.4	48.9	45.0	70.0
Fixed Income	37,877,377,299	19.3	19.9	10.0	26.0
Private Equity	17,680,483,101	9.0	9.1	2.0	12.0
Real Estate	18,969,471,560	9.7	9.8	4.0	16.0
Strategic Investments	21,914,814,920	11.2	11.2	0.0	16.0
Cash	2,971,774,619	1.5	1.0	0.3	5.0





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**Global Equity**

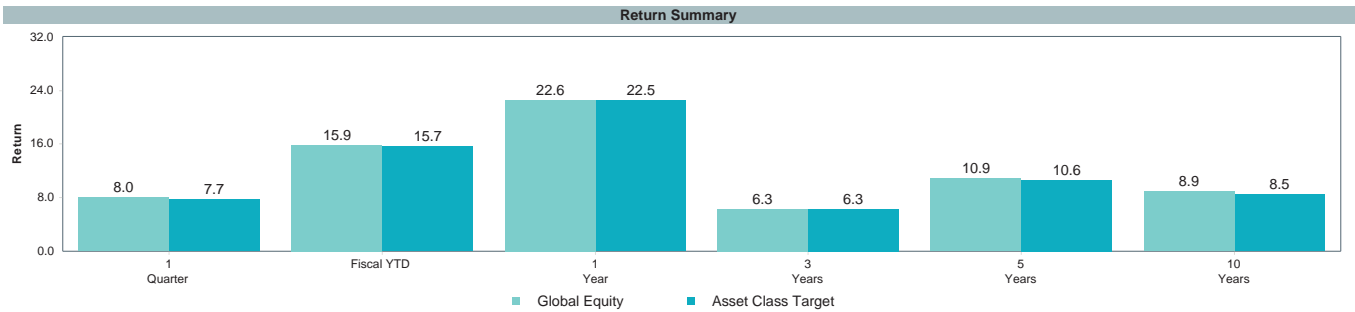
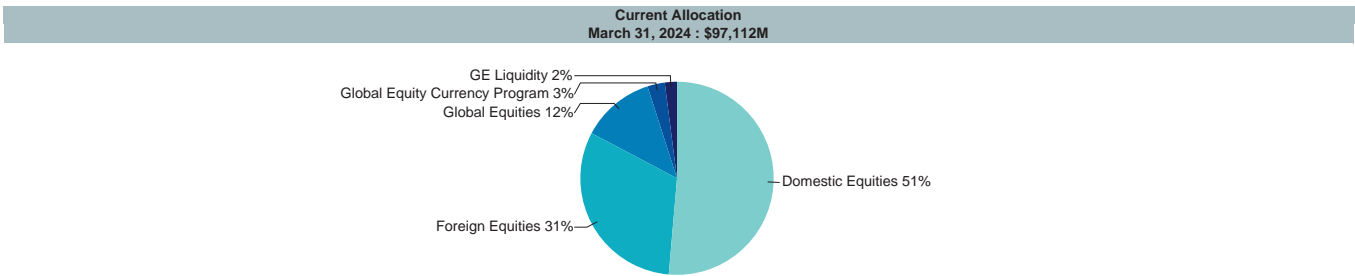


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# Global Equity\* Portfolio Overview

As of March 31, 2024



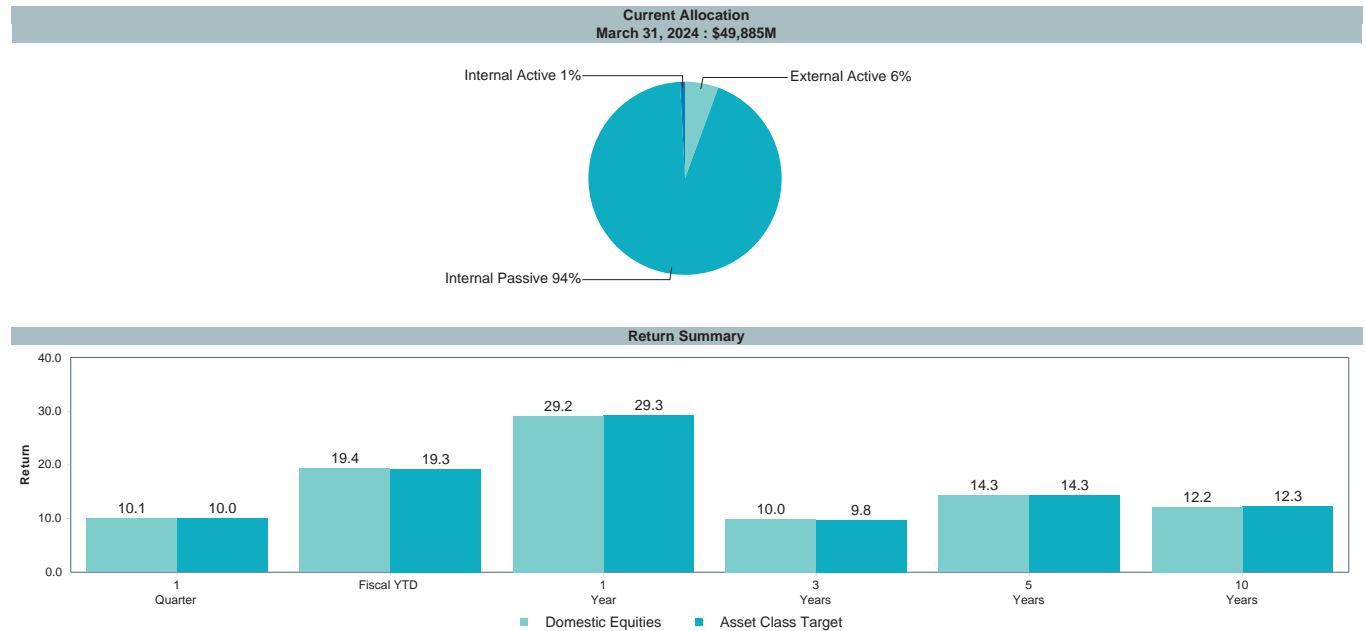
\* Global Equity became an asset class in July 2010. The historical return series prior to July 2010 was derived from the underlying Domestic Equities, Foreign Equities, and Global Equities components.

## Domestic Equities



# Domestic Equities Portfolio Overview

As of March 31, 2024

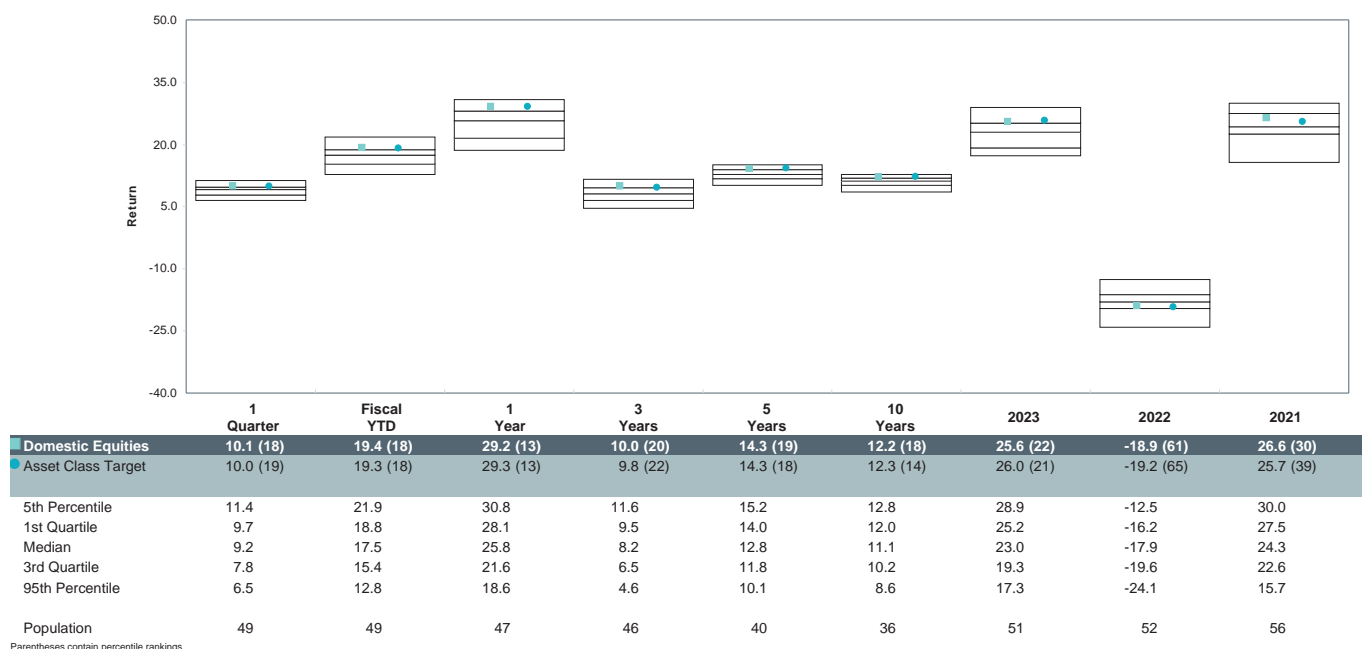


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# Domestic Equities Peer Group Analysis

As of March 31, 2024



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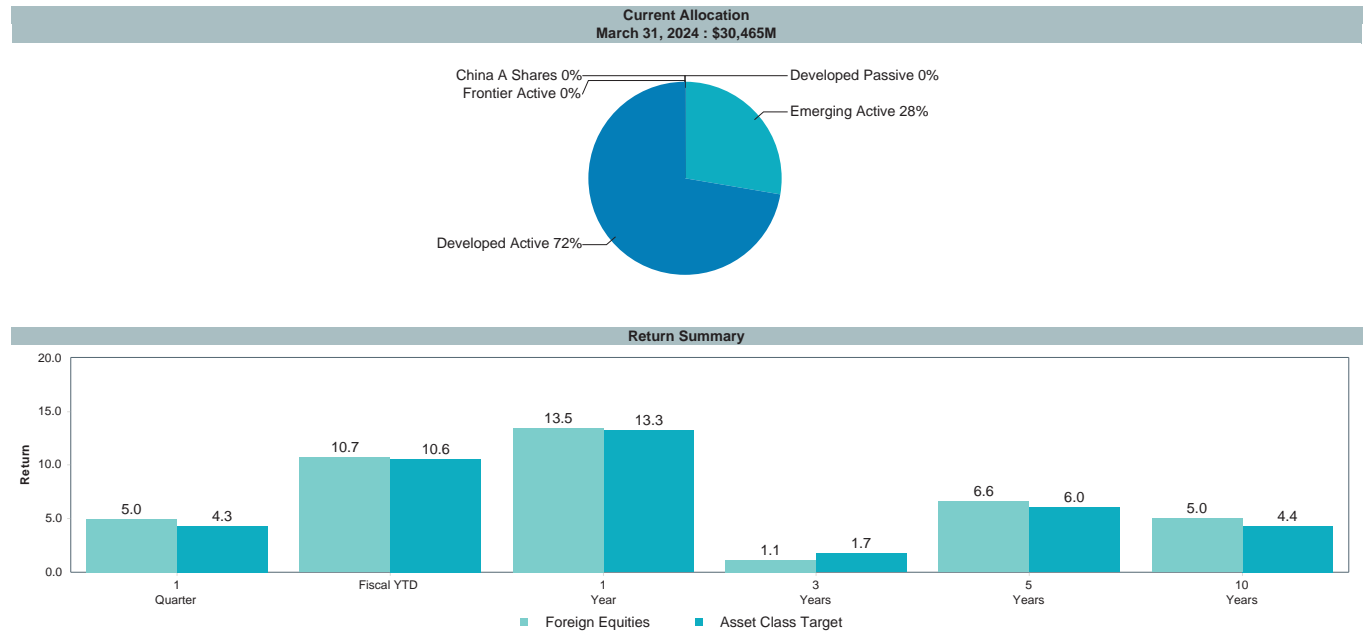
**Foreign Equities**

**AON**



# Foreign Equities Portfolio Overview

As of March 31, 2024

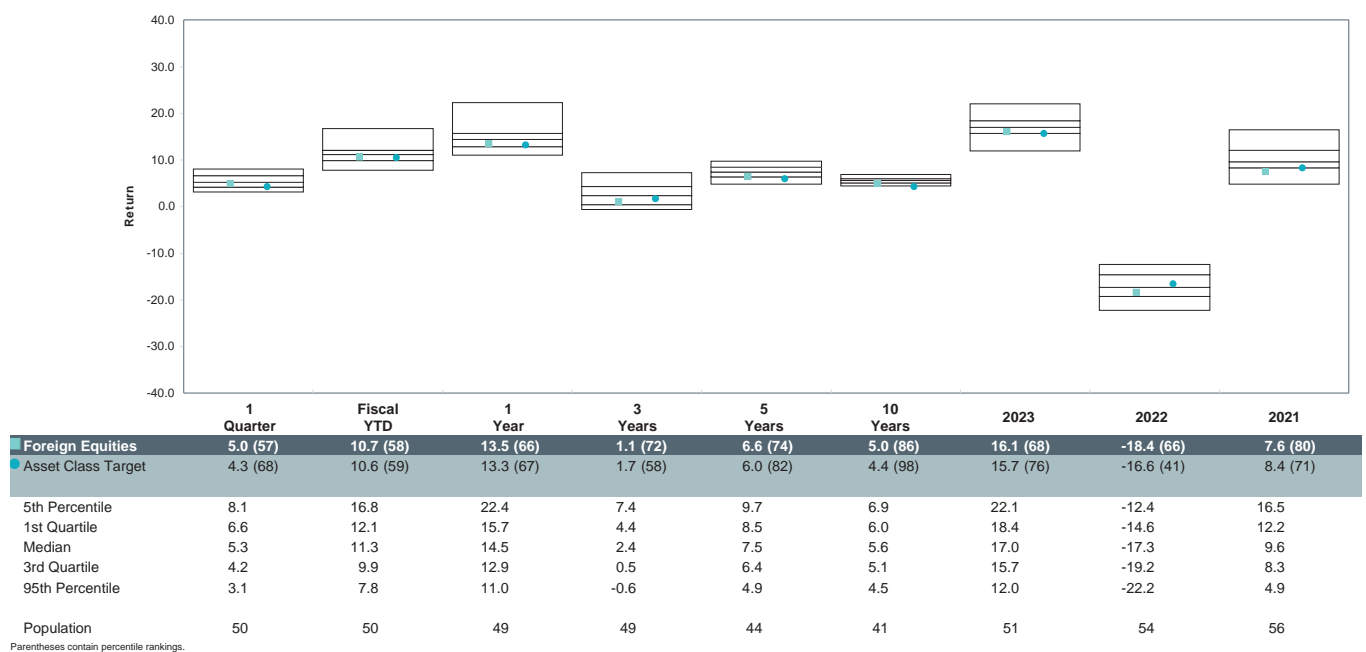


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# Foreign Equities Peer Group Analysis

As of March 31, 2024



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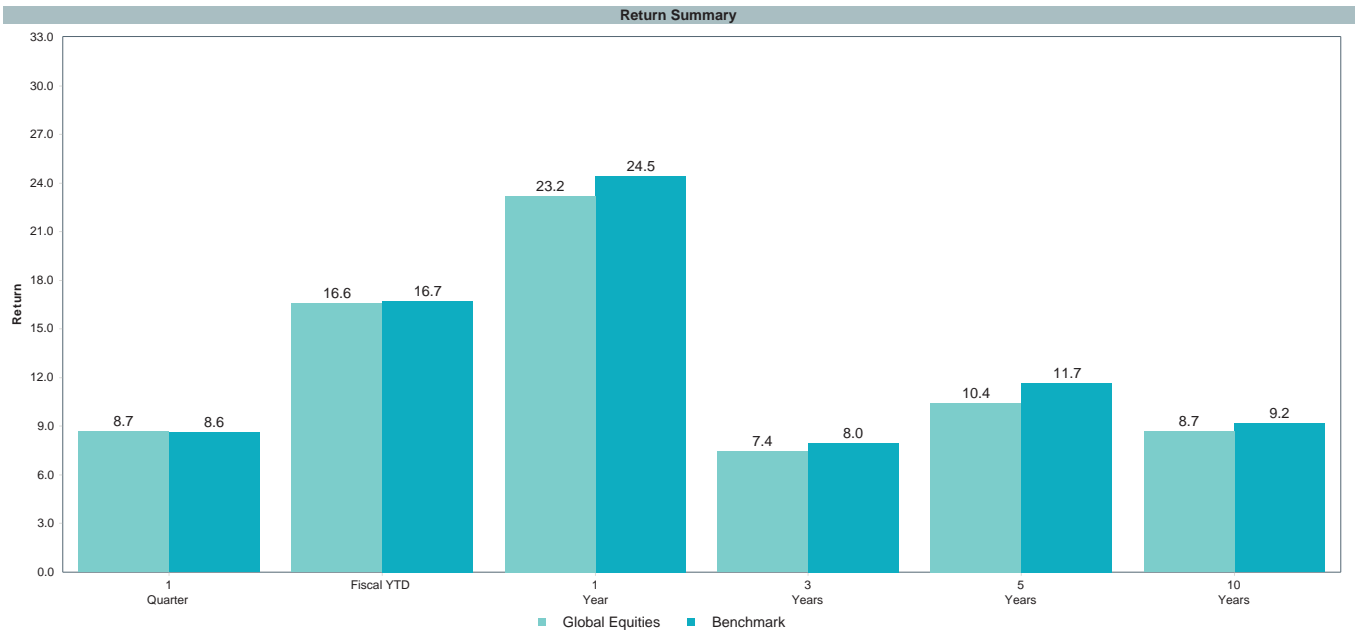
**Global Equities**



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# Global Equities Performance Summary

As of March 31, 2024

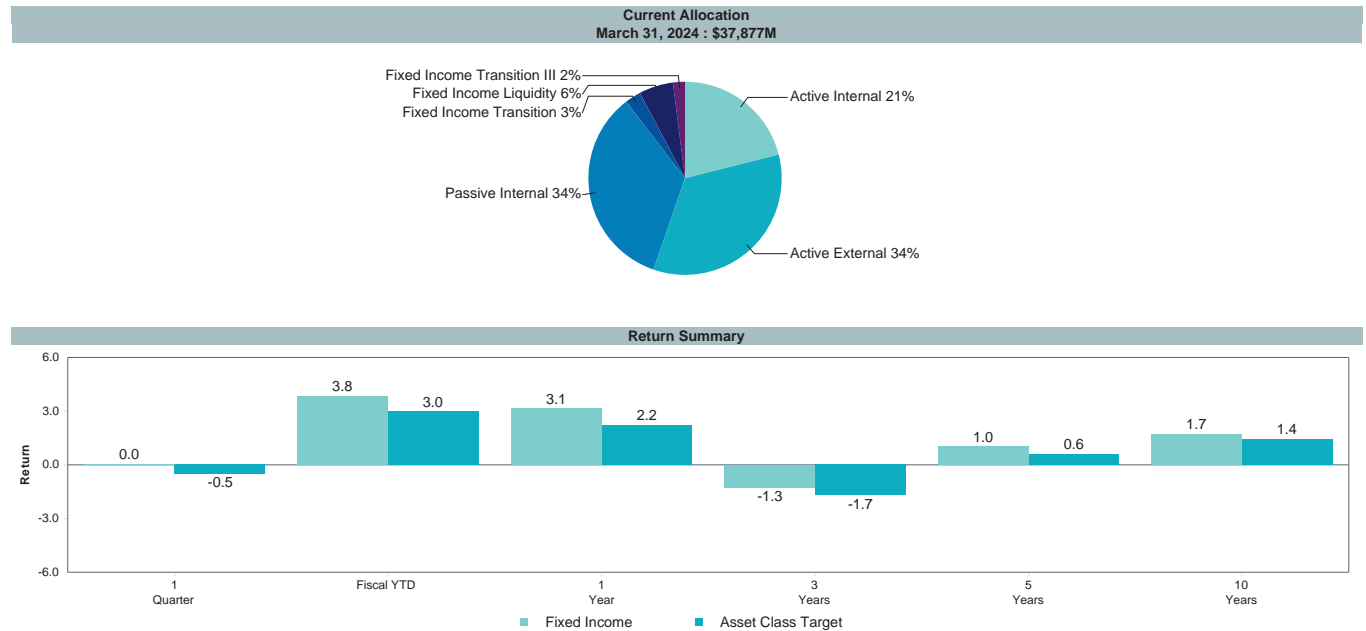


## Fixed Income



# Fixed Income Portfolio Overview

As of March 31, 2024

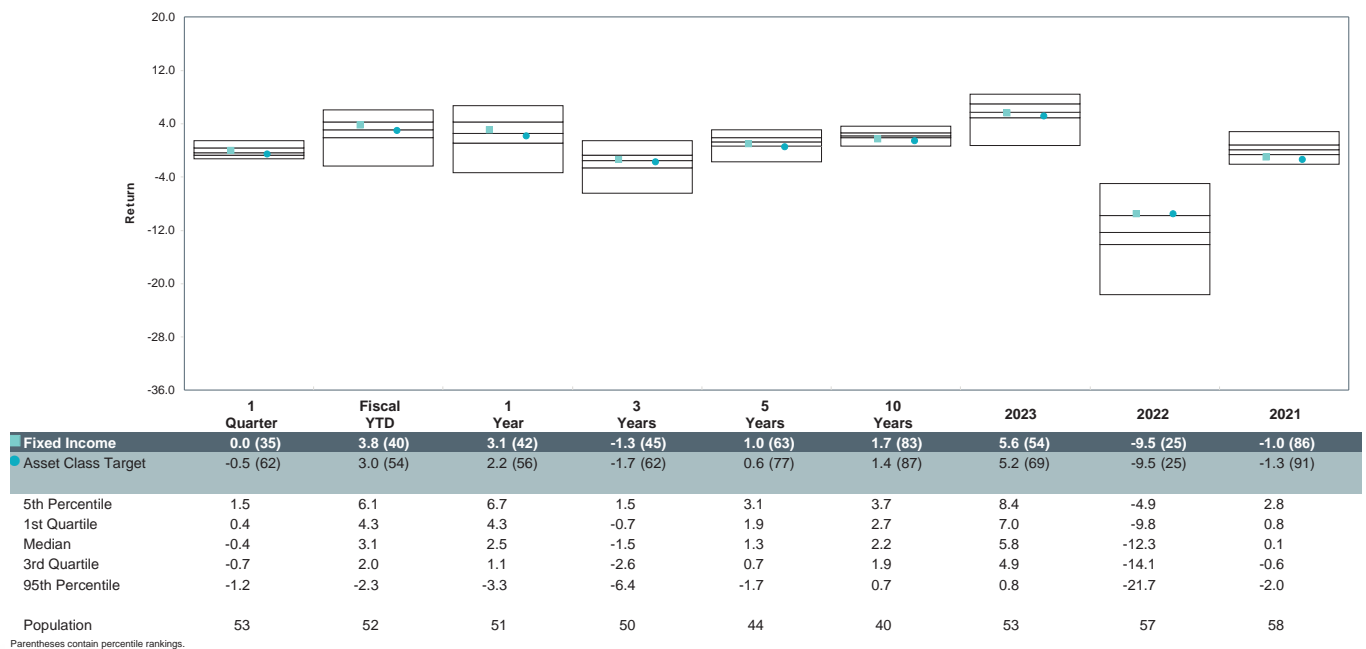


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# Fixed Income Peer Group Analysis

As of March 31, 2024



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**Private Equity**



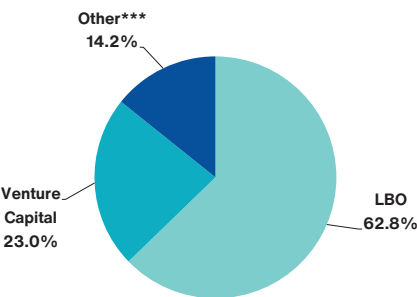
**AON**



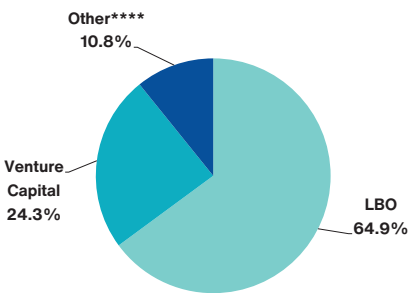
# Private Equity Asset Allocation Overview

## As of March 31, 2024

FRS Private Equity by Market Value\*



Preqin Private Equity Strategies by Market Value\*\*



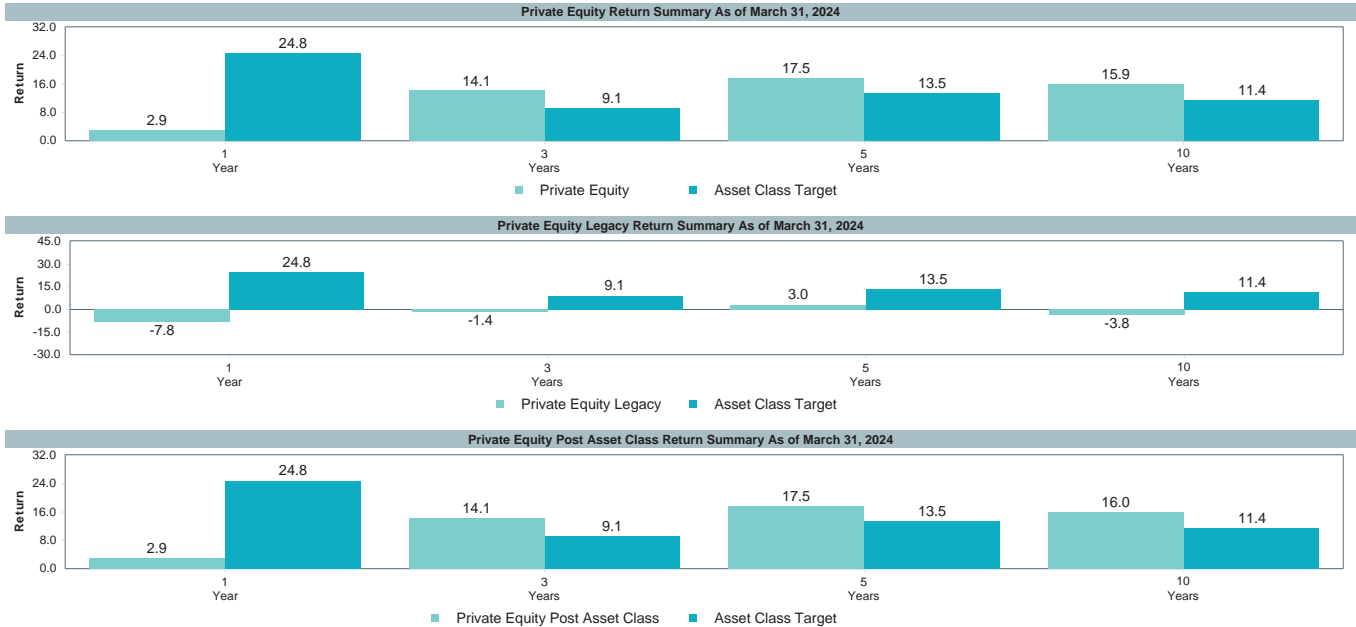
\*Allocation data is as of March 31, 2024.  
 \*\*Allocation data is as of June 30, 2019, from the Preqin database.  
 \*\*\*Other for the FRS Private Equity consists of Growth Capital, Secondary, PE Cash, and PE Transition.  
 \*\*\*\*Other for the Preqin data consists of Distressed PE, Growth, Mezzanine, and other Private Equity/Special Situations.  
 Preqin universe is comprised of 10,000 private equity funds representing \$4.8 trillion.



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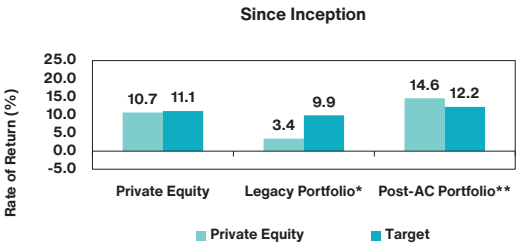
# Private Equity Time-Weighted Investment Results

## As of March 31, 2024

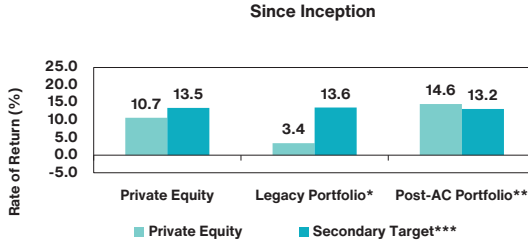


# Dollar-Weighted Investment Results

As of December 31, 2023<sup>1</sup>



As of December 31, 2023



\*The Inception Date for the Legacy Portfolio is January 1989.  
\*\*The Inception Date for the Post-AC Portfolio is September 2000.  
\*\*\*The Secondary Target is a blend of the Cambridge Associates Private Equity Index and the Cambridge Associates Venture Capital Index based on actual ABAL weights. Secondary Target data is on a quarterly lag.  
<sup>1</sup>Data not available at time of reporting, data as of 12/31/23



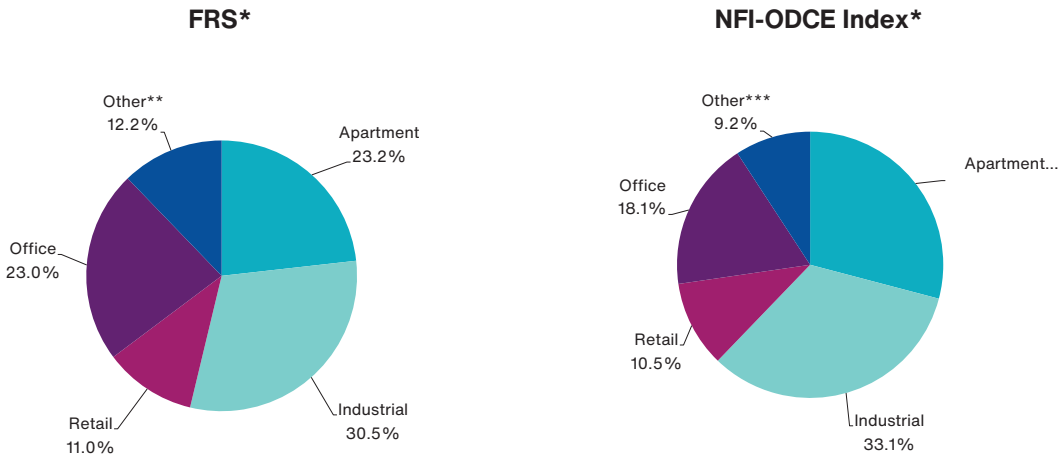
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Real Estate



# Real Estate Asset Allocation Overview

As of March 31, 2024



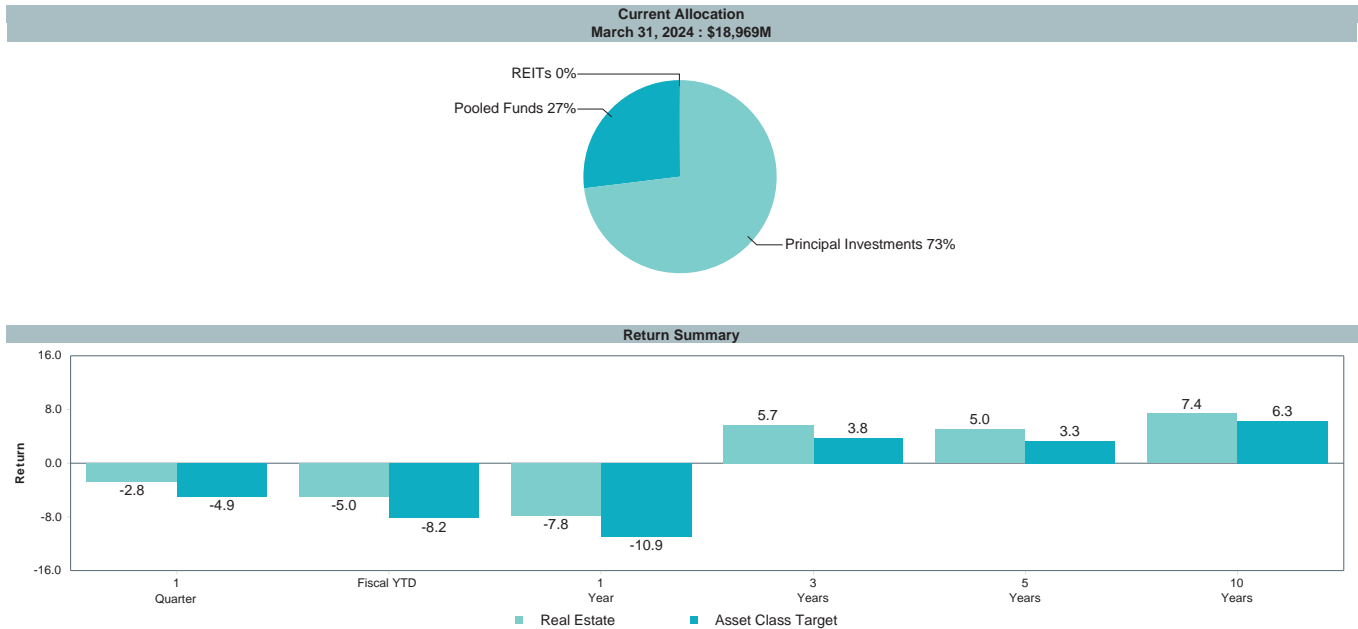
\*Property Allocation data is as of December 31, 2023. The FRS chart includes only the FRS private real estate assets. Property type information for the REIT portfolios is not included.  
\*\*Other for the FRS consists of Hotel, Land, Preferred Equity, Agriculture, Self-Storage and Senior Housing.  
\*\*\*Other for the NFI-ODCE Index consists of Hotel, Senior Living, Healthcare, Mixed Use, Single Family Residential, Parking, Timber/Agriculture, Land and Infrastructure.



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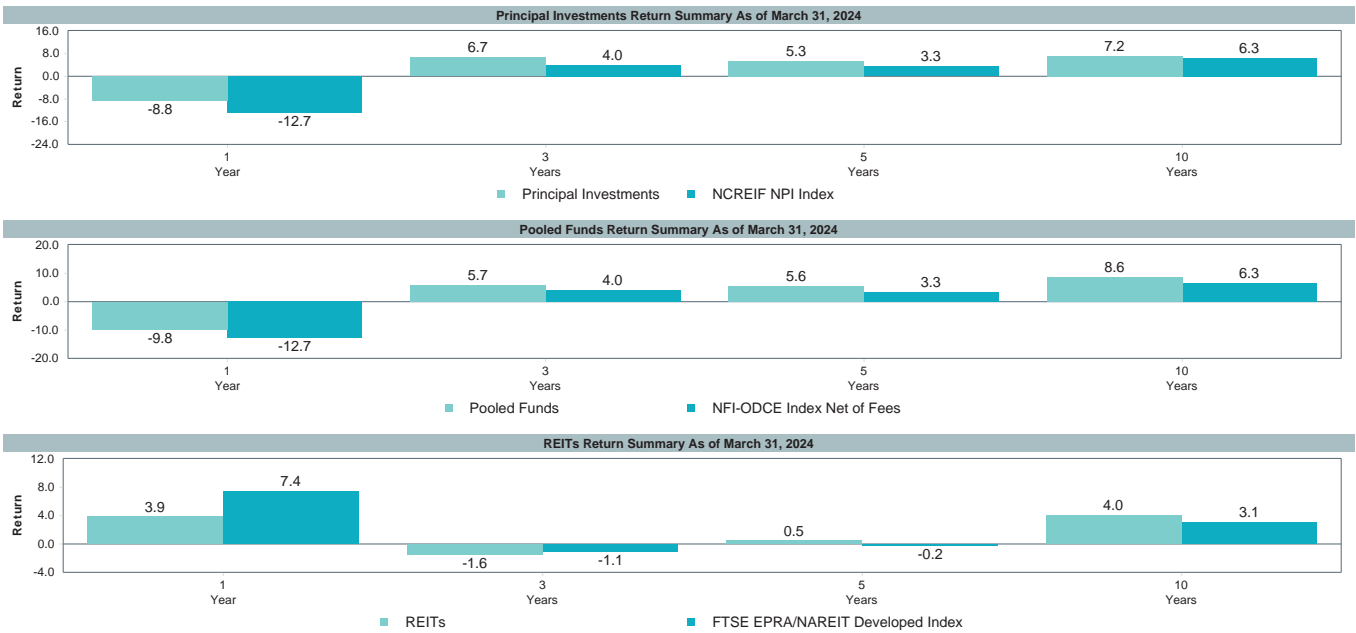
# Real Estate Portfolio Overview

As of March 31, 2024



# Real Estate Performance Overview

As of March 31, 2024



## Strategic Investments

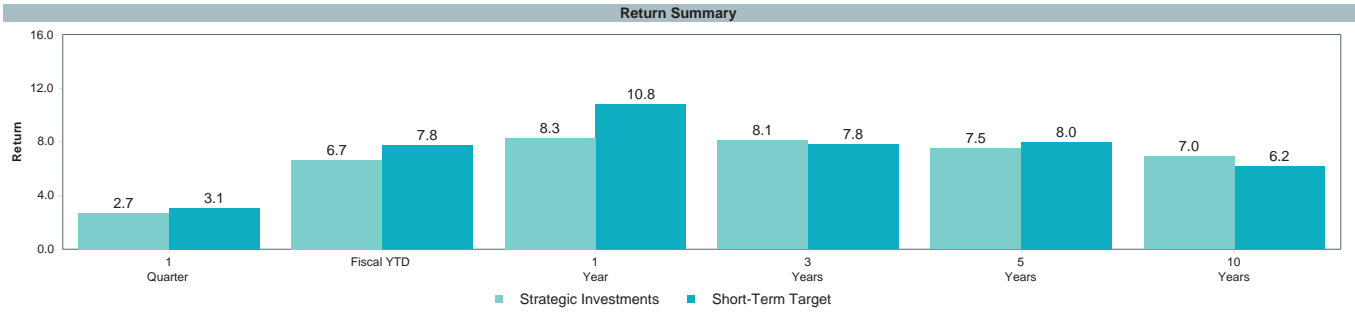
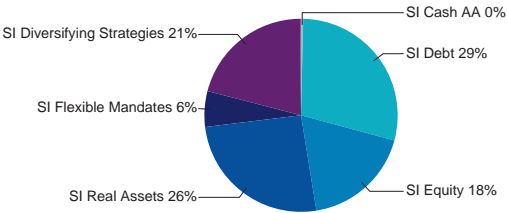




# Strategic Investments Portfolio Overview

As of March 31, 2024

Current Allocation  
March 31, 2024 : \$21,915M

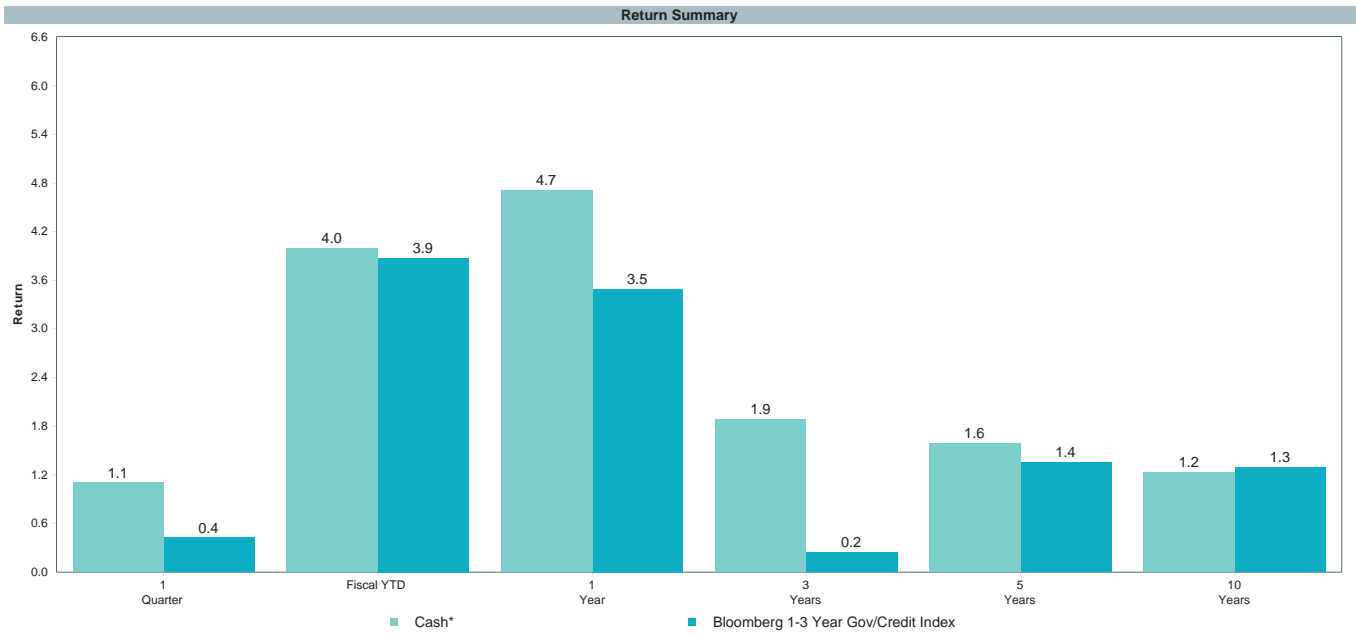


Cash



# Cash Performance Summary

As of March 31, 2024



\*Performance for the Cash & Central Custody and Enhanced Cash Composite is shown.



## Appendix



## Appendix

### Total FRS Assets

**Performance Benchmark-** A combination of the Global Equity Target, the Barclays Capital U.S. Intermediate Aggregate Index, the Private Equity Target Index, the Real Estate Investments Target Index, the Strategic Investments Target Benchmark, and the Bank of America Merrill Lynch 3-Month US Treasury Index. The short-term target policy allocations to the Strategic Investments, Real Estate and Private Equity asset classes are floating and based on the actual average monthly balance of the Global Equity asset class. Please refer to section VII. Performance Measurement in the FRS Defined Benefit Plan Investment Policy Statement for more details on the calculation of the Performance Benchmark. Prior to October 1, 2013, the Performance benchmark was a combination of the Global Equity Target, the Barclays Aggregate Bond Index, the Private Equity Target Index, the Real Estate Investments Target Index, the Strategic Investments Target Benchmark, and the iMoneyNet First Tier Institutional Money Market Funds Net Index. The short-term target policy allocations to the Strategic Investments, Real Estate and Private Equity asset classes are floating and based on the actual average monthly balance of the Global Equity asset class. Prior to July 2010, the Performance Benchmark was a combination of the Russell 3000 Index, the Foreign Equity Target Index, the Strategic Investments Target Benchmark, the Barclays Aggregate Bond Index, the Real Estate Investments Target Index, the Private Equity Target Index, the Barclays U.S. High Yield Ba/B 2% Issuer Capped Index, and the iMoneyNet First Tier Institutional Money Market Funds Gross Index. During this time, the short-term target policy allocations to Strategic Investments, Real Estate and Private Equity asset classes were floating and based on the actual average monthly balance of the Strategic Investments, Real Estate and Private Equity asset classes. The target weights shown for Real Estate and Private Equity were the allocations that the asset classes were centered around. The actual target weight floated around this target month to month based on changes in asset values.

### Total Global Equity

**Performance Benchmark-** A custom version of the MSCI All Country World Investable Market Index (MSCI IMI), in dollar terms, net of withholding taxes on non-resident institutional investors, adjusted to reflect securities and other investments prohibited by Florida law or that would be prohibited by Florida law if acquired as of the date of measurement of such Index notwithstanding that the securities or investments were actually acquired before such date. Prior to July 2010, the asset class benchmark is a weighted average of the underlying Domestic Equities, Foreign Equities and Global Equities historical benchmarks.

### Total Domestic Equities

**Performance Benchmark-** The Russell 3000 Index. Prior to July 1, 2002, the benchmark was the Wilshire 2500 Stock Index. Prior to January 1, 2001, the benchmark was the Wilshire 2500 Stock Index ex-Tobacco. Prior to May 1, 1997, the benchmark was the Wilshire 2500 Stock Index. Prior to September 1, 1994, the benchmark was the S&P 500 Stock Index.

### Total Foreign Equities

**Performance Benchmark-** A custom version of the MSCI ACWI ex-U.S. Investable Market Index adjusted to exclude companies divested under the PFIA. Prior to April 1, 2008, it was the MSCI All Country World Index ex-U.S. Investable Market Index. Prior to September 24, 2007, the target was the MSCI All Country World ex-U.S. Free Index. Prior to November 1, 1999, the benchmark was 85% MSCI Europe, Australasia and Far East (EAFE) Foreign Stock Index and 15% IFCI Emerging Markets Index with a half weight in Malaysia. Prior to March 31, 1995, the benchmark was the EAFE Index.

### Total Global Equities

**Performance Benchmark-** Aggregated based on each underlying manager's individual benchmark. The calculation accounts for the actual weight and the benchmark return. The benchmarks used for the underlying managers include both the MSCI FSB All Country World ex-Sudan ex-Iran Net Index and MSCI FSB All Country World ex-Sudan ex-Iran Net Investable Market Index (IMI).

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## Appendix

### Total Fixed Income

**Performance Benchmark-** The Barclays Capital U.S. Intermediate Aggregate Index. Prior to October 1, 2013, it was the Barclays U.S. Aggregate Bond Index. Prior to June 1, 2007, it was the Fixed Income Management Aggregate (FIMA). Prior to July 1, 1999, the benchmark was the Florida High Yield Extended Duration Index. Prior to July 31, 1997, the benchmark was the Florida Extended Duration Index. Prior to July 1, 1989, the Salomon Brothers Broad Investment-Grade Bond Index was the benchmark. For calendar year 1985, the performance benchmark was 70% Shearson Lehman Extended Duration and 30% Salomon Brothers Mortgage Index.

### Total Private Equity

**Performance Benchmark-** The MSCI All Country World Investable Market Index (ACWI IMI), adjusted to reflect the provisions of the Protecting Florida's Investments Act, plus a fixed premium return of 300 basis points per annum. Prior to July 1, 2014, the benchmark was the domestic equities target index return (Russell 3000 Index) plus a fixed premium return of 300 basis points per annum. Prior to July 1, 2010, it was the domestic equities target index return plus a fixed premium return of 450 basis points per annum. Prior to November 1, 1999, Private Equities was part of the Domestic Equities asset class and its benchmark was the domestic equities target index return plus 750 basis points.

### Total Real Estate

**Performance Benchmark-** The core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index- Open-ended Diversified Core Equity, net of fees, weighted at 76.5%, and the non-core portion of the asset class is benchmarked to an average of the National Council of Real Estate Investment Fiduciaries (NCREIF) Fund Index- Open-ended Diversified Core Equity, net of fees, weighted at 13.5%, plus a fixed return premium of 150 basis points per annum, and the FTSE EPRA/NAREIT Developed Index, in dollar terms, net of withholding taxes on non-resident institutional investors, weighted at 10%. Prior to July 1, 2014, the benchmark was a combination of 90% NCREIF ODCE Index, net of fees, and 10% FTSE EPRA/NAREIT Developed Index, net of fees. Prior to July 1, 2010, it was a combination of 90% NCREIF ODCE Index, gross of fees, and 10% Dow Jones U.S. Select RESI. Prior to June 1, 2007, it was the Consumer Price Index plus 450 basis points annually. Prior to July 1, 2003, the benchmark was the Dow Jones U.S. Select Real Estate Securities Index Un-Levered. Prior to November 1, 1999, the benchmark was the Russell-NCREIF Property Index.

### Total Strategic Investments

**Performance Benchmark-** Long-term, 4.0% plus the contemporaneous rate of inflation or CPI. Short-term, a weighted aggregation of individual portfolio level benchmarks. Prior to July 1, 2018, a Performance Benchmark-Long-term, 4.5% plus the contemporaneous rate of inflation or CPI. Short-term, a weighted aggregation of individual portfolio level benchmark.

### Total Cash

**Performance Benchmark-** Bloomberg Barclays U.S. Treasury Bill: 1-3 month index. Prior to October 1, 2020, it was the Bank of America Merrill Lynch 3-Month US Treasury Index. Prior to July 1, 2018 it was the iMoneyNet First Tier Institutional Money Market Funds Net Index. Prior to July 1, 2010, it was the iMoneyNet First Tier Institutional Money Market Funds Gross Index. Prior to June 1, 2007, it was the return of the Merrill Lynch 90-Day (Auction Average) Treasury Bill Yield Index.

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## Appendix

### Description of Benchmarks

**Bloomberg Barclays U.S. Treasury Bill: 1-3 month Index-** Consists of U.S. Treasury Bills that have a remaining maturity of greater than or equal to 1 month and less than 3 months

**Barclays Capital U.S. Intermediate Aggregate Bond Index-** A market value-weighted index consisting of U.S. Treasury securities, corporate bonds and mortgage-related and asset-backed securities with one to ten years to maturity and an outstanding par value of \$250 million or greater.

**Consumer Price Index (CPI)-** The CPI, an index consisting of a fixed basket of goods bought by the typical consumer and used to measure consumer inflation.

**FTSE EPRA/NAREIT Developed Index-** An index designed to represent general trends in eligible real estate equities worldwide. Relevant real estate activities are defined as the ownership, disposal and development of income-producing real estate. This index covers the four primary core asset classes (Industrial, Retail, Office, and Apartment).

**MSCI All Country World Investable Market Index-** A free float-adjusted market capitalization-weighted index that is designed to measure the equity market performance of developed and emerging markets. This investable market index contains constituents from the large, mid, and small cap size segments and targets a coverage range around 99% of free-float adjusted market capitalization.

**NCREIF ODCE Property Index-** The NCREIF ODCE is a capitalization-weighted, gross of fee, time-weighted return index. The index is a summation of open-end funds, which NCREIF defines as infinite-life vehicles consisting of multiple investors who have the ability to enter or exit the fund on a periodic basis, subject to contribution and/or redemption requests.

**Russell 3000 Index-** A capitalization-weighted stock index consisting of the 3,000 largest publicly traded U.S. stocks by capitalization. This represents most publicly traded, liquid U.S. stocks.

## Appendix

### Description of Universes

**Total Fund-** A universe comprised of 150 total fund portfolio returns, net of fees, of public defined benefit plans calculated and provided by BNY Mellon Performance & Risk Analytics and Investment Metrics. Aggregate assets in the universe comprised \$2.0 trillion as of quarter-end and the average market value was \$13.2 billion.

**Domestic Equity-** A universe comprised of 52 total domestic equity portfolio returns, net of fees, of public defined benefit plans calculated and provided by BNY Mellon Performance & Risk Analytics. Aggregate assets in the universe comprised \$1.0 trillion as of quarter-end and the average market value was \$18.5 billion.

**Foreign Equity-** A universe comprised of 55 total international equity portfolio returns, net of fees, of public defined benefit plans calculated and provided by BNY Mellon Performance & Risk Analytics. Aggregate assets in the universe comprised \$1.0 trillion as of quarter-end and the average market value was \$18.5 billion.

**Fixed Income-** A universe comprised of 55 total fixed income portfolio returns, net of fees, of public defined benefit plans calculated and provided by BNY Mellon Performance & Risk Analytics. Aggregate assets in the universe comprised \$1.1 trillion as of quarter-end and the average market value was \$19.5 billion.

**Real Estate-** A universe comprised of 42 total real estate portfolio returns, net of fees, of public defined benefit plans calculated and provided by BNY Mellon Performance & Risk Analytics. Aggregate assets in the universe comprised \$1.0 trillion as of quarter-end and the average market value was \$24.1 billion.

**Private Equity-** An appropriate universe for private equity is unavailable.

**Strategic Investments-** An appropriate universe for strategic investments is unavailable.



## Appendix

### Explanation of Exhibits

**Quarterly and Cumulative Excess Performance-** The vertical axis, excess return, is a measure of fund performance less the return of the primary benchmark. The horizontal axis represents the time series. The quarterly bars represent the underlying funds' relative performance for the quarter.

**Ratio of Cumulative Wealth Graph-** An illustration of a portfolio's cumulative, un-annualized performance relative to that of its benchmark. An upward-sloping line indicates superior fund performance versus its benchmark. Conversely, a downward-sloping line indicates underperformance by the fund. A flat line is indicative of benchmark-like performance.

**Performance Comparison - Plan Sponsor Peer Group Analysis-** An illustration of the distribution of returns for a particular asset class. The component's return is indicated by the circle and its performance benchmark by the triangle. The top and bottom borders represent the 5th and 95th percentiles, respectively. The solid line indicates the median while the dotted lines represent the 25th and 75th percentiles.

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## Notes

- The rates of return contained in this report are shown on an after-fees basis unless otherwise noted. They are geometric and time-weighted. Returns for periods longer than one year are annualized.
- Universe percentiles are based upon an ordering system in which 1 is the best ranking and 100 is the worst ranking.
- Due to rounding throughout the report, percentage totals displayed may not sum to 100%. Additionally, individual fund totals in dollar terms may not sum to the plan total.

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## Past performance is not necessarily indicative of future results.

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## Quarterly Investment Review

FRS Investment Plan

First Quarter 2024

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## FRS Investment Plan



# Asset Allocation & Performance

As of March 31, 2024

	Allocation		Performance %				
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years
<b>FRS Investment Plan</b>	<b>16,718,226,467</b>	<b>100.0</b>	<b>5.8</b>	<b>16.1</b>	<b>4.7</b>	<b>8.1</b>	<b>7.0</b>
<i>Total Plan Aggregate Benchmark</i>			5.4	16.0	5.0	8.0	6.8
<b>Retirement Date</b>	<b>8,415,481,972</b>	<b>50.3</b>					
<b>FRS Retirement Fund</b>	<b>609,780,020</b>	<b>3.6</b>	<b>2.0 (83)</b>	<b>6.7 (82)</b>	<b>1.9 (34)</b>	<b>4.9 (29)</b>	<b>4.3 (71)</b>
<i>Retirement Custom Index</i>			1.4 (91)	6.2 (86)	1.8 (42)	4.7 (36)	4.2 (79)
<b>FRS 2020 Retirement Date Fund</b>	<b>487,397,979</b>	<b>2.9</b>	<b>2.4 (98)</b>	<b>7.4 (98)</b>	<b>2.2 (48)</b>	<b>5.3 (78)</b>	<b>5.0 (84)</b>
<i>2020 Retirement Custom Index</i>			1.7 (100)	7.1 (98)	2.2 (48)	5.3 (79)	4.9 (92)
<b>FRS 2025 Retirement Date Fund</b>	<b>967,742,864</b>	<b>5.8</b>	<b>3.1 (85)</b>	<b>9.1 (98)</b>	<b>2.7 (31)</b>	<b>6.1 (63)</b>	<b>5.7 (70)</b>
<i>2025 Retirement Custom Index</i>			2.4 (98)	9.1 (98)	2.8 (21)	6.1 (59)	5.6 (76)
<b>FRS 2030 Retirement Date Fund</b>	<b>1,089,648,474</b>	<b>6.5</b>	<b>4.3 (68)</b>	<b>12.0 (88)</b>	<b>3.6 (24)</b>	<b>7.0 (67)</b>	<b>6.5 (71)</b>
<i>2030 Retirement Custom Index</i>			3.7 (87)	12.0 (88)	3.7 (19)	7.1 (66)	6.3 (76)
<b>FRS 2035 Retirement Date Fund</b>	<b>1,108,803,421</b>	<b>6.6</b>	<b>5.3 (64)</b>	<b>14.4 (91)</b>	<b>4.3 (31)</b>	<b>7.8 (87)</b>	<b>7.0 (80)</b>
<i>2035 Retirement Custom Index</i>			4.8 (84)	14.4 (92)	4.4 (25)	7.9 (83)	6.9 (84)
<b>FRS 2040 Retirement Date Fund</b>	<b>1,059,629,391</b>	<b>6.3</b>	<b>5.9 (77)</b>	<b>16.0 (92)</b>	<b>4.7 (66)</b>	<b>8.4 (92)</b>	<b>7.4 (79)</b>
<i>2040 Retirement Custom Index</i>			5.4 (93)	16.0 (92)	4.8 (60)	8.4 (92)	7.3 (88)
<b>FRS 2045 Retirement Date Fund</b>	<b>1,086,191,631</b>	<b>6.5</b>	<b>6.1 (92)</b>	<b>17.1 (95)</b>	<b>5.0 (78)</b>	<b>8.8 (95)</b>	<b>7.7 (95)</b>
<i>2045 Retirement Custom Index</i>			5.7 (96)	16.9 (95)	5.0 (77)	8.9 (95)	7.6 (97)
<b>FRS 2050 Retirement Date Fund</b>	<b>795,526,086</b>	<b>4.8</b>	<b>6.2 (95)</b>	<b>17.6 (96)</b>	<b>5.2 (79)</b>	<b>9.1 (92)</b>	<b>7.8 (93)</b>
<i>2050 Retirement Custom Index</i>			5.9 (99)	17.4 (96)	5.3 (78)	9.1 (92)	7.7 (95)

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# Asset Allocation & Performance

As of March 31, 2024

	Allocation		Performance %				
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years
<b>FRS 2055 Retirement Date Fund</b>	<b>624,729,516</b>	<b>3.7</b>	<b>6.2 (98)</b>	<b>17.7 (97)</b>	<b>5.4 (75)</b>	<b>9.3 (94)</b>	<b>7.9 (100)</b>
<i>2055 Retirement Custom Index</i>			5.9 (100)	17.4 (97)	5.3 (83)	9.2 (95)	7.7 (100)
<b>FRS 2060 Retirement Date Fund</b>	<b>556,994,238</b>	<b>3.3</b>	<b>6.2 (100)</b>	<b>17.7 (100)</b>	<b>5.4 (75)</b>	<b>9.4 (-)</b>	<b>-</b>
<i>2060 Retirement Custom Index</i>			5.9 (100)	17.4 (100)	5.3 (83)	9.2 (-)	-
<b>FRS 2065 Retirement Date Fund</b>	<b>29,038,352</b>	<b>0.2</b>	<b>6.2 (100)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<i>2065 Retirement Custom Index</i>			5.9 (100)	-	-	-	-
<b>Stable Value</b>	<b>1,304,124,217</b>	<b>7.8</b>					
<b>FRS Stable Value Fund</b>	<b>1,304,124,217</b>	<b>7.8</b>	<b>0.7 (49)</b>	<b>2.8 (75)</b>	<b>-</b>	<b>-</b>	<b>-</b>
<i>ICE BofA US Treasuries 1-3 Year Index</i>			0.3 (96)	3.0 (33)	0.1 (94)	-	-
<b>Real Assets</b>	<b>154,370,833</b>	<b>0.9</b>					
<b>FRS Inflation Sensitive Fund</b>	<b>154,370,833</b>	<b>0.9</b>	<b>0.5</b>	<b>1.0</b>	<b>1.9</b>	<b>3.3</b>	<b>2.3</b>
<i>FRS Custom Multi-Assets Index</i>			-0.1	1.1	2.1	3.1	2.3
<b>Fixed Income</b>	<b>582,739,553</b>	<b>3.5</b>	<b>0.2 (11)</b>	<b>4.1 (14)</b>	<b>-1.3 (12)</b>	<b>1.4 (14)</b>	<b>2.3 (7)</b>
<i>Total Bond Index</i>			-0.2 (29)	3.4 (24)	-1.5 (15)	1.1 (27)	2.0 (19)
<b>FRS U.S. Bond Enhanced Index Fund</b>	<b>220,415,582</b>	<b>1.3</b>	<b>-0.6 (59)</b>	<b>1.9 (61)</b>	<b>-2.4 (45)</b>	<b>0.5 (66)</b>	<b>1.6 (59)</b>
<i>Blmbg. U.S. Aggregate Index</i>			-0.8 (85)	1.7 (70)	-2.5 (53)	0.4 (71)	1.5 (71)
<b>FRS Core Plus Bond Fund</b>	<b>362,323,971</b>	<b>2.2</b>	<b>0.3 (14)</b>	<b>4.7 (10)</b>	<b>-1.2 (18)</b>	<b>1.6 (17)</b>	<b>2.5 (11)</b>
<i>FRS Custom Core-Plus Fixed Income Index</i>			-0.4 (72)	3.4 (43)	-1.5 (28)	1.2 (56)	2.1 (34)

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# Asset Allocation & Performance

As of March 31, 2024

	Allocation		Performance %				
	Market Value \$	%	1 Quarter	1 Year	3 Years	5 Years	10 Years
<b>Domestic Equity</b>	<b>4,048,408,643</b>	<b>24.2</b>	<b>10.2 (43)</b>	<b>29.9 (28)</b>	<b>9.2 (44)</b>	<b>13.6 (35)</b>	<b>11.8 (25)</b>
<i>Total U.S. Equities Index</i>			9.9 (51)	28.9 (34)	9.6 (39)	13.7 (34)	11.7 (28)
<b>FRS U.S. Stock Market Index Fund</b>	<b>1,859,446,935</b>	<b>11.1</b>	<b>10.0 (47)</b>	<b>29.4 (32)</b>	<b>9.8 (35)</b>	<b>14.4 (25)</b>	<b>12.4 (16)</b>
<i>Russell 3000 Index</i>			10.0 (47)	29.3 (33)	9.8 (36)	14.3 (26)	12.3 (17)
<b>FRS U.S. Stock Fund</b>	<b>2,188,961,708</b>	<b>13.1</b>	<b>10.8 (33)</b>	<b>32.3 (20)</b>	<b>8.7 (50)</b>	-	-
<i>Russell 3000 Index</i>			10.0 (47)	29.3 (33)	9.8 (36)	-	-
<b>International/Global Equity</b>	<b>828,451,311</b>	<b>5.0</b>	<b>5.2 (35)</b>	<b>14.2 (39)</b>	<b>2.2 (46)</b>	<b>7.1 (34)</b>	<b>5.5 (21)</b>
<i>Total Foreign and Global Equities Index</i>			4.9 (39)	14.4 (38)	2.4 (44)	6.6 (42)	4.9 (30)
<b>FRS Foreign Stock Index Fund</b>	<b>291,404,661</b>	<b>1.7</b>	<b>4.4 (47)</b>	<b>13.0 (48)</b>	<b>1.9 (49)</b>	<b>6.2 (46)</b>	<b>4.6 (41)</b>
<i>MSCI All Country World ex-U.S. IMI Index</i>			4.3 (49)	13.2 (47)	1.7 (51)	6.0 (49)	4.3 (47)
<b>FRS Foreign Stock Fund</b>	<b>178,871,145</b>	<b>1.1</b>	<b>7.4 (14)</b>	<b>13.5 (45)</b>	<b>-0.2 (62)</b>	<b>6.9 (38)</b>	<b>5.6 (21)</b>
<i>MSCI AC World ex USA (Net)</i>			4.7 (43)	13.3 (46)	1.9 (48)	6.0 (49)	4.3 (49)
<b>FRS Global Stock Fund</b>	<b>358,175,505</b>	<b>2.1</b>	<b>8.5 (33)</b>	<b>22.9 (34)</b>	<b>5.2 (49)</b>	<b>12.8 (13)</b>	<b>11.0 (5)</b>
<i>MSCI AC World Index (Net)</i>			8.2 (37)	23.2 (32)	7.0 (35)	10.9 (30)	8.7 (30)
<b>FRS Self-Dir Brokerage Acct</b>	<b>1,384,649,938</b>	<b>8.3</b>					

The returns for the Retirement Date Funds, Inflation Sensitive Fund, and Core Plus Bond Fund use prehire data for all months prior to 7/1/2014, actual live data is used thereafter.  
Note: The SDBA opened for members on 1/2/2014. No performance calculations will be made for the SDBA.

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# Asset Allocation & Performance

As of March 31, 2024

	Performance %								
	2023	2022	2021	2020	2019	2018	2017	2016	2015
<b>FRS Investment Plan</b>	<b>15.7</b>	<b>-15.1</b>	<b>14.1</b>	<b>13.1</b>	<b>20.5</b>	<b>-5.7</b>	<b>16.4</b>	<b>8.0</b>	<b>-0.9</b>
<i>Total Plan Aggregate Benchmark</i>	15.4	-13.8	14.2	11.7	20.0	-5.8	15.5	8.5	-1.3
<b>Retirement Date</b>									
<b>FRS Retirement Fund</b>	<b>8.6 (81)</b>	<b>-11.8 (36)</b>	<b>9.6 (1)</b>	<b>10.2 (38)</b>	<b>14.8 (36)</b>	<b>-3.7 (69)</b>	<b>10.8 (24)</b>	<b>6.2 (18)</b>	<b>-2.6 (100)</b>
<i>Retirement Custom Index</i>	8.2 (92)	-10.7 (12)	8.9 (9)	9.6 (61)	14.5 (40)	-3.8 (69)	10.4 (41)	6.2 (18)	-1.8 (87)
<b>FRS 2020 Retirement Date Fund</b>	<b>9.0 (98)</b>	<b>-12.1 (7)</b>	<b>10.5 (10)</b>	<b>10.5 (69)</b>	<b>16.3 (67)</b>	<b>-4.4 (51)</b>	<b>14.0 (29)</b>	<b>7.4 (22)</b>	<b>-2.1 (100)</b>
<i>2020 Retirement Custom Index</i>	9.1 (98)	-11.1 (4)	10.0 (22)	10.2 (72)	16.0 (73)	-4.5 (53)	13.3 (49)	7.1 (25)	-1.6 (85)
<b>FRS 2025 Retirement Date Fund</b>	<b>10.3 (94)</b>	<b>-13.0 (14)</b>	<b>11.7 (14)</b>	<b>11.4 (72)</b>	<b>18.2 (75)</b>	<b>-5.2 (51)</b>	<b>16.1 (25)</b>	<b>8.0 (22)</b>	<b>-1.7 (79)</b>
<i>2025 Retirement Custom Index</i>	10.8 (89)	-11.9 (6)	11.3 (24)	11.2 (74)	17.8 (82)	-5.3 (56)	15.5 (39)	7.6 (26)	-1.5 (72)
<b>FRS 2030 Retirement Date Fund</b>	<b>12.5 (89)</b>	<b>-13.7 (15)</b>	<b>12.8 (29)</b>	<b>12.0 (76)</b>	<b>19.8 (80)</b>	<b>-6.0 (46)</b>	<b>18.0 (27)</b>	<b>8.5 (20)</b>	<b>-1.3 (60)</b>
<i>2030 Retirement Custom Index</i>	12.8 (85)	-12.7 (7)	12.4 (40)	12.0 (76)	19.4 (82)	-6.0 (47)	17.3 (46)	8.0 (28)	-1.5 (63)
<b>FRS 2035 Retirement Date Fund</b>	<b>14.3 (91)</b>	<b>-14.5 (8)</b>	<b>13.8 (66)</b>	<b>12.6 (85)</b>	<b>21.1 (81)</b>	<b>-6.7 (45)</b>	<b>19.8 (21)</b>	<b>9.1 (16)</b>	<b>-1.4 (54)</b>
<i>2035 Retirement Custom Index</i>	14.4 (91)	-13.6 (3)	13.4 (72)	12.7 (84)	20.8 (87)	-6.8 (46)	18.9 (48)	8.3 (37)	-1.7 (62)
<b>FRS 2040 Retirement Date Fund</b>	<b>15.7 (92)</b>	<b>-15.2 (9)</b>	<b>14.6 (80)</b>	<b>13.3 (77)</b>	<b>22.5 (77)</b>	<b>-7.5 (51)</b>	<b>20.9 (24)</b>	<b>9.2 (14)</b>	<b>-1.4 (49)</b>
<i>2040 Retirement Custom Index</i>	15.8 (92)	-14.4 (5)	14.3 (85)	13.4 (75)	22.1 (82)	-7.5 (51)	20.4 (42)	8.6 (45)	-1.7 (65)
<b>FRS 2045 Retirement Date Fund</b>	<b>16.9 (90)</b>	<b>-15.8 (12)</b>	<b>15.4 (90)</b>	<b>13.8 (77)</b>	<b>23.4 (81)</b>	<b>-8.0 (57)</b>	<b>21.5 (24)</b>	<b>9.4 (25)</b>	<b>-1.5 (52)</b>
<i>2045 Retirement Custom Index</i>	16.7 (94)	-15.0 (9)	15.1 (91)	13.9 (75)	23.0 (87)	-8.0 (57)	21.2 (41)	8.9 (38)	-1.7 (64)
<b>FRS 2050 Retirement Date Fund</b>	<b>17.5 (89)</b>	<b>-16.0 (11)</b>	<b>16.1 (88)</b>	<b>14.0 (75)</b>	<b>24.0 (82)</b>	<b>-8.4 (66)</b>	<b>21.6 (26)</b>	<b>9.5 (24)</b>	<b>-1.5 (61)</b>
<i>2050 Retirement Custom Index</i>	17.2 (93)	-15.1 (4)	15.8 (94)	14.1 (72)	23.6 (83)	-8.4 (66)	21.3 (49)	8.9 (42)	-1.7 (66)
<b>FRS 2055 Retirement Date Fund</b>	<b>17.8 (89)</b>	<b>-16.0 (12)</b>	<b>16.4 (86)</b>	<b>14.3 (69)</b>	<b>24.1 (88)</b>	<b>-8.4 (60)</b>	<b>21.5 (40)</b>	<b>9.3 (35)</b>	<b>-1.4 (53)</b>
<i>2055 Retirement Custom Index</i>	17.2 (92)	-15.1 (2)	16.0 (92)	14.1 (79)	23.7 (90)	-8.4 (60)	21.3 (56)	8.9 (39)	-1.7 (64)

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# Asset Allocation & Performance

As of March 31, 2024

	Performance %									
	2023	2022	2021	2020	2019	2018	2017	2016	2015	2014
<b>FRS 2060 Retirement Date Fund</b>	<b>17.8 (93)</b>	<b>-16.0 (7)</b>	<b>16.4 (80)</b>	<b>14.5 (78)</b>	<b>24.2 (-)</b>	<b>-8.3 (-)</b>	-	-	-	-
<i>2060 Retirement Custom Index</i>	<i>17.2 (96)</i>	<i>-15.1 (1)</i>	<i>16.0 (89)</i>	<i>14.1 (81)</i>	<i>23.7 (-)</i>	<i>-8.4 (-)</i>	-	-	-	-
<b>FRS 2065 Retirement Date Fund</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<i>2065 Retirement Custom Index</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>
<b>Stable Value</b>										
<b>FRS Stable Value Fund</b>	<b>2.7 (77)</b>	<b>1.8 (62)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<i>ICE BofA US Treasuries 1-3 Year Index</i>	<i>4.3 (12)</i>	<i>-3.6 (94)</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>
<b>Real Assets</b>										
<b>FRS Inflation Sensitive Fund</b>	<b>2.5</b>	<b>-7.7</b>	<b>12.8</b>	<b>4.0</b>	<b>13.0</b>	<b>-5.5</b>	<b>8.1</b>	<b>6.0</b>	<b>-7.9</b>	<b>3.2</b>
<i>FRS Custom Multi-Assets Index</i>	<i>2.9</i>	<i>-5.9</i>	<i>11.5</i>	<i>2.3</i>	<i>13.0</i>	<i>-5.5</i>	<i>8.1</i>	<i>6.2</i>	<i>-5.0</i>	<i>1.8</i>
<b>Fixed Income</b>	<b>7.1 (15)</b>	<b>-12.4 (16)</b>	<b>-0.3 (15)</b>	<b>8.0 (55)</b>	<b>9.8 (22)</b>	<b>-0.1 (36)</b>	<b>4.4 (22)</b>	<b>4.7 (12)</b>	<b>0.3 (59)</b>	<b>4.7 (77)</b>
<i>Total Bond Index</i>	<i>6.7 (24)</i>	<i>-11.9 (13)</i>	<i>-0.7 (27)</i>	<i>7.2 (84)</i>	<i>9.2 (48)</i>	<i>-0.1 (30)</i>	<i>3.9 (43)</i>	<i>4.3 (17)</i>	<i>0.1 (71)</i>	<i>4.9 (77)</i>
<b>FRS U.S. Bond Enhanced Index Fund</b>	<b>5.9 (55)</b>	<b>-13.1 (34)</b>	<b>-1.7 (68)</b>	<b>7.8 (63)</b>	<b>8.7 (61)</b>	<b>0.0 (23)</b>	<b>3.6 (59)</b>	<b>2.7 (66)</b>	<b>0.7 (26)</b>	<b>6.2 (29)</b>
<i>Blmbg. U.S. Aggregate Index</i>	<i>5.5 (75)</i>	<i>-13.0 (30)</i>	<i>-1.5 (62)</i>	<i>7.5 (72)</i>	<i>8.7 (61)</i>	<i>0.0 (24)</i>	<i>3.5 (63)</i>	<i>2.6 (67)</i>	<i>0.5 (36)</i>	<i>6.0 (39)</i>
<b>FRS Core Plus Bond Fund</b>	<b>7.7 (11)</b>	<b>-13.2 (47)</b>	<b>-0.1 (21)</b>	<b>8.6 (55)</b>	<b>11.0 (18)</b>	<b>-0.5 (40)</b>	<b>5.3 (28)</b>	<b>5.7 (15)</b>	<b>0.1 (47)</b>	<b>4.6 (73)</b>
<i>FRS Custom Core-Plus Fixed Income Index</i>	<i>6.9 (45)</i>	<i>-12.5 (23)</i>	<i>-0.3 (31)</i>	<i>7.6 (75)</i>	<i>10.0 (41)</i>	<i>-0.4 (36)</i>	<i>4.2 (69)</i>	<i>4.9 (33)</i>	<i>0.2 (43)</i>	<i>5.1 (50)</i>
<b>Domestic Equity</b>	<b>27.1 (23)</b>	<b>-20.4 (69)</b>	<b>24.6 (58)</b>	<b>20.0 (35)</b>	<b>30.1 (38)</b>	<b>-6.5 (49)</b>	<b>20.8 (49)</b>	<b>13.7 (30)</b>	<b>0.7 (32)</b>	<b>11.5 (47)</b>
<i>Total U.S. Equities Index</i>	<i>25.7 (29)</i>	<i>-19.1 (62)</i>	<i>25.9 (44)</i>	<i>18.9 (38)</i>	<i>30.0 (38)</i>	<i>-6.5 (49)</i>	<i>19.6 (57)</i>	<i>14.9 (23)</i>	<i>-0.5 (42)</i>	<i>11.1 (51)</i>
<b>FRS U.S. Stock Market Index Fund</b>	<b>26.0 (27)</b>	<b>-19.2 (62)</b>	<b>25.7 (46)</b>	<b>21.0 (31)</b>	<b>31.1 (28)</b>	<b>-5.2 (36)</b>	<b>21.2 (43)</b>	<b>12.9 (35)</b>	<b>0.6 (32)</b>	<b>12.6 (31)</b>
<i>Russell 3000 Index</i>	<i>26.0 (28)</i>	<i>-19.2 (63)</i>	<i>25.7 (46)</i>	<i>20.9 (31)</i>	<i>31.0 (28)</i>	<i>-5.2 (36)</i>	<i>21.1 (46)</i>	<i>12.7 (37)</i>	<i>0.5 (33)</i>	<i>12.6 (33)</i>
<b>FRS U.S. Stock Fund</b>	<b>30.2 (16)</b>	<b>-22.4 (76)</b>	<b>22.9 (65)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
<i>Russell 3000 Index</i>	<i>26.0 (28)</i>	<i>-19.2 (63)</i>	<i>25.7 (46)</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>	<i>-</i>

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# Asset Allocation & Performance

As of March 31, 2024

	Performance %									
	2023	2022	2021	2020	2019	2018	2017	2016	2015	2014
<b>International/Global Equity</b>	<b>17.1 (40)</b>	<b>-18.2 (54)</b>	<b>9.5 (49)</b>	<b>15.2 (40)</b>	<b>23.7 (38)</b>	<b>-13.5 (33)</b>	<b>28.6 (49)</b>	<b>4.5 (44)</b>	<b>-2.6 (47)</b>	<b>-3.2 (43)</b>
<i>Total Foreign and Global Equities Index</i>	<i>16.4 (45)</i>	<i>-16.8 (46)</i>	<i>9.8 (47)</i>	<i>11.7 (51)</i>	<i>22.3 (47)</i>	<i>-14.0 (39)</i>	<i>27.3 (58)</i>	<i>4.9 (41)</i>	<i>-4.4 (54)</i>	<i>-3.0 (42)</i>
<b>FRS Foreign Stock Index Fund</b>	<b>16.0 (48)</b>	<b>-16.6 (45)</b>	<b>8.6 (53)</b>	<b>11.5 (51)</b>	<b>22.3 (47)</b>	<b>-14.7 (46)</b>	<b>28.3 (51)</b>	<b>5.3 (38)</b>	<b>-4.4 (54)</b>	<b>-4.5 (57)</b>
<i>MSCI All Country World ex-U.S. IMI Index</i>	<i>15.6 (51)</i>	<i>-16.6 (45)</i>	<i>8.5 (53)</i>	<i>11.1 (53)</i>	<i>21.6 (53)</i>	<i>-14.8 (47)</i>	<i>27.8 (54)</i>	<i>4.4 (44)</i>	<i>-4.6 (55)</i>	<i>-4.2 (53)</i>
<b>FRS Foreign Stock Fund</b>	<b>16.1 (47)</b>	<b>-22.7 (74)</b>	<b>2.8 (71)</b>	<b>25.3 (17)</b>	<b>27.4 (21)</b>	<b>-14.9 (49)</b>	<b>31.2 (40)</b>	<b>1.0 (68)</b>	<b>-0.5 (36)</b>	<b>-2.3 (35)</b>
<i>MSCI AC World ex USA (Net)</i>	<i>15.6 (51)</i>	<i>-16.0 (42)</i>	<i>7.8 (56)</i>	<i>10.7 (55)</i>	<i>21.5 (54)</i>	<i>-14.2 (41)</i>	<i>27.2 (59)</i>	<i>4.5 (43)</i>	<i>-5.7 (59)</i>	<i>-3.9 (48)</i>
<b>FRS Global Stock Fund</b>	<b>25.0 (23)</b>	<b>-25.6 (70)</b>	<b>18.1 (45)</b>	<b>33.8 (23)</b>	<b>30.5 (25)</b>	<b>-5.6 (21)</b>	<b>29.3 (18)</b>	<b>2.2 (84)</b>	<b>5.6 (12)</b>	<b>3.7 (53)</b>
<i>MSCI AC World Index (Net)</i>	<i>22.2 (33)</i>	<i>-18.4 (49)</i>	<i>18.5 (40)</i>	<i>16.3 (45)</i>	<i>26.6 (47)</i>	<i>-9.4 (52)</i>	<i>24.0 (41)</i>	<i>7.9 (47)</i>	<i>-2.4 (57)</i>	<i>4.2 (47)</i>

The returns for the Retirement Date Funds, Inflation Sensitive Fund, and Core Plus Bond Fund use prehire data for all months prior to 7/1/2014, actual live data is used thereafter.

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# Asset Allocation - FRS Investment Plan

## As of March 31, 2024

Asset Allocation as of 3/31/2024								
	U.S. Equity	Non-U.S. Equity	U.S. Fixed Income	Real Assets	Stable Value	Brokerage	Total	% of Total
FRS Retirement Fund	96,345,243	75,612,722	309,158,470	128,663,584			609,780,020	3.6%
FRS 2020 Retirement Date Fund	85,782,044	67,748,319	231,026,642	102,840,974			487,397,979	2.9%
FRS 2025 Retirement Date Fund	222,580,859	175,161,458	384,193,917	185,806,630			967,742,864	5.8%
FRS 2030 Retirement Date Fund	317,087,706	248,439,852	345,418,566	178,702,350			1,089,648,474	6.5%
FRS 2035 Retirement Date Fund	379,210,770	298,268,120	279,418,462	151,906,069			1,108,803,421	6.6%
FRS 2040 Retirement Date Fund	413,255,462	324,246,594	205,568,102	116,559,233			1,059,629,391	6.3%
FRS 2045 Retirement Date Fund	469,234,785	369,305,155	154,239,212	93,412,480			1,086,191,631	6.5%
FRS 2050 Retirement Date Fund	362,759,895	285,593,865	80,348,135	66,824,191			795,526,086	4.8%
FRS 2055 Retirement Date Fund	293,622,872	231,149,921	45,605,255	54,351,468			624,729,516	3.7%
FRS 2060 Retirement Date Fund	261,787,292	206,087,868	40,660,579	48,458,499			556,994,238	3.3%
FRS 2065 Retirement Date Fund	15,012,828	8,072,662	2,700,567	3,252,295			29,038,352	0.2%
<b>Total Retirement Date Funds</b>	<b>\$ 2,916,679,757</b>	<b>\$ 2,289,686,536</b>	<b>\$ 2,078,337,907</b>	<b>\$ 1,130,777,773</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 8,415,481,972</b>	<b>50.3%</b>
FRS Stable Value Fund					1,304,124,217		1,304,124,217	7.8%
<b>Total Stable Value</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,304,124,217</b>	<b>\$ -</b>	<b>\$ 1,304,124,217</b>	<b>7.8%</b>
FRS Inflation Adjusted Multi-Assets Fund				154,370,833	-		154,370,833	0.9%
<b>Total Real Assets</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 154,370,833</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 154,370,833</b>	<b>0.9%</b>
FRS U.S. Bond Enhanced Index Fund			220,415,582				220,415,582	1.3%
FRS Core Plus Bond Fund			362,323,971				362,323,971	2.2%
<b>Total Fixed Income</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 582,739,553</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 582,739,553</b>	<b>3.5%</b>
FRS U.S. Stock Market Index Fund	1,859,446,935						1,859,446,935	11.1%
FRS U.S. Stock Fund	2,188,961,708						2,188,961,708	13.1%
<b>Total Domestic Equity</b>	<b>\$ 4,048,408,643</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 4,048,408,643</b>	<b>24.2%</b>
FRS Foreign Stock Index Fund		291,404,661					291,404,661	1.7%
FRS Global Stock Fund		358,175,505					358,175,505	2.1%
FRS Foreign Stock Fund		178,871,145					178,871,145	1.1%
<b>Total International/Global Equity</b>	<b>\$ -</b>	<b>\$ 828,451,311</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 828,451,311</b>	<b>5.0%</b>
FRS Self-Dir Brokerage Acct						1,384,649,938	1,384,649,938	8.3%
<b>Total Self-Dir Brokerage Acct</b>						<b>\$ 1,384,649,938</b>	<b>\$ 1,384,649,938</b>	<b>8.3%</b>
<b>Total Portfolio</b>	<b>\$ 6,965,088,400</b>	<b>\$ 3,118,137,847</b>	<b>\$ 2,661,077,460</b>	<b>\$ 1,285,148,605</b>	<b>\$ 1,304,124,217</b>	<b>\$ 1,384,649,938</b>	<b>\$ 16,718,226,467</b>	<b>100.0%</b>
<b>Percent of Total</b>	<b>41.7%</b>	<b>18.7%</b>	<b>15.9%</b>	<b>7.7%</b>	<b>7.8%</b>	<b>8.3%</b>	<b>100.0%</b>	

The returns for the Retirement Date Funds, Inflation Adjusted Multi-Assets Fund and Core Plus Bond Fund use pre hire data for all months prior to 7/1/2014, actual live data is used thereafter.

Note: The SDBA opened for members on 1/2/14. No performance calculations will be made for the SDBA.



Investment advice and consulting services provided by Aon Investments USA Inc.

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# Multi Time Period Statistics

## As of March 31, 2024

	3 Years Return	3 Years Standard Deviation	3 Years Sharpe Ratio	3 Years Tracking Error	3 Years Information Ratio	3 Years Up Market Capture	3 Years Down Market Capture
<b>FRS Investment Plan</b>	<b>4.69</b>	<b>12.52</b>	<b>0.23</b>	<b>0.71</b>	<b>-0.36</b>	<b>101.27</b>	<b>103.44</b>
FRS Retirement Fund	1.91	9.52	-0.02	0.67	0.16	101.32	100.70
FRS 2020 Retirement Date Fund	2.22	9.87	0.01	0.72	-0.03	98.87	98.82
FRS 2025 Retirement Date Fund	2.69	10.71	0.06	0.80	-0.22	98.27	99.13
FRS 2030 Retirement Date Fund	3.60	11.82	0.14	0.80	-0.16	99.29	99.92
FRS 2035 Retirement Date Fund	4.29	12.81	0.19	0.81	-0.11	99.94	100.48
FRS 2040 Retirement Date Fund	4.72	13.66	0.22	0.84	-0.05	100.40	100.78
FRS 2045 Retirement Date Fund	5.00	14.37	0.23	0.89	-0.02	101.21	101.72
FRS 2050 Retirement Date Fund	5.24	14.73	0.25	0.92	0.00	101.35	101.83
FRS 2055 Retirement Date Fund	5.37	14.96	0.25	0.98	0.11	102.51	102.77
FRS 2060 Retirement Date Fund	5.38	14.95	0.25	0.97	0.12	102.51	102.72
FRS 2065 Retirement Date Fund	-	-	-	-	-	-	-
FRS Stable Value Fund	-	-	-	-	-	-	-
FRS Inflation Sensitive Fund	1.89	8.93	-0.03	1.10	-0.20	96.37	97.44
FRS U.S. Bond Enhanced Index Fund	-2.37	7.33	-0.65	0.27	0.36	101.69	100.44
FRS Core Plus Bond Fund	-1.16	7.06	-0.50	0.66	0.58	100.28	96.38
FRS U.S. Stock Market Index Fund	9.82	17.84	0.47	0.03	1.41	100.11	99.97
FRS U.S. Stock Fund	8.74	18.93	0.40	2.19	-0.35	102.39	107.32
FRS Foreign Stock Index Fund	1.89	17.15	0.04	2.29	0.12	105.64	105.17
FRS Global Stock Fund	5.20	18.69	0.23	3.95	-0.33	106.35	115.21
FRS Foreign Stock Fund	-0.16	18.10	-0.06	4.60	-0.39	107.42	116.90

The returns for the Retirement Date Funds, Inflation Sensitive Fund, and Core Plus Bond Fund use prehire data for all months prior to 7/1/2014, actual live data is used thereafter.



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# Multi Time Period Statistics

As of March 31, 2024

	5 Years Return	5 Years Standard Deviation	5 Years Sharpe Ratio	5 Years Tracking Error	5 Years Information Ratio	5 Years Up Market Capture	5 Years Down Market Capture
<b>FRS Investment Plan</b>	<b>8.05</b>	<b>13.15</b>	<b>0.50</b>	<b>0.68</b>	<b>0.17</b>	<b>102.28</b>	<b>102.83</b>
FRS Retirement Fund	4.90	9.21	0.35	0.61	0.38	101.92	100.56
FRS 2020 Retirement Date Fund	5.33	9.93	0.37	0.67	0.09	99.75	99.09
FRS 2025 Retirement Date Fund	6.10	11.10	0.41	0.71	-0.06	99.31	99.30
FRS 2030 Retirement Date Fund	7.04	12.37	0.45	0.70	-0.07	99.71	99.91
FRS 2035 Retirement Date Fund	7.80	13.48	0.48	0.71	-0.08	99.89	100.22
FRS 2040 Retirement Date Fund	8.41	14.50	0.49	0.73	-0.06	100.09	100.41
FRS 2045 Retirement Date Fund	8.84	15.35	0.50	0.76	-0.03	100.55	101.00
FRS 2050 Retirement Date Fund	9.14	15.84	0.51	0.79	-0.01	100.58	100.94
FRS 2055 Retirement Date Fund	9.31	16.04	0.51	0.82	0.16	101.46	101.56
FRS 2060 Retirement Date Fund	9.35	16.04	0.51	0.83	0.20	101.54	101.49
FRS 2065 Retirement Date Fund	-	-	-	-	-	-	-
FRS Stable Value Fund	-	-	-	-	-	-	-
FRS Inflation Sensitive Fund	3.33	9.28	0.18	1.07	0.22	99.90	97.54
FRS U.S. Bond Enhanced Index Fund	0.45	6.22	-0.22	0.24	0.40	102.13	101.01
FRS Core Plus Bond Fund	1.63	6.58	-0.03	1.38	0.36	108.57	103.39
FRS U.S. Stock Market Index Fund	14.39	18.94	0.70	0.04	1.03	100.14	100.01
FRS U.S. Stock Fund	-	-	-	-	-	-	-
FRS Foreign Stock Index Fund	6.22	18.19	0.31	1.90	0.15	103.39	103.28
FRS Global Stock Fund	12.77	19.43	0.61	4.01	0.49	109.56	105.36
FRS Foreign Stock Fund	6.91	19.01	0.34	4.47	0.26	109.04	106.70

The returns for the Retirement Date Funds, Inflation Sensitive Fund, and Core Plus Bond Fund use prehire data for all months prior to 7/1/2014, actual live data is used thereafter.



## Appendix





## Benchmark Descriptions

**Retirement Date Benchmarks** - A weighted average composite of the underlying components' benchmarks for each fund.

**ICE BofA US Treasuries 1-3 Year Index** - An unmanaged index that tracks the performance of the direct sovereign debt of the U.S. Government having a maturity of at least one year and less than three years.

**FRS Custom Multi-Assets Index** - A monthly weighted composite of underlying indices for each TIPS and Real Assets fund. These indices include Barclays U.S. TIPS Index, MSCI AC World Index and the Bloomberg Commodity Total Return Index, NAREIT Developed Index, S&P Global Infrastructure Index, S&P Global Natural Resources Index.

**Total Bond Index** - A weighted average composite of the underlying benchmarks for each bond fund.

**Barclays Aggregate Bond Index** - A market value-weighted index consisting of government bonds, SEC-registered corporate bonds and mortgage-related and asset-backed securities with at least one year to maturity and an outstanding par value of \$250 million or greater. This index is a broad measure of the performance of the investment grade U.S. fixed income market.

**FRS Custom Core-Plus Fixed Income Index** - A monthly rebalanced blend of 80% Barclays U.S. Aggregate Bond Index and 20% Barclays U.S. High Yield Ba/B 1% Issuer Constrained Index.

**Total U.S. Equities Index** - A weighted average composite of the underlying benchmarks for each domestic equity fund.

**Russell 3000 Index** - A capitalization-weighted index consisting of the 3,000 largest publicly traded U.S. stocks by capitalization. This index is a broad measure of the performance of the aggregate domestic equity market.

**Total Foreign and Global Equities Index** - A weighted average composite of the underlying benchmarks for each foreign and global equity fund.

**MSCI All Country World ex-U.S. IMI Index** - A capitalization-weighted index of stocks representing 22 developed country stock markets and 24 emerging countries, excluding the U.S. market.

**MSCI All Country World ex-U.S. Index** - A capitalization-weighted index consisting of 23 developed and 24 emerging countries, but excluding the U.S.

**MSCI All Country World Index** - A capitalization-weighted index of stocks representing approximately 47 developed and emerging countries, including the U.S. and Canadian markets.



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## Descriptions of Universes

**Retirement Date Funds** - Target date universes calculated and provided by Lipper.

**FRS Stable Value Fund** - A stable value universe calculated and provided by Lipper.

**FRS U.S. Bond Enhanced Index Fund** - A broad market core fixed income universe calculated and provided by Lipper.

**FRS Core Plus Bond Fund** - A broad market core plus fixed income universe calculated and provided by Lipper.

**FRS U.S. Stock Market Index Fund** - A multi-cap U.S. equity universe calculated and provided by Lipper.

**FRS U.S. Stock Fund** - A multi-cap U.S. equity universe calculated and provided by Lipper.

**FRS Foreign Stock Index Fund** - A foreign blend universe calculated and provided by Lipper.

**FRS Foreign Stock Fund** - A foreign blend universe calculated and provided by Lipper.

**FRS Global Stock Fund** - A global stock universe calculated and provided by Lipper.



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## Notes

- The rates of return contained in this report are shown on an after-fees basis unless otherwise noted. They are geometric and time-weighted. Returns for periods longer than one year are annualized.
- Universe percentiles are based upon an ordering system in which 1 is the best ranking and 100 is the worst ranking.
- Due to rounding throughout the report, percentage totals displayed may not sum to 100%. Additionally, individual fund totals in dollar terms may not sum to the plan total.



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### Past performance is not necessarily indicative of future results.

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Aon Investments USA Inc.  
200 East Randolph Street  
Suite 700  
Chicago, IL 60601  
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