

**REPORT ON EXAMINATION**  
**OF**  
**MAIN STREET AMERICA ASSURANCE**  
**COMPANY**  
**JACKSONVILLE, FLORIDA**

**AS OF**  
**DECEMBER 31, 2010**

**BY THE**  
**OFFICE OF INSURANCE REGULATION**

## TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>LETTER OF TRANSMITTAL</b> .....   | <b>-</b>  |
| <b>SCOPE OF EXAMINATION</b> .....  | <b>1</b>  |
| <b>SUMMARY OF SIGNIFICANT FINDINGS</b> .....   | <b>2</b>  |
| CURRENT EXAM FINDINGS .....  | 2         |
| PRIOR EXAM FINDINGS .....  | 2         |
| <b>SUBSEQUENT EVENTS</b> .....   | <b>2</b>  |
| <b>HISTORY</b> .....   | <b>3</b>  |
| GENERAL .....  | 3         |
| DIVIDENDS TO STOCKHOLDERS .....  | 3         |
| CAPITAL STOCK AND CAPITAL CONTRIBUTIONS.....   | 4         |
| SURPLUS DEBENTURES .....   | 4         |
| ACQUISITIONS, MERGERS, DISPOSALS, DISSOLUTIONS, AND PURCHASE OR SALES THROUGH<br>REINSURANCE ..... | 4         |
| <b>CORPORATE RECORDS</b> .....   | <b>5</b>  |
| CONFLICT OF INTEREST .....   | 5         |
| <b>MANAGEMENT AND CONTROL</b> .....  | <b>6</b>  |
| MANAGEMENT .....   | 6         |
| AFFILIATED COMPANIES .....   | 7         |
| ORGANIZATIONAL CHART .....   | 8         |
| INTERCOMPANY QUOTA SHARE REINSURANCE AGREEMENTS .....  | 9         |
| TAX ALLOCATION AGREEMENT .....   | 9         |
| COST SHARING AGREEMENT .....   | 9         |
| <b>FIDELITY BOND AND OTHER INSURANCE</b> .....   | <b>9</b>  |
| <b>PENSION, STOCK OWNERSHIP AND INSURANCE PLANS</b> .....  | <b>10</b> |
| <b>TERRITORY AND PLAN OF OPERATIONS</b> .....  | <b>10</b> |
| TREATMENT OF POLICYHOLDERS.....  | 10        |
| <b>COMPANY GROWTH</b> .....  | <b>10</b> |
| PROFITABILITY OF COMPANY .....   | 11        |
| <b>LOSS EXPERIENCE</b> .....   | <b>11</b> |
| <b>REINSURANCE</b> .....   | <b>12</b> |
| ASSUMED .....  | 12        |
| CEDED .....  | 12        |
| <b>ACCOUNTS AND RECORDS</b> .....  | <b>13</b> |
| CUSTODIAL AGREEMENT .....  | 13        |
| INDEPENDENT AUDITOR AGREEMENT .....  | 14        |

**INFORMATION TECHNOLOGY REPORT ..... 14**  
**STATUTORY DEPOSITS..... 15**  
**FINANCIAL STATEMENTS PER EXAMINATION..... 15**  
ASSETS ..... 16  
LIABILITIES, SURPLUS AND OTHER FUNDS ..... 17  
STATEMENT OF INCOME ..... 18  
COMPARATIVE ANALYSIS OF CHANGES IN SURPLUS ..... 19  
**COMMENTS ON FINANCIAL STATEMENTS ..... 20**  
LIABILITIES ..... 20  
CAPITAL AND SURPLUS ..... 20  
**CONCLUSION ..... 21**

Tallahassee, Florida

October 19, 2011

Kevin M. McCarty  
Commissioner  
Office of Insurance Regulation  
State of Florida  
Tallahassee, Florida 32399-0326

Sharon P. Clark  
Secretary, Southeastern Zone, NAIC  
Commissioner  
Kentucky Department of Insurance  
215 West Main Street  
Frankfort, Kentucky 40601

Honorable Joseph Torti III  
Chairman, NAIC Financial Condition (E) Committee  
Superintendent  
State of Rhode Island  
Department of Business Regulation,  
Division of Insurance  
1511 Pontiac Avenue, Building 69-2  
Cranston, Rhode Island 02920

Dear Sirs and Madam:

Pursuant to your instructions, in compliance with Section 624.316, Florida Statutes; Rule 690-138.005, Florida Administrative Code; and in accordance with the practices and procedures promulgated by the National Association of Insurance Commissioners (NAIC), we have conducted an examination of December 31, 2010, of the financial condition and corporate affairs of:

**MAIN STREET AMERICA ASSURANCE COMPANY  
4601 TOUCHTON ROAD EAST, SUITE 3400  
JACKSONVILLE, FLORIDA 32246**

Hereinafter referred to as, the "Company". Such report of examination is herewith respectfully submitted.

## **SCOPE OF EXAMINATION**

This examination covered the period of January 1, 2009, through December 31, 2010. The Company was last examined by representatives of the Florida Office of Insurance Regulation (Office) as of December 31, 2008. This examination commenced with planning at the Office on June 13, 2011, to June 17, 2011. The fieldwork commenced on June 20, 2011, and concluded as of October 19, 2011.

This financial examination was a multi-state statutory financial examination conducted in accordance with the Financial Condition Examiners Handbook, Accounting Practices and Procedures Manual and annual statement instructions promulgated by the NAIC as adopted by Rules 69O-137.001(4) and 69O-138.001, Florida Administrative Code, with due regard to the statutory requirements of the insurance laws and rules of the State of Florida.

The Financial Condition Examiners Handbook requires that the examination be planned and performed to evaluate the financial condition and identify prospective risks of the Company by obtaining information about the Company including corporate governance, identifying and assessing inherent risks within the Company, and evaluating system controls and procedures used to mitigate those risks. An examination also includes assessing the principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation and management's compliance with Statutory Accounting Principles and annual statement instructions when applicable to domestic state regulations.

All accounts and activities of the Company were considered in accordance with the risk-focused examination process.

This report of examination is confined to significant adverse findings, a material change in the financial statements or other information of regulatory significance or requiring regulatory action. The report comments on matters that involved departures from laws, regulations or rules, or which were deemed to require special explanation or description.

## **SUMMARY OF SIGNIFICANT FINDINGS**

### **Current Exam Findings**

There were no material findings or exceptions noted during the examination as of December 31, 2010.

### **Prior Exam Findings**

There were no prior examination findings, exceptions or corrective action to be taken by the Company for the examination as of December 31, 2008.

## **SUBSEQUENT EVENTS**

Subsequent to December 31, 2010, the Company amended its Investment Management Agreements to reflect the name change of the ultimate controlling insurer to NGM Insurance Company, effective retroactively to August 2005.

On September 15, 2011, an agreement was finalized with affiliate Spring Valley Mutual Insurance Company of Minnesota (Spring Valley). Effective January 1, 2012, Spring Valley will begin participation in the Intercompany Quota Share Reinsurance arrangement, under which the Company is a participant.

## HISTORY

### General

The Company was incorporated in New Hampshire on December 23, 1986, and commenced business on that date as Presidential Property and Casualty Insurance Company. The name was changed to Main Street America Assurance Company on November 25, 1987. On June 6, 2005, the Company re-domiciled to the State of Florida. The Company is a wholly owned subsidiary of Main Street America Financial Corporation (MSAFC), which was organized under New Hampshire law.

The Company was authorized to transact the following insurance coverage in Florida on December 31, 2010:

|                        |  |
|------------------------|--|
| Fire                   | Private passenger automobile liability |
| Allied lines           | Commercial automobile liability        |
| Farmowners multi peril | Private passenger auto physical damage |
| Homeowners multi peril | Fidelity                               |
| Inland marine          | Surety                                 |
| Ocean marine           | Glass                                  |
| Workers' compensation  | Burglary and theft                     |
| Other liability        | Mobile home multi peril                |
| Boiler and machinery   | Mobile home physical damage            |
| Multi peril crop       |  |

The Articles of Incorporation and the Bylaws were not amended during the period covered by this examination.

### Dividends to Stockholders

In accordance with Section 628.371, Florida Statutes, the Company declared and paid a dividend to its stockholder in 2009 in the amount of \$10,000,000.

## **Capital Stock and Capital Contributions**

As of December 31, 2010, the Company's capitalization was as follows:

|  |             |
|--|-------------|
| Number of authorized common capital shares | 150,000     |
| Number of shares issued and outstanding    | 75,000      |
| Total common capital stock                 | \$7,500,000 |
| Par value per share                        | \$100       |

Control of the Company was maintained by its parent, MSAFC, which owned 100% of the stock issued by the Company, in turn, MSAFC was owned 100% by NGM Insurance Company (NGM), a Florida insurance Company. NGM was a wholly owned subsidiary of Main Street America Group, Inc. (MSA Group), which was 100% owned by Main Street America Group Mutual Holdings, Inc.

During 2010, the Company returned \$70,000,000 of paid in capital to its parent company. The approval for this transfer of funds was obtained from the Office on December 6, 2010.

## **Surplus Debentures**

The Company did not have any surplus debentures during the period of this examination.

## **Acquisitions, Mergers, Disposals, Dissolutions, and Purchase or Sales through Reinsurance**

The Company had no acquisitions, mergers, disposals, and purchase or sales through reinsurance during the period of this examination.



## **CORPORATE RECORDS**

The recorded minutes of the shareholder, Board of Directors (Board), and certain internal committees were reviewed for the period under examination. The recorded minutes of the Board adequately documented its meetings and approval of Company transactions and events, including the authorization of investments as required by Section 625.304, Florida Statutes.

### **Conflict of Interest**

The Company adopted a policy statement requiring annual disclosure of conflicts of interest in accordance with the NAIC Financial Condition Examiners Handbook adopted by Rule 690-138.001, Florida Administrative Code.

## MANAGEMENT AND CONTROL

### Management

The annual shareholder meeting for the election of directors was held in accordance with Section 628.231, Florida Statutes. Directors serving as of December 31, 2010, were:

### Directors

| <b>Name and Location</b>                             | <b>Principal Occupation</b>  |
|--|--|
| Terry Lawrence Baxter<br>Lyme, New Hampshire         | Retired Insurance Executive  |
| Cotton Mather Cleveland<br>New London, New Hampshire | Sr. Associate/Mgt. Consulting,<br>Mather Associates  |
| John Adrian Delaney<br>Neptune Beach, Florida        | University President,<br>University of North Florida   |
| Albert Henry Elfner III<br>Boston, Massachusetts     | Retired Investment Management  |
| David (NMN) Freeman<br>Canton, Connecticut           | Retired President and CEO,<br>Lydall, Inc.   |
| William Dawson Gunter, Jr.<br>Tallahassee, Florida   | Insurance Agency Executive and Consultant  |
| Karl Thomas Kemp<br>Hanover, New Hampshire           | Retired Insurance Executive  |
| Philip Donald Koerner<br>Tipp City, Ohio             | Retired Insurance Executive  |
| James Everitt Morley, Jr.<br>Annapolis, Maryland     | Retired President and CEO, Nat'l. Assoc. for<br>College and University Business Officers             |
| Thomas Mark Van Berkel<br>Ponta Vedra Beach, Florida | Chairman, CEO and President, all Main<br>Street America Group affiliated companies                   |
| Idalene Fay Kesner<br>Bloomington, Indiana           | Associate Dean of Faculty & Research and<br>Professor of Strategic Management,<br>Indiana University |

The Board in accordance with the Company's bylaws appointed the following senior officers:

### Senior Officers

| <b>Name</b>            | <b>Title</b>                |
|------------------------|-----------------------------|
| Thomas Mark Van Berkel | CEO, Chairman and President |
| Edward John Kuhl       | Treasurer and Controller    |
| Bruce Robert Fox       | Secretary                   |

The Company's Board appointed several internal committees. Following were the principal internal board committees and their members as of December 31, 2010:

#### **Executive Committee**

Thomas M. Van Berkel<sup>1</sup>  
John A. Delaney  
Albert H. Elfner III  
David Freeman  
William D. Gunter, Jr.

<sup>1</sup> Chairman

#### **Audit Committee**

David Freeman <sup>1</sup>  
John A. Delaney  
William D. Gunter, Jr.  
Philip D. Koerner

#### **Finance Committee**

Albert H. Elfner III <sup>1</sup>  
Terry L. Baxter  
Cotton M. Cleveland  
James E. Morley, Jr.

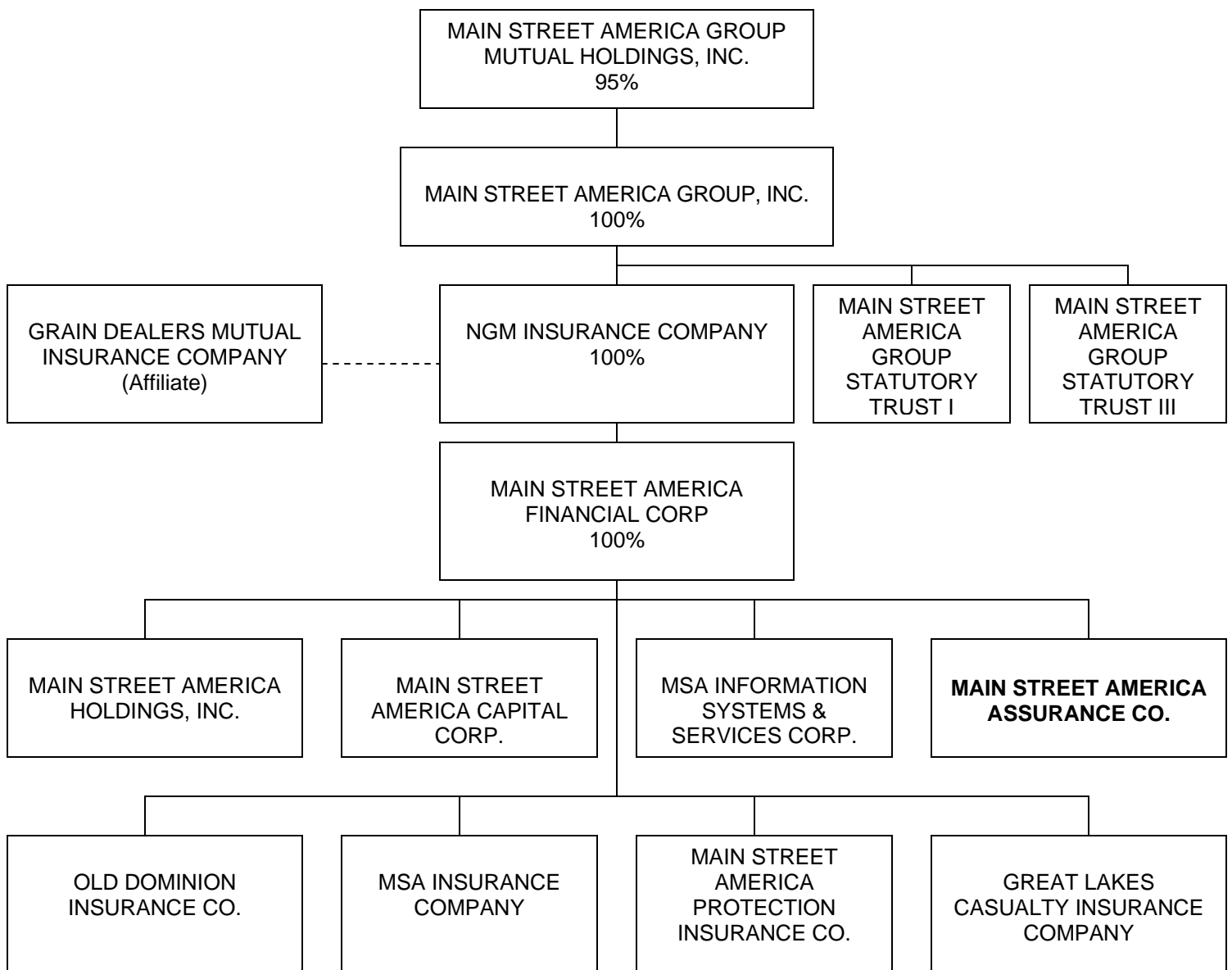
### **Affiliated Companies**

The Company was a member of an insurance holding company system as defined by Rule 69O-143.045(3), Florida Administrative Code. The latest holding company registration statement was filed with the State of Florida on February 15, 2011, as required by Section 628.801, Florida Statutes, and Rule 69O-143.046, Florida Administrative Code.

An organizational chart as of December 31, 2010, reflecting the holding company system, is shown below. Schedule Y of the Company's 2010 annual statement provided a list of all related companies of the holding company group.

**MAIN STREET AMERICA ASSURANCE COMPANY  
ORGANIZATIONAL CHART**

**DECEMBER 31, 2010**



The following agreements were in effect between the Company and its affiliates:

### **Intercompany Quota Share Reinsurance Agreements**

The Company was a participant in the intercompany pooling arrangement for the MSA Group of insurers. Pursuant to the agreement, the Company ceded 100% of its net underwriting results to the lead company, NGM.

### **Tax Allocation Agreement**

The Company, along with its parent and affiliates, filed a consolidated federal income tax return. On December 31, 2010, the method of allocation between the companies was subject to a written agreement dated March 30, 1998, and was approved by the Board. Allocation was based upon separate return calculations with current credit for net losses recoverable on a consolidated basis.

### **Cost Sharing Agreement**

The Company entered into an intercompany expense allocation agreement with its indirect parent company, NGM, and affiliates to receive administrative and managerial services. Indirect costs were allocated based upon a uniform and reasonable basis for all affiliated companies. On a quarterly basis, NGM furnished all affiliated companies with an accounting of costs and expenses paid on behalf of each affiliate named as a party to the agreement.

## **FIDELITY BOND AND OTHER INSURANCE**

The Company was a named insured on a fidelity bond providing coverage up to \$10,000,000 with a deductible of \$150,000, per loss, which reached the suggested minimum as recommended by the NAIC. In addition, the Company was a named insured for fiduciary liability coverage with limits

up to \$10,000,000 with a \$150,000 deductible, per loss. The Company also maintained other property and liability insurance coverage necessary for the operation of the business.

### **PENSION, STOCK OWNERSHIP AND INSURANCE PLANS**

The Company had no employees and therefore no pension, stock ownership or insurance plans.

### **TERRITORY AND PLAN OF OPERATIONS**

The Company was authorized to transact insurance in the following states:

|             |                |                |
|-------------|----------------|----------------|
| Connecticut | Massachusetts  | Rhode Island   |
| Delaware    | New Hampshire  | South Carolina |
| Florida     | New York       | Tennessee      |
| Georgia     | North Carolina | Vermont        |
| Maine       | Pennsylvania   | Virginia       |
| Maryland    |                |                |

### **Treatment of Policyholders**

The Company established procedures for handling written complaints in accordance with Section 626.9541(1) (j), Florida Statutes.

The Company maintained a claims procedure manual that included detailed procedures for handling each type of claim in accordance with Section 626.9541(1) (i) 3a, Florida Statutes.

### **COMPANY GROWTH**

The Company has reflected substantial premium growth during the period covered by this examination on a gross basis.

During the fourth quarter of 2010, the Company's surplus as regards policyholders decreased significantly due to a return of capital in the amount of \$70,000,000. The Company obtained approved from the Office to transfer the funds to MSAFC on December 6, 2010.

### **Profitability of Company**

The following table shows the profitability trend (in dollars) of the Company for the period of examination, as reported in the filed annual statements.

|                                  | <b>2010</b> | <b>2009</b> | <b>2008</b> |
|----------------------------------|-------------|-------------|-------------|
| Premiums Earned                  | 0           | 0           | 0           |
| Net Underwriting Gain/(Loss)     | 0           | 0           | 0           |
| Net Income                       | 5,517,117   | 6,507,830   | (9,510,668) |
| Total Assets                     | 41,083,890  | 101,262,345 | 115,132,309 |
| Total Liabilities                | 9,172,424   | 6,235,483   | 16,743,883  |
| Surplus As Regards Policyholders | 31,911,466  | 95,026,862  | 98,388,426  |

### **LOSS EXPERIENCE**

The Company ceded 100% of written business into the affiliated reinsurance pool. For the current examination period, the pool had not experienced significant changes to their loss development. However, loss and loss adjustment expense reserves increased during 2010. In addition to this increase in the reserves due to the premium growth in 2010, there were increases due to additional exposures in commercial lines of business.

## **REINSURANCE**

The reinsurance agreements reviewed complied with NAIC standards with respect to the standard insolvency clause, arbitration clause, transfer of risk, reporting and settlement information deadlines.

The Company was party to an intercompany quota share reinsurance agreement with NGM and its subsidiaries. Under the terms of the agreement, all direct and assumed business of the participating companies was pooled and assumed 100% by NGM. No amount was ceded back to the Company under this pooling arrangement.

### **Assumed**

The Company did not assume any reinsurance during the period of this examination.

### **Ceded**

The Company ceded 100% of its risk on a quota share basis under an intercompany pooling arrangement.

The reinsurance contracts were reviewed by the Company's appointed actuary and were utilized in determining the ultimate loss opinion.



## **ACCOUNTS AND RECORDS**

The Company maintained its principal operational offices in Keene, New Hampshire and Jacksonville, Florida. The examination was conducted from both locations.

An independent CPA firm audited the Company's statutory basis financial statements annually for the years 2009 and 2010, in accordance with Section 624.424(8), Florida Statutes. Supporting work papers were prepared by the CPA as required by Rule 69O-137.002, Florida Administrative Code.

The Company's accounting records were maintained on a computerized system and several subsystems which were able to generate reports and statements sufficient for management of the Company.

The Company and non-affiliates had the following agreements:

### **Custodial Agreement**

The Company had a custodial agreement for the safekeeping of the securities. The Agreement was in compliance with all requirements of Rule 69O-143.042, Florida Administrative Code.

### **Investment Management Agreements**

The Company was a party to multiple investment advisory agreements for this period of operations. NGM, as the ultimate controlling insurer of the MSA Group, has a Chief Financial Officer and support staff to oversee the management of the MSA Group's investments. The Chief Investment Officer, operating under the investment guidelines set by the Finance Committee of the Board, invested Company assets through third party, unaffiliated investment managers.

The third party investment managers and the investment management agreements included Prospector Partners, LLC, Asset Allocation and Management Co., LLC and Municrest. MSA Group also invested in certain mutual funds with Vanguard.

### **Independent Auditor Agreement**

The Company contracted with an external independent CPA firm to perform the annual audit of its financial statements as required by Rule 69O-137.002 (7) (c), Florida Administrative Code.

### **INFORMATION TECHNOLOGY REPORT**

Samuel BowerCraft, MSIC, CISA of McKonly & Asbury, LLP performed an evaluation of the information technology and computer systems of the Company. Results of the evaluation were noted in the Information Technology Report provided to the Company.

## STATUTORY DEPOSITS

The following securities were deposited with the State of Florida as required by Section 624.411, Florida Statutes and with various state officials as required or permitted by law:

| STATE                  | Description                      | Par<br>Value        | Market<br>Value     |
|------------------------|----------------------------------|---------------------|---------------------|
| FL                     | Oregon Tax Pens, 5.55%, 06/30/28 | \$ 1,455,000        | \$ 1,429,814        |
| FL                     | Usureas, 6.25%, 08/15/23         | <u>500,000</u>      | <u>628,438</u>      |
| TOTAL FLORIDA DEPOSITS |                                  | \$ 1,955,000        | \$ 2,058,252        |
| DE                     | Oregon Tax Pens, 5.55%, 06/30/28 | \$ 150,000          | \$ 147,404          |
| GA                     | Oregon Tax Pens, 5.55%, 06/30/28 | 85,000              | 83,529              |
| MA                     | Oregon Tax Pens, 5.55%, 06/30/28 | 60,000              | 58,961              |
| MA                     | Oregon Tax Pens, 5.55%, 06/30/28 | 150,000             | 147,404             |
| NH                     | Oregon Tax Pens, 5.55%, 06/30/28 | 1,000,000           | 982,690             |
| NC                     | USTreas, 7.50%, 11/15/16         | 325,000             | 417,701             |
| VA                     | Oregon Tax Pens, 5.55%, 06/30/28 | <u>350,000</u>      | <u>343,940</u>      |
| TOTAL OTHER DEPOSITS   |                                  | <u>\$ 2,120,000</u> | <u>\$ 2,181,629</u> |
| TOTAL SPECIAL DEPOSITS |                                  | <u>\$ 4,075,000</u> | <u>\$ 4,239,881</u> |

## FINANCIAL STATEMENTS PER EXAMINATION

The following pages contain financial statements showing the Company's financial position as of December 31, 2010, and the results of its operations for the year then ended as determined by this examination. Adjustments made as a result of the examination are noted in the section of this report captioned, "Comparative Analysis of Changes in Surplus."

**MAIN STREET AMERICA ASSURANCE COMPANY**  
**Assets**

**DECEMBER 31, 2010**

|  | <b>Per Company</b>  | <b>Examination<br/>Adjustments</b> | <b>Per Examination</b> |
|--|---------------------|------------------------------------|------------------------|
| Bonds  | \$37,927,431        | \$0                                | \$37,927,431           |
| Cash and Short-Term Investments                      | 404,458             |                                    | 404,458                |
| Other invested assets                                | 1,762,525           |                                    | 1,762,525              |
| Receivable for securities                            | 98,213              |                                    | 98,213                 |
| Investment income due and accrued                    | 508,964             |                                    | 508,964                |
| Aggregate write-in for<br>other than invested assets | 382,299             |                                    | 382,299                |
| Totals   | <u>\$41,083,890</u> | <u>\$0</u>                         | <u>\$41,083,890</u>    |

**MAIN STREET AMERICA ASSURANCE COMPANY**  
**Liabilities, Surplus and Other Funds**

**DECEMBER 31, 2010**

|   | <b>Per Company</b>  | <b>Examination<br/>Adjustments</b> | <b>Per<br/>Examination</b> |
|---|---------------------|------------------------------------|----------------------------|
| Losses  | \$0                 |                                    | \$0                        |
| Loss adjustment expenses                          | 0                   |                                    | 0                          |
| Current FIT taxes                                 | 3,744,241           |                                    | 3,744,241                  |
| Net deferred tax liability                        | 2,117,242           |                                    | 2,117,242                  |
| Payable to parent, subsidiaries and affiliates    | 3,275,341           |                                    | 3,275,341                  |
| Aggregate write-ins for liabilities               | 35,600              |                                    | 35,600                     |
| <b>Total Liabilities</b>                          | <b>\$9,172,424</b>  | <b>\$0</b>                         | <b>\$9,172,424</b>         |
| <br>  |                     |                                    |                            |
| Common capital stock                              | \$7,500,000         |                                    | \$7,500,000                |
| Gross paid in and contributed surplus             | 8,122,131           |                                    | 8,122,131                  |
| Unassigned funds (surplus)                        | 16,289,335          |                                    | 16,289,335                 |
| <b>Surplus as regards policyholders</b>           | <b>\$31,911,466</b> | <b>\$0</b>                         | <b>\$31,911,466</b>        |
| <b>Total liabilities, surplus and other funds</b> | <b>\$41,083,890</b> | <b>\$0</b>                         | <b>\$41,083,890</b>        |

**MAIN STREET AMERICA ASSURANCE COMPANY**  
**Statement of Income**

**DECEMBER 31, 2010**

**Underwriting Income**

|   |     |
|---|-----|
| Premiums earned                                 | \$0 |
| <b>Deductions</b>                               |     |
| Losses incurred                                 | \$0 |
| Loss adjustment expenses incurred               | 0   |
| Other underwriting expenses incurred            | 0   |
| Aggregate write-ins for underwriting deductions | 0   |
| Total underwriting deductions                   | \$0 |
| Net income of protected cells                   | 0   |
| Net underwriting gain                           | \$0 |

**Investment Income**

|                              |             |
|------------------------------|-------------|
| Net investment income earned | \$4,029,961 |
| Net realized capital gains   | 2,327,501   |
| Net investment gain          | \$6,357,462 |

**Other Income**

|   |     |
|---|-----|
| Net gain from agents' or premium balances charged off | \$0 |
| Finance and service charges not included in premiums  | 0   |
| Aggregate write-ins for miscellaneous income          | 0   |
| Total other income                                    | \$0 |

|  |             |
|--|-------------|
| Net income before dividends to policyholders and<br>before federal & foreign income taxes  | \$6,357,462 |
| Dividends to policyholders   | 0           |
| Net Income, after dividends to policyholders, but<br>before federal & foreign income taxes | \$6,357,462 |
| Federal & foreign income taxes   | 840,345     |
| Net Income   | \$5,517,117 |

**Capital and Surplus Account**

|  |                |
|--|----------------|
| Surplus as regards policyholders, December 31 prior year   | \$95,026,862   |
| Net Income   | \$5,517,117    |
| Change in net unrealized capital gains or (losses)         | 707,457        |
| Change in net deferred income tax                          | 660,030        |
| Surplus adjustments: Paid in                               | (70,000,000)   |
| Change in surplus as regards policyholders for the year    | (\$63,115,396) |
| Surplus as regards policyholders, December 31 current year | \$31,911,466   |

A comparative analysis of changes in surplus is shown below.

**MAIN STREET AMERICA ASSURANCE COMPANY**  
**Comparative Analysis of Changes in Surplus**

**DECEMBER 31, 2010**

The following is a reconciliation of Surplus as regards policyholders between that reported by the Company and as determined by the examination.

Surplus as Regards Policyholders  
December 31, 2010, per Annual Statement \$31,911,466

|  | <u>PER</u><br><u>COMPANY</u> | <u>PER</u><br><u>EXAM</u> | <u>INCREASE</u><br><u>(DECREASE)</u><br><u>IN SURPLUS</u> |
|--|------------------------------|---------------------------|---|
| ASSETS:  |                              |                           |   |
| No Adjustment  |                              |                           |   |
| LIABILITIES:   |                              |                           |   |
| No Adjustment  |                              |                           |   |
| Net Change in Surplus:   |                              |                           | <u>0</u>  |
| Surplus as Regards Policyholders<br>December 31, 2010, Per Examination |                              |                           | <u><u>\$31,911,466</u></u>                                |

## COMMENTS ON FINANCIAL STATEMENTS

### Liabilities

**Losses and Loss Adjustment Expenses** \$           0

The Company's actuary rendered an opinion that the amounts carried in the balance sheet as of December 31, 2010, made a reasonable provision for all unpaid loss and loss expense obligations of the Company under the terms of its policies and agreements.

The Office consulting actuary, Richard Lo, FCAS, MAAA, FCS of Alliance Actuarial Services, Inc. reviewed the loss and loss adjustment expense work papers provided by the Company and was in concurrence with this opinion.

### Capital and Surplus

The amount reported by the Company of \$31,911,466, exceeded the minimum of \$4,000,000 required by Section 624.408, Florida Statutes.



## CONCLUSION

The insurance examination practices and procedures as promulgated by the NAIC have been followed in ascertaining the financial condition of **Main Street America Assurance Company** as of December 31, 2010, consistent with the insurance laws of the State of Florida.

Per examination findings, the Company's Surplus as regards policyholders was \$31,911,466, which exceeded the minimum of \$4,000,000 required by Section 624.408, Florida Statutes.

In addition to the undersigned, James E. Salter, CFE, CPA, Examiner-In-Charge and Roshanak Fekrat, CPA, CFE, CIA, MCM; Cynthia Sikorski, CFE, MCM; Charles Black, CFE; Randall Dillow; and Aram Morvari, MCM, Participating Examiners, of Global Insurance Enterprises, Inc. participated in the examination. In addition, Richard Lo, FCAS MAAA, FCS consulting actuary of Alliance Actuarial Services Inc.; Samuel BowerCraft, CISA, IT Manager, and Diane Rudy, CPA, CIA of McKonly & Asbury LLP also participated in the examination. Kethessa Carpenter, CPA, Financial Examiner/Analyst Supervisor and Samita Lamsal, Financial Examiner/Analyst II, of the Office also participated in the examination.

Respectfully submitted,

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Mary M. James, CFE, CPM  
Chief Examiner  
Florida Office of Insurance Regulation