

Report
of the
Examination of
National Casualty Company
Madison, Wisconsin
As of December 31, 2011

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State of Wisconsin / OFFICE OF THE COMMISSIONER OF INSURANCE

Scott Walker, Governor
Theodore K. Nickel, Commissioner

Wisconsin.gov

May 9, 2013

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Honorable Theodore K. Nickel
Commissioner of Insurance
State of Wisconsin
125 South Webster Street
Madison, Wisconsin 53703

Commissioner:

In accordance with your instructions, a compliance examination has been made of the affairs and financial condition of:

NATIONAL CASUALTY COMPANY
Madison, Wisconsin

and this report is respectfully submitted.

I. INTRODUCTION

The previous examination of National Casualty Company (the company) was conducted in 2007 as of December 31, 2006. The current examination covered the intervening period ending December 31, 2011, and included a review of such 2012 transactions as deemed necessary to complete the examination.

The examination was conducted using a risk-focused approach in accordance with the NAIC Financial Condition Examiners Handbook, which sets forth guidance for planning and performing an examination to evaluate the financial condition and identify prospective risks of an insurer. This approach includes the obtaining of information about the company including corporate governance, the identification and assessment of inherent risks within the company, and the evaluation of system controls and procedures used by the company to mitigate those risks. The examination also included an assessment of the principles used and significant estimates made by management, as well as an evaluation of the overall financial statement

presentation and management's compliance with statutory accounting principles, annual statement instructions, and Wisconsin laws and regulations.

The examination of the company was conducted concurrently with the examination of Nationwide Mutual Insurance Company. Representatives of the Ohio Department of Insurance acted in the capacity as the lead state for the coordinated exams. Work performed by the Ohio Department of Insurance was reviewed and relied on where deemed appropriate.

The examination consisted of a review of all major phases of the company's operations and included the following areas:

- History
- Management and Control
- Corporate Records
- Conflict of Interest
- Fidelity Bonds and Other Insurance
- Employees' Welfare and Pension Plans
- Territory and Plan of Operations
- Affiliated Companies
- Growth of Company
- Reinsurance
- Financial Statements
- Accounts and Records
- Data Processing

Emphasis was placed on the audit of those areas of the company's operations accorded a high priority by the examiner-in-charge when planning the examination. Special attention was given to the action taken by the company to satisfy the recommendations and comments made in the previous examination report.

The company is annually audited by an independent public accounting firm as prescribed by s. Ins 50.05, Wis. Adm. Code. An integral part of this compliance examination was the review of the independent accountant's work papers. Based on the results of the review of these work papers, alternative or additional examination steps deemed necessary for the completion of this examination were performed. The examination work papers contain documentation with respect to the alternative or additional examination steps performed during the course of the examination.

Independent Actuary's Review

The Ohio Department of Insurance actuary reviewed the loss and loss adjustment expense reserves of the Nationwide Group for adequacy. The actuary's results were reported to the Ohio Department of Insurance examiner-in-charge. As deemed appropriate, reference is made in this report to the actuary's conclusion.

II. HISTORY AND PLAN OF OPERATION

The company was organized in 1904 under the laws of Michigan and commenced business on December 31, 1904. It succeeded the National Protective Society, a co-operative company, which began business in 1894. Financial control of the company was acquired in 1952 by the Nationwide Mutual Insurance Company of Columbus, Ohio. The controlling stock ownership passed to the Nationwide Life Insurance Company, which acquired complete control on December 31, 1993. As of June 30, 1997, controlling stock ownership once again passed to Nationwide Mutual Insurance Company. The state of domicile was changed from Michigan to Wisconsin effective November 13, 1997.

In 2011, the company wrote direct premium in the following states:

New York	\$ 93,081,752	13.8%
Pennsylvania	37,161,713	5.5
Texas	37,126,675	5.5
Florida	33,806,398	5.0
New Jersey	30,777,408	4.6
Illinois	28,849,121	4.3
Utah	24,857,280	3.7
Washington	22,438,456	3.3
Virginia	18,783,381	2.8
California	18,735,617	2.7
Massachusetts	18,365,508	2.7
North Carolina	17,408,060	2.6
All others	293,977,945	43.5
 Total	 \$675,369,314	 100.0%

The company is licensed in the District of Columbia and all U.S. states. Direct premium written in the state of Wisconsin during 2011 was \$9,469,662.

The major products marketed by the company include other commercial auto liability, other liability occurrence, auto physical damage and auto warranty. The major products are marketed through independent general agents.

The following table is a summary of the net insurance premiums written by the company in 2011. The growth of the company is discussed in the “Financial Data” section of this report.

Line of Business	Direct Premium	Reinsurance Assumed	Reinsurance Ceded	Net Premium
Fire	\$ 7,541,838	\$ 0	\$ 7,541,838	\$0
Allied lines	5,298,259	55,415	5,353,674	0
Homeowner's multiple peril	3,787,774	0	3,787,774	0
Commercial multiple peril	43,550,587	18,862	43,569,449	0
Mortgage guaranty		0		0
Ocean marine	25,899,725	1,022,585	26,922,310	0
Inland marine	9,195,753	0	9,195,753	0
Medical professional liability – occurrence	350	0	350	0
Medical professional liability – claims made	1,702	0	1,702	0
Earthquake	21,197	0	21,197	0
Group accident and health	786,110	0	786,110	0
Other accident and health	826,863	0	826,863	0
Worker's compensation	6,687,500	2,185,274	8,872,774	0
Other liability – occurrence	271,306,139	160,258	271,466,397	0
Other liability – claims made	32,352,812	1,886,703	34,239,515	0
Products liability – occurrence	(221,935)	0	(221,935)	0
Commercial auto liability	176,463,202	380,029	176,843,231	0
Auto physical damage	49,428,658	6,967	49,435,625	0
Fidelity	1,100	0	1,100	0
Burglary and theft	109,980	0	109,980	0
Boiler and machinery	1,231,269	0	1,231,269	0
Warranty	<u>41,100,432</u>	<u>0</u>	<u>41,100,432</u>	<u>0</u>
Total All Lines	<u>\$675,369,315</u>	<u>\$5,716,093</u>	<u>\$681,085,408</u>	<u>\$0</u>

III. MANAGEMENT AND CONTROL

Board of Directors

National Casualty Company's articles of incorporation provide that the corporation shall be managed by a board of not fewer than five and not more than ten directors. The current board of directors consists of five members. The directors are elected annually to serve a one-year term. All directors hold office until their respective successors are elected and qualified. Board vacancies may be filled for the unexpired term by a vote of the majority of the board members present if they constitute a quorum. Officers are elected at the board's annual meeting. Members of the company's board of directors may also be members of other boards of directors in the holding company group. As executive employees of the holding company system, the directors receive no compensation specific to their service on the company's board.

Currently the board of directors consists of the following persons:

Name and Residence	Principal Occupation	Term Expires
Kenneth A. Levine Scottsdale, Arizona	Vice President – Chief Actuary	2013
Susan F. Wain Scottsdale, Arizona	Senior Vice President – Claims	2013
Peter W. Harper Scottsdale, Arizona	Senior Vice President and Chief Financial Officer – Property and Casualty	2013
Michael D. Miller Scottsdale, Arizona	President and Chief Operating Officer	2013
Gary L. Tiepelman Scottsdale, Arizona	Senior Vice President – Underwriting	2013

Officers of the Company

The officers serving at the time of this examination are as follows:

Name	Office	2012 Compensation*
Michael D. Miller	President and Chief Operating Officer	Not Allocated
Peter W. Harper	Vice President and Treasurer	Not Allocated
Randall L. Orr	Vice President and Assistant Secretary	Not Allocated
Robert W. Horner III	Vice President and Secretary	Not Allocated
Gary L. Tiepelman	Senior Vice President – Underwriting	Not Allocated
Susan F. Wain	Senior Vice President – Claims	Not Allocated
Pamela A. Biesecker	Senior Vice President – Head of Taxation	Not Allocated

* The company's officers are paid by other affiliates and no portion of the expense of their compensation is allocated to National Casualty Company.

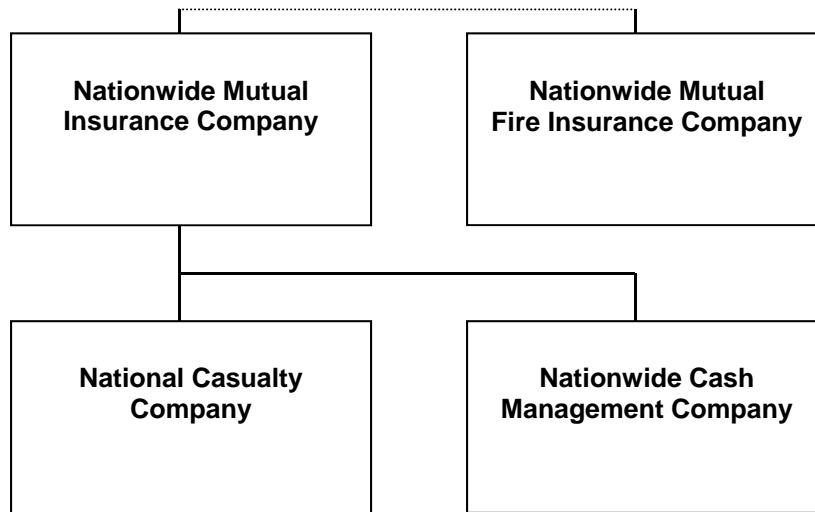
Committees of the Board

Although the company's bylaws allow for the formation of certain committees by the board of directors, all committees at the time of the examination are organized at the corporate enterprise level.

IV. AFFILIATED COMPANIES

National Casualty Company is a member of a holding company system. The organizational chart below depicts the relationships among the affiliates in the group that control National Casualty Company or with which the company has reinsurance or service agreements. The Nationwide Group is ultimately controlled by two mutual insurers, Nationwide Mutual Insurance Company and Nationwide Mutual Fire Insurance Company. The above entities are sister companies under the same management control which operate in tandem as the ultimate controlling entities for all subsidiaries. A brief description of the significant affiliates follows the simplified organization chart.

**Organizational Chart
As of December 31, 2011**



Nationwide Mutual Insurance Company (NMIC)

Nationwide Mutual Insurance Company provides personal automobile, property and commercial insurance products and services through exclusive and independent agents in all U.S. states as well as the District of Columbia and U.S. Virgin Islands. NMIC is the administrator of the Nationwide Pooling Agreement with a pool participation percentage of 83.7%. As of December 31, 2011, the audited financial statements of Nationwide Mutual Insurance Company reported assets of \$27,617,831,419, liabilities of \$17,182,942,679, and surplus as regards policyholders of \$10,434,888,740. Operations for 2011 produced a net loss of \$910,107,691.

Nationwide Mutual Fire Insurance Company (NMFIC)

Nationwide Mutual Fire Insurance Company provides private passenger auto, homeowner's multiple peril and commercial multiple peril coverage in all U.S. states as well as the District of Columbia and the U.S. Virgin Islands. Nationwide Mutual Fire Insurance Company shares in the Nationwide Pooling Agreement with a pooling participation percentage of 11.3%. As of December 31, 2011, the audited financial statements of Nationwide Mutual Fire Insurance Company reported assets of \$4,553,400,810, liabilities of \$2,310,246,490, and surplus as regards policyholders of \$2,243,154,320. Operations for 2011 produced a net loss of \$8,639,958.

Nationwide Cash Management Company (NMC)

Nationwide Cash Management Company is a wholly owned, non-insurance subsidiary of Nationwide Mutual Insurance Company. NMC is a stock corporation incorporated under the laws of the state of Ohio. The company acts in the capacity of an in-house money market fund through the purchase and sale of various investment securities of a short-term nature as the agent for other corporations, foundations and insurance company separate accounts, including National Casualty Company. As of December 31, 2011, the unaudited financial statements of Nationwide Cash Management Company reported assets of \$2,075,239,675, liabilities of \$2,066,259,851, and shareholders' equity of \$8,979,824. Operations for 2011 produced net income of \$0.

Agreements with Affiliates

National Casualty Company is a party to the following affiliate agreements:

Cost Sharing Agreement

Nationwide Mutual Insurance Company provides various operational and administrative services to the company under a Second Amended & Restated Cost Sharing Agreement, effective January 1, 2011. Operational services provided under the agreement include functions associated with field acquisition, policy processing and administration, data processing, accounting, actuarial and investment. Administrative services provided under the agreement include functions associated with payroll, benefits, investment management, legal and human resources.

Costs associated with these services are allocated based on various standard cost accounting procedures which are in conformity with NAIC statutory accounting principles.

Methods used to allocate costs to respective parties include special cost studies, individual time estimates, claim counts, policies in force, direct premium written or pro rata share. The agreement remains in effect until terminated by either party providing 90 days' written notice.

Investment Agency Cost Allocation Agreement

Nationwide Cash Management Company, a subsidiary of NMIC, acts as agent on behalf of National Casualty Company in handling the purchase and sale of short-term securities under an Investment Agency Cost Allocation Agreement, effective November 14, 2002.

Nationwide Cash Management Company's authority as agent encompasses the purchase, sale or transfer of investments, collection and account credit of all dividends, interest and other investment income as well as the proceeds from the sale, redemption, or other disposition of investments and the maintenance of agent bank accounts to hold funds. The agreement may be terminated at the end of each business day by the company upon written notice to the agent and at any time by the agent upon 30 days' written notice.

Tax Sharing Agreement

Nationwide Mutual Insurance Company provides consolidated federal income tax return filing to affiliates, including National Casualty Company, under a revised Tax Sharing Agreement, effective January 1, 2008. NMIC's consolidated tax return preparation and filing responsibilities under the agreement include consolidated federal, state or local income tax return filing on behalf of the affiliates for eligible years, amended return filing, acting as agent for the affiliate in the event of any tax audit, administrative or judicial proceedings and retention of copies of all tax return related work papers. Subsidiary responsibilities under the Tax Sharing Agreement include payment to NMIC of an amount equal to the income tax liability attributable to such subsidiary within 90 days following the filing of group tax returns, payment to NMIC of tax liabilities which may be incurred related to estimated taxes, tax deficiencies, interest or penalties and providing information required in connection with tax return preparation.

V. REINSURANCE

The company's major reinsurance agreement in force at the time of the examination is summarized below. The contract contained proper insolvency provisions.

Affiliated Ceding Contracts

1. Type: 100% Quota Share
Reinsurer: Nationwide Mutual Insurance Company
Scope: Property and casualty insurance issued in various jurisdictions
Retention: None
Coverage: 100% of all liability of the subject business
Premium: 100% of premium
Effective date: January 1, 2011
Termination: Automatically renewing one-year term with 365-day prior notice required to terminate

2. Type: Reinsurance Agreement as amended
Reinsurer: Nationwide Indemnity Company
Scope: 100% of unpaid construction defect claims for policies with inception dates between January 1, 1982, and December 31, 1997
Retention: None
Coverage: 100% of all liability of the subject business
Premium: 100% of premium
Effective date: January 1, 2000
Termination: 90 days' prior written notice

VI. FINANCIAL DATA

The following financial statements reflect the financial condition of the company as reported to the Commissioner of Insurance in the December 31, 2011, annual statement. Also included in this section are schedules that reflect the growth of the company, NAIC Insurance Regulatory Information System (IRIS) ratio results for the period under examination, and the compulsory and security surplus calculation. Adjustments made as a result of the examination are noted at the end of this section in the area captioned "Reconciliation of Surplus per Examination."

National Casualty Company
Assets
As of December 31, 2011

	Assets	Nonadmitted Assets	Net Admitted Assets
Bonds	\$108,927,789	\$	\$108,927,789
Cash, cash equivalents, and short-term investments	9,248,733		9,248,733
Investment income due and accrued	1,190,134		1,190,134
Premiums and considerations:			
Uncollected premiums and agents' balances in course of collection	109,264,233	23,390,740	85,873,493
Reinsurance:			
Amounts recoverable from reinsurers	39,092,601		39,092,601
Funds held by or deposited with reinsured companies	149,867		149,867
Other amounts receivable under reinsurance contracts	2,885,635		2,885,635
Net deferred tax asset	152,675	101,307	51,350
Receivable from parent, subsidiaries, and affiliates	641,792	37	641,755
Health care and other amounts receivable			
Write-ins for other than invested assets:			
Third-party administrator receivable	473,490		473,490
Equities and deposits in pools and associations	378,250		378,250
State surcharge/recoupment recoverable	34,562		34,562
Miscellaneous	<u>14,467</u>	<u>14,467</u>	<u> </u>
Total Assets	<u>\$272,454,210</u>	<u>\$23,506,551</u>	<u>\$248,947,659</u>

National Casualty Company
Liabilities, Surplus, and Other Funds
As of December 31, 2011

Reinsurance payable on paid loss and loss adjustment expenses		\$ 9,348
Current federal and foreign income taxes		1,374,427
Ceded reinsurance premiums payable (net of ceding commissions)		19,560,621
Funds held by company under reinsurance treaties		(150,368)
Remittances and items not allocated		902
Payable to parent, subsidiaries, and affiliates		<u>108,776,761</u>
 Total liabilities		 129,571,691
 Common capital stock	\$ 5,000,000	
Gross paid in and contributed surplus	21,486,670	
Unassigned funds (surplus)	<u>92,889,298</u>	
 Surplus as regards policyholders		 <u>119,375,968</u>
 Total Liabilities and Surplus		 <u>\$248,947,659</u>

**National Casualty Company
Summary of Operations
For the Year 2011**

Investment Income

Net investment income earned	\$3,634,442	
Net realized capital gains (losses)	<u>670,098</u>	
Net investment gain (loss)		\$4,304,540

Other Income

Write-ins for miscellaneous income:		
Miscellaneous expense	<u>(7,332)</u>	
Total other income		<u>(7,332)</u>
Net income (loss) after dividends to policyholders but before federal and foreign income taxes		4,297,208
Federal and foreign income taxes incurred		<u>1,013,359</u>
Net Income		<u>\$3,283,849</u>

National Casualty Company
Cash Flow
For the Year 2011

Premiums collected net of reinsurance		\$(104,824,379)
Net investment income		4,198,581
Miscellaneous income		<u>1,901,219</u>
Total		(98,724,578)
Benefit- and loss-related payments	\$ 3,427,147	
Commissions, expenses paid, and aggregate write-ins for deductions	12,664	
Federal and foreign income taxes paid (recovered)	<u>898,433</u>	
Total deductions		<u>4,338,244</u>
Net cash from operations		(103,062,822)
Proceeds from investments sold, matured, or repaid:		
Bonds	\$40,226,390	
Miscellaneous proceeds	<u>222,875</u>	
Total investment proceeds		40,449,265
Cost of investments acquired (long-term only):		
Bonds	<u>39,866,857</u>	
Total investments acquired		<u>39,866,857</u>
Net cash from investments		582,408
Cash from financing and miscellaneous sources:		
Other cash provided (applied)	<u>106,238,953</u>	
Net cash from financing and miscellaneous sources		<u>106,238,953</u>
Reconciliation:		
Net change in cash, cash equivalents, and short-term investments		3,758,539
Cash, cash equivalents, and short-term investments:		
Beginning of year		<u>5,490,193</u>
End of Year		<u>\$ 9,248,732</u>

**National Casualty Company
Compulsory and Security Surplus Calculation
December 31, 2011**

Assets	\$248,947,659
Less liabilities	<u>129,571,691</u>
Adjusted surplus	119,375,968
Compulsory surplus (subject to a minimum of \$2 million)	<u>2,000,000</u>
Compulsory Surplus Excess (or Deficit)	<u><u>\$117,375,968</u></u>
Adjusted surplus (from above)	\$119,375,968
Security surplus: (140% of compulsory surplus, factor reduced 1% for each \$33 million in premium written in excess of \$10 million, with a minimum factor of 110%)	<u>2,800,000</u>
Security Surplus Excess (or Deficit)	<u><u>\$116,575,968</u></u>

**National Casualty Company
Analysis of Surplus
For the Five-Year Period Ending December 31, 2011**

The following schedule details items affecting surplus during the period under examination as reported by the company in its filed annual statements:

	2011	2010	2009	2008	2007
Surplus, beginning of year	\$115,186,228	\$111,175,427	\$106,563,660	\$103,573,732	\$100,295,218
Net income	3,283,849	3,755,266	4,530,066	3,064,678	3,312,427
Change in net unrealized capital gains/losses	490,278	121,442	294,011	(38,099)	(33,280)
Change in net deferred income tax	220,119	(214,714)	401,204	(62,126)	68,720
Change in nonadmitted assets	<u>195,494</u>	<u>348,807</u>	<u>(613,514)</u>	<u>25,474</u>	<u>(69,353)</u>
Surplus, End of Year	<u>\$119,375,968</u>	<u>\$115,186,228</u>	<u>\$111,175,427</u>	<u>\$106,563,660</u>	<u>\$103,573,732</u>

**National Casualty Company
Insurance Regulatory Information System
For the Five-Year Period Ending December 31, 2011**

The company's NAIC Insurance Regulatory Information System (IRIS) results for the period under examination are summarized below. Unusual IRIS results are denoted with asterisks and discussed below the table.

Ratio	2011	2010	2009	2008	2007
#1 Gross Premium to Surplus	571%	494%	488%	516%	556%
#2 Net Premium to Surplus	0	0	0	0	0
#3 Change in Net Premiums Written	0	0	0	0	0
#4 Surplus Aid to Surplus	0	0	0	0	0
#5 Two-Year Overall Operating Ratio	0	0	0	0	0
#6 Investment Yield	3.2	3.3	3.6	4.1	4.6
#7 Gross Change in Surplus	4	4	4	3	3
#8 Change in Adjusted Surplus	4	4	4	3	3
#9 Liabilities to Liquid Assets	109*	41	42	36	80
#10 Agents' Balances to Surplus	72*	2	2	0	0
#11 One-Year Reserve Development to Surplus	0	0	0	-1	0
#12 Two-Year Reserve Development to Surplus	0	0	-1	0	1
#13 Estimated Current Reserve Deficiency to Surplus	0	0	0	0	0

Ratio No. 9 is a measure of the insurer's ability to meet financial demands. The usual range for this ratio includes results below 100%. The increase in this ratio in 2011 is mainly associated with the timing of the settlement with NMIC.

Ratio No. 10 measures agents' balances booked as written and billed to agents or policyholders in relation to the insurer's policyholders' surplus. The usual range for this ratio includes results less than 40%. The increase in this ratio in 2011 is consistent with the company's increase in written premiums.

The zero IRIS ratio results reflect the impact of the company's 100% quota share contracts with the Nationwide Pool.

Growth of National Casualty Company

Year	Admitted Assets	Liabilities	Surplus as Regards Policyholders	Net Income
2011	\$248,947,659	\$129,571,691	\$119,375,968	\$3,283,849
2010	162,230,302	47,044,074	115,186,228	3,755,266
2009	161,103,050	49,927,623	111,175,427	4,530,066
2008	144,388,489	37,824,829	106,563,660	3,064,678
2007	185,511,172	81,937,440	103,573,732	3,312,427
2006	156,736,229	56,441,011	100,295,218	3,600,758

Year	Gross Premium Written	Net Premium Written	Premium Earned	Loss and LAE Ratio	Expense Ratio	Combined Ratio
2011	\$681,085,408	\$0	\$0	0.0%	0.0%	0.0%
2010	569,460,587	0	0	0.0	0.0	0.0
2009	542,780,274	0	0	0.0	0.0	0.0
2008	550,131,967	0	0	0.0	0.0	0.0
2007	575,643,663	0	0	0.0	0.0	0.0
2006	574,441,315	0	0	0.0	0.0	0.0

Gross premium written has stayed relatively consistent over the previous six years with the exception of 2011. The increase in gross premium written in 2011 is attributed to a geographically concentrated increase in auto warranty business along with internal initiatives to provide greater specialization to improve competition. As a result of this change, the company is reporting an increase in assets and liabilities specifically, agent balances in course of collection and a corresponding entry for payable to affiliate.

Reconciliation of Surplus per Examination

No adjustments were made to surplus as a result of the examination. The amount of surplus of \$119,375,968 reported by the company as of December 31, 2011, is accepted.

VII. SUMMARY OF EXAMINATION RESULTS

Compliance with Prior Examination Report Recommendations

There were four specific comments and recommendations in the previous examination report. Comments and recommendations contained in the last examination report and actions taken by the company are as follows:

1. Shareholder and Board of Directors' Actions Without a Meeting—It is recommended that the company comply with the intention of formal bylaw meeting requirements or amend its bylaws to clarify that "Action by Unanimous Written Consent Without a Meeting" is an acceptable alternative for all shareholder meetings in lieu of other specific shareholder meeting requirements.

Action—Compliance.

2. Articles of Incorporation Amendment Filing—It is recommended that the company file amendments to its articles of incorporation, pursuant to s. 611.29 (4), Wis. Stat.

Action—Compliance.

3. Board of Directors' Oversight—It is recommended that the minutes of the board of directors demonstrate more complete oversight as it relates to annual acknowledgment and acceptance of summary reports of investment transactions as well as auditor appointment.

Action—Compliance.

4. Intercompany Settlement—It is recommended that intercompany settlement, which also incorporates affiliated reinsurance account settlement, be completed on a monthly basis going forward to provide for timely settlement and minimize potential write-offs.

Action—Compliance.

Summary of Current Examination Results

There were no adverse or material examination findings as a result of the current examination of the company.

VIII. CONCLUSION

National Casualty Company reported admitted assets of \$248,947,659, liabilities of \$129,571,691 and surplus as regards policyholders of \$119,375,968 as of December 31, 2011.

The company cedes 100% of its business to its parent, Nationwide Mutual Insurance Company, with no pool participation in the Nationwide Pool. The company has been profitable for all years under review. Gross premium written has stayed relatively consistent over the previous six years with the exception of 2011. The increase in gross premium written in 2011 is attributed to a geographically concentrated increase in auto warranty business along with internal initiatives to provide greater specialization to improve competition.

The company has complied with all four prior examination recommendations and the current examination did not result in any recommendations. Additionally, the examination did not result in any adjustments to policyholders' surplus as reported by the company.

IX. SUMMARY OF COMMENTS AND RECOMMENDATIONS

There were no recommendations made as a result of this examination.

X. ACKNOWLEDGMENT

The courtesy and cooperation extended during the course of the examination by the officers and employees of the company are acknowledged.

In addition to the undersigned, the following representatives of the Office of the Commissioner of Insurance, State of Wisconsin, participated in the examination:

Name	Title
Tom Janke	Insurance Financial Examiner
Randy Milquet	IT Specialist

Respectfully submitted,

Amanda Schroeder
Examiner-in-Charge