



QUARTERLY STATEMENT

As of March 31, 2011
of the Condition and Affairs of the

American Commerce Insurance Company

NAIC Group Code.....0411, 0411 (Current Period) (Prior Period)	NAIC Company Code..... 19941	Employer's ID Number..... 31-4361173
Organized under the Laws of OHIO	State of Domicile or Port of Entry OHIO	Country of Domicile US
Incorporated/Organized..... September 18, 1946	Commenced Business..... March 19, 1947	
Statutory Home Office	3590 TWIN CREEKS DRIVE..... COLUMBUS OH 43218-2579 (Street and Number) (City or Town, State and Zip Code)	
Main Administrative Office	211 MAIN STREET..... WEBSTER MA 01570 (Street and Number) (City or Town, State and Zip Code)	508-943-9000 (Area Code) (Telephone Number)
Mail Address	211 MAIN STREET..... WEBSTER MA 01570 (Street and Number or P. O. Box) (City or Town, State and Zip Code)	
Primary Location of Books and Records	211 MAIN STREET..... WEBSTER MA 01570 (Street and Number) (City or Town, State and Zip Code)	508-943-9000 (Area Code) (Telephone Number)
Internet Web Site Address	www.acilink.com	
Statutory Statement Contact	BRIAN KEITH GERMAIN (Name) bgermai@commerceinsurance.com (E-Mail Address)	508-943-9000-14942 (Area Code) (Telephone Number) (Extension) 508-949-4246 (Fax Number)

OFFICERS

Name	Title	Name	Title
JAIME TAMAYO	PRESIDENT & CEO	DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & SVP
ROBERT EDWARD MCKENNA	TREASURER, CAO, & SVP	RANDALL VAUGHN BECKER	EXECUTIVE VICE PRESIDENT & CFO

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	DENNIS JOHN CROSSLEY	GERALD FELS	FREDERICK LAWRENCE GRUEL
CHARLES BORROMEO LIEKWEG	JOHN DAVID PORTER	HENRY THOMAS ROWLES	MARK ALLEN SHAW
MARK HARRY SHAW	JAIME TAMAYO	OTTO TILLMAN WRIGHT	

State of..... MASSACHUSETTS
County of..... WORCESTER

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

(Signature) JAIME TAMAYO (Printed Name) PRESIDENT & CEO (Title)	(Signature) DANIEL PATRICK OLOHAN (Printed Name) SECRETARY, GENERAL COUNSEL, & SVP (Title)	(Signature) ROBERT EDWARD MCKENNA (Printed Name) TREASURER, CAO, & SVP (Title)
Subscribed and sworn to before me This _____ day of _____	a. Is this an original filing? b. If no: 1. State the amendment number 2. Date filed 3. Number of pages attached	Yes [X] No [] _____ _____ _____

ASSETS

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31 Prior Year Net Admitted Assets
1. Bonds.....	193,813,760		193,813,760	184,499,172
2. Stocks:				
2.1 Preferred stocks.....	8,857,547		8,857,547	3,465,804
2.2 Common stocks.....			0	
3. Mortgage loans on real estate:				
3.1 First liens.....			0	
3.2 Other than first liens.....			0	
4. Real estate:				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....	1,910,410		1,910,410	1,805,466
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			0	
4.3 Properties held for sale (less \$.....0 encumbrances).....			0	
5. Cash (\$.....939,703), cash equivalents (\$.....0) and short-term investments (\$.....0).....	939,703		939,703	6,391,369
6. Contract loans (including \$.....0 premium notes).....			0	
7. Derivatives.....			0	
8. Other invested assets.....			0	
9. Receivables for securities.....			0	
10. Securities lending reinvested collateral assets.....			0	
11. Aggregate write-ins for invested assets.....	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	205,521,420	0	205,521,420	196,161,811
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	2,344,283	150,008	2,194,275	2,153,832
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	38,149,162		38,149,162	39,141,309
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....0 earned but unbilled premiums).....			0	
15.3 Accrued retrospective premiums.....			0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	49,250,617		49,250,617	48,521,365
16.2 Funds held by or deposited with reinsured companies.....			0	
16.3 Other amounts receivable under reinsurance contracts.....	28,623,317		28,623,317	24,090,780
17. Amounts receivable relating to uninsured plans.....			0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....			0	
18.2 Net deferred tax asset.....	9,644,320	3,246,800	6,397,520	5,100,079
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	1,272,536		1,272,536	961,879
21. Furniture and equipment, including health care delivery assets (\$.....0).....	691,007	691,007	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	4,582,614
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	45,211,482	2,169,673	43,041,809	40,074,188
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	380,708,144	6,257,488	374,450,656	360,787,857
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	380,708,144	6,257,488	374,450,656	360,787,857

DETAILS OF WRITE-INS

1101.			0	
1102.			0	
1103.			0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0	0
2501. PRE PAID EXPENSES.....	280,013	280,013	0	
2502. EQUITY IN POOLS AND ASSOCIATIONS.....	41,791,936		41,791,936	38,825,755
2503. ARIZONA RENEWAL BUSINESS.....	1,889,660	1,889,660	0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	1,249,873	0	1,249,873	1,248,433
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	45,211,482	2,169,673	43,041,809	40,074,188

LIABILITIES, SURPLUS AND OTHER FUNDS

			1	2
			Current	December 31
			Statement Date	Prior Year
1.	Losses (current accident year \$.....13,385,000).....		50,270,232	51,160,721
2.	Reinsurance payable on paid losses and loss adjustment expenses.....		31,842,869	25,997,820
3.	Loss adjustment expenses.....		12,880,653	12,558,744
4.	Commissions payable, contingent commissions and other similar charges.....		3,683,553	4,956,958
5.	Other expenses (excluding taxes, licenses and fees).....		2,130,445	3,345,113
6.	Taxes, licenses and fees (excluding federal and foreign income taxes).....		201,991	1,121,524
7.1	Current federal and foreign income taxes (including \$.....15,073 on realized capital gains (losses)).....		354,000	3,237,888
7.2	Net deferred tax liability.....			
8.	Borrowed money \$.....0 and interest thereon \$.....0.....			
9.	Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$.....149,094,116 and including warranty reserves of \$.....0).....		74,280,681	71,660,954
10.	Advance premium.....		4,750,096	2,880,025
11.	Dividends declared and unpaid:			
11.1	Stockholders.....			
11.2	Policyholders.....			
12.	Ceded reinsurance premiums payable (net of ceding commissions).....		50,073,242	47,360,094
13.	Funds held by company under reinsurance treaties.....			
14.	Amounts withheld or retained by company for account of others.....			
15.	Remittances and items not allocated.....			
16.	Provision for reinsurance.....			
17.	Net adjustments in assets and liabilities due to foreign exchange rates.....			
18.	Drafts outstanding.....			
19.	Payable to parent, subsidiaries and affiliates.....		5,118,343	
20.	Derivatives.....			
21.	Payable for securities.....		996,000	
22.	Payable for securities lending.....			
23.	Liability for amounts held under uninsured plans.....			
24.	Capital notes \$.....0 and interest thereon \$.....0.....			
25.	Aggregate write-ins for liabilities.....		332,571	346,984
26.	Total liabilities excluding protected cell liabilities (Lines 1 through 25).....		236,914,676	224,626,825
27.	Protected cell liabilities.....			
28.	Total liabilities (Lines 26 and 27).....		236,914,676	224,626,825
29.	Aggregate write-ins for special surplus funds.....		667,770	760,961
30.	Common capital stock.....		3,226,140	3,226,140
31.	Preferred capital stock.....			
32.	Aggregate write-ins for other than special surplus funds.....		0	0
33.	Surplus notes.....			
34.	Gross paid in and contributed surplus.....		26,188,147	26,188,147
35.	Unassigned funds (surplus).....		107,453,930	105,985,784
36.	Less treasury stock, at cost:			
36.1	0.000 shares common (value included in Line 30 \$.....0).....			
36.2	0.000 shares preferred (value included in Line 31 \$.....0).....			
37.	Surplus as regards policyholders (Lines 29 to 35, less 36).....		137,535,987	136,161,032
38.	Totals.....		374,450,663	360,787,857

DETAILS OF WRITE-INS

2501.	MISCELLANEOUS LIABILITIES.....		332,571	346,984
2502.				
2503.				
2598.	Summary of remaining write-ins for Line 25 from overflow page.....		0	0
2599.	Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....		332,571	346,984
2901.	ADDITIONAL ADMITTED DEFERRED TAX ASSETS UNDER SSAP10R, par. 10e.....		667,770	760,961
2902.				
2903.				
2998.	Summary of remaining write-ins for Line 29 from overflow page.....		0	0
2999.	Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....		667,770	760,961
3201.				
3202.				
3203.				
3298.	Summary of remaining write-ins for Line 32 from overflow page.....		0	0
3299.	Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....		0	0

American Commerce Insurance Company
STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$.....69,246,240).....	67,867,950	58,758,214	251,685,085
1.2 Assumed..... (written \$.....38,571,361).....	35,951,633	33,686,370	138,871,314
1.3 Ceded..... (written \$.....69,246,240).....	67,867,950	58,758,214	251,685,085
1.4 Net..... (written \$.....38,571,361).....	35,951,633	33,686,370	138,871,314
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....26,827,000):			
2.1 Direct.....	46,450,822	37,363,441	174,007,922
2.2 Assumed.....	26,545,532	21,906,560	86,764,797
2.3 Ceded.....	46,450,822	37,363,441	174,007,922
2.4 Net.....	26,545,532	21,906,560	86,764,797
3. Loss adjustment expenses incurred.....	4,735,195	4,125,948	16,738,427
4. Other underwriting expenses incurred.....	9,966,587	9,545,122	38,996,733
5. Aggregate write-ins for underwriting deductions.....	(11,892)	0	(130,040)
6. Total underwriting deductions (Lines 2 through 5).....	41,235,422	35,577,630	142,369,917
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(5,283,789)	(1,891,260)	(3,498,603)
INVESTMENT INCOME			
9. Net investment income earned.....	2,549,425	2,852,734	11,758,812
10. Net realized capital gains (losses) less capital gains tax of \$.....(712,157).....	1,365,688	502,008	2,685,594
11. Net investment gain (loss) (Lines 9 + 10).....	3,915,113	3,354,742	14,444,406
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$.....0 amount charged off \$.....0).....	0		
13. Finance and service charges not included in premiums.....	486,946	431,828	1,863,786
14. Aggregate write-ins for miscellaneous income.....	6,053	9,441	46,253
15. Total other income (Lines 12 through 14).....	492,999	441,269	1,910,039
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	(875,677)	1,904,751	12,855,842
17. Dividends to policyholders.....			
18. Net income after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	(875,677)	1,904,751	12,855,842
19. Federal and foreign income taxes incurred.....	397,766	704,662	3,348,629
20. Net income (Line 18 minus Line 19) (to Line 22).....	(1,273,443)	1,200,089	9,507,213
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	136,161,032	133,815,552	133,815,552
22. Net income (from Line 20).....	(1,273,443)	1,200,089	9,507,213
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....302,511.....	561,805	463,519	2,707,151
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	(965,730)	(142,276)	(384,233)
27. Change in nonadmitted assets.....	2,645,783	804,218	2,108,225
28. Change in provision for reinsurance.....			
29. Change in surplus notes.....			
30. Surplus (contributed to) withdrawn from protected cells.....			
31. Cumulative effect of changes in accounting principles.....			
32. Capital changes:			
32.1 Paid in.....			
32.2 Transferred from surplus (Stock Dividend).....			
32.3 Transferred to surplus.....			
33. Surplus adjustments:			
33.1 Paid in.....			
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....			(13,381,555)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	406,540	1,965,818	1,788,679
38. Change in surplus as regards policyholders (Lines 22 through 37).....	1,374,955	4,291,368	2,345,480
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	137,535,987	138,106,920	136,161,032
DETAILS OF WRITE-INS			
0501. LAD PROGRAM INCOME.....	(11,892)		(130,040)
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	(11,892)	0	(130,040)
1401. Miscellaneous Expense.....	6,053	9,441	30,288
1402. GAIN ON SALE OF FIXED ASSETS.....			15,965
1403.			
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	6,053	9,441	46,253
3701. ADDITIONAL ADMITTED DEFERRED TAX ASSETS UNDER SSAP10R, par 10e.....	667,770	642,965	760,961
3702. RECLASSIFICATION OF ADDITIONAL ADMITTED DEFERRED TAX ASSETS TO SPECIAL SURPLUS FUNDS...	(667,770)	(642,965)	(760,961)
3703. STAUTORY ADJUSTMENT FOR TAX SETTLEMENT.....	308,213	907,481	737,222
3798. Summary of remaining write-ins for Line 37 from overflow page.....	98,327	1,058,337	1,051,457
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	406,540	1,965,818	1,788,679

CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	44,146,726	32,707,727	142,796,974
2. Net investment income.....	2,364,088	2,673,038	11,799,074
3. Miscellaneous income.....	492,999	441,269	1,910,039
4. Total (Lines 1 through 3).....	47,003,813	35,822,034	156,506,087
5. Benefit and loss related payments.....	26,852,761	31,370,597	101,389,775
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	17,775,587	15,460,737	52,913,733
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....(751) tax on capital gains (losses).....	2,569,497	2,410,881	2,550,137
10. Total (Lines 5 through 9).....	47,197,845	49,242,215	156,853,645
11. Net cash from operations (Line 4 minus Line 10).....	(194,032)	(13,420,181)	(347,558)
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	15,504,642	22,512,732	98,744,955
12.2 Stocks.....		801,875	15,987,174
12.3 Mortgage loans.....			
12.4 Real estate.....			62,829
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....	996,000		
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	16,500,642	23,314,607	114,794,958
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	23,361,860	17,653,780	71,277,447
13.2 Stocks.....	5,307,400		2,003,200
13.3 Mortgage loans.....			
13.4 Real estate.....	133,927		518,186
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	28,803,187	17,653,780	73,798,833
14. Net increase (decrease) in contract loans and premium notes.....			
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14).....	(12,302,545)	5,660,827	40,996,125
CASH FROM FINANCING AND MISCELLANEOUS SOURCES			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes.....			
16.2 Capital and paid in surplus, less treasury stock.....			
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			27,318,480
16.6 Other cash provided (applied).....	7,044,911	4,943,970	(12,947,019)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	7,044,911	4,943,970	(40,265,499)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11 plus Line 15 plus Line 17).....	(5,451,666)	(2,815,384)	383,068
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	6,391,369	6,008,301	6,008,301
19.2 End of period (Line 18 plus Line 19.1).....	939,703	3,192,917	6,391,369
Note: Supplemental disclosures of cash flow information for non-cash transactions:			
20.0001			

NOTES TO FINANCIAL STATEMENTS

Note 1 - Summary of Significant Accounting Policies

A. The accompanying financial statements of the American Commerce Insurance Company (the Company) have been prepared in conformity with accounting practices prescribed or permitted by the National Association of Insurance Commissioners (NAIC) and the State of Ohio. The NAIC Accounting Practices and Procedures manual, version effective January 1, 2001 (NAIC SAP), has been adopted as a component of prescribed or permitted practices by the State of Ohio. Certain prior year account balances have been reclassified to conform to the 2010 presentation.

Note 2 - Accounting Changes and Corrections of Errors

No significant change.

Note 3 - Business Combinations and Goodwill

No significant change.

Note 4 - Discontinued Operations

No significant change.

Note 5 - Investments

D. Loan-backed Securities

1 Prepayment assumptions are obtained from broker-dealer surveys, internal estimates or Bloomberg

	(1) Amortized Cost Before OTTI	(2) OTTI Recognized in Loss	(3) Fair Value 1-2
OTTI RECOGNIZED 1ST QTR			
2 a. Intent to Sell:	0	0	0
2 b. Inability or Lack Intent to hold:	0	0	0
2 c. TOTAL OTTI 1ST QTR	0	0	0
OTTI RECOGNIZED 2ND QTR			
2 d. Intent to Sell:	0	0	0
2 e. Inability or Lack Intent to hold:	0	0	0
2 f. TOTAL OTTI 2ND QTR	0	0	0
OTTI RECOGNIZED 3RD QTR			
2 g. Intent to Sell:	0	0	0
2 h. Inability or Lack Intent to hold:	0	0	0
2 i. TOTAL OTTI 3RD QTR	0	0	0
OTTI RECOGNIZED 4TH QTR			
2 j. Intent to Sell:	0	0	0
2 k. Inability or Lack Intent to hold:	0	0	0
2 l. TOTAL OTTI 4TH QTR	0	0	0
2 m. TOTALS FOR 2011:	0	0	0

3 Currently held securities with recognized OTTI

CUSIP	Book/Adj Carrying Amortized Cost Before OTTI	Projected Cashflows	OTTI Recognized	Fair Value at time of OTTI	Date of Financial Stmt Where Reported
59024KAG8 MERRILL LYNCH ALT NTE	\$1,460,175	\$200,000	\$1,260,175	\$201,152	12/31/2009
TOTALS:	\$1,460,175	\$200,000	\$1,260,175	\$201,152	

Impaired securities for which an OTTI has not been recognized

4 A1. The aggregate amount of unrealized losses- Less than 12 months:	\$115,213
4 A2. The aggregate amount of unrealized losses- 12 months or longer:	\$1,088,732
4 B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$7,998,410
4 B2. The aggregate related fair value of securities with unrealized losses -12 months or longer :	\$2,521,012

NOTES TO FINANCIAL STATEMENTS

- 5 **The general categories of information considered in reaching the conclusion that the impairments are not other-than temporary include:**
- Probability of collecting all amounts due according to the contractual terms in effect at the time of acquisition.
 - Intent to sell: Is there intent to sell the security before recovery.
 - The length of time and the extent to which fair value has been less than amortized cost.
 - The financial conditions and short term prospects of the issuer.
 - Intent and Ability to hold: Is there a lack of ability to hold, where cash and working capital requirements and contractual or regulatory obligations indicate that the investment may need to be sold before the forecasted recovery occurs.

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

No significant change.

Note 7 - Investment Income

No significant change.

Note 8 - Derivative Instruments

No significant change.

Note 9 - Income Taxes

No significant change.

Note 10 - Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

No significant change.

Note 11 - Debt

No significant change.

Note 12 - Retirement Plans, Deferred Compensation, Postemployment Benefits and Compensated Absences and Other Postretirement Benefit Plans

No significant change.

Note 13 - Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

No significant change.

Note 14 - Contingencies

No significant change.

Note 15 - Leases

No significant change.

Note 16 - Information About Financial Instruments With Off-Balance Sheet Risk and Financial Instruments With Concentrations of Credit Risk

No significant change.

Note 17 - Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

C.

No wash sales to report this quarter.

Note 18 - Gain or Loss to the Reporting Entity from Uninsured Plans and the Uninsured Portion of Partially Insured Plans

No significant change.

NOTES TO FINANCIAL STATEMENTS

Note 19 - Direct Premium Written/Produced by Managing General Agents/Third Party Administrators

No significant change.

Note 20 - Fair Value

A1. Assets Measured at Fair Value at 03/31/11

Description	Level 1	Level 2	Level 3	TOTAL
Preferred Stock	-	\$3,576,010	-	\$3,576,010
Bonds	-	607,966	-	607,966
Common Stock	-	-	-	-
TOTALS	-	\$4,183,976	-	\$4,183,976

A2. Roll of LEVEL 3 from Prior Year End

Description	Balance 12/31/10	Realized G/(L)	Unrealized G/(L)	Purchase (Sales)	Transfers In/(Out)	Balance 3/31/11	Gain/(loss) incl in Income
Preferred Stock	-	-	-	-	-	-	-
Bonds	392,179	-	-	-	(392,179)	-	-
Common Stock	-	-	-	-	-	-	-
TOTALS	\$392,179	-	-	-	(\$392,179)	-	-

Note 21 - Other Items

No significant change.

Note 22 - Events Subsequent

No significant change.

Note 23 - Reinsurance

No significant change.

Note 24 - Retrospectively Rated Contracts & Contracts Subject to Redetermination

No significant change.

Note 25 - Change in Incurred Losses and Loss Adjustment Expenses

The estimated cost of loss and loss adjustment expenses attributable to insured events of prior years decreased by \$1,234,000 during the current year. The redundancy of \$1,234,000 is approximately 1.9 % of the unpaid losses and LAE of \$63,719,465 as of the prior year end. This is the result of the pooled results and not the Company on a stand alone basis.

Note 26 - Intercompany Pooling Arrangements

No significant change.

Note 27 - Structured Settlements

No significant change.

Note 28 - Health Care Receivables

No significant change.

Note 29 - Participating Policies

No significant change.

NOTES TO FINANCIAL STATEMENTS

Note 30 - Premium Deficiency Reserves

No significant change.

Note 31 - High Deductibles

No significant change.

Note 32 - Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

No significant change.

Note 33 - Asbestos/Environmental Reserves

No significant change.

Note 34 - Subscriber Savings Accounts

No significant change.

Note 35 - Multiple Peril Crop Insurance

No significant change.

Note 36 - Financial Guaranty Insurance

No significant change.

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

1.1

Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act?

Yes [☐]

No [☒ X]

1.2

If yes, has the report been filed with the domiciliary state?

Yes [☐]

No [☐]

2.1

Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?

Yes [☐]

No [☒ X]

2.2

If yes, date of change:

.....

3.

Have there been any substantial changes in the organizational chart since the prior quarter end?
If yes, complete the Schedule Y-Part 1 - Organizational chart.

Yes [☐]

No [☒ X]

4.1

Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?

Yes [☐]

No [☒ X]

4.2

If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

1	2	3
Name of Entity	NAIC Company Code	State of Domicile

5.

If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved?
If yes, attach an explanation.

Yes [☐]

No [☒ X]

N/A [☐]

6.1

State as of what date the latest financial examination of the reporting entity was made or is being made.

12/31/2008.....

6.2

State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released.

12/31/2008.....

6.3

State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).

3/17/2010.....

6.4

By what department or departments?
STATE OF OHIO DEPARTMENT OF INSURANCE

6.5

Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments?

Yes [☐]

No [☐]

N/A [☒ X]

6.6

Have all of the recommendations within the latest financial examination report been complied with?

Yes [☐]

No [☐]

N/A [☒ X]

7.1

Has this reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period?

Yes [☐]

No [☒ X]

7.2

If yes, give full information:

8.1

Is the company a subsidiary of a bank holding company regulated by the Federal Reserve Board?

Yes [☐]

No [☒ X]

8.2

If response to 8.1 is yes, please identify the name of the bank holding company.

8.3

Is the company affiliated with one or more banks, thrifts or securities firms?

Yes [☐]

No [☒ X]

8.4

If the response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Office of Thrift Supervision (OTS), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator].

1	2	3	4	5	6	7
Affiliate Name	Location (City, State)	FRB	OCC	OTS	FDIC	SEC

9.1

Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?

Yes [☒ X]

No [☐]

- (a)
- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (b)
- Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
- (c)
- Compliance with applicable governmental laws, rules and regulations;
- (d)
- The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
- (e)
- Accountability for adherence to the code.

9.11

If the response to 9.1 is No, please explain:

9.2

Has the code of ethics for senior managers been amended?

Yes [☐]

No [☒ X]

9.21

If the response to 9.2 is Yes, provide information related to amendment(s).

9.3

Have any provisions of the code of ethics been waived for any of the specified officers?

Yes [☐]

No [☒ X]

American Commerce Insurance Company
GENERAL INTERROGATORIES
PART 1 - COMMON INTERROGATORIES
GENERAL

9.31 If the response to 9.3 is Yes, provide the nature of any waiver(s).

FINANCIAL

10.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [] No [X]

10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount:

INVESTMENT

11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) Yes [] No [X]

11.2 If yes, give full and complete information relating thereto:

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: \$.....0

13. Amount of real estate and mortgages held in short-term investments: \$.....0

14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? Yes [] No [X]

14.2 If yes, please complete the following:

	1	2
	Prior Year-End	Current Quarter
	Book/Adjusted Carrying Value	Book/Adjusted Carrying Value
14.21 Bonds.....	\$0	\$0
14.22 Preferred Stock.....	\$0	\$0
14.23 Common Stock.....	\$0	\$0
14.24 Short-Term Investments.....	\$0	\$0
14.25 Mortgage Loans on Real Estate.....	\$0	\$0
14.26 All Other.....	\$0	\$0
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26).....	\$0	\$0
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above.....	\$0	\$0

15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? Yes [] No [X]

15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No []
If no, attach a description with this statement.

16. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 3, III. Conducting Examinations, F-Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook? Yes [X] No []

16.1 For all agreements that comply with the requirements of the NAIC Financial Condition Examiners Handbook, complete the following:

1	2
Name of Custodian(s)	Custodian Address
BANK OF NEW YORK MELLON	ONE WALL STREET, NEW YORK, NY

16.2 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation.

1	2	3
Name(s)	Location(s)	Complete Explanation(s)

16.3 Have there been any changes, including name changes, in the custodian(s) identified in 16.1 during the current quarter? Yes [] No [X]

16.4 If yes, give full and complete information relating thereto:

1	2	3	4
Old Custodian	New Custodian	Date of Change	Reason

16.5 Identify all investment advisors, broker/dealers or individuals acting on behalf of broker/dealers that have access to the investment accounts, handle securities and have authority to make investments on behalf of the reporting entity:

1	2	3
Central Registration Depository	Name(s)	Address

17.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Securities Valuation Office been followed? Yes [X] No []

17.2 If no, list exceptions:

American Commerce Insurance Company
GENERAL INTERROGATORIES (continued)

PART 2

PROPERTY & CASUALTY INTERROGATORIES

1.

If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change?
If yes, attach an explanation.

Yes [] No [X] N/A []

2.

Has the reporting entity reinsured any risk with any other reporting entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on the risk, or portion thereof, reinsured?
If yes, attach an explanation.

Yes [] No [X]

3.1

Have any of the reporting entity's primary reinsurance contracts been canceled?

Yes [] No [X]

3.2

If yes, give full and complete information thereto:

4.1

Are any of the liabilities for unpaid losses and loss adjustment expenses other than certain workers' compensation liabilities tabular reserves (see Annual Statement Instructions pertaining to disclosure of discounting for definition of "tabular reserves,") discounted at a rate of interest greater than zero?

Yes [] No [X]

4.2

If yes, complete the following schedule:

1	2	3	Total Discount				Discount Taken During Period			
Line of Business	Maximum Interest	Disc. Rate	4 Unpaid Losses	5 Unpaid LAE	6 IBNR	7 Total	8 Unpaid Losses	9 Unpaid LAE	10 IBNR	11 Total
						0				0
Total.....	XXX...	XXX.....	0	0	0	0	0	0	0	0

5.

Operating Percentages:

5.1

A&H loss percent

0.0 %

5.2

A&H cost containment percent

0.0 %

5.3

A&H expense percent excluding cost containment expenses

0.0 %

6.1

Do you act as a custodian for health savings accounts?

Yes [] No [X]

6.2

If yes, please provide the amount of custodial funds held as of the reporting date.

0

6.3

Do you act as an administrator for health savings accounts?

Yes [] No [X]

6.4

If yes, please provide the amount of funds administered as of the reporting date.

0

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

1	2	3	4	5
NAIC Company Code	Federal ID Number	Name of Reinsurer	Domiciliary Jurisdiction	Is Insurer Authorized? (YES or NO)

NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.	1 Active Status	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid	
		2 Current Year to Date	3 Prior Year to Date	4 Current Year to Date	5 Prior Year to Date	6 Current Year to Date	7 Prior Year to Date
1. Alabama.....AL	L.....	134,536	127,852	28,601	1,964	27,229	22,083
2. Alaska.....AK	L.....	29,782	55,360			5,396	2,251
3. Arizona.....AZ	L.....	2,049,747	2,269,517	3,512,377	1,091,264	1,724,631	3,773,568
4. Arkansas.....AR	L.....	45,551	(2,016)	5,595	15,207	111,219	16,364
5. California.....CA	L.....	129,638	122,809				81,457
6. Colorado.....CO	L.....	96,828	59,332	31,478	2,955	118,148	62,851
7. Connecticut.....CT	L.....	1,587,626	486,711	726,147	157,564	825,090	572,392
8. Delaware.....DE	L.....	74,158	22,227	3,145		41,585	159
9. District of Columbia.....DC	L.....	6,265	1,154	32,500		15,012	
10. Florida.....FL	L.....	480,599	136,613	82,198		910,261	104
11. Georgia.....GA	L.....	277,477	307,682	9,099	7,060	251,456	104,463
12. Hawaii.....HI	L.....	16,686	23,871		992	2,902	3,062
13. Idaho.....ID	L.....	668,825	621,087	292,814	399,227	891,284	538,863
14. Illinois.....IL	L.....	720,766	526,786	21,112	1,242	1,019,070	258,567
15. Indiana.....IN	L.....	1,712,894	1,383,342	1,252,402	704,199	1,575,296	1,440,132
16. Iowa.....IA	L.....	40,297	37,433	3,452	1,822	9,720	13,608
17. Kansas.....KS	L.....	193,999	19,242	10,978		10,099	2
18. Kentucky.....KY	L.....	1,112,394	1,705,988	1,022,629	1,783,126	4,126,036	6,847,619
19. Louisiana.....LA	L.....	557,869	74,992	45,047	156,293	329,624	190,946
20. Maine.....ME	L.....	18,263	7,751	3,000		10,144	
21. Maryland.....MD	L.....	60,106	29,243	18,612	1,520	54,596	42,434
22. Massachusetts.....MA	L.....	75,185	24,280	3,963	131	50,103	28,672
23. Michigan.....MI	L.....	317,355	110,078	9,710		35,971	163
24. Minnesota.....MN	L.....	191,054	169,465	20,537	14,474	102,847	32,269
25. Mississippi.....MS	L.....	98,803	20,790	4,006		9,751	3
26. Missouri.....MO	L.....	157,419	82,421	62,330	1,388	121,092	36,325
27. Montana.....MT	L.....	5,725	4,137	450	4,123	20,798	22,895
28. Nebraska.....NE	L.....	80,426	64,573	4,919	2,379	24,876	20,154
29. Nevada.....NV	L.....	45,669	988	257		31,529	9
30. New Hampshire.....NH	L.....	81,070	76,516	85,173	46,200	18,348	211,901
31. New Jersey.....NJ	L.....	10,890,700	8,310,412	4,737,531	2,565,394	13,968,393	5,085,717
32. New Mexico.....NM	L.....	23,209	3,182	689	2,333	650,440	3,403
33. New York.....NY	L.....	12,452,163	12,359,949	10,912,911	6,832,909	21,799,910	5,740,775
34. North Carolina.....NC	L.....	160,502	147,902				
35. North Dakota.....ND	L.....	23,612	26,707			7,254	3,200
36. Ohio.....OH	L.....	4,595,718	4,655,043	2,991,882	2,627,863	8,740,324	5,584,957
37. Oklahoma.....OK	L.....	87,809	65,056	190,271	748,517	1,949,061	5,958,039
38. Oregon.....OR	L.....	6,200,146	6,594,462	2,814,350	3,698,199	10,613,364	9,323,768
39. Pennsylvania.....PA	L.....	544,749	390,605	7,391	694	1,558,647	171,973
40. Rhode Island.....RI	L.....	8,325,357	7,861,171	4,994,029	4,667,690	16,380,437	16,975,912
41. South Carolina.....SC	L.....	214,454	163,111	250		13,982	2
42. South Dakota.....SD	L.....	5,716	1,709	(263)	5,783	149,654	386,389
43. Tennessee.....TN	L.....	958,200	963,549	436,024	445,830	789,085	1,208,968
44. Texas.....TX	L.....	1,617,327	80,718	35,040	(133)	383,363	269
45. Utah.....UT	L.....	81,432	90,906			58,936	16,786
46. Vermont.....VT	L.....	32,841	22,663	1,279		1,801	3
47. Virginia.....VA	L.....	150,084	135,336	303	9,007	47,746	32,741
48. Washington.....WA	L.....	11,667,767	12,212,230	7,370,032	9,387,039	21,074,124	20,170,724
49. West Virginia.....WV	L.....	2,488	39	(20)	7,497	33,734	128,147
50. Wisconsin.....WI	L.....	142,826	186,260	6,796		60,177	24,055
51. Wyoming.....WY	L.....	2,128	(1,641)		4,825	5,041	(3,550)
52. American Samoa.....AS	N.....						
53. Guam.....GU	N.....						
54. Puerto Rico.....PR	N.....						
55. US Virgin Islands.....VI	N.....						
56. Northern Mariana Islands.....MP	N.....						
57. Canada.....CN	N.....						
58. Aggregate Other Alien.....OT	XXX.....	0	0	0	0	0	0
59. Totals.....	(a).....51	69,246,240	62,839,593	41,791,026	35,396,577	110,759,586	85,135,594

DETAILS OF WRITE-INS

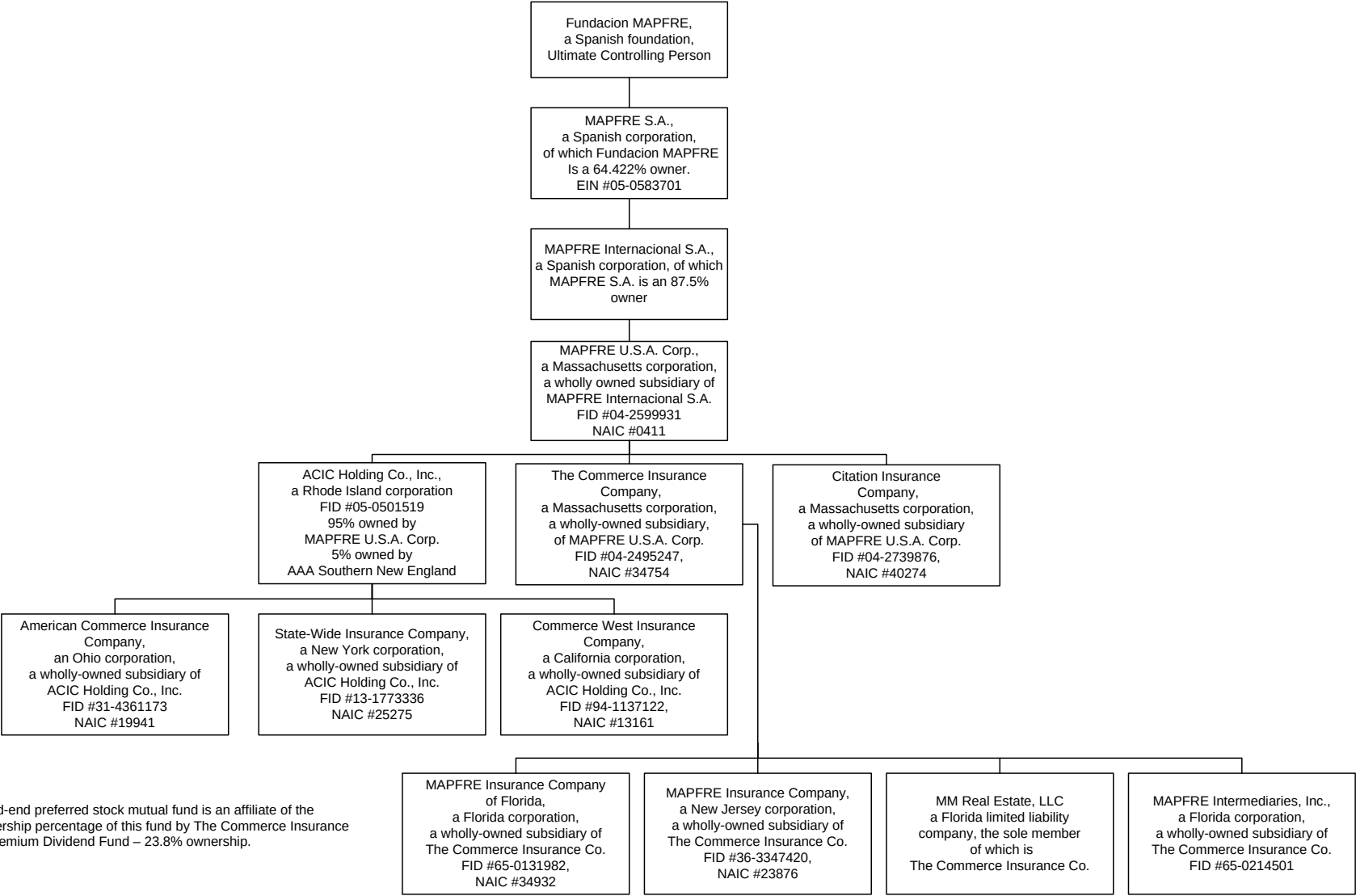
5801.	XXX.....						
5802.	XXX.....						
5803.	XXX.....						
5898. Summary of remaining write-ins for Line 58 from overflow page.....	XXX.....	0	0	0	0	0	0
5899. Totals (Lines 5801 thru 5803 + Line 5898) (Line 58 above).....	XXX.....	0	0	0	0	0	0

(L) - Licensed or Chartered - Licensed Insurance Carrier or Domicilled RRG; (R) - Registered - Non-domiciled RRGs; (Q) - Qualified - Qualified or Accredited Reinsurer;
(E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) - None of the above - Not allowed to write business in the state.

(a) Insert the number of L responses except for Canada and Other Alien.

SCHEDULE Y – INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP

PART 1 – ORGANIZATIONAL CHART



PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	521,618	443,969	85.1	60.4
2. Allied lines.....	13,750	5,985	43.5	20.9
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	14,491,385	10,296,416	71.1	77.7
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	22,653	(772)	(3.4)	
10. Financial guaranty.....			0.0	
11.1. Medical professional liability - occurrence.....			0.0	
11.2. Medical professional liability - claims-made.....			0.0	
12. Earthquake.....			0.0	
13. Group accident and health.....			0.0	
14. Credit accident and health.....			0.0	
15. Other accident and health.....			0.0	
16. Workers' compensation.....			0.0	
17.1 Other liability-occurrence.....	814,988	2,254	0.3	0.6
17.2 Other liability-claims made.....			0.0	
17.3 Excess workers' compensation.....			0.0	
18.1 Products liability-occurrence.....			0.0	
18.2 Products liability-claims made.....			0.0	
19.1, 19.2 Private passenger auto liability.....	30,665,582	24,643,185	80.4	67.2
19.3, 19.4 Commercial auto liability.....			0.0	
21. Auto physical damage.....	15,053,774	8,263,400	54.9	58.2
22. Aircraft (all perils).....	6,284,200	2,796,385	44.5	24.7
23. Fidelity.....			0.0	
24. Surety.....			0.0	
26. Burglary and theft.....			0.0	
27. Boiler and machinery.....			0.0	
28. Credit.....			0.0	
29. International.....			0.0	
30. Warranty.....			0.0	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	0	0	0.0	
35. Totals.....	67,867,950	46,450,822	68.4	63.6

DETAILS OF WRITE-INS				
3401.			0.0	
3402.			0.0	
3403.			0.0	
3498 Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0.0	XXX
3499 Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	0	0	0.0	

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	520,817	520,817	474,971
2. Allied lines.....	12,349	12,349	95,700
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	14,479,627	14,479,627	12,382,590
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	19,366	19,366	
10. Financial guaranty.....			
11.1 Medical professional liability - occurrence.....			
11.2 Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....			
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1 Other liability-occurrence.....	2,902,954	2,902,954	2,705,087
17.2 Other liability-claims made.....			
17.3 Excess workers' compensation.....			
18.1 Products liability-occurrence.....			
18.2 Products liability-claims made.....			
19.1 19.2 Private passenger auto liability.....	30,351,640	30,351,640	30,038,869
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	15,163,171	15,163,171	14,952,538
22. Aircraft (all perils).....	5,796,316	5,796,316	2,189,838
23. Fidelity.....			
24. Surety.....			
26. Burglary and theft.....			
27. Boiler and machinery.....			
28. Credit.....			
29. International.....			
30. Warranty.....			
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	0	0	0
35. Totals.....	69,246,240	69,246,240	62,839,593

DETAILS OF WRITE-INS			
3401.			
3402.			
3403.			
3498 Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0
3499 Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	0	0	0

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

	1	2	3	4	5	6	7	8	9	10	11	12	13
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year-End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1 + 2)	2011 Loss and LAE Payments on Claims Reported as of Prior Year-End	2011 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2011 Loss and LAE Payments (Cols. 4 + 5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year-End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year-End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols. 7 + 8 + 9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 4 + 7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 5 + 8 + 9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/Deficiency (Cols. 11 + 12)
1. 2008 + Prior.....	12,797	154	12,951	2,349	21	2,370	13,528	312	(1,871)	11,969	3,080	(1,692)	1,388
2. 2009.....	10,956	1,948	12,904	1,877	34	1,911	10,526	209	171	10,906	1,447	(1,534)	(87)
3. Subtotals 2009 + Prior.....	23,753	2,102	25,855	4,226	55	4,281	24,054	521	(1,700)	22,875	4,527	(3,226)	1,301
4. 2010.....	27,223	10,641	37,864	10,226	1,204	11,430	25,329	444	(1,874)	23,899	8,332	(10,867)	(2,535)
5. Subtotals 2010 + Prior.....	50,976	12,743	63,719	14,452	1,259	15,711	49,383	965	(3,574)	46,774	12,859	(14,093)	(1,234)
6. 2011.....	XXX.....	XXX.....	XXX.....	XXX.....	16,139	16,139	XXX.....	5,204	11,173	16,377	XXX.....	XXX.....	XXX.....
7. Totals.....	50,976	12,743	63,719	14,452	17,398	31,850	49,383	6,169	7,599	63,151	12,859	(14,093)	(1,234)
8. Prior Year-End's Surplus As Regards Policyholders	136,161										Col. 11, Line 7 As % of Col. 1, Line 7	Col. 12, Line 7 As % of Col. 2, Line 7	Col. 13, Line 7 As % of Col. 3, Line 7
											1.25.2 %	2.(110.6)%	3.(1.9)%
													Col. 13, Line 7 Line 8

Q13

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

The following supplemental reports are required to be filed as part of your statement filing. However, in the event that your company does not transact the type of business for which the special report must be filed, your response of NO to the specific interrogatory will be accepted in lieu of filing a "NONE" report and a bar code will be printed below. If the supplement is required of your company but is not being filed for whatever reason, enter SEE EXPLANATION and provide an explanation following the interrogatory questions.

	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?	NO
2. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed with this statement?	NO
3. Will the Medicare Part D Coverage Supplement be filed with the state of domicile and the NAIC with this statement?	NO
4. Will the Director and Officer Supplement be filed with the state of domicile and the NAIC with this statement?	NO

Explanation:

1.
2.
3.
4.

Bar Code:



American Commerce Insurance Company

Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31, Prior Year Net Admitted Assets
2504. MISC ASSETS.....	4,441		4,441	3,000
2505. SALE OF NY CREDITS.....	1,245,432		1,245,432	1,245,433
2597. Summary of remaining write-ins for Line 25.....	1,249,873	0	1,249,873	1,248,433

Additional Write-ins for Statement of Income:

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
3704. STATUTORY ADJUSTMENT INTERCO EXPENSE POOLING.....	98,326	1,019,074	1,047,200
3705. STAT POOLING ADJ//IFRS PY POOLING ADJUSTMENT.....		39,263	4,257
3797. Summary of remaining write-ins for Line 37.....	98,327	1,058,337	1,051,457

American Commerce Insurance Company
SCHEDULE A - VERIFICATION

Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,805,466	1,450,308
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		518,186
2.2 Additional investment made after acquisition.....	133,927	
3. Current year change in encumbrances.....		
4. Total gain (loss) on disposals.....		
5. Deduct amounts received on disposals.....		62,829
6. Total foreign exchange change in book/adjusted carrying value.....		
7. Deduct current year's other than temporary impairment recognized.....		
8. Deduct current year's depreciation.....	28,984	100,199
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,910,409	1,805,466
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,910,409	1,805,466

SCHEDULE B - VERIFICATION

Mortgage Loans

	1	2
	Year to Date	Prior Year Ended December 31
1. Book value/recorded investment excluding accrued interest, December 31 of prior year.....	0	
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		
3. Capitalized deferred interest and other.....		
4. Accrual of discount.....		
5. Unrealized valuation increase (decrease).....		
6. Total gain (loss) on disposals.....		
7. Deduct amounts received on disposals.....		
8. Deduct amortization of premium and mortgage interest points and commitment fees.....		
9. Total foreign exchange change in book value/recorded investment excluding accrued interest.....		
10. Deduct current year's other than temporary impairment recognized.....		
11. Book value/recorded investment excluding accrued interest at end of current period (Lines 1+2+3+4+5+6-7-8+9-10).....	0	0
12. Total valuation allowance.....		
13. Subtotal (Line 11 plus Line 12).....	0	0
14. Deduct total nonadmitted amounts.....		
15. Statement value at end of current period (Line 13 minus Line 14).....	0	0

NONE

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	0	
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		
3. Capitalized deferred interest and other.....		
4. Accrual of discount.....		
5. Unrealized valuation increase (decrease).....		
6. Total gain (loss) on disposals.....		
7. Deduct amounts received on disposals.....		
8. Deduct amortization of premium and depreciation.....		
9. Total foreign exchange change in book/adjusted carrying value.....		
10. Deduct current year's other than temporary impairment recognized.....		
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5+6-7-8+9-10).....	0	0
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	0	0

NONE

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	187,964,976	222,353,022
2. Cost of bonds and stocks acquired.....	28,669,260	73,280,647
3. Accrual of discount.....	193,541	929,418
4. Unrealized valuation increase (decrease).....	864,317	4,164,845
5. Total gain (loss) on disposals.....	653,531	2,900,594
6. Deduct consideration for bonds and stocks disposed of.....	15,504,642	114,732,129
7. Deduct amortization of premium.....	169,671	716,421
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other than temporary impairment recognized.....		215,000
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	202,671,312	187,964,976
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	202,671,312	187,964,976

SCHEDULE D - PART 1B

Showing the Acquisitions, Dispositions and Non-Trading Activity
During the Current Quarter for all Bonds and Preferred Stock by Rating Class

QSI02		1	2	3	4	5	6	7	8
		Book/Adjusted Carrying Value Beginning of Current Quarter	Acquisitions During Current Quarter	Dispositions During Current Quarter	Non-Trading Activity During Current Quarter	Book/Adjusted Carrying Value End of First Quarter	Book/Adjusted Carrying Value End of Second Quarter	Book/Adjusted Carrying Value End of Third Quarter	Book/Adjusted Carrying Value December 31 Prior Year
	BONDS								
	1. Class 1 (a).....	156,680,634	20,373,710	11,243,450	197,086	166,007,980			156,680,634
	2. Class 2 (a).....	26,157,940	2,988,150	3,607,661	606,694	26,145,123			26,157,940
	3. Class 3 (a).....	1,660,598			64	1,660,662			1,660,598
	4. Class 4 (a).....								
	5. Class 5 (a).....								
	6. Class 6 (a).....								
	7. Total Bonds.....	184,499,172	23,361,860	14,851,111	803,844	193,813,765	0	0	184,499,172
	PREFERRED STOCK								
	8. Class 1.....	2,002,628	802,500		46,981	2,852,109			2,002,628
	9. Class 2.....	1,463,176	2,002,400		38,719	3,504,295			1,463,176
	10. Class 3.....		2,502,500		(1,357)	2,501,143			
	11. Class 4.....								
	12. Class 5.....								
	13. Class 6.....								
	14. Total Preferred Stock.....	3,465,804	5,307,400	0	84,343	8,857,547	0	0	3,465,804
	15. Total Bonds and Preferred Stock.....	187,964,976	28,669,260	14,851,111	888,187	202,671,312	0	0	187,964,976

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of non-rated short-term and cash equivalent bonds by NAIC designation:
NAIC 1 \$.....0; NAIC 2 \$.....0; NAIC 3 \$.....0; NAIC 4 \$.....0; NAIC 5 \$.....0; NAIC 6 \$.....0.

Sch. DA-Pt 1
NONE

Sch. DA-Verification
NONE

Sch. DB-Pt A-Verification
NONE

Sch. DB-Pt B-Verification
NONE

Sch. DB-Pt C-Sn 1
NONE

Sch. DB-Pt C-Sn 2
NONE

Sch. DB-Verification
NONE

Sch. E-Verification
NONE

Sch. B-Pt 2
NONE

Sch. B-Pt 3
NONE

Sch. BA-Pt 2
NONE

Sch. BA-Pt 3
NONE

SCHEDULE D - PART 3

Show all Long-Term Bonds and Stock Acquired During the Current Quarter

1	2				3	4	5			6	7	8	9	10
CUSIP Identification	Description				Foreign	Date Acquired	Name of Vendor			Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation or Market Indicator (a)
Bonds - U.S. Government														
3134G2 CX 8	FEDERAL HOME LN MTG CORP.....					...03/31/2011	MORGAN KEEGAN.....				996,000	1,000,000		1.....
742651 DF 6	PRIVATE EXPT FDG CORP.....					...01/19/2011	MORGAN J.P.....				1,058,460	1,000,000	9,368	1.....
0599999.	Total - Bonds - U.S. Government.....										2,054,460	2,000,000	9,368	XXX.....
Bonds - U.S. Special Revenue and Special Assessment														
3137A5 NF 7	FEDERAL HOME LN MTG CORP REMIC.....					...02/03/2011	BAIRD, ROBERT W. & CO.....				1,016,875	1,000,000	875	1.....
3137A7 K7 4	FEDERAL HOME LN MTG CORP REMIC TR.....					...03/23/2011	BAIRD, ROBERT W. & CO.....				2,044,458	1,991,557	5,975	1.....
31398P HB 8	FEDERAL NATL MTG ASSN REMIC TR.....					...01/06/2011	BAIRD, ROBERT W. & CO.....				1,690,412	1,615,204	2,243	1.....
3128PT LA 1	FHLMC PC PL#J13921.....					...01/04/2011	BAIRD, ROBERT W. & CO.....				2,006,944	1,991,695	3,485	1.....
3137A3 U2 3	FHLMC REMIC SERIES 3773.....					...03/24/2011	RBC DAIN RAUSCHER.....				1,004,976	989,781	2,694	1.....
3138A4 SG 1	FNMA PASS-THR POOL #AH3218.....					...03/16/2011	BAIRD, ROBERT W. & CO.....				2,062,485	1,994,848	4,987	1.....
373506 AT 1	GEORGIA ST ENVIRONMENTAL LN AC.....					...03/25/2011	MORGAN KEEGAN.....				1,000,000	1,000,000		1FE.....
676907 PZ 5	OHIO HSG FIN AGY MTG REV.....					...01/13/2011	BAIRD, ROBERT W. & CO.....				1,006,250	1,000,000	21,982	1FE.....
3199999.	Total - Bonds - U.S. Special Revenue & Special Assessments.....										11,832,400	11,583,085	42,241	XXX.....
Bonds - Industrial and Miscellaneous														
56501R AB 2	MANULIFE FINL CORP.....				A.....	...01/03/2011	CITIGROUP GLOBAL MARKETS.....				969,900	1,000,000	14,836	1FE.....
073294 AA 8	BB&T CAP TR IV.....					...03/22/2011	CastleOak Securities.....				990,600	1,000,000	19,513	2FE.....
58155Q AD 5	MCKESSON CORP.....					...02/24/2011	MORGAN J.P.....				1,011,110	1,000,000	132	1FE.....
631005 BB 0	NARRAGANSETT ELEC CO.....					...01/19/2011	RW PRESSPRICH & CO.....				511,860	500,000	8,123	1FE.....
867914 BD 4	SUNTRUST BKS INC.....					...03/21/2011	Barclays.....				999,610	1,000,000		2FE.....
92343V AX 2	VERIZON COMMUNICATIONS INC.....					...03/23/2011	MORGAN J.P.....				991,450	1,000,000		1FE.....
067316 AC 3	BACARDI LTD RESTR.....				F.....	...01/18/2011	Barclays.....				997,940	1,000,000		2FE.....
05567L T3 1	BNP PARIBAS / BNP PARIBAS US.....					...01/14/2011	UBS Financial Services.....				1,007,670	1,000,000	278	1FE.....
65557C AD 5	NORDEA BANK AG MEDIUM TERM.....				F.....	...01/11/2011	CITIGROUP GLOBAL MARKETS.....				995,230	1,000,000		1FE.....
865622 AK 0	SUMITOMO MITSUI BK CORP RESTR.....				F.....	...01/06/2011	GOLDMAN SACHS.....				999,630	1,000,000		1FE.....
3899999.	Total - Bonds - Industrial & Miscellaneous.....										9,475,000	9,500,000	42,882	XXX.....
8399997.	Total - Bonds - Part 3.....										23,361,860	23,083,085	94,491	XXX.....
8399999.	Total - Bonds.....										23,361,860	23,083,085	94,491	XXX.....
Preferred Stocks - Industrial and Miscellaneous														
37247D 40 3	GENWORTH FINL INC.....					...01/19/2011	CastleOak Securities.....			50,000.000	2,502,500	50.00		RP3UFE.....
74460D 25 7	PUBLIC STORAGE INC.....					...01/19/2011	JANNEY MONTGOMERY SCOTT.....			80,000.000	2,002,400	25.00		P2LFE.....
902973 86 6	US BANCORP.....					...02/01/2011	JEFFERIES.....			1,000.000	802,500	1,000.00		P1LFE.....
8499999.	Total - Preferred Stocks - Industrial & Miscellaneous.....										5,307,400	XXX.....	0	XXX.....
8999997.	Total - Preferred Stocks - Part 3.....										5,307,400	XXX.....	0	XXX.....
8999999.	Total - Preferred Stocks.....										5,307,400	XXX.....	0	XXX.....
9899999.	Total - Preferred and Common Stocks.....										5,307,400	XXX.....	0	XXX.....
9999999.	Total - Bonds, Preferred and Common Stocks.....										28,669,260	XXX.....	94,491	XXX.....

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues:.....0.

QE04

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2		3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
											11	12	13	14	15							
CUSIP Identification	Description		F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/ Adjusted Carrying Value At Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date	NAIC Design- ation or Market Indicator (a)

Bonds - U.S. Government

3133XU	MS	9		02/22/2011	BANK OF AMERICA.....		1,065,360	1,000,000	1,030,900	1,027,617		(378)		(378)		1,027,240		38,120	38,120	20,000	09/13/2019	1.....
36225B	GW	2		03/15/2011	PAYDOWN OF PRINCIPAL.....		8,693	8,693	9,011	8,962		(1)		(1)		8,962		(268)	(268)	100	11/15/2029	1.....
911759	EA	2		02/01/2011	U S DEPT HSG & URBAN DEV GOVT.....		15,000	15,000	15,566	15,000				0		15,000			0	589	08/01/2016	1.....
0599999.	Total - Bonds - U.S. Government.....						1,089,053	1,023,693	1,055,477	1,051,579	0	(379)	0	(379)	0	1,051,202	0	37,852	37,852	20,689	...XXX...	...XXX...

Bonds - U.S. Political Subdivisions of States, Territories and Possessions

947134	PM	8		02/15/2011	WEATHERFORD TEC INDPT SCH DIST.....		17,693	45,000	9,421	17,550		143		143		17,693			0		02/15/2025	1FE.....
947134	PN	6		02/15/2011	WEATHERFORD TEX INDPT SCH DIST.....		5,517	15,000	2,938	5,473		45		45		5,517			0		02/15/2026	1FE.....
2499999.	Total - Bonds - U.S. Political Subdivisions of States, Territories & Possessions.....						23,210	60,000	12,359	23,023	0	188	0	188	0	23,210	0	0	0	0	...XXX...	...XXX...

Bonds - U.S. Special Revenue and Special Assessment

115030	HY	7		02/01/2011	CALLED @ 100.0000000.....		105,000	105,000	110,880	109,743		(33)		(33)		109,710		(4,710)	(4,710)		10/01/2039	1FE.....
23410B	AB	7		03/01/2011	CALLED @ 100.0000000.....		92,645	92,645	96,351	95,277		(16)		(16)		95,261		(2,616)	(2,616)	652	12/01/2038	1FE.....
3133XE	5D	7		03/28/2011	PRINCIPAL RECEIPT.....		91,306	91,306	91,281	91,352		(46)		(46)		91,306			0	752	12/28/2012	1.....
31393L	D6	7		03/15/2011	PRINCIPAL RECEIPT.....		83,111	83,111	81,916	82,138		973		973		83,111			0	600	02/15/2017	1.....
31394R	TD	1		03/15/2011	PRINCIPAL RECEIPT.....		272,482	272,482	266,723	266,267		6,215		6,215		272,482			0	1,908	09/15/2029	1.....
31396E	Y9	1		02/15/2011	PRINCIPAL RECEIPT.....		80,987	80,987	80,126	80,256		731		731		80,987			0	398	03/15/2025	1.....
31396G	G7	0		03/15/2011	PRINCIPAL RECEIPT.....		68,257	68,257	68,148	68,134		123		123		68,257			0	575	12/15/2013	1.....
31398P	HB	8		03/25/2011	PRINCIPAL RECEIPT.....		38,949	38,949	40,763			(1,814)		(1,814)		38,949			0	252	11/25/2049	1.....
3128PT	LA	1		03/15/2011	PRINCIPAL RECEIPT.....		21,295	21,295	21,458			(163)		(163)		21,295			0	93	12/01/2025	1.....
3128M7	JL	1		03/15/2011	PRINCIPAL RECEIPT.....		99,147	99,147	104,956	104,903		(5,756)		(5,756)		99,147			0	819	12/01/2035	1.....
31288L	TG	6		03/16/2011	VARIOUS.....		1,491,786	1,412,483	1,420,207	1,417,498		(572)		(572)		1,416,926		74,859	74,859	24,749	05/01/2037	1.....
3128M7	VT	0		03/15/2011	PRINCIPAL RECEIPT.....		71,973	71,973	74,706	74,690		(2,717)		(2,717)		71,973			0	528	08/01/2039	1.....
3128M7	SC	1		03/15/2011	PRINCIPAL RECEIPT.....		167,289	167,289	179,156	179,475		(12,186)		(12,186)		167,289			0	1,561	07/01/2039	1.....
31393W	WK	1		03/15/2011	PRINCIPAL RECEIPT.....		152,185	152,185	155,039	154,963		(2,778)		(2,778)		152,185			0	836	08/15/2017	1.....
31397G	7M	6		03/15/2011	PRINCIPAL RECEIPT.....		92,356	92,356	92,252	92,228		128		128		92,356			0	775	12/15/2020	1.....
31394H	R8	6		03/15/2011	PRINCIPAL RECEIPT.....		67,423	67,423	68,730	69,280				0		69,280		(1,856)	(1,856)	909	08/15/2033	1.....
34073M	2T	8		03/01/2011	VARIOUS.....		26,024	85,000	12,837	25,798		223		223		26,020		3	3		01/01/2030	1FE.....
34073N	V2	3		01/03/2011	CALLED @ 100.0000000.....		50,000	50,000	45,526	45,757				0		45,757		4,243	4,243	1,175	07/01/2037	1FE.....
31371K	2X	8		03/25/2011	VARIOUS.....		1,121,982	1,042,588	1,042,914	1,041,898		16		16		1,041,914		80,068	80,068	16,742	04/01/2023	1.....
31371M	LB	1		03/25/2011	VARIOUS.....		1,471,976	1,381,090	1,362,747	1,365,558		1,285		1,285		1,366,842		105,134	105,134	23,706	12/01/2035	1.....
31371M	ML	8		03/25/2011	VARIOUS.....		748,222	705,690	688,929	695,003		1,355		1,355		696,358		51,863	51,863	10,333	01/01/2016	1.....
31402D	ML	1		03/25/2011	PRINCIPAL RECEIPT.....		61,003	61,003	61,299	61,196		(193)		(193)		61,003			0	632	10/01/2034	1.....
31403C	XS	5		03/25/2011	PRINCIPAL RECEIPT.....		47,398	47,398	46,657	46,815		583		583		47,398			0	481	12/01/2035	1.....
31412P	HR	5		03/25/2011	PRINCIPAL RECEIPT.....		118,500	118,500	123,259	122,728		(4,228)		(4,228)		118,500			0	845	04/01/2039	1.....
31403D	GP	8		03/25/2011	PRINCIPAL RECEIPT.....		9,610	9,610	10,356	10,132		(522)		(522)		9,610			0	97	02/01/2016	1.....
31396Q	FC	8		03/25/2011	PRINCIPAL RECEIPT.....		99,632	99,632	102,628	102,369		(2,738)		(2,738)		99,632			0	728	07/25/2039	1.....

QE05

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1	2		3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
											11	12	13	14	15							
CUSIP Identification	Description		F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other Than Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/ Adjusted Carrying Value At Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Maturity Date	NAIC Design- ation or Market Indicator (a)
38375P KA 8	GNMA REMIC TRUST 2008-9.....			03/21/2011	PRINCIPAL RECEIPT.....		105,694	105,694	109,789	109,936		(4,243)		(4,243)		105,694			0	716	07/20/2037	1.....
46940R AA 4	JACKSONVILLE FLA HSG FIN AUTH HOME.....			03/01/2011	CALLED @ 100.0000000.....		75,000	75,000	76,538	75,926		(18)		(18)		75,908		(908)	(908)	19	10/01/2038	1FE.....
676907 PZ 5	OHIO HSG FIN AGY MTG REV.....			03/01/2011	CALLED @ 100.0000000.....		1,000,000	1,000,000	1,006,250			(6,250)		(6,250)		1,000,000			0	29,750	09/01/2029	1FE.....
3199999.	Total - Bonds - U.S. Special Revenue & Assessment.....						7,931,232	7,698,091	7,642,421	6,589,320	0	(32,641)	0	(32,641)	0	7,625,150	0	306,080	306,080	120,631	XXX...	XXX...
Bonds - Industrial and Miscellaneous																						
001055 AC 6	AFLAC INC.....			03/17/2011	VARIOUS.....		1,193,460	1,000,000	1,169,250	1,155,529		(2,993)		(2,993)		1,152,536		40,924	40,924	29,514	05/15/2019	1FE.....
00087V AC 1	AVIATION CAPITAL GROUP TRUST III.....			03/25/2011	PRINCIPAL RECEIPT.....		27,250	27,250	25,070	25,083		2,167		2,167		27,250			0	127	12/25/2035	12*.....
073294 AA 8	BB&T CAP TR IV.....			03/22/2011	CastleOak Securities.....		1,980,000	2,000,000	1,813,280	1,814,376		103		103		1,814,478		165,522	165,522	39,026	06/12/2057	2FE.....
12667F VD 4	CWALT INC 2004-J10.....			03/25/2011	PRINCIPAL RECEIPT.....		448,412	448,412	441,686	441,600		6,812		6,812		448,412			0	4,441	10/25/2019	12*.....
29078P AA 8	EMBARCADERO AIRCRAFT.....			03/15/2011	PRINCIPAL RECEIPT.....		38,326	38,326	34,589	19,163	15,771			15,771		34,934		3,392	3,392	57	08/15/2025	12*.....
53079Q AD 9	LIBERTY MUT INS CO RESTR 144A.....			03/22/2011	Jefferies & Co.....		1,823,730	1,961,000	1,726,464	1,726,493		3		3		1,726,495		97,235	97,235	67,084	10/15/2097	2FE.....
59024K AG 8	ML ALT NT ASSET TRUST 2007-AF1.....			03/25/2011	VARIOUS.....		25,328	177,162	23,989	16,053	7,029	(245)		6,784		22,836		2,493	2,493	1,384	05/25/2037	12*.....
590218 AF 0	ML MTG INV TR 2006-F1.....			03/25/2011	PRINCIPAL RECEIPT.....		66,687	66,687	66,437	59,361	7,078	248		7,326		66,687			0	541	04/25/2036	12*.....
61747Y CJ 2	MORGAN STANLEY.....			03/28/2011	CREDIT SUISSE.....		509,540	500,000	510,675	509,722		(215)		(215)		509,507		33	33	14,688	09/23/2019	1FE.....
70557R AC 4	PEGAGUS AVIATION LSE 2001-1.....			03/10/2011	PRINCIPAL RECEIPT.....		123,670	123,670	107,593	86,569	23,982	13,119		37,101		123,670			0	198	03/10/2014	12*.....
69336R CM 0	PHH MTG CAP LLC.....			03/18/2011	PRINCIPAL RECEIPT.....		173,585	173,585	170,981	171,061		2,524		2,524		173,585			0	1,637	11/18/2035	12*.....
74432R AA 1	PRUDENTIAL FINL INC RETAIL.....			03/15/2011	Sink PMT @ 100.0000000.....		51,159	51,159	50,047	50,633		525		525		51,159			0	371	05/12/2015	1FE.....
3899999.	Total - Bonds - Industrial & Miscellaneous.....						6,461,147	6,567,250	6,140,061	6,075,643	53,860	22,048	0	75,908	0	6,151,549	0	309,599	309,599	159,068	XXX...	XXX...
8399997.	Total - Bonds - Part 4.....						15,504,642	15,349,034	14,850,318	13,739,565	53,860	(10,784)	0	43,076	0	14,851,111	0	653,531	653,531	300,388	XXX...	XXX...
8399999.	Total - Bonds.....						15,504,642	15,349,034	14,850,318	13,739,565	53,860	(10,784)	0	43,076	0	14,851,111	0	653,531	653,531	300,388	XXX...	XXX...
9999999.	Total - Bonds, Preferred and Common Stocks.....						15,504,642	XXX.....	14,850,318	13,739,565	53,860	(10,784)	0	43,076	0	14,851,111	0	653,531	653,531	300,388	XXX...	XXX...

(a) For all common stock bearing the NAIC market indicator "U" provide: the number of such issues:.....0.

QE05.1

Sch. DB-Pt A-Sn 1
NONE

Sch. DB-Pt A-Sn 1-Footer
NONE

Sch. DB-Pt B-Sn 1
NONE

Sch. DB-Pt B-Sn 1-Footer
NONE

Sch. DB-Pt B-Sn 1B-Broker List
NONE

Sch. DB-Pt D
NONE

Sch. DL-Pt. 1
NONE

Sch. DL-Pt. 2
NONE

SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *
					6 First Month	7 Second Month	8 Third Month	

Open Depositories

MM: FED GOVERNMENT.....	5800 CORP D PITTSBURG, PA 15237...		0.011			5,561	5,561	5,561	XXX..
MM: FID FIDELITY.....	500 SALEM ST, SMITHFIELD RI 02917		0.023	362		5,569,953	2,861,301	7,417,391	XXX..
MM: BLACK ROCK ONE FINANCIAL CENTER.....	BOSTON, MASS 02111.....					6,321	6,321	6,321	XXX..
MM: RESERVE PRIMARY.....	1250 BROADWAY, NY, NY 10001.....					2			XXX..
BANK OF NEW YORK.....	ONE WALL ST NY, NY 10005.....		0.010	8		154,064	1,747,548	99,486	XXX..
DEUTSCHE BANK.....	60 Wall St New York NY 10005.....					2,186,230	2,301,274	829,828	XXX..
WELLS FARGO MAC N9305-075.....	90 S. 7TH ST Minneapolis MN 55402.....					20,542	19,990	19,431	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					1,693,621	3,727,399	2,599,460	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(132,480)	(141,388)	(154,065)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(641,698)	(632,175)	(706,036)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(2,420,701)	(2,426,753)	(2,231,843)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(96,935)	(141,166)	(116,927)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(6,567,615)	(6,492,981)	(6,339,433)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(289,901)	(412,751)	(426,179)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(12,050)	(13,592)	(8,471)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(70,854)	(55,166)	(54,821)	XXX..
0199999. Total Open Depositories.....	...XXX.....	...XXX.....		370	0	(595,940)	353,422	939,703	XXX..
0399999. Total Cash on Deposit.....	...XXX.....	...XXX.....		370	0	(595,940)	353,422	939,703	XXX..
0599999. Total Cash.....	...XXX.....	...XXX.....		370	0	(595,940)	353,422	939,703	XXX..

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1	2	3	4	5	6	7	8
Description	Code	Date Acquired	Rate of Interest	Maturity Date	Book/Adjusted Carrying Value	Amount of Interest Due & Accrued	Amount Received During Year

NONE