



QUARTERLY STATEMENT

As of September 30, 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) bgermain@mapfreusa.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
JOHN DAVID PORTER	HENRY THOMAS ROWLES	MARK ALLEN SHAW	MARK HARRY SHAW
JAIME TAMAYO	OTTO TILLMAN WRIGHT	DAVID HILL COCHRANE #	KIRK RICHARD NELSON #

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 [] _____ _____ _____

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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.....	192,017,330		192,017,330	184,499,172
2. Stocks:				
2.1 Preferred stocks.....	6,112,669		6,112,669	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).....	1,884,961		1,884,961	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 (\$.....(7,988,761)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(7,988,761)		(7,988,761)	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).....	192,026,199	0	192,026,199	196,161,811
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	2,201,799	150,008	2,051,791	2,153,832
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	37,754,527		37,754,527	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:				
161. Amounts recoverable from reinsurers.....	56,579,872		56,579,872	48,521,365
16.2 Funds held by or deposited with reinsured companies.....			0	
16.3 Other amounts receivable under reinsurance contracts.....	28,455,076		28,455,076	24,090,780
17. Amounts receivable relating to uninsured plans.....			0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....	16,239		16,239	
18.2 Net deferred tax asset.....	8,755,356	2,404,976	6,350,380	5,100,079
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	1,065,892		1,065,892	961,879
21. Furniture and equipment, including health care delivery assets (\$.....0).....	825,079	825,079	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.....	50,060,113	2,086,061	47,974,052	40,074,188
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	377,740,152	5,466,124	372,274,028	360,787,857
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	377,740,152	5,466,124	372,274,028	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.....	325,248	325,248	0	
2502. EQUITY IN POOLS AND ASSOCIATIONS.....	47,667,668		47,667,668	38,825,755
2503. ARIZONA RENEWAL BUSINESS.....	1,760,813	1,760,813	0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	306,384	0	306,384	1,248,433
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	50,060,113	2,086,061	47,974,052	40,074,188

Statement for September 30, 2011 of the **American Commerce Insurance Company**

LIABILITIES, SURPLUS AND OTHER FUNDS

		1	2
		Current Statement Date	December 31 Prior Year
1.	Losses (current accident year \$....24,814,000).....	48,121,413	51,160,721
2.	Reinsurance payable on paid losses and loss adjustment expenses.....	30,946,351	25,997,820
3.	Loss adjustment expenses.....	13,259,145	12,558,744
4.	Commissions payable, contingent commissions and other similar charges.....	4,500,974	4,956,958
5.	Other expenses (excluding taxes, licenses and fees).....	2,592,199	3,345,113
6.	Taxes, licenses and fees (excluding federal and foreign income taxes).....		1,121,524
7.1	Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....		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 \$....153,849,391 and including warranty reserves of \$.....0).....	78,061,767	71,660,954
10.	Advance premium.....	4,716,339	2,880,025
11.	Dividends declared and unpaid:		
11.1	Stockholders.....		
11.2	Policyholders.....		
12.	Ceded reinsurance premiums payable (net of ceding commissions).....	49,240,455	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.....	1,792,085	
20.	Derivatives.....		
21.	Payable for securities.....		
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.....	212,863	346,984
26.	Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	233,443,591	224,626,825
27.	Protected cell liabilities.....		
28.	Total liabilities (Lines 26 and 27).....	233,443,591	224,626,825
29.	Aggregate write-ins for special surplus funds.....	816,026	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).....	108,600,124	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).....	138,830,437	136,161,032
38.	Totals.....	372,274,028	360,787,857

DETAILS OF WRITE-INS

2501.	MISCELLANEOUS LIABILITIES.....	212,863	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).....	212,863	346,984
2901.	ADDITIONAL ADMITTED DEFERRED TAX ASSETS UNDER SSAP10R, par. 10e.....	816,026	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).....	816,026	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

Statement for September 30, 2011 of the **American Commerce Insurance Company**

STATEMENT OF INCOME

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$.....205,629,204).....	199,495,638	184,398,579	251,685,085
1.2 Assumed..... (written \$.....116,474,648).....	110,073,835	103,094,803	138,871,314
1.3 Ceded..... (written \$.....205,629,204).....	199,495,638	184,398,579	251,685,085
1.4 Net..... (written \$.....116,474,648).....	110,073,835	103,094,803	138,871,314
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....76,413,000):			
2.1 Direct.....	142,363,915	124,269,882	174,007,922
2.2 Assumed.....	76,307,846	64,435,957	86,764,797
2.3 Ceded.....	142,363,915	124,269,882	174,007,922
2.4 Net.....	76,307,846	64,435,957	86,764,797
3. Loss adjustment expenses incurred.....	13,875,989	11,876,112	16,738,427
4. Other underwriting expenses incurred.....	30,753,113	29,588,348	38,996,733
5. Aggregate write-ins for underwriting deductions.....	(11,892)	0	(130,040)
6. Total underwriting deductions (Lines 2 through 5).....	120,925,056	105,900,417	142,369,917
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(10,851,221)	(2,805,614)	(3,498,603)
INVESTMENT INCOME			
9. Net investment income earned.....	7,178,664	8,571,341	11,758,812
10. Net realized capital gains (losses) less capital gains tax of \$.....(987,482).....	2,949,840	1,058,303	2,685,594
11. Net investment gain (loss) (Lines 9 + 10).....	10,128,504	9,629,644	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.....	1,365,965	1,362,895	1,863,786
14. Aggregate write-ins for miscellaneous income.....	43,514	25,494	46,253
15. Total other income (Lines 12 through 14).....	1,409,479	1,388,389	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).....	686,762	8,212,419	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).....	686,762	8,212,419	12,855,842
19. Federal and foreign income taxes incurred.....	(15,621)	2,526,741	3,348,629
20. Net income (Line 18 minus Line 19) (to Line 22).....	702,383	5,685,678	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).....	702,383	5,685,678	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 \$.....79,823.....	148,244	734,643	2,707,151
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	(2,077,381)	503,139	(384,233)
27. Change in nonadmitted assets.....	3,437,141	646,577	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.....	459,018	561,367	1,788,679
38. Change in surplus as regards policyholders (Lines 22 through 37).....	2,669,405	8,131,404	2,345,480
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	138,830,437	141,946,956	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 Income.....	43,514	25,494	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).....	43,514	25,494	46,253
3701. ADDITIONAL ADMITTED DEFERRED TAX ASSETS UNDER SSAP10R, par 10e.....	816,026	696,844	760,961
3702. RECLASSIFICATION OF ADDITIONAL ADMITTED DEFERRED TAX ASSETS TO SPECIAL SURPLUS FUNDS...	(816,026)	(696,844)	(760,961)
3703. STAUTORY ADJUSTMENT FOR TAX SETTLEMENT.....	308,213	524,703	737,222
3798. Summary of remaining write-ins for Line 37 from overflow page.....	150,805	36,664	1,051,457
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	459,018	561,367	1,788,679

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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.....	121,578,105	114,004,744	142,796,974
2. Net investment income.....	7,165,940	8,163,696	11,799,074
3. Miscellaneous income.....	1,409,479	1,388,389	1,910,039
4. Total (Lines 1 through 3).....	130,153,524	123,556,829	156,506,087
5. Benefit and loss related payments.....	86,821,426	80,911,953	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.....	46,247,231	40,590,613	52,913,733
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....(37,300) tax on capital gains (losses).....	2,251,024	2,337,617	2,550,137
10. Total (Lines 5 through 9).....	135,319,681	123,840,183	156,853,645
11. Net cash from operations (Line 4 minus Line 10).....	(5,166,157)	(283,354)	(347,558)
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	49,918,912	56,570,860	98,744,955
12.2 Stocks.....	3,211,900	3,301,875	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.....		517,149	
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	53,130,812	60,389,884	114,794,958
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	55,027,545	60,041,810	71,277,447
13.2 Stocks.....	6,019,900	2,003,200	2,003,200
13.3 Mortgage loans.....			
13.4 Real estate.....	172,705	132,921	518,186
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....		1,086,178	
13.7 Total investments acquired (Lines 13.1 to 13.6).....	61,220,150	63,264,109	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).....	(8,089,338)	(2,874,225)	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).....	(1,124,635)	(5,313,269)	(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).....	(1,124,635)	(5,313,269)	(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).....	(14,380,130)	(8,470,848)	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).....	(7,988,761)	(2,462,547)	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 2011 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

D. Loan-backed Securities

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

	(7) Amortized Cost Before OTTI	(8) OTTI Recognized in Loss	(9) Fair Value (7) - (8)
2 OTTI Recognized 1st Qtr			
a. Intent to Sell:	\$0	\$0	\$0
b. Inability or lack intent to hold:	\$0	\$0	\$0
c. Total OTTI 1st Qtr	\$0	\$0	\$0

OTTI Recognized 2nd Qtr

d. Intent to Sell:	\$0	\$0	\$0
e. Inability or lack intent to hold:	\$0	\$0	\$0
f. Total OTTI 2nd Qtr	\$0	\$0	\$0

OTTI Recognized 3rd Qtr

g. Intent to Sell:	\$0	\$0	\$0
h. Inability or lack intent to hold:	\$0	\$0	\$0
i. Total OTTI 3rd Qtr	\$0	\$0	\$0
m. Totals for 2011	\$0	\$0	\$0

3 Currently held structured securities with recognized OTTI

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

4 Impaired securities for which an OTTI has not been recognized

A1. The aggregate amount of unrealized losses - Less than 12 months:	\$80,260
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$943,836
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$4,837,091
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$1,714,384

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.

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

No significant change.

NOTES TO FINANCIAL STATEMENTS

Note 20 - Fair Value

A1. Assets Measured at Fair Value at 9/30/11

Description	Level 1	Level 2	Level 3	TOTAL
Preferred Stock	\$0	\$3,332,700	\$0	\$3,332,700
Bonds	0	1,009,921	0	1,009,921
Common Stock	0	0	0	0
TOTALS	\$0	\$4,342,621	\$0	\$4,342,621

A2 Roll of Level 3 from Prior Year End

Assets measured at fair value on a recurring basis using significant unobservable inputs

Description	Balance at 1/1	Transfers in Level 3	Transfers out of Level 3	Total gains & (losses) included in Net Income	Total gains and (losses) included in Surplus	Purchases, issuances, sales & settlements	Balance at 9/30/2011
Preferred Stock	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Bonds	392,179	0	0	28,959	108,644	(529,782)	0
Common Stock	0	0	0	0	0	0	0
TOTALS	\$392,179	\$0	\$0	\$28,959	\$108,644	(\$529,782)	\$0

A3 The company’s policy is to recognize transfers in and transfers out as of the actual date of the event or change in circumstances that caused the transfer.

A4 Financial assets included in Level 2 fair value measurement are securities priced by the company’s custodial bank.
Financial Assets included in Level 3 fair value measurement are securities priced utilizing broker quotes or valued at net asset value.

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 increased by \$294,000 during the current year. The deficiency of \$294,000 is approximately 0.5 % of the unpaid losses and LAE of \$63,719,000 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

NOTES TO FINANCIAL STATEMENTS

No significant change.

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.

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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? Yes [X] No []
If yes, complete the Schedule Y-Part 1 - Organizational chart.

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? Yes [] No [X] N/A []
If yes, attach an explanation.

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]

Statement for September 30, 2011 of the **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:

Statement for September 30, 2011 of the **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

Statement for September 30, 2011 of the

American Commerce Insurance Company

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

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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.....	313,172	322,332	43,835	15,604	21,446	35,737
2. Alaska.....AK	L.....	18,972	99,340			4,701	4,376
3. Arizona.....AZ	L.....	6,239,287	6,711,105	7,428,379	3,785,261	1,347,717	2,475,216
4. Arkansas.....AR	L.....	253,202	181,667	12,851	16,962	82,517	98,184
5. California.....CA	L.....	388,913	368,426	734		2,266	81,457
6. Colorado.....CO	L.....	218,897	187,997	113,112	24,369	126,520	86,160
7. Connecticut.....CT	L.....	5,916,016	1,678,043	2,371,702	542,145	1,404,977	844,202
8. Delaware.....DE	L.....	276,102	330,887	42,805	677	73,137	16,521
9. District of Columbia.....DC	L.....	54,572	47,709	40,207		8,872	2,007
10. Florida.....FL	L.....	414,970	1,565,305	9,203	3,281		87,584
11. Georgia.....GA	L.....	552,823	547,522	87,332	206,788	176,074	116,649
12. Hawaii.....HI	L.....	12,959	8,522	1,105	1,546	2,186	2,699
13. Idaho.....ID	L.....	2,198,505	2,118,782	1,060,749	1,207,279	829,452	588,063
14. Illinois.....IL	L.....	1,485,587	1,484,973	469,529	48,938	996,602	634,902
15. Indiana.....IN	L.....	5,427,621	4,560,163	4,410,617	2,245,022	2,555,066	1,359,616
16. Iowa.....IA	L.....	111,205	95,918	3,452	21,016	6,940	139,750
17. Kansas.....KS	L.....	139,638	107,909	28,777	259	25,403	3,163
18. Kentucky.....KY	L.....	3,126,853	4,804,460	3,129,685	4,797,209	3,066,747	4,534,887
19. Louisiana.....LA	L.....	1,026,987	794,600	132,404	346,657	412,109	290,321
20. Maine.....ME	L.....	61,068	51,848	4,335		22,235	3,364
21. Maryland.....MD	L.....	284,597	267,546	35,312	7,113	35,223	52,147
22. Massachusetts.....MA	L.....	244,761	219,809	24,018	14,891	53,947	58,565
23. Michigan.....MI	L.....	527,666	502,737	14,741		53,637	8,959
24. Minnesota.....MN	L.....	367,480	298,569	120,323	23,895	54,210	49,226
25. Mississippi.....MS	L.....	123,826	123,598	13,119		102,945	4,105
26. Missouri.....MO	L.....	281,748	219,357	115,935	29,715	83,532	38,743
27. Montana.....MT	L.....	82,488	78,838	9,725	10,754	11,591	18,412
28. Nebraska.....NE	L.....	279,621	235,216	8,789	10,630	24,662	28,558
29. Nevada.....NV	L.....	186,956	206,168	11,660		34,472	12,831
30. New Hampshire.....NH	L.....	168,885	170,309	85,889	181,275	13,632	92,348
31. New Jersey.....NJ	L.....	36,519,162	27,770,199	21,319,935	9,314,890	16,598,623	9,817,566
32. New Mexico.....NM	L.....	42,139	44,005	663,782	2,295	8,155	11,335
33. New York.....NY	L.....	35,554,005	43,802,897	29,044,488	25,954,545	23,078,880	19,728,360
34. North Carolina.....NC	L.....	603,288	443,706	343		7,542	
35. North Dakota.....ND	L.....	19,906	14,152		9,443	6,160	4,394
36. Ohio.....OH	L.....	14,096,907	14,443,957	11,348,357	9,168,548	9,856,839	6,700,023
37. Oklahoma.....OK	L.....	170,220	184,588	570,788	1,927,714	1,556,887	2,751,875
38. Oregon.....OR	L.....	18,913,618	20,000,186	8,961,300	10,837,099	9,903,183	8,866,996
39. Pennsylvania.....PA	L.....	1,077,671	1,048,600	774,337	22,608	1,079,525	203,050
40. Rhode Island.....RI	L.....	26,357,135	25,383,685	15,844,594	14,597,334	17,632,502	15,594,016
41. South Carolina.....SC	L.....	590,212	589,284	19,156		20,238	5,134
42. South Dakota.....SD	L.....	11,599	11,058	(2,631)	30,463	155,973	421,682
43. Tennessee.....TN	L.....	3,254,732	3,045,878	4,286,868	1,669,978	1,379,943	720,154
44. Texas.....TX	L.....	1,592,563	1,591,394	226,480	66,979	386,127	124,789
45. Utah.....UT	L.....	160,016	179,468	19,797	14,878	31,427	31,759
46. Vermont.....VT	L.....	73,353	70,862	1,674		2,069	248
47. Virginia.....VA	L.....	544,540	519,945	10,350	21,518	34,157	60,974
48. Washington.....WA	L.....	34,816,592	36,496,087	20,905,497	23,089,758	21,173,840	20,222,982
49. West Virginia.....WV	L.....	10,326	13,391	(14,580)	43,558	32,772	33,590
50. Wisconsin.....WI	L.....	410,069	341,894	21,732	7,078	49,160	42,082
51. Wyoming.....WY	L.....	25,774	33,929	5,046	5,525	(752)	3,355
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	205,629,204	204,418,820	133,837,637	110,325,497	114,626,068	97,113,116

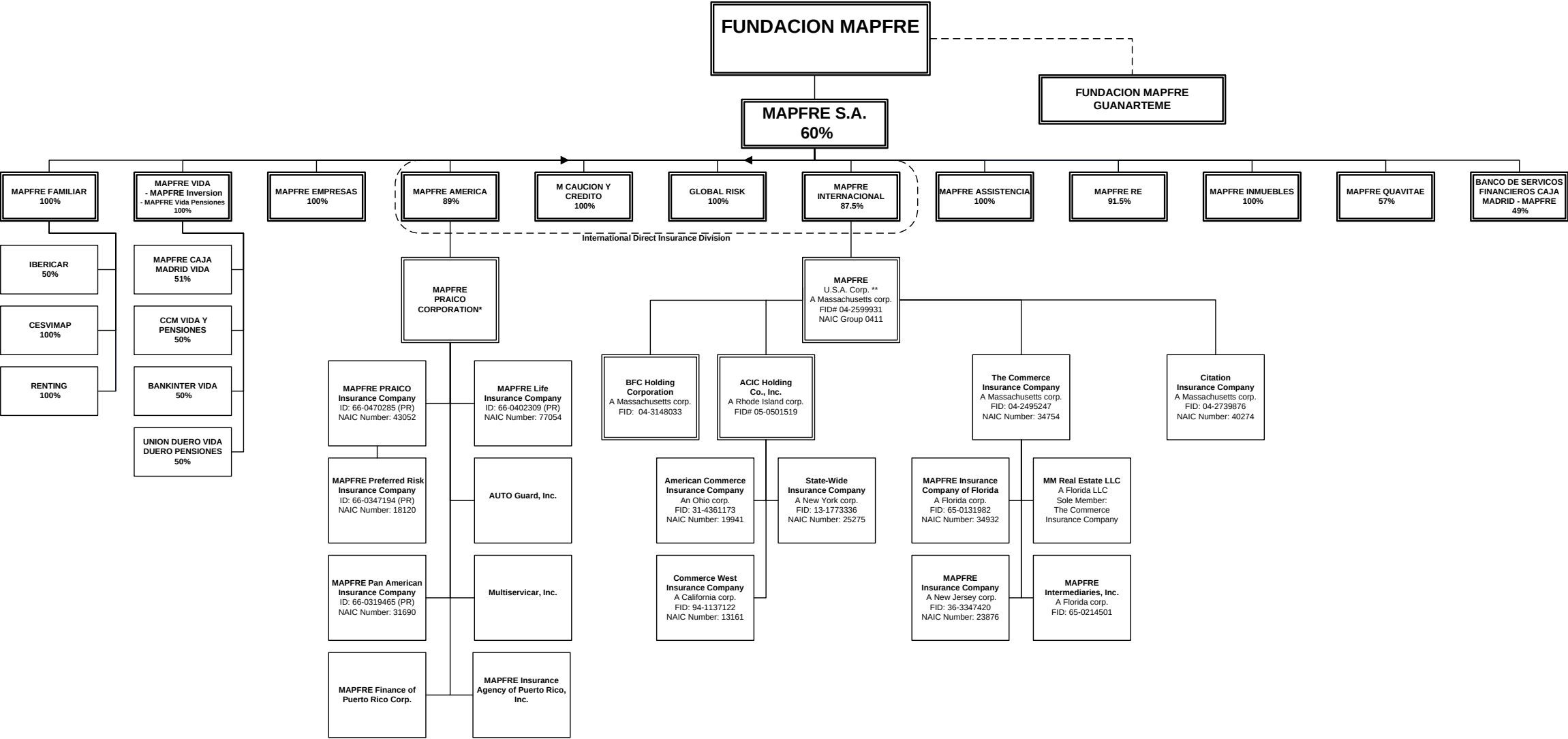
DETAILS OF WRITE-INS							
5801.	XXX.....						
5802.	XXX.....						
5803.	XXX.....						
5898. Summary of remaining write-ins for Line 58 from overflow page.....	XXX.....	0	0	0	0	0	0
5899. Totals (Lines 5801 thru 5803 + Line 5898) (Line 58 above).....	XXX.....	0	0	0	0	0	0

(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

Q11



* All subsidiaries of MAPFRE PRAICO Corporation are 100% owned by their parent companies, except MAPFRE Preferred Risk Insurance Company which is 100% owned by MAPFRE PRAICO Insurance Company.

** All subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies, except ACIC Holding Co., Inc., which is 5% owned by AAA Southern New England.

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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.....	1,644,627	1,089,232	66.2	83.8
2. Allied lines.....	43,549	22,421	51.5	66.8
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	45,647,460	42,124,998	92.3	55.4
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	68,062	16,944	24.9	76.0
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.....	2,449,380	8,723	0.4	0.5
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.....	92,701,014	64,964,837	70.1	77.3
19.3, 19.4 Commercial auto liability.....			0.0	
21. Auto physical damage.....	45,242,689	30,894,931	68.3	60.9
22. Aircraft (all perils).....	11,698,857	3,241,829	27.7	67.3
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.....	199,495,638	142,363,915	71.4	67.4

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.....	689,571	1,825,380	1,566,832
2. Allied lines.....	19,215	45,425	37,932
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	18,157,392	50,344,181	43,739,765
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	22,788	77,051	84,988
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.....	2,904,255	8,722,314	8,234,191
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.....	30,623,458	90,969,983	94,406,407
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	14,595,060	44,166,539	46,044,762
22. Aircraft (all perils).....	1,533,651	9,478,331	10,303,943
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.....	68,545,390	205,629,204	204,418,820

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

Statement for September 30, 2011 of the **American Commerce Insurance Company**

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:



Additional Write-ins for Assets:

	Current Statement Date			4 December 31, Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. MISC ASSETS.....	306,384		306,384	3,000
2505. SALE OF NY CREDITS.....			0	1,245,433
2597. Summary of remaining write-ins for Line 25.....	306,384	0	306,384	1,248,433

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
3704. STATUTORY ADJUSTMENT INTERCO EXPENSE POOLING.....	150,805	32,405	1,047,200
3705. STAT POOLING ADJ/IFRS PY POOLING ADJUSTMENT.....		39,259	4,257
3706. IFRS PY POOLING FOR DAC.....		(35,000)	
3797. Summary of remaining write-ins for Line 37.....	150,805	36,664	1,051,457

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.....	172,705	
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.....	93,210	100,199
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,884,961	1,805,466
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,884,961	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.....	61,047,444	73,280,647
3. Accrual of discount.....	554,799	929,418
4. Unrealized valuation increase (decrease).....	228,067	4,164,845
5. Total gain (loss) on disposals.....	1,962,357	2,900,594
6. Deduct consideration for bonds and stocks disposed of.....	53,130,812	114,732,129
7. Deduct amortization of premium.....	496,832	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).....	198,129,999	187,964,976
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	198,129,999	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).....	159,816,140	14,172,946	12,622,190	1,727,452	166,007,980	159,816,140	163,094,348	156,680,634
2. Class 2 (a).....	28,273,806	3,184,760	1,007,989	(1,527,595)	26,145,123	28,273,806	28,922,982	26,157,940
3. Class 3 (a).....					1,660,662			1,660,598
4. Class 4 (a).....								
5. Class 5 (a).....								
6. Class 6 (a).....								
7. Total Bonds.....	188,089,946	17,357,706	13,630,179	199,857	193,813,765	188,089,946	192,017,330	184,499,172
PREFERRED STOCK								
8. Class 1.....	2,841,562			(159,546)	2,852,109	2,841,562	2,682,016	2,002,628
9. Class 2.....	3,533,322			(102,669)	3,504,295	3,533,322	3,430,653	1,463,176
10. Class 3.....					2,501,143			
11. Class 4.....								
12. Class 5.....								
13. Class 6.....								
14. Total Preferred Stock.....	6,374,884	0	0	(262,215)	8,857,547	6,374,884	6,112,669	3,465,804
15. Total Bonds and Preferred Stock.....	194,464,830	17,357,706	13,630,179	(62,358)	202,671,312	194,464,830	198,129,999	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

SCHEDULE A - PART 2

Showing all Real Estate ACQUIRED AND ADDITIONS MADE During the Current Quarter

1	Location		4	5	6	7	8	9
	2	3						
Description of Property	City	State	Date Acquired	Name of Vendor	Actual Cost at Time of Acquisition	Amount of Encumbrances	Book/Adjusted Carrying Value Less Encumbrances	Additional Investment Made After Acquisition

NONE

SCHEDULE A - PART 3

Showing all Real Estate DISPOSED During the Quarter, Including Payments During the Final Year on "Sales Under Contract "

1	Location		4	5	6	7	8	Change in Book/Adjusted Carrying Value Less Encumbrances					14	15	16	17	18	19	20
	2	3						9	10	11	12	13							
Description of Property	City	State	Disposal Date	Name of Purchaser	Actual Cost	Expended for Additions, Permanent Improvements and Changes in Encumbrances	Book/Adjusted Carrying Value Less Encumbrances Prior Year	Current Year's Depreciation	Current Year's Other Than Temporary Impairment Recognized	Current Year's Change in Encumbrances	Total Change in B./A.C.V. (11 - 9 - 10)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value Less Encumbrances on Disposal	Amounts Received During Year	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Gross Income Earned Less Interest Incurred on Encumbrances	Taxes, Repairs, and Expenses Incurred

Property Disposed

THREE STORY BUILDING 37,077 SQUARE FT.....	COLUMBUS.....	OH.	09/30/2011	VARIOUS.....				34,054			(34,054)						0		
LOCATED ON 5982 ACRES ON FOUR SEPERATE..											0						0		
PARCELS.....											0						0		
0199999. Totals.....					0	0	0	34,054	0	0	(34,054)	0	0	0	0	0	0	0	0
0399999. Totals.....					0	0	0	34,054	0	0	(34,054)	0	0	0	0	0	0	0	0

QE01

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. Political Subdivisions of States, Territories and Possessions													
249164 LH 5	DENVER COLO CITY & CNTY.....				...09/27/2011	CastleOak Securities.....				1,087,600	1,000,000	7,916	1FE.....
2499999.	Total - Bonds - U.S. Political Subdivision of States, Territories & Possessions.....									1,087,600	1,000,000	7,916	...XXX...
Bonds - U.S. Special Revenue and Special Assessment													
3138EG NP 5	FEDERAL NAT'L MTGE ASSN PL#AL0397.....				...08/11/2011	MORGAN KEEGAN.....				1,064,992	993,289	1,862	1.....
31397U EV 7	FEDERAL NATL MTG ASSN REMIC TR.....				...09/16/2011	BAIRD, ROBERT W. & CO.....				3,247,500	3,000,000	6,667	1.....
3137A7 Z7 8	FHLMC SERIES 3825.....				...07/20/2011	BAIRD, ROBERT W. & CO.....				3,131,559	2,969,621	7,919	1.....
3199999.	Total - Bonds - U.S. Special Revenue & Special Assessments.....									7,444,051	6,962,910	16,448	...XXX...
Bonds - Industrial and Miscellaneous													
126650 BU 3	CVS CAREMARK CORPORATION.....				...07/13/2011	CREDIT SUISSE.....				2,121,000	2,000,000	15,833	2FE.....
316773 CF 5	FIFTH THIRD BANCORP.....				...09/27/2011	JANNEY MONTGOMERY SCOTT.....				1,063,760	1,000,000	11,354	2FE.....
46625H GY 0	JPMORGAN CHASE & CO.....				...09/27/2011	RBC CAPITAL MARKETS.....				2,235,960	2,000,000	25,000	1FE.....
491674 BG 1	KENTUCKY UTILS CO.....				...07/31/2011	Exch from 491674BF3.....				1,483,890	1,500,000		1FE.....
69349L AC 2	PNC BK N A PITTSBURGH PA.....				...07/27/2011	CastleOak Securities.....				1,921,446	1,800,000	31,688	1FE.....
3899999.	Total - Bonds - Industrial & Miscellaneous.....									8,826,056	8,300,000	83,875	...XXX...
8399997.	Total - Bonds - Part 3.....									17,357,707	16,262,910	108,239	...XXX...
8399999.	Total - Bonds.....									17,357,707	16,262,910	108,239	...XXX...
9999999.	Total - Bonds, Preferred and Common Stocks.....									17,357,707	XXX	108,239	...XXX...

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

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

36225B	GW	2	GNMA POOL #0781113.....	09/15/2011	PAYDOWN OF PRINCIPAL.....	6,911	6,911	7,164	7,125		(4)		(4)		7,121		(210)	(210)	329	11/15/2029	1.....
0599999.			Total - Bonds - U.S. Government.....			6,911	6,911	7,164	7,125	0	(4)	0	(4)	0	7,121	0	(210)	(210)	329	XXX...	XXX...

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

249164	LH	5	DENVER COLO CITY & CNTY.....	09/27/2011	CastleOak Securities.....	1,086,810	1,000,000	1,000,000	1,000,000				0		1,000,000		86,810	86,810	62,253	08/01/2025	1FE.....
616794	LN	1	MORELAND CALIF SCH DIST.....	09/15/2011	MORGAN KEEGAN.....	703,902	2,865,000	426,713	603,454		24,439		24,439		627,893		76,008	76,008		08/01/2038	1FE.....
2499999.			Total - Bonds - U.S. Political Subdivisions of States, Territories & Possessions.....			1,790,712	3,865,000	1,426,713	1,603,454	0	24,439	0	24,439	0	1,627,893	0	162,818	162,818	62,253	XXX...	XXX...

Bonds - U.S. Special Revenue and Special Assessment

115030	HY	7	BROWARD CNTY FLA HSG FIN AUTH SIN.....	09/01/2011	CALLED @ 100.0000000.....	70,000	70,000	73,920	73,162		(141)		(141)		73,021		(3,021)	(3,021)	2,307	10/01/2039	1FE.....
23410B	AB	7	DAKOTA CNTY MINN CMNTY DEV AGY.....	09/01/2011	CALLED @ 100.0000000.....	46,294	46,294	48,146	47,609		(83)		(83)		47,526		(1,232)	(1,232)	1,582	12/01/2038	1FE.....
3133XE	5D	7	FEDERAL HOME LN BKS.....	09/28/2011	PRINCIPAL RECEIPT.....	51,025	51,025	51,011	51,050		(26)		(26)		51,025			0	1,798	12/28/2012	1.....
3137A7	K7	4	FEDERAL HOME LN MTG CORP REMIC TR.....	09/15/2011	PRINCIPAL RECEIPT.....	25,754	25,754	26,438		(684)		(684)		25,754				0	429	09/15/2025	1.....
31393L	D6	7	FEDERAL HOME LN MTG CORP REMIC TR.....	09/15/2011	PRINCIPAL RECEIPT.....	51,991	51,991	51,243	51,382		609		609		51,991			0	1,568	02/15/2017	1.....
31396G	G7	0	FEDERAL HOME LN MTG CORP REMIC TR.....	09/15/2011	PRINCIPAL RECEIPT.....	46,386	46,386	46,312	46,303		84		84		46,386			0	1,588	12/15/2013	1.....
3138EG	NP	5	FEDERAL NAT'L MTGE ASSN PL#AL0397.....	09/26/2011	PRINCIPAL RECEIPT.....	5,696	5,696	6,107		(411)		(411)		5,696				0	21	06/01/2041	1.....
31398P	HB	8	FEDERAL NATL MTG ASSN REMIC TR.....	09/26/2011	PRINCIPAL RECEIPT.....	100,821	100,821	105,516		(4,695)		(4,695)		100,821				0	2,976	11/25/2049	1.....
3128PT	LA	1	FHLMC PC PL#J13921.....	09/15/2011	PRINCIPAL RECEIPT.....	31,059	31,059	31,297		(238)		(238)		31,059				0	634	12/01/2025	1.....
3128M7	JL	1	FHLMC PC POOL #G05367.....	09/15/2011	PRINCIPAL RECEIPT.....	69,287	69,287	73,347	73,310		(4,023)		(4,023)		69,287			0	2,483	12/01/2035	1.....
3128M7	VT	0	FHLMC PC PL#G05726.....	09/15/2011	PRINCIPAL RECEIPT.....	72,230	72,230	74,973	74,957		(2,727)		(2,727)		72,230			0	2,416	08/01/2039	1.....
3128M7	SC	1	FHLMC POOL #G05615.....	09/15/2011	PRINCIPAL RECEIPT.....	28,682	28,682	30,717	30,771		(2,089)		(2,089)		28,682			0	1,152	07/01/2039	1.....
31393W	WK	1	FHLMC REMIC SERIES 2638.....	09/15/2011	PRINCIPAL RECEIPT.....	132,712	132,712	135,200	135,134		(2,422)		(2,422)		132,712			0	3,152	08/15/2017	1.....
3137A0	UL	7	FHLMC REMIC SERIES 3716.....	09/16/2011	VARIOUS.....	2,899,312	2,858,275	2,771,187		5,122		5,122		2,776,308		123,004	123,004	33,525	04/15/2038	1.....	
3137A2	YS	4	FHLMC REMIC SERIES 3763.....	08/15/2011	VARIOUS.....	1,492,336	1,455,607	1,454,925		(14)		(14)		1,454,911		37,426	37,426	9,039	02/15/2039	1.....	
3137A3	U2	3	FHLMC REMIC SERIES 3773.....	08/15/2011	VARIOUS.....	1,016,961	976,510	991,501		(1,192)		(1,192)		990,309		26,651	26,651	15,635	08/15/2037	1.....	
3137A8	XH	6	FHLMC REMIC SERIES 3836.....	09/15/2011	PRINCIPAL RECEIPT.....	44,860	44,860	44,907		(47)		(47)		44,860				0	227	08/15/2040	1.....
31397G	7M	6	FHLMC REMIC SERIES R011.....	09/15/2011	PRINCIPAL RECEIPT.....	56,698	56,698	56,634	56,619		79		79		56,698			0	2,104	12/15/2020	1.....
31394H	R8	6	FHLMC SERIES 2656.....	09/15/2011	PRINCIPAL RECEIPT.....	19,246	19,246	19,619	19,776		(44)		(44)		19,732		(486)	(486)	770	08/15/2033	1.....
3137A7	Z7	8	FHLMC SERIES 3825.....	09/15/2011	PRINCIPAL RECEIPT.....	30,804	30,804	32,484		(1,680)		(1,680)		30,804				0	157	03/15/2039	1.....
34073N	V2	3	FLORIDA HSG FIN CORP REV MTG.....	07/01/2011	CALLED @ 100.0000000.....	45,000	45,000	40,973	41,181		34		34		41,215		3,785	3,785	2,115	07/01/2037	1FE.....
31412P	HR	5	FNMA POOL #930940.....	09/26/2011	PRINCIPAL RECEIPT.....	91,472	91,472	95,145	94,735		(3,264)		(3,264)		91,472			0	3,096	04/01/2039	1.....
3138A4	SG	1	FNMA PASS-THR POOL #AH3218.....	09/26/2011	PRINCIPAL RECEIPT.....	39,434	39,434	40,772		(1,337)		(1,337)		39,434				0	803	01/01/2041	1.....
31403D	GP	8	FNMA PASS-THRU PL#745506.....	09/26/2011	PRINCIPAL RECEIPT.....	9,159	9,159	9,871	9,657		(498)		(498)		9,159			0	348	02/01/2016	1.....
31396Q	FC	8	FNMA REMIC TRUST 2009-47.....	09/26/2011	PRINCIPAL RECEIPT.....	78,616	78,616	80,980	80,776		(2,160)		(2,160)		78,616			0	2,356	07/25/2039	1.....
31397S	WX	8	FNR 2011-40 CA.....	09/26/2011	PRINCIPAL RECEIPT.....	29,844	29,844	30,355		(511)		(511)		29,844				0	269	12/25/2028	1.....
38375P	KA	8	GNMA REMIC TRUST 2008-9.....	09/20/2011	PRINCIPAL RECEIPT.....	66,939	66,939	69,533	69,626		(2,687)		(2,687)		66,939			0	1,897	07/20/2037	1.....
46940R	AA	4	JACKSONVILLE FLA HSG FIN AUTH HOME.....	09/01/2011	CALLED @ 100.0000000.....	45,000	45,000	45,923	45,555		(63)		(63)		45,493		(493)	(493)	1,154	10/01/2038	1FE.....

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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)
67756Q DQ 7	OHIO ST HSG FIN AGY RESIDENTIA MTG.....			09/01/2011	CALLED @ 100.0000000.....		10,000	10,000	10,000	10,000				0		10,000			0	256	09/01/2038	1FE.....
917436 YR 2	UTAH HSG CORP SINGLE FAMILY.....			07/01/2011	CALLED @ 100.0000000.....		15,000	15,000	15,248	15,163		(14)		(14)		15,148		(148)	(148)	803	01/01/2036	1FE.....
3199999.	Total - Bonds - U.S. Special Revenue & Assessment.....						6,722,618	6,604,402	6,564,284	1,026,766	0	(25,122)	0	(25,122)	0	6,537,132	0	185,486	185,486	96,660	XXX...	XXX...
Bonds - Industrial and Miscellaneous																						
00087V AC 1	AVIATION CAPITAL GROUP TRUST III.....			09/26/2011	PRINCIPAL RECEIPT.....		26,674	26,674	24,540	24,553		2,121		2,121		26,674			0	617	12/25/2035	1FE.....
12667F VD 4	CWALT INC 2004-J10.....			09/26/2011	PRINCIPAL RECEIPT.....		35,543	35,543	35,009	35,003		540		540		35,543			0	1,187	10/25/2019	1Z*.....
29078P AA 8	EMBARCADERO AIRCRAFT.....			09/15/2011	PRINCIPAL RECEIPT.....		271,087	271,087	244,656	135,544	111,554			111,554		247,098		23,989	23,989	1,342	08/15/2025	1FE.....
316773 CF 5	FIFTH THIRD BANCORP.....			09/27/2011	JANNEY MONTGOMERY SCOTT,.....		1,063,270	1,000,000	1,009,530	1,008,936		(947)		(947)		1,007,989		55,281	55,281	65,854	01/15/2017	2FE.....
46625H GY 0	JPMORGAN CHASE & CO.....			09/27/2011	RBC CAPITAL MARKETS.....		2,233,600	2,000,000	2,133,480	2,117,112		(10,454)		(10,454)		2,106,659		126,941	126,941	145,000	01/15/2018	1FE.....
491674 BF 3	KENTUCKY UTILS CO.....			07/31/2011	Exc to 491674BG1.....		1,483,890	1,500,000	1,483,725	1,483,753		136		136		1,483,890			0	35,234	11/01/2040	1FE.....
59024K AG 8	ML ALT NT ASSET TRUST 2007-AF1.....			09/26/2011	VARIOUS.....		10,468	208,086	28,176	18,854	8,256	(452)		7,804		26,658		(16,190)	(16,190)	8,286	05/25/2037	1Z*.....
590218 AF 0	ML MTG INV TR 2006-F1.....			09/26/2011	PRINCIPAL RECEIPT.....		74,345	74,345	74,067	66,179	7,891	276		8,167		74,345			0	3,004	04/25/2036	2Z*.....
70557R AC 4	PEGAGUS AVIATION LSE 2001-1.....			07/27/2011	VARIOUS.....		298,399	328,872	286,119	230,211	63,775	(9,578)		54,197		284,407		13,992	13,992	1,876	03/10/2014	1FE.....
69336R CM 0	PHH MTG CAP LLC.....			09/19/2011	PRINCIPAL RECEIPT.....		112,489	112,489	110,801	110,853		1,636		1,636		112,489			0	4,040	11/18/2035	1Z*.....
74432R AA 1	PRUDENTIAL FINL INC RETAIL.....			09/13/2011	Sink PMT @ 100.0000000.....		52,280	52,280	51,145	51,743		537		537		52,280			0	1,515	05/12/2015	1FE.....
3899999.	Total - Bonds - Industrial & Miscellaneous.....						5,662,045	5,609,376	5,481,248	5,282,741	191,476	(16,185)	0	175,291	0	5,458,032	0	204,013	204,013	267,955	XXX...	XXX...
8399997.	Total - Bonds - Part 4.....						14,182,286	16,085,690	13,479,409	7,920,086	191,476	(16,872)	0	174,604	0	13,630,178	0	552,107	552,107	427,197	XXX...	XXX...
8399999.	Total - Bonds.....						14,182,286	16,085,690	13,479,409	7,920,086	191,476	(16,872)	0	174,604	0	13,630,178	0	552,107	552,107	427,197	XXX...	XXX...
9999999.	Total - Bonds, Preferred and Common Stocks.....						14,182,286	XXX.....	13,479,409	7,920,086	191,476	(16,872)	0	174,604	0	13,630,178	0	552,107	552,107	427,197	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

Statement for September 30, 2011 of the **American Commerce Insurance Company**
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...		...0.010			5,561	5,561	5,561	XXX..
MM: FID FIDELITY.....	500 SALEM ST, SMITHFIELD RI 02917		...0.010	92		2,112	2,958,643	2,248,761	XXX..
MM: BLACK ROCK ONE FINANCIAL CENTER.....	BOSTON, MASS 02111.....		...0.010			6,321	6,321	6,321	XXX..
MM: RESERVE PRIMARY 1250 BROADWAY.....	NEW YORK, NY 10001.....								XXX..
BANK OF NEW YORK.....	ONE WALL ST NY, NY 10005.....		...0.010	19		5,957,401	455,158	219,090	XXX..
DEUTSCHE BANK.....	60 Wall St New York NY 10005.....					2,039,150	885,379	994,441	XXX..
WELLS FARGO MAC N9305-075.....	90 S. 7TH ST Minneapolis MN 55402.....					320	320		XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					2,011,948	2,279,453	3,056,524	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(163,163)	(138,287)	(150,383)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(750,978)	(728,865)	(757,168)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(2,152,379)	(2,184,013)	(2,291,049)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(123,596)	(163,850)	(129,513)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(7,102,837)	(7,806,103)	(10,496,735)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(578,967)	(514,450)	(613,341)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....								XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(10,449)	(10,112)	(10,696)	XXX..
JP MORGAN CHASE 100 E. Broad St	COLUMBUS, OHIO 43271-0278.....					(67,522)	(60,277)	(70,574)	XXX..
0199999. Total Open Depositories.....	...XXX.....	...XXX.....	111	0		(927,078)	(5,015,122)	(7,988,761)	XXX..
0399999. Total Cash on Deposit.....	...XXX.....	...XXX.....	111	0		(927,078)	(5,015,122)	(7,988,761)	XXX..
0599999. Total Cash.....	...XXX.....	...XXX.....	111	0		(927,078)	(5,015,122)	(7,988,761)	XXX..

Statement for September 30, 2011 of the

American Commerce Insurance Company

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