



QUARTERLY STATEMENT

As of September 30, 2014
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 US 43218-2579 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	
Main Administrative Office	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Mail Address	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)</i>	
Primary Location of Books and Records	211 MAIN STREET..... WEBSTER MA US 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Internet Web Site Address	www.mapfreinsurance.com	
Statutory Statement Contact	CHRISTINE A MULCAHY <i>(Name)</i> cmulcah@mapfreusa.com <i>(E-Mail Address)</i>	508-943-9000-14376 <i>(Area Code) (Telephone Number) (Extension)</i> 508-949-4246 <i>(Fax Number)</i>

OFFICERS

Name	Title	Name	Title
1. JAIME TAMAYO	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. ROBERT EDWARD MCKENNA	TREASURER, CAO, & SVP	4. RANDALL VAUGHN BECKER	EXECUTIVE VICE PRESIDENT & CFO

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	DAVID HILL COCHRANE	DENNIS JOHN CROSSLEY	FREDERICK LAWRENCE GRUEL
TIMOTHY JOHN MORGAN #	DANIEL PATRICK OLOHAN	MARK ALLEN SHAW	MARK HARRY SHAW
JAIME TAMAYO			

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 _____ 1. (Printed Name) PRESIDENT & CEO _____ (Title)	_____ (Signature) DANIEL PATRICK OLOHAN _____ 2. (Printed Name) SECRETARY, GENERAL COUNSEL, & EVP _____ (Title)	_____ (Signature) ROBERT EDWARD MCKENNA _____ 3. (Printed Name) TREASURER, CAO, & SVP _____ (Title)
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Subscribed and sworn to before me
This _____ day of _____

a. Is this an original filing? Yes [X] No []
b. If no: 1. State the amendment number _____
2. Date filed _____
3. Number of pages attached _____

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	162,660,892		162,660,892	155,533,348
2. Stocks:				
2.1 Preferred stocks.....	2,340,119		2,340,119	2,159,979
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).....	1,537,033		1,537,033	1,594,549
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 (\$.....1,696,736), cash equivalents (\$.....0) and short-term investments (\$.....0).....	1,696,736		1,696,736	7,545,711
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).....	168,234,780	0	168,234,780	166,833,587
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,391,237		1,391,237	1,458,837
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	63,043,639		63,043,639	56,861,485
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.....	17,685,518		17,685,518	16,018,829
16.2 Funds held by or deposited with reinsured companies.....			0	
16.3 Other amounts receivable under reinsurance contracts.....			0	
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.....	5,648,890	98,117	5,550,773	4,996,693
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	152,828		152,828	473,410
21. Furniture and equipment, including health care delivery assets (\$.....0).....	959,287	959,287	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	71,265,736	2,661,574	68,604,162	59,416,563
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	328,381,915	3,718,978	324,662,937	306,059,404
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	328,381,915	3,718,978	324,662,937	306,059,404

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. Prepaid expenses.....	1,673,801	1,673,801	0	
2502. Equity in pools and associations.....	68,501,862		68,501,862	59,391,259
2503. Arizona renewal business.....	987,773	987,773	0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	102,300	0	102,300	25,304
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	71,265,736	2,661,574	68,604,162	59,416,563

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$....30,542,000).....	61,040,614	55,632,980
2. Reinsurance payable on paid losses and loss adjustment expenses.....	9,882,180	9,438,979
3. Loss adjustment expenses.....	13,633,607	13,826,366
4. Commissions payable, contingent commissions and other similar charges.....	4,466,901	4,485,637
5. Other expenses (excluding taxes, licenses and fees).....	902,528	1,237,677
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	1,816,060
7.1 Current federal and foreign income taxes (including \$....727,437 on realized capital gains (losses)).....	617,654	832,912
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 \$....192,248,305 and including warranty reserves of \$.....0 and accrued accident and health experience rating refunds including \$.....0 for medical loss ratio rebate per the Public Health Service Act.....	90,884,432	83,662,569
10. Advance premium.....	6,198,061	4,050,867
11. Dividends declared and unpaid:		
11.1 Stockholders.....	11,199,465
11.2 Policyholders.....
12. Ceded reinsurance premiums payable (net of ceding commissions).....	20,197,032	17,084,494
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 (including \$.....0 certified).....
17. Net adjustments in assets and liabilities due to foreign exchange rates.....
18. Drafts outstanding.....
19. Payable to parent, subsidiaries and affiliates.....	3,042,064	1,022,570
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.....	1,911,193	973,643
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	223,975,731	194,064,754
27. Protected cell liabilities.....
28. Total liabilities (Lines 26 and 27).....	223,975,731	194,064,754
29. Aggregate write-ins for special surplus funds.....	0	0
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).....	71,272,919	82,580,363
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....
36.20.000 shares preferred (value included in Line 31 \$.....0).....
37. Surplus as regards policyholders (Lines 29 to 35, less 36).....	100,687,206	111,994,650
38. Totals (Page 2, Line 28, Col. 3).....	324,662,937	306,059,404

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,911,193	973,643
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).....	1,911,193	973,643
2901.
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).....	0	0
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 \$.....225,192,540).....	208,507,418	190,714,545	256,818,628
1.2 Assumed..... (written \$.....134,984,513).....	127,762,648	122,520,444	164,381,876
1.3 Ceded..... (written \$.....225,192,540).....	208,507,418	190,714,545	256,818,628
1.4 Net..... (written \$.....134,984,513).....	127,762,648	122,520,444	164,381,876
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....80,095,000):			
2.1 Direct.....	144,246,420	124,708,959	169,612,821
2.2 Assumed.....	84,563,308	76,746,597	102,392,504
2.3 Ceded.....	144,246,420	124,708,959	169,612,821
2.4 Net.....	84,563,308	76,746,597	102,392,504
3. Loss adjustment expenses incurred.....	14,095,533	14,083,379	18,430,092
4. Other underwriting expenses incurred.....	36,776,215	35,872,020	47,304,026
5. Aggregate write-ins for underwriting deductions.....	0	0	(49,686)
6. Total underwriting deductions (Lines 2 through 5).....	135,435,056	126,701,996	168,076,936
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(7,672,408)	(4,181,552)	(3,695,060)
INVESTMENT INCOME			
9. Net investment income earned.....	4,540,178	4,958,799	7,239,304
10. Net realized capital gains (losses) less capital gains tax of \$.....735,685.....	1,415,816	957,581	1,487,777
11. Net investment gain (loss) (Lines 9 + 10).....	5,955,994	5,916,380	8,727,081
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.....	1,716,417	1,566,512	2,152,132
14. Aggregate write-ins for miscellaneous income.....	60,432	52,455	64,704
15. Total other income (Lines 12 through 14).....	1,776,849	1,618,967	2,216,836
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	60,435	3,353,795	7,248,857
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).....	60,435	3,353,795	7,248,857
19. Federal and foreign income taxes incurred.....	(352,188)	768,789	739,788
20. Net income (Line 18 minus Line 19) (to Line 22).....	412,623	2,585,006	6,509,069
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	111,994,650	118,151,154	118,151,160
22. Net income (from Line 20).....	412,623	2,585,006	6,509,069
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....274,470.....	(509,729)	(191,688)	(122,584)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	296,485	(274,625)	(1,521,765)
27. Change in nonadmitted assets.....	(769,183)	(618,822)	281,677
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.....	(11,199,465)		(11,815,116)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	461,825	363,606	512,209
38. Change in surplus as regards policyholders (Lines 22 through 37).....	(11,307,444)	1,863,477	(6,156,510)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	100,687,206	120,014,631	111,994,650
DETAILS OF WRITE-INS			
0501. LAD program income.....			(49,686)
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).....	0	0	(49,686)
1401. Miscellaneous income.....	30,505	40,581	48,879
1402. Gain on sale of fixed assets.....	29,927	11,874	10,088
1403. Other technical income (other reinsurer).....			5,737
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).....	60,432	52,455	64,704
3701. Statutory adjustment intercompany expense pooling.....	461,825	363,606	512,209
3702.			
3703.			
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0	0
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	461,825	363,606	512,209

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.....	134,062,089	126,364,129	164,635,625
2. Net investment income.....	4,848,690	5,225,988	7,785,759
3. Miscellaneous income.....	1,776,849	1,618,967	2,216,836
4. Total (Lines 1 through 3).....	140,687,628	133,209,084	174,638,220
5. Benefit and loss related payments.....	80,379,162	64,676,025	89,308,881
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	53,234,452	52,684,663	67,929,130
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....(255,703) tax on capital gains (losses).....	598,755	188,719	188,717
10. Total (Lines 5 through 9).....	134,212,369	117,549,407	157,426,728
11. Net cash from operations (Line 4 minus Line 10).....	6,475,259	15,659,677	17,211,492
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	34,446,604	35,621,027	59,198,285
12.2 Stocks.....	147,343		
12.3 Mortgage loans.....			
12.4 Real estate.....			
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....			
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	34,593,947	35,621,027	59,198,285
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	40,673,636	39,861,849	46,391,634
13.2 Stocks.....	0		
13.3 Mortgage loans.....			
13.4 Real estate.....	44,089	6,066	6,066
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	40,717,725	39,867,915	46,397,700
14. Net increase or (decrease) in contract loans and premium notes.....			
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14).....	(6,123,779)	(4,246,888)	12,800,585
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.....		12,876,826	24,691,942
16.6 Other cash provided (applied).....	(6,200,456)	(2,156,179)	(4,290,415)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(6,200,456)	(15,033,005)	(28,982,357)
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).....	(5,848,975)	(3,620,216)	1,029,720
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	7,545,711	6,515,991	6,515,991
19.2 End of period (Line 18 plus Line 19.1).....	1,696,736	2,895,775	7,545,711

Note: Supplemental disclosures of cash flow information for non-cash transactions:

20.0001			
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NOTES TO FINANCIAL STATEMENTS**Note 1 - Summary of Significant Accounting Policies****A. Accounting Practices, Impact of NAIC/State Differences**

The accompanying financial statements of The American Commerce Insurance Company (the Company) have been prepared in conformity with the 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.

There are no differences between Ohio prescribed practices and NAIC statutory accounting practices (NAIC SAP) as noted below:

	State	2014	2013
NET INCOME	OH		
1. Net Income, state basis		\$ 412,623	\$ 6,509,069
2. Effect of state prescribed practices		-	-
3. Effect of state permitted practices		-	-
4. Net Income, NAIC SAP basis		<u>\$ 412,623</u>	<u>\$ 6,509,069</u>
SURPLUS	OH		
5. Policyholders' surplus, state basis		\$ 100,687,206	\$ 111,994,650
6. Effect of state prescribed practices		-	-
7. Effect of state permitted practices		-	-
8. Policyholders' surplus, NAIC SAP basis		<u>\$ 100,687,206</u>	<u>\$ 111,994,650</u>

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

2 This note is used to disclose any loan-backed security that has recognized an other-than-temporary impairment during the quarter and is classified with an intent to sell or inability or lack of intent to hold. During the current quarter, no securities that have recognized an other-than-temporary impairment fit this criteria.

3 There are no structured securities with recognized OTTI as of the reporting date.

4 Impaired securities for which an OTTI has not been recognized

A1. The aggregate amount of unrealized losses - Less than 12 months:	\$ 57,868
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$ 1,101,903
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$ 8,746,916
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$ 28,127,352

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

The Company declared \$11,199,465 in dividends on September 11, 2014, payable on December 3, 2014.

Note 11 - Debt

No significant change.

NOTES TO FINANCIAL STATEMENTS**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.

Note 20 - Fair Value Measurements**A1 Summary of Financial Assets Measured and Reported at Fair Value at 09/30/14**

Description	Level 1	Level 2	Level 3	TOTAL
Bonds	\$ -	\$ 1,323,951	\$ -	\$ 1,323,951
Preferred Stock	-	2,340,119	-	2,340,119
Common Stock	-	-	-	-
TOTALS	\$ -	\$ 3,664,070	\$ -	\$ 3,664,070

A2 Fair Value Measurement in Level 3 of the Fair Value Hierarchy.

Description	Beginning Balance at 7/1/2014	Transfers into 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	Ending Balance at 9/30/2014
Bonds	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Preferred Stock	-	-	-	-	-	-	-	-	-	-
Common Stock	-	-	-	-	-	-	-	-	-	-
TOTALS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

A3 The company's policy is to recognize "transfers into" and "transfers out of" the Fair Value Hierarchy Levels on the actual date of the event or change in circumstances that caused the transfer.

A4 Financial Assets included in Level 1 of the Fair Value Hierarchy include US Treasury securities and exchange traded common stock where prices are obtained directly from active markets.

Financial Assets included in Level 2 of the Fair Value Hierarchy are securities priced by the company's custodial bank and based on observable market data.

Financial Assets included in Level 3 of the Fair Value Hierarchy are securities priced utilizing broker quotes.

A5 The company does not hold derivative assets or liabilities.

20C Aggregate Fair Value of all Financial Instruments by Hierarchical Level

Type of Financial Instrument	Aggregate Fair Value	Admitted Asset	Level 1	Level 2	Level 3	Not Practicable
Bonds	\$ 166,110,617	\$ 162,660,892	\$ 6,152,386	\$ 159,958,231	\$ -	\$ -
Preferred Stock	2,340,119	2,340,119	-	2,340,119	-	-
Common Stock	-	-	-	-	-	-
TOTALS	\$ 168,450,736	\$ 165,001,011	\$ 6,152,386	\$ 162,298,350	\$ -	\$ -

20D Not Practicable to Estimate Fair Value

NONE

Note 21 - Other Items

No significant change.

Note 22 - Events Subsequent

No significant change.

NOTES TO FINANCIAL STATEMENTS

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

Current year losses and LAE reflected on the Statement of Income of \$98,659,000 were higher by \$3,104,000 due to unfavorable development of prior year estimates. This deficiency was 4.5% of the unpaid losses and LAE of \$69,459,000 as of prior year-end.

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.

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

B. No significant change.

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:
- 3.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes [X] No []
If yes, complete Schedule Y, Parts 1 and 1A.
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes [] No [X]
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.

- 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 Name of Entity	2 NAIC Company Code	3 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.12/31/2013.....
- 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 Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator].

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

PART 1 - 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:

PART 1 - 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 Prior Year-End Book/Adjusted Carrying Value	2 Current Quarter 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. For the reporting entity's security lending program, state the amount of the following as of current statement date:

- 16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$.....0
- 16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$.....0
- 16.3 Total payable for securities lending reported on the liability page: \$.....0

17. 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 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC Financial Condition Examiners Handbook? Yes [X] No []

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

1 Name of Custodian(s)	2 Custodian Address
Bank of New York Mellon	One Wall Street, New York, NY

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

17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]

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

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

17.5 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 Central Registration Depository	2 Name(s)	3 Address

PART 1 - INVESTMENT

18.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Securities Valuation Office been followed?

Yes No

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

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

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 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 Line of Business	2 Maximum Interest	3 Disc. Rate	Total Discount				Discount Taken During Period			
			4 Unpaid Losses	5 Unpaid LAE	6 IBNR	7 Total	8 Unpaid Losses	9 Unpaid LAE	10 IBNR	11 Total
XXX..XXX.....00000000
TotalXXX..XXX.....00000000

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 NAIC Company Code	2 ID Number	3 Name of Reinsurer	4 Domiciliary Jurisdiction	5 Type of Reinsurer	6 Certified Reinsurer Rating (1 through 6)	7 Effective Date of Certified Reinsurer Rating
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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.....		300,721	202,796	8,037	9,769	57,966	61,317
2. Alaska.....AK.....L.....		3,258	20,930		177,766	1,902	13,271
3. Arizona.....AZ.....L.....		4,595,210	5,010,016	4,099,844	3,536,969	1,617,803	2,446,079
4. Arkansas.....AR.....L.....		126,066	43,399	5,232	32,362	17,625	45,136
5. California.....CA.....L.....		47,769	338,924	1,229		21,902	21,902
6. Colorado.....CO.....L.....		89,030	(18,745)	4,610	51,001	38,935	80,828
7. Connecticut.....CT.....L.....		34,701,806	25,079,173	15,568,828	8,459,920	17,039,113	9,585,959
8. Delaware.....DE.....L.....		55,149	1,709	65,648	59,114	1,242,557	1,196,903
9. District of Columbia.....DC.....L.....		18,038	6,384	1,562	114	13,362	31,769
10. Florida.....FL.....L.....		774,667	474,311	191,505	25,897	152,136	151,419
11. Georgia.....GA.....L.....		325,836	267,654	17,351	42,828	42,587	140,422
12. Hawaii.....HI.....L.....		16,933	11,336	1,923	2,182	678	3,953
13. Idaho.....ID.....L.....		2,548,506	2,408,313	1,440,182	1,095,331	937,043	946,167
14. Illinois.....IL.....L.....		1,256,130	1,119,812	430,530	646,021	392,239	547,598
15. Indiana.....IN.....L.....		4,899,760	5,869,867	4,491,363	4,963,359	3,418,405	2,700,287
16. Iowa.....IA.....L.....		98,619	61,592	5,935	3,948	8,244	12,693
17. Kansas.....KS.....L.....		108,162	85,279	15,659	24,049	9,008	31,875
18. Kentucky.....KY.....L.....		4,477,775	4,140,927	2,319,974	2,554,071	2,266,720	1,390,799
19. Louisiana.....LA.....L.....		349,545	157,644	243,916	185,419	197,110	396,510
20. Maine.....ME.....L.....		30,975	41,458	121	46,066	2,032	37,784
21. Maryland.....MD.....L.....		177,257	114,632	83,950	2,295	145,486	33,946
22. Massachusetts.....MA.....L.....		144,433	98,033	1,900	2,941	17,168	36,328
23. Michigan.....MI.....L.....		426,159	345,246	12,900	36,250	44,575	111,593
24. Minnesota.....MN.....L.....		314,752	192,421	(131)	24,921	26,509	47,265
25. Mississippi.....MS.....L.....		76,041	46,561	(1,251)	56,635	2,657	19,925
26. Missouri.....MO.....L.....		138,470	136,387	3,938	5,616	11,284	85,656
27. Montana.....MT.....L.....		20,072	(6,547)	3,484	2,967	11,334	12,372
28. Nebraska.....NE.....L.....		285,139	82,021	23,338	37,687	19,059	52,571
29. Nevada.....NV.....L.....		38,592	(7,518)	315,080	4,777	403,074	446,624
30. New Hampshire.....NH.....L.....		137,861	113,409	6,458	12,594	22,045	33,367
31. New Jersey.....NJ.....L.....		64,605,750	60,922,382	40,667,462	35,853,927	38,027,460	26,327,314
32. New Mexico.....NM.....L.....		63,776	31,640	1,612	5,348	4,690	10,280
33. New York.....NY.....L.....		1,038,895	228,212	6,492,986	10,119,727	9,687,384	13,406,095
34. North Carolina.....NC.....L.....		616,550	463,190	356	276,277	53,011	181,193
35. North Dakota.....ND.....L.....		4,259	6,929			3,551	7,804
36. Ohio.....OH.....L.....		13,645,073	13,439,315	7,632,894	7,851,943	6,679,670	6,241,717
37. Oklahoma.....OK.....L.....		53,711	32,562	14,321	603,111	(10,953)	144,489
38. Oregon.....OR.....L.....		17,647,566	20,018,459	9,606,794	12,510,805	9,701,733	8,486,072
39. Pennsylvania.....PA.....L.....		877,127	565,214	63,645	314,864	1,958,881	2,213,540
40. Rhode Island.....RI.....L.....		29,812,913	27,856,827	18,026,220	16,106,635	20,074,752	19,532,152
41. South Carolina.....SC.....L.....		642,398	453,612	7,893	4,123	47,252	29,561
42. South Dakota.....SD.....L.....		7,388	(430)	1,302	140,712	61,075	27,408
43. Tennessee.....TN.....L.....		13,182,199	10,674,736	6,835,013	4,681,948	4,159,716	2,690,773
44. Texas.....TX.....L.....		671,961	567,630	150,391	273,651	137,445	493,048
45. Utah.....UT.....L.....		83,046	24,700	(8,639)	13,882	31,535	44,011
46. Vermont.....VT.....L.....		80,976	63,873			531	3,311
47. Virginia.....VA.....L.....		442,527	280,479	22,421	132,700	45,412	74,493
48. Washington.....WA.....L.....		24,877,593	28,039,235	16,617,388	18,725,594	15,607,455	17,908,436
49. West Virginia.....WV.....L.....		5,168	883	(80)	(80)	25,537	27,066
50. Wisconsin.....WI.....L.....		241,291	192,601	37,114	29,662	73,830	107,243
51. Wyoming.....WY.....L.....		9,642	(945)			7,376	20,226
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.....CAN.....N.....							
58. Aggregate Other Alien.....OT.....XXX.....		0	0	0	0	0	0
59. Totals.....(a).....51.....		225,192,540	210,298,528	135,532,208	129,747,702	134,557,901	118,698,551

DETAILS OF WRITE-INS

58001.....	XXX.....						
58002.....	XXX.....						
58003.....	XXX.....						
58998. Summary of remaining write-ins for Line 58 from overflow page....	XXX.....	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	XXX.....	0	0	0	0	0	0

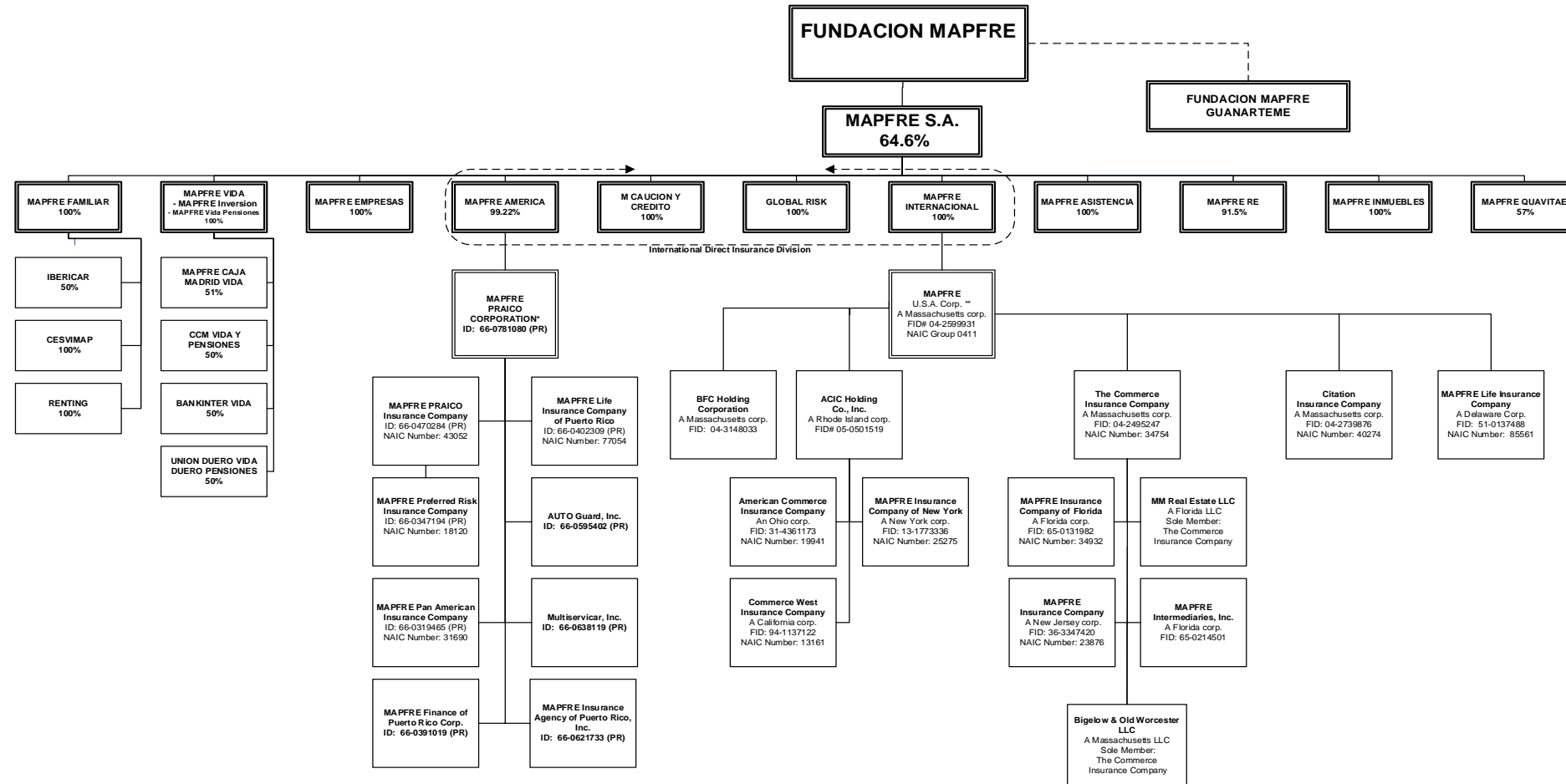
(L) - Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) - Registered - Non-domiciled RRGs; (Q) - Qualified - Qualified or Accredited Reinsurer;

(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



* 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 and 0.06% owned by AAA Ohio Auto Club and AAA Oregon / Idaho each.

***See attached list for additional companies.

MAPFRE, S.A.	% OWNED NAIC	FED ID
MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	100.0	
POLICLINICO SALUD 4, S.A.	100.0	
MULTISERVICAR	100.0	
MAPFRE GESTION DE FLOTAS, S.A.	100.0	
CLUB MAPFRE, S.A.	100.0	
MAPFRE MULTICENTRO DEL AUTOMOVIL, S.A.	100.0	
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	100.0	
VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	100.0	
BUSINESS LAB VENTURES, S.A.	100.0	
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5	
MAPFRE TECH	78.5	
MAPFRE VIDEO Y COMUNICACION, S.A.	50.0	
DISEÑO URBANO, S.L.	50.0	
SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.	50.0	
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0	
FINLOG-ALUGUER E COMERCIO DE AUTOMOVEIS, S.A.	50.0	
CATALUNYA CAIXA ASSEGURANCES GENERALS	50.0	
IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	50.0	
AUTOMOCION PENINSULAR INMUEBLES, S.A.	50.0	
ONLINE SHOPPING CLUB EUROPE, S.L.	49.9	
BANKINTER SEGUROS GENERALES, S.A.	25.1	
RESTREATOR.COM LTD	25.0	
ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	22.5	
AUDATEX ESPANA, S.A.	12.5	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0	
TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	16.4	
FUNESPANA, S.A.	63.8	
FUNERARIA PEDROLA, S.L.	100.0	
FUNEBALEAR, S.L.	100.0	
FUENMALAGA, S.L.	100.0	
SERVICIOS EMPRESAS MORTUORIAS PONTEVEDRESAS, S.A.	100.0	
KEGYELET TEMETKEZESI SZOLGALAT	100.0	
TANATORIUM ZRT	100.0	
ALL FUNERAL SERVICES, S.L.	100.0	
FUNERIRIA CRESPO, S.L.	100.0	
TANATORIO SAN ALBERTO, S.A.	100.0	
FUNEGRUP, S.L.	100.0	
SALZILLO SERVICIOS FUNERARIOS S.L.	100.0	
SERVICIOS Y GESTION FUNERARIA, S.A.	100.0	
SERVICIOS FUNERARIOS EL CARMEN, S.A.	100.0	
FUNERARIA GIMENO, S.A.	100.0	
FUNERARIA SANTO ROSTRO, S.A.	100.0	
TANATORI ALACANT, S.A.	100.0	
TANATORI BENIDORM, S.L.	100.0	
TANATORIO DE ARANJUEZ, S.L.	100.0	
TANATORI LA DAMA D'ELX, S.L.	97.1	
ZACARIAS NUNO, S.L.	50.0	
FUNERARIA TERRASA, S.A.	100.0	
EUROPEA DE FINANZAS Y C.S.E., S.A.	100.0	
SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.	65.0	
CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	49.0	
FUNETXEA, S.L.	100.0	
FUNERARIA SARRIA, S.A.	100.0	
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	100.0	
FUNERARIA ZETA ORBITAL, S.L.	100.0	
FUNERARIA VALLE DEL EBRO, S.L.	100.0	
INICIATIVAS ALCAESAR, S.L.	65.0	
ALCAESAR FUNERHERVAS, S.L.	100.0	
ALCAESAR FUNERCORIA, S.L.	100.0	
FUNERTRUJILLO, S.L.	100.0	
SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.	30.0	
ALCAESAR FUNERPLASENCIA, S.L.	50.0	
NUEVO TANATORIO, S.L.	50.0	
NUEVOS SERVICIOS FUNERARIOS, S.L.	50.0	
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.0	
TANATORIO Y CEMENTERIO DE SANLUCAR, S.L.	75.0	
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.0	
GESTION DE CEMENTERIS DE TARRAGONA	50.0	
GAB MANAGEMENT & CONSULTING, S.R.L.	77.6	
POMPAS FUNEBRES DOMINGO, S.L.	75.0	
DE MENA SERVICIOS FUNERARIOS S.L.	70.0	
CEMENTERIO PARQUE ANDUJAR, S.L.	60.0	
FUNBIERZO, S.L.	51.0	
FUNERARIA HISPALENSE, S.L.	50.0	
ISABELO ALVAREZ MAYORGA, S.A.	50.0	
SERVICIOS FUNERARIOS DEL NERVION, S.L.	50.0	
EMPRESA MIXTA SERVICIOS FUNERARIOS DE MADRID, S.A.	49.0	
TANATORIO DE ECIJA, S.L.	25.0	
TANATORIO SE-30 SEVILLA, S.L.	10.0	
HIJOS DE LUIS SANTOS, S.L.	100.0	
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	66.0	
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	34.0	
MAPFRE INMUEBLES, S.G.A.	50.2	
INMOBILIARIA MAPINVER S.A.	100.0	
DESARROLLOS URBANOS CIC, S.A.	99.9	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9	
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.4	
BIOINGENIERIA ARAGONESA, S.L.	40.0	
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0	
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.9	
MAPFRE TECH	14.7	
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0	
MIRACETI S.A.	100.0	
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	100.0	
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	100.0	
MAPFRE INVERSION DOS SOCIEDAD GESTORA DE INSTITUCIONES DE INVERSION COLECTIVA S.A.	100.0	

CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.9	
GESTION MODA SHOPPING S.A.	99.8	
MAPFRE CAJA MADRID VIDA, S.A.	51.0	
CATALUNYACAIXA VIDA S.A. D'ASSEGURANCES I	50.0	
BANKINTER SEGUROS DE VIDA, S.A.	50.0	
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.0	
UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	50.0	
DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	50.0	
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3	
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	91.5	
INVERSIONES IBERICAS, L.T.D.A.	100.0	
ITSEMAP CHILE, S.A.	25.0	
CIAR INVESTMENT	100.0	
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.0	
REINSURANCE MANAGEMENT INC.	100.0	
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.	100.0	
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	100.0	
MAPFRE CHILE REASEGUROS, S.A.	100.0	
C R ARGENTINA, S.A.	100.0	
CAJA REASEGURADORA DE CHILE, S.A.	99.8	
INMOBILIARIA TIRILLUCA S.A.	43.8	
INMOBILIARIA COSTA DE MONTEMAR, S.A.	31.4	
ADMINISTRADORA DE PROPIEDADES S.A.	31.3	
COMMERCIAL Y TURISMO, S.A.	31.2	
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.0	
ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	40.0	
MAPFRE AMERICA, S.A.	99.2	
MAPFRE ARGENTINA HOLDING	100.0	
SURASSUR S.A.	100.0	
CLUB MAPFRE ARGENTINA	96.1	
MAPFRE ARGENTINA SEGUROS S.A.	100.0	
CESVI ARGENTINA, S.A.	65.0	
ACONCAGUA SEGUROS DE RETIRO S.A.	76.4	
ACONCAGUA SEGUROS DE RETIRO S.A.	23.6	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0	
MAPFRE PRAICO CORPORATION	100.0	66-0781080
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0	31690 66-0319465
MAPFRE FINANCE OF PUERTO RICO CORP	100.0	66-0391019
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0	66-0621733
AUTO GUARD INC.	100.0	66-0595402
MULTISERVICAR INC.	100.0	66-0638119
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0	77054 66-0402309
MAPFRE PRAICO INSURANCE COMPANY	100.0	43052 66-0470284
MAPFRE PREFERRED RISK INSURANCE COMPANY	100.0	18120 66-0347194
MAPFRE LA SEGURIDAD S.A.	99.5	
CLUB MAPFRE S.A.	100.0	
CEFOPROSEG C.A.	100.0	
INVERSORA SEGURIDAD C.A.	100.0	
AUTOMOTRIZ MULTISERVICAR, C.A.	99.7	
MAPFRE CHILE SEGUROS S.A.	100.0	
EUROAMERICA ASESORIAS GENERALES S.A.	100.0	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	18.6	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	81.4	
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	100.0	
MAPFRE CHILE VIDA S.A.	100.0	
INVERSIONES MAPFRE CHILE LIMITADA	100.0	
MAPFRE HOLDING DO BRASIL LTDA	99.3	
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.0	
DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE I	100.0	
CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	100.0	
MAPFRE SAUDE LTDA	100.0	
MAPFRE BRASIL PARTICIPACOES, S.A.	100.0	
MAPFRE PREVIDENCIA S.A.	100.0	
MAPFRE SEGUADORA DE CREDITO A LA EXPORTACION, S.A.	100.0	
MAPFRE CAPITALIZACAO	100.0	
MAPFRE BB SH2 PARTICIPACOES, S.A.	50.0	
ALIANCA DO BRASIL SEGUROS S.A.	100.0	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0	
MAPFRE SEGUROS GERAIS S.A.	100.0	
MAPFRE AFFINITY SEGUADORA	100.0	
MAPFRE ASSISTENCIA	100.0	
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0	
MAPFRE VIDA S.A.	100.0	
VIDA SEGUADORA	100.0	
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.0	
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	86.3	
MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	100.0	
MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	100.0	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	94.3	
CREDIMAPFRE	94.9	
AUTOMOTORES CAPITAL LTDA	100.0	
MAPFRE COLOMBIA VIDA S.A.	94.4	
GESTIMAP S.A.	92.3	
CESVI COLOMBIA, S.A.	63.9	
MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	67.3	
CORPORACION FINISTERRE, S.A.	100.0	
MAPFRE PERU CAMPANIA DE SEGUROLS Y REASEGUROS	99.2	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.6	
MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	60.0	
MAPFRE SOFT S.A.	100.0	
MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	89.5	
APOINT S.A.	100.0	
MAPFRE LA URUGUAYA S.A.	100.0	
MAPFRE DOMINICANA S.A.	100.0	
MAPFRE BHD COMPANIA DE SEGUROS, S.A.	51.0	
CREDI PRIMAS, S.A.	100.0	

GRUPO CORPORATIVO LML S.A. DE C.V.	100.0	
MAPFRE TEPEYAC S.A.	44.3	
MAPFRE TEPEYAC S.A.	55.7	
UNIDAD MOVIL DE DIAGNOSTICO S.A.	100.0	
TEPEYAC INC.	100.0	
MAPFRE SERVICIOS MEXICANOS	100.0	
MAPFRE FIANZAS S.A.	100.0	
ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	78.8	
TEPEYAC ASESORES	51.0	
TEPEYAC ASESORES	16.0	
CESVI MEXICO, S.A.	14.0	
MAPFRE AMERICA CENTRAL, S.A.	100.0	
MAPFRE PANAMA	99.3	
INMOBILIARIA AMERICANA S.A.	78.9	
MPF TENEDORA AC, S.A.	100.0	
MAPFRE HONDURAS	73.0	
MAPFRE HONDURAS	25.1	
MAPFRE COSTA RICA	100.0	
MAPFRE GUATEMALA	100.0	
MAPFRE NICARAGUA	100.0	
MAPFRE INTERNACIONAL S.A.	100.0	
MAPFRE USA CORPORATION INC.	100.0	04-2599931
MAPFRE LIFE INSURANCE COMPANY	100.0	85561 51-0137488
THE CITATION INSURANCE COMPANY	100.0	40274 04-2739876
BAY FINANCE HOLDING COMPANY	100.0	04-3148033
INSPOP USA, LLC	10.0	
THE COMMERCE INSURANCE COMPANY	100.0	34754 04-2495247
MAPFRE INTERMEDIARIES	100.0	65-0214501
MAPFRE INSURANCE COMPANY OF FLORIDA	100.0	34932 65-0131982
MAPFRE INSURANCE COMPANY	100.0	23876 36-3347420
MM REAL ESTATE, LLC	100.0	
BIGELOW & OLD WORCESTER, LLC	100.0	04-2495247
ACIC HOLDINGS COMPANY, INC.	95.0	05-0501519
THE COMMERCE WEST INSURANCE COMPANY	100.0	13161 94-1137122
AMERICAN COMMERCE INSURANCE COMPANY	100.0	19941 31-4361173
MAPFRE INSURANCE COMPANY OF NEW YORK	100.0	25275 13-1773336
MAPFRE INSURANCE COMPANY	100.0	85561 51-0137488
MAPFRE SEGUROS GERAIS S.A.	100.0	
MAPFRE SEGUROS DE VIDA S.A.	100.0	
TURKIYE GENEL SIGORTA, A.S.	99.7	
GENEL YASAM SIFORTA, A.S.	100.0	
GENEL SERVİSYEDEK PARCA DAGITIM TICARET ANONIM SİRKET	51.0	
MAPFRE INSULAR INSURANCE CORPORATION	74.9	
MIDDLESEA INSURANCE P.L.C.	54.6	
M.S.V. LIFE P.L.C.	50.0	
BEE INSURANCE MANAGEMENT LTD	100.0	
MIDDLESEA ASSIST LIMITED	49.0	
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.0	
IBEROASISTENCIA, ARGENTINA S.A.	100.0	
IBERO ASISTENCIA, S.A.	100.0	
VENEASISTENCIA, S.A.	100.0	
IRELAND ASSIST, LTD	100.0	
MEXICO ASISTENCIA, S.A.	100.0	
FEDERAL ASSIST CO.	100.0	
C.I. DE SERVICIOS Y ASIST.	100.0	
ALLMAP ASSIST	100.0	
ARAB ASSIST	100.0	
LLC M. WARRANTY	100.0	
MAPFRE ASISTENCIA LIMITED	100.0	
MAPFRE ASISTENCIA COMPANY LIMITED	100.0	
MAPFRE WARRANTY JAPAN	100.0	
INSURE AND GO USA	100.0	
COSTA RICA ASISTENCIA	100.0	
QUETZAL ASISTENCIA, S.A.	100.0	
NICASSIT, S.A.	100.0	
EL SALVADOR ASISTENCIA, S.A.	100.0	
NORASIST, INC D/B/A ROAD CANADA	100.0	
BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	100.0	
VIAJES MAPFRE CCI, S.L.	100.0	
ROAD CHINA ASISTANCE	100.0	
INSURE AND GO AUSTRALIA	100.0	
BRASIL ASISTENCIA S/A	100.0	
MAPFRE WARRANTY BRASIL LTDA	100.0	
MAPFRE ABRAXAS SOFTWARE, LTD	100.0	
MAPFRE WARRANTY UK LIMITED	100.0	
MAPFRE WARRANTY S.P.A.	100.0	
MAPFRE WARRANTIES	100.0	
FRANCE ASSIST	100.0	
ALLIANCE OPTIMALE, S.L.R.	100.0	
MAPFRE ASSISTANCE USA INC.	100.0	
CENTURY AUTOMOTIVE SERVICES COMPANY	100.0	
INSURE AND GO	100.0	
TRAVEL CLAIMS SERVICES LIMITED	100.0	
INSURE AND GO AUSTRALASIA	100.0	
CIG SERVICES LIMITED	100.0	
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	94.9	
ECUASISTENCIA	94.5	
PERU ASISTENCIA, S.A.	99.9	
CONSULTING DE SERVICIOS Y TECNOLOGIA SIAM, S.A.	99.9	
IBEROASISTENCIA INTERNACIONAL	99.8	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6	
EUROSOS	99.5	
URUGUAY ASISTENCIA	94.8	
SUR ASISTENCIA, S.A.	99.0	
NILE ASSIT	98.0	
TUR ASSIST	91.7	
ROAD CHINA ASSISTANCE CO., LTD.	60.3	

IBEROASISTENCIA, S.A.	99.9
MIDDLESEA ASSIST LIMITED	51.0
ASISTENCIA BOLIVIANA	99.5
GULF ASSIST, B.S.C.	74.6
CARIBE ASISTENCIA	73.7
BENELUX ASSIST, S.A.	70.0
PANAMA ASISTENCIA	58.0
LIB ASSIST	51.0
AFRIQUE ASSISTANCE, S.A.	49.0
MAPFRE INMUEBLES, S.G.A.	10.0
INMOBILIARIA MAPINVER S.A.	100.0
DESARROLLOS URBANOS CIC, S.A.	99.9
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9
MAPFRE GLOBAL RISKS	100.0
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0
SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	100.0
INDUSTRIAL RE MUSINI S.A.	100.0
MAPFRE SERVICIOS DE CAUCION S.A.	99.7
SOLUNION SEGUROS DE CREDITO S.A.	50.0
SOLUNION SERVICIOS DE CREDITO, S.L.U.	100.0
SOLUNION SERVICIOS DE CREDITO ARGENTINA	95.0
MAPFRE AMERICA CAUCION Y CREDITO	100.0
MAPFRE GARANTIAS Y CREDITO CIA DE SEGUROS, S.A.	100.0
MAPFRE SEGUROS DE CREDITO S.A.	100.0
COMPANIA DE SEGUROS DE CREDITOS COMERCIALES, S.A.	94.9
MAPFRE SEGUROS DE EMPRESAS	100.0
MAPFRE INMUEBLES, S.G.A.	26.7
INMOBILIARIA MAPINVER S.A.	100.0
DESARROLLOS URBANOS CIC, S.A.	99.9
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0
BANKINTER SEGUROS GENERALES, S.A.	25.0
MAPFRE SERVICIOS MARITIMOS, COMISARIADO Y LIQUIDACION DE AVERIAS, S.A.	100.0
SERVICIOS DE PERITACION MAPFRE S.A.	96.0
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3
AGROSEGURO, S.A.	20.1
ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	60.0
ITSEMAP BRASIL, LTDA	100.0
ITSEMAP MEXICO, S.A.	100.0
ITSEMAP PORTUGAL, LTDA	100.0
ITSEMAP CHILE, S.A.	75.0
MAQUAVIT INMUEBLES, S.L.	56.8
BIOINGENIERIA ARAGONESA, S.L.	60.0
PROVITAE CENTROS ASISTENCIALES, S.L.	50.0
FANCY INVESTMENT S.A.	100.0
CENTRO INTERNACIONAL DE FORMACION DE DIRECTIVOS S.A.	100.0

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
Members														
							MAPFRE, S.A.....	ESP.....	UIP.....					
							MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							POLICLINICO SALUD 4, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MULTISERVICAR.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE GESTION DE FLOTAS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE MULTICENTRO DEL AUTOMOVIL, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BUSINESS LAB VENTURES, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	97.500	MAPFRE S.A.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	78.500	MAPFRE S.A.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	14.700	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESAS.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							DISEÑO URBANO, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	

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SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							FINLOG-ALUGUER E COMERCIO DE AUTOMOVEIS, S.A.	PRT.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							CATALUNYA CAIXA ASSEGURANCES GENERALS	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							AUTOMOCION PENINSULAR INMUEBLES, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ONLINE SHOPPING CLUB EUROPE, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	49.900	MAPFRE S.A.....	
							BANKINTER SEGUROS GENERALES, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	25.100	MAPFRE S.A.....	
							BANKINTER SEGUROS GENERALES, S.A.	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESAS	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							RESTREATOR.COM LTD.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	22.500	MAPFRE S.A.....	
							AUDATEX ESPANA, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	12.500	MAPFRE S.A.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	16.400	MAPFRE S.A.....	
							FUNESPANA, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	63.800	MAPFRE S.A.....	
							FUNERARIA PEDROLA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNEBALEAR, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUENMALAGA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS EMPRESAS MORTUORIAS PONTEVEDRESAS, S.A.	ESP.....	NIA.....	FUNESPANA, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							KEGYELET TEMETKEZESI SZOLGALAT	HUN.....	NIA.....	FUNESPANA, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.1

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							TANATORIO ZRT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ALL FUNERAL SERVICES, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERIRIA CRESPO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIO SAN ALBERTO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNEGRUP, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SALZILLO SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS Y GESTION FUNERARIA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS EL CARMEN, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA GIMENO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA SANTO ROSTRO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI ALACANT, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI BENIDORM, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIO DE ARANJUEZ, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORI LA DAMA D'ELX, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	97.100	MAPFRE S.A.....	
							ZACARIAS NUNO, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							FUNERARIA TERRASA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							EUROPEA DE FINANZAS Y C.S.E., S.A.....	ESP.....	NIA.....	FUNERARIA TERRASA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.....	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP.....	65.000	MAPFRE S.A.....	
							CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.....	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							FUNETXEA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA SARRIA, S.A.....	ESP.....	NIA.....	FUNETXEA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA ZETA ORBITAL, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIA VALLE DEL EBRO, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INICIATIVAS ALCAESAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	65.000	MAPFRE S.A.....	
							ALCAESAR FUNERHERVAS, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ALCAESAR FUNERCORIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERTRUJILLO, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	30.000	MAPFRE S.A.....	
							ALCAESAR FUNERPLASENCIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							NUEVO TANATORIO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							NUEVOS SERVICIOS FUNERARIOS, S.L.....	ESP.....	NIA.....	NUEVO TANATORIO, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	

Q12.2

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							TANATORIO Y CEMENTERIO DE SANLUCAR, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS LA CARIDAD, S.L.....	OWNERSHIP.....	75.000	MAPFRE S.A.....	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							GESTION DE CEMENTERIS DE TARRAGONA.....	ESP.....	NIA.....	EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							GAB MANAGEMENT & CONSULTING, S.R.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	77.600	MAPFRE S.A.....	
							POMPAS FUNEBRES DOMINGO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	75.000	MAPFRE S.A.....	
							DE MENA SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	70.000	MAPFRE S.A.....	
							CEMENTERIO PARQUE ANDUJAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	
							FUNBIERZO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							FUNERARIA HISPALENSE, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ISABELO ALVAREZ MAYORGA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS DEL NERVION, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							EMPRESA MIXTA SERVICIOS FUNERARIOS DE MADRID, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							TANATORIO DE ECIJA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							TANATORIO SE-30 SEVILLA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							HIJOS DE LUIS SANTOS, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FUNERARIAS REUNIDAS DEL BIERZO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	66.000	MAPFRE S.A.....	
							FUNERARIAS REUNIDAS DEL BIERZO, S.A.....	ESP.....	NIA.....	HIJOS DE LUIS SANTOS, S.L.....	OWNERSHIP.....	34.000	MAPFRE S.A.....	
							MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							MIRACETI S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INVERSION SOCIEDAD DE VALORES S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE INVERSION DOS SOCIEDAD GESTORA DE INSTITUCIONES DE INVERSION COLECTIVA S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	99.900	MAPFRE S.A.....	

Q12.3

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...99.800	MAPFRE S.A.....	
							MAPFRE CAJA MADRID VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...51.000	MAPFRE S.A.....	
							CATALUNYACAIXA VIDA S.A. D'ASSEGURANCES I	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...91.500	MAPFRE S.A.....	
							INVERSIONES IBERICAS, L.T.D.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							REINSURANCE MANAGEMENT INC.....	USA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	

Q12.4

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE CHILE REASEGUROS, S.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							C R ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CAJA REASEGURADORA DE CHILE, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							INMOBILIARIA TIRILLUCA S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	43.800	MAPFRE S.A.....	
							INMOBILIARIA COSTA DE MONTEMAR, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.400	MAPFRE S.A.....	
							ADMINISTRADORA DE PROPIEDADES S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.300	MAPFRE S.A.....	
							COMMERCIAL Y TURISMO, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP.....	31.200	MAPFRE S.A.....	
							MAPFRE MANDATOS Y SERVICIOS, S.A.....	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	95.000	MAPFRE S.A.....	
							MAPFRE AMERICA, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	99.200	MAPFRE S.A.....	
							MAPFRE ARGENTINA HOLDING.....	ARG.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SURASSUR S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	96.100	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CESVI ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP.....	65.000	MAPFRE S.A.....	
							ACONCAGUA SEGUROS DE RETIRO S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	23.600	MAPFRE S.A.....	
							ACONCAGUA SEGUROS DE RETIRO S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP.....	76.400	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.....	ARG.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	64.000	MAPFRE S.A.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP.....	36.000	MAPFRE S.A.....	
	MAPFRE INSURANCE GROUP.....		66-0781080				MAPFRE PRAICO CORPORATION.....	PR.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	31690.....	66-0319465				MAPFRE PAN AMERICAN INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0391019				MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0621733				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0595402				AUTO GUARD INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0638119				MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	77054.....	66-0402309				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	43052.....	66-0470284				MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
0411.....	MAPFRE INSURANCE GROUP.....	18120.....	66-0347194				MAPFRE PREFERRED RISK INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							CLUB MAPFRE S.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CEFOPROSEG C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.5

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							INVERSORA SEGURIDAD C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							AUTOMOTRIZ MULTISERVICAR, C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							MAPFRE CHILE SEGUROS S.A.....	CHL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							EUROAMERICA ASESORIAS GENERALES S.A.....	CHL.....	NIA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.....	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	81.400	MAPFRE S.A.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.....	CHL.....	IA.....	EUROAMERICA ASESORIAS GENERALES S.A.....	OWNERSHIP.....	18.600	MAPFRE S.A.....	
							MAPFRE CHILE VIDA S.A.....	CHL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE.....	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INVERSIONES MAPFRE CHILE LIMITADA.....	CHL.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							DETECTAR DESENVOLVIMENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SAUDE LTDA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PREVIDENCIA S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGURADORA DE CREDITO A LA EXPORTACION, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE CAPITALIZACAO.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE BB SH2 PARTICIPACOES, S.A.....	BRA.....	IA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ALIANCA DO BRASIL SEGUROS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS GERAIS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE AFFINITY SEGURADORA.....	BRA.....	IA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ASSISTENCIA.....	BRA.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							BB MAPFRE SH1 PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							MAPFRE VIDA S.A.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VIDA SEGURADORA.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.6

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	BRA.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	86.300	MAPFRE S.A.....	
							MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	COL.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	94.300	MAPFRE S.A.....	
							GESTIMAP S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP...	92.300	MAPFRE S.A.....	
							CREDIMAPFRE.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP...	94.900	MAPFRE S.A.....	
							AUTOMOTORES CAPITAL LTDA.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE COLOMBIA VIDA S.A.....	COL.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	94.400	MAPFRE S.A.....	
							CESVI COLOMBIA, S.A.....	COL.....	IA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP...	63.900	MAPFRE S.A.....	
							MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	PER.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	67.300	MAPFRE S.A.....	
							CORPORACION FINISTERRE, S.A.....	PER.....	NIA.....	MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	PER.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	99.200	MAPFRE S.A.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	PER.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	98.600	MAPFRE S.A.....	
							MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	ECU.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	60.000	MAPFRE S.A.....	
							MAPFRE SOFT S.A.....	ESP.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	PRY.....	IA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	89.500	MAPFRE S.A.....	
							APOINT S.A.....	URY.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE LA URUGUAYA S.A.....	URY.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE DOMINICANA S.A.....	DOM.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE BHD COMPANIA DE SEGUROS, S.A.....	DOM.....	IA.....	MAPFRE DOMINICANA S.A.....	OWNERSHIP...	51.000	MAPFRE S.A.....	
							CREDI PRIMAS, S.A.....	DOM.....	NIA.....	MAPFRE BHD COMPANIA DE SEGUROS, S.A.	OWNERSHIP...	100.000	MAPFRE S.A.....	
							GRUPO CORPORATIVO LML S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	100.000	MAPFRE S.A.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	55.700	MAPFRE S.A.....	

Q12.7

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	GRUPO CORPORATIVO LML S.A. DE C.V.....	OWNERSHIP.....	44.300	MAPFRE S.A.....	
							UNIDAD MOVIL DE DIAGNOSTICO S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TEPEYAC INC.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS MEXICANOS.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE FIANZAS S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	78.800	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	16.000	MAPFRE S.A.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	14.000	MAPFRE S.A.....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE PANAMA.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	78.900	MAPFRE S.A.....	
							MPF TENEDORA AC, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE COSTA RICA.....	CRI.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE GUATEMALA.....	GTM.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE NICARAGUA.....	NIC.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	25.100	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MPF TENEDORA AC, S.A.....	OWNERSHIP.....	73.000	MAPFRE S.A.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-2599931				MAPFRE USA CORPORATION INC.....	MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274.....	04-2739876				THE CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-3148033				BAY FINANCE HOLDING COMPANY.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INPOP USA, LLC.....	VA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754.....	04-2495247				THE COMMERCE INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			65-0214501				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932.....	65-0131982				MAPFRE INSURANCE COMPANY OF FLORIDA.....	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876.....	36-3347420				MAPFRE INSURANCE COMPANY.....	NJ.....	IA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MM REAL ESTATE, LLC.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			04-2495247				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	85561.....	51-0137488				MAPFRE LIFE INSURANCE COMPANY.....	DE.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.8

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS DE VIDA S.A.....	PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TURKIYE GENEL SIGORTA, A.S.....	TUR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							GENEL YASAM SIFORTA, A.S.....	TUR.....	NIA.....	TURKIYE GENEL SIGORTA, A.S.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							GENEL SERVİSYEDEK PARCA DAGITIM TICARET ANONİM SİRKET	TUR.....	NIA.....	TURKIYE GENEL SIGORTA, A.S.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							MAPFRE INSULAR INSURANCE CORPORATION	PHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	74.900	MAPFRE S.A.....	
			05-0501519				ACIC HOLDINGS COMPANY, INC.....	MA.....	UDP.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	95.000	MAPFRE S.A.....	**
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161.....	94-1137122				THE COMMERCE WEST INSURANCE COMPANY	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941.....	31-4361173				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	25275.....	13-1773336				MAPFRE INSURANCE COMPANY OF NEW YORK	NY.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MIDDLESEA INSURANCE P.L.C.....	MLT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	54.600	MAPFRE S.A.....	
							M.S.V. LIFE P.L.C.....	MLT.....	IA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							BEE INSURANCE MANAGEMENT LTD.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IBERO ASISTENCIA, S.A.....	PRT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							VENEASISTENCIA, S.A.....	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							IRELAND ASSIST, LTD.....	IRL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MEXICO ASISTENCIA, S.A.....	MEX.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							FEDERAL ASSIST CO.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.9

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	Federal ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	*
							C.I. DE SERVICIOS Y ASIST.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							ALLMAP ASSIST.....	DEU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							ARAB ASSIST.....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							LLC M. WARRANTY.....	RUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA LIMITED.....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE ASISTENCIA COMPANY LIMITED.....	TWN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY JAPAN.....	JPN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							INSURE AND GO USA.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							COSTA RICA ASISTENCIA.....	CRI.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							QUETZAL ASISTENCIA, S.A.....	GTM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							NICASSIT, S.A.....	NIC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							EL SALVADOR ASISTENCIA, S.A.....	SLV.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	

Q12.10

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							NORASIST, INC D/B/A ROAD CANADA.....	CAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							VIAJES MAPFRE CCI, S.L.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ROAD CHINA ASISTANCE.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							INSURE AND GO AUSTRALIA.....	AUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							BRASIL ASISTENCIA S/A.....	BRA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY BRASIL LTDA.....	BRA.....	NIA.....	BRASIL ASISTENCIA S/A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE ABRAXAS SOFTWARE, LTD.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY UK LIMITED.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTY S.P.A.....	ITA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE WARRANTIES.....	LUX.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							FRANCE ASSIST.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ALLIANCE OPTIMALE, S.L.R.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MAPFRE ASSISTANCE USA INC.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							CENTURY AUTOMOTIVE SERVICES COMPANY	NM.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							INSURE AND GO.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	

Q12.11

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INSURE AND GO AUSTRALASIA.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CIG SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.....	COL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	94.900	MAPFRE S.A.....	
							ECUASISTENCIA.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	94.500	MAPFRE S.A.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							CONSULTING DE SERVICIOS Y TECNOLOGIA SIAM, S.A.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							IBEROASISTECIA INTERNACIONAL.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED.....	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.600	MAPFRE S.A.....	
							EUROSOS.....	GRC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							URUGUAY ASISTENCIA.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	94.800	MAPFRE S.A.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	99.000	MAPFRE S.A.....	
							NILE ASSIT.....	EGY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	98.000	MAPFRE S.A.....	
							TUR ASSIST.....	TUR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	91.700	MAPFRE S.A.....	
							ROAD CHINA ASSISTANCE CO., LTD.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	60.300	MAPFRE S.A.....	

Q12.12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							IBEROASISTENCIA, S.A.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							ASISTENCIA BOLIVIANA.....	BOL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	74.600	MAPFRE S.A.....	
							CARIBE ASISTENCIA.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	73.700	MAPFRE S.A.....	
							BENELUX ASSIST, S.A.....	BEL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	70.000	MAPFRE S.A.....	
							PANAMA ASISTENCIA.....	PAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	58.000	MAPFRE S.A.....	
							LIB ASSIST.....	LBY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							AFRIQUE ASSISTANCE, S.A.....	TUN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	49.000	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.200	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	26.700	MAPFRE S.A.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							INMOBILIARIA MAPINVER S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							MAPFRE GLOBAL RISKS.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	

Q12.13

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INDUSTRIAL RE MUSINI S.A.....	LUX.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS DE CAUCION S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							SOLUNION SERVICIOS DE CREDITO, S.L.U.....	ESP.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SOLUNION SERVICIOS DE CREDITO ARGENTINA	ARG.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	95.000	MAPFRE S.A.....	
							MAPFRE AMERICA CAUCION Y CREDITO.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE GARANTIAS Y CREDITO CIA DE SEGUROS, S.A.	CHL.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS DE CREDITO S.A.....	MEX.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							COMPANIA DE SEGUROS DE CREDITOS COMERCIALES, S.A.	COL.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	94.900	MAPFRE S.A.....	
							MAPFRE SEGUROS DE EMPRESA.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS MARITIMOS, COMISARIADO Y LIQUIDACION DE AVERIAS, S.A.	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SERVICIOS DE PERITACION MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	96.000	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	33.400	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	33.300	MAPFRE S.A.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	33.300	MAPFRE S.A.....	
							AGROSEGURO, S.A.....	ESP.....	NIA.....	MAPFRE SEGUROS DE EMPRESA.....	OWNERSHIP.....	20.100	MAPFRE S.A.....	
							ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	
							ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	40.000	MAPFRE S.A.....	
							ITSEMAP BRASIL, LTDA.....	BRA.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP MEXICO, S.A.....	MEX.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP PORTUGAL, LTDA.....	PRT.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP.....	75.000	MAPFRE S.A.....	

Q12.14

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 Federal ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries or Affiliates	9 Domiciliary Location	10 Relationship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership Board, Management Attorney-in-Fact, Influence, Other)	13 If Control is Ownership Provide Percentage	14 Ultimate Controlling Entity(ies)/Person(s)	15 *
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	INVERSIONES IBERICAS.....	OWNERSHIP....25.000	MAPFRE S.A.....	
							MAQUAVIT INMUEBLES, S.L.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....56.800	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....40.000	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....60.000	MAPFRE S.A.....	
							PROVITAE CENTROS ASISTENCIALES, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....50.000	MAPFRE S.A.....	
							FANCY INVESTMENT S.A.....	URY.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CENTRO INTERNACIONAL DE FORMACION DE DIRECTIVOS S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	

Q12.15

Asterisk	Explanation
*	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 and 0.06% owned by AAA Ohio Auto Club and AAA Oregon/Idaho each.

American Commerce Insurance Company PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	1,952,781	921,494	47.2	11.9
2. Allied lines.....	57,609	40,319	70.0	67.9
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	67,233,739	44,170,822	65.7	55.4
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	665,607	470,178	70.6	32.5
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.....	65,257	58,969	90.4	3.1
14. Credit accident and health.....			0.0	
15. Other accident and health.....			0.0	
16. Workers' compensation.....			0.0	
17.1. Other liability-occurrence.....	2,415,617	9,888	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.....	87,321,231	70,593,440	80.8	79.1
19.3, 19.4. Commercial auto liability.....			0.0	
21. Auto physical damage.....	47,983,636	28,655,420	59.7	57.8
22. Aircraft (all perils).....	713,630	(843,532)	(118.2)	80.6
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.....	98,312	169,421	172.3	
35. Totals.....	208,507,419	144,246,419	69.2	65.4
DETAILS OF WRITE-INS				
3401. TRAVEL.....	98,312	169,421	172.3	
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).....	98,312	169,421	172.3	

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1	2	3
	Current Quarter	Current Year to Date	Prior Year Year to Date
1. Fire.....	674,318	1,941,109	2,014,990
2. Allied lines.....	22,305	61,219	52,406
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	24,832,994	71,250,966	65,573,374
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	239,454	658,720	218,924
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....	26,232	65,136	19,414
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	3,121,705	8,945,851	7,120,651
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.....	29,017,561	89,036,202	87,658,112
19.3 19.4. Commercial auto liability.....			
21. Auto physical damage.....	16,559,505	49,822,363	46,674,005
22. Aircraft (all perils).....	2,986,569	3,292,365	966,652
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.....	44,611	118,607	0
35. Totals.....	77,525,254	225,192,538	210,298,528
DETAILS OF WRITE-INS			
3401. TRAVEL.....	44,611	118,607	
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).....	44,611	118,607	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)	2014 Loss and LAE Payments on Claims Reported as of Prior Year-End	2014 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2014 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. 2011 + Prior.....	24,955	(8,755)	16,200	8,208	137	8,345	15,147	166	(4,821)	10,492	(1,600)	4,237	2,637
2. 2012.....	17,262	(2,790)	14,472	5,331	220	5,551	12,075	82	(2,916)	9,241	144	176	320
3. Subtotals 2012 + Prior.....	42,217	(11,545)	30,672	13,539	357	13,896	27,222	248	(7,737)	19,733	(1,456)	4,413	2,957
4. 2013.....	31,041	7,744	38,785	16,245	3,697	19,942	19,655	456	(1,121)	18,990	4,859	(4,712)	147
5. Subtotals 2013 + Prior.....	73,258	(3,801)	69,457	29,784	4,054	33,838	46,877	704	(8,858)	38,723	3,403	(299)	3,104
6. 2014.....	XXX	XXX	XXX	XXX	59,607	59,607	XXX	25,770	10,183	35,953	XXX	XXX	XXX
7. Totals.....	73,258	(3,801)	69,457	29,784	63,661	93,445	46,877	26,474	1,325	74,676	3,403	(299)	3,104
8. Prior Year-End's Surplus As Regards Policyholders	111,995										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
											1.4.6 %	2.7.9 %	3.4.5 %
													Col. 13, Line 7 Line 8
													4.2.8 %

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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:



Statement for September 30, 2014 of the **American Commerce Insurance Company**
Overflow Page for Write-Ins

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. Miscellaneous assets.....	4,890		4,890	2,267
2505. Premium tax recoverable.....	97,410		97,410	23,037
2597. Summary of remaining write-ins for Line 25.....	102,300	0	102,300	25,304

American Commerce Insurance Company
SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,594,549	1,724,127
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....	44,089	6,066
3. Current year change in encumbrances.....		
4. Total gain (loss) on disposals.....		
5. Deduct amounts received on disposals.....		
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.....	101,605	135,644
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,537,033	1,594,549
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,537,033	1,594,549

SCHEDULE B - VERIFICATION

Mortgage Loans

	1 Year to Date	2 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 Year to Date	2 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 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	157,693,327	169,110,027
2. Cost of bonds and stocks acquired.....	40,673,636	46,391,634
3. Accrual of discount.....	362,132	697,538
4. Unrealized valuation increase (decrease).....	(784,199)	(188,591)
5. Total gain (loss) on disposals.....	2,151,501	1,731,297
6. Deduct consideration for bonds and stocks disposed of.....	34,593,947	59,198,285
7. Deduct amortization of premium.....	501,439	705,236
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other than temporary impairment recognized.....		145,057
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	165,001,011	157,693,327
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	165,001,011	157,693,327

SCHEDULE D - PART 1B

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

	1	2	3	4	5	6	7	8
NAIC Designation	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. NAIC 1 (a).....	136,045,316	11,825,753	12,241,315	(2,279,420)	130,494,205	136,045,316	133,350,334	126,900,804
2. NAIC 2 (a).....	25,877,149	3,131,660	1,008,411	(13,790)	28,290,267	25,877,149	27,986,608	28,436,847
3. NAIC 3 (a).....				1,245,600			1,245,600	
4. NAIC 4 (a).....	81,758		3,359	(49)	85,490	81,758	78,350	86,926
5. NAIC 5 (a).....								
6. NAIC 6 (a).....					106,226			108,771
7. Total Bonds.....	162,004,223	14,957,413	13,253,085	(1,047,659)	158,976,188	162,004,223	162,660,892	155,533,348
PREFERRED STOCK								
8. NAIC 1.....								
9. NAIC 2.....	1,596,399			(16,780)	1,569,369	1,596,399	1,579,619	1,456,979
10. NAIC 3.....	783,904			(23,404)	770,000	783,904	760,500	703,000
11. NAIC 4.....								
12. NAIC 5.....								
13. NAIC 6.....								
14. Total Preferred Stock.....	2,380,303	0	0	(40,184)	2,339,369	2,380,303	2,340,119	2,159,979
15. Total Bonds and Preferred Stock.....	164,384,526	14,957,413	13,253,085	(1,087,843)	161,315,557	164,384,526	165,001,011	157,693,327

QS102

(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 Description of Property	Location		4 Date Acquired	5 Name of Vendor	6 Actual Cost at Time of Acquisition	7 Amount of Encumbrances	8 Book/Adjusted Carrying Value Less Encumbrances	9 Additional Investment Made After Acquisition
	2 City	3 State						
Acquired by Purchase								
ADDITIONS TO: THREE STORY BUILDING, 37,077 SQUARE FEET, LOCATED ON 6.002 ACRES OF LAND ON FOUR SEPARATE PARCELS	COLUMBUS	OH	09/30/2014	VARIOUS			1,537,033	44,089
0199999 Totals					0	0	1,537,033	44,089
0399999 Totals					0	0	1,537,033	44,089

QE01

SCHEDULE A - PART 3

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

1 Description of Property	Location		4 Disposal Date	5 Name of Purchaser	6 Actual Cost	7 Expended for Additions, Permanent Improvements and Changes in Encumbrances	8 Book/Adjusted Carrying Value Less Encumbrances Prior Year	Change in Book/Adjusted Carrying Value Less Encumbrances					14 Book/Adjusted Carrying Value Less Encumbrances on Disposal	15 Amounts Received During Year	16 Foreign Exchange Gain (Loss) on Disposal	17 Realized Gain (Loss) on Disposal	18 Total Gain (Loss) on Disposal	19 Gross Income Earned Less Interest Incurred on Encumbrances	20 Taxes, Repairs, and Expenses Incurred
	2 City	3 State						9 Current Year's Depreciation	10 Current Year's Other Than Temporary Impairment Recognized	11 Current Year's Change in Encumbrances	12 Total Change in B./A.C.V. (11 - 9 - 10)	13 Total Foreign Exchange Change in B./A.C.V.							
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 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Number of Shares of Stock	7 Actual Cost	8 Par Value	9 Paid for Accrued Interest and Dividends	10 NAIC Designation or Market Indicator (a)
Bonds - U.S. Special Revenue and Special Assessment									
3137AU XX 2	FEDERAL HOME LN MTG COR REMIC.....		08/21/2014	JANNEY MONTGOMERY SCOTT.....		1,399,249	1,367,623	2,849	1.....
3137BD 3T 1	FHLMC REMIC SERIES 4379.....		09/09/2014	BAIRD, ROBERT W. & CO.....		2,094,319	1,989,852	2,128	1.....
3199999	Total Bonds - U.S. Special Revenue and Special Assessment.....					3,493,568	3,357,475	4,977	XXX.....
Bonds - Industrial and Miscellaneous									
00203Q AB 3	AP MOLLER MAERSK A/S.....	F.....	09/18/2014	PIERPONT SECURITIES.....		998,260	1,000,000	104	2FE.....
03073E AL 9	AMERISOURCEBERGEN CORP.....		07/08/2014	RBC CAPITAL MARKETS.....		994,010	1,000,000	4,628	1FE.....
032511 BJ 5	ANADARKO PETROLEUM CORP.....		07/01/2014	DEUTSCHE BANK.....		999,400	1,000,000		2FE.....
07330M AA 5	BRANCH BANKING & TRUST.....		09/23/2014	PIERPONT SECURITIES.....		999,290	1,000,000		1FE.....
141781 AY 0	CARGILL INC.....		08/25/2014	PIERPONT SECURITIES.....		1,097,170	1,000,000	12,442	1FE.....
372917 AS 3	GENZYME CORP.....		07/31/2014	RW PRESSPRICH & CO.....		1,585,430	1,400,000	9,722	1FE.....
46625H HS 2	JPMORGAN CHASE.....		07/30/2014	PIERPONT SECURITIES.....		1,630,845	1,500,000	2,200	1FE.....
49326E ED 1	KEYCORP.....		08/12/2014	DEUTSCHE BANK.....		1,134,000	1,000,000	19,975	2FE.....
713448 BY 3	PEPSICO INC.....		09/10/2014	WELLS FARGO SECURITIES, L.....		1,479,900	1,500,000	1,146	1FE.....
907818 DG 0	UNION PAC CORP.....		08/06/2014	RW PRESSPRICH & CO.....		545,540	500,000	556	1FE.....
3899999	Total Bonds - Industrial and Miscellaneous.....					11,463,845	10,900,000	50,773	XXX.....
8399997	Total Bonds - Part 3.....					14,957,413	14,257,475	55,750	XXX.....
8399999	Total Bonds.....					14,957,413	14,257,475	55,750	XXX.....
Preferred Stocks - Industrial and Miscellaneous									
172967 ER 8	CITIGROUP INC.....		09/22/2014	CL ACT SETLMNT.....	0.010		100.00		P1LFE.....
8499999	Total Preferred Stocks - Industrial and Miscellaneous.....					0	XXX	0	XXX.....
8999997	Total Preferred Stocks - Part 3.....					0	XXX	0	XXX.....
8999999	Total Preferred Stocks.....					0	XXX	0	XXX.....
9899999	Total Preferred and Common Stocks.....					0	XXX	0	XXX.....
9999999	Total Bonds, Preferred and Common Stocks.....					14,957,413	XXX	55,750	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	For 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	Stated Contractual Maturity Date	NAIC Designation or Market Indicator (a)
Bonds - U.S. Government																					
36225B GW 2	GNMA POOL #0781113.....		09/15/2014	PAYDOWN OF PRINCIPAL.....		6,177	6,177	6,402	6,351		(4)		(4)		6,347		(171)	(171)	288	11/15/2029	1.....
83162C TA 1	SMALL BUS ADMIN GTD DEV PTC.....		07/01/2014	PRINCIPAL RECEIPT.....		272,311	272,311	300,520	299,463		(27,152)		(27,152)		272,311				0	01/01/2030	1.....
0599999. Total Bonds - U.S. Government.....						278,488	278,487	306,922	305,814	0	(27,156)	0	(27,156)	0	278,658	0	(171)	(171)	12,665	XXX...	XXX...
Bonds - U.S. Political Subdivisions of States, Territories and Possessions																					
521840 T2 4	LEANDER TEX INDPT SCH DIST.....		09/26/2014	CALLED @ 20.0576100.....		2,005,761	10,000,000	1,822,500	1,945,016		60,412		60,412		2,005,428		333	333		08/15/2043	1FE.....
2499999. Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....						2,005,761	10,000,000	1,822,500	1,945,016	0	60,412	0	60,412	0	2,005,428	0	333	333	0	XXX...	XXX...
Bonds - U.S. Special Revenue and Special Assessment																					
115030 HY 7	BROWARD CNTY FLA HSG FIN AUTH SIN.....		07/01/2014	CALLED @ 100.0000000.....		10,000	10,000	10,560	10,346		(19)		(19)		10,327		(327)	(327)	309	10/01/2039	1FE.....
23410B AB 7	DAKOTA CNTY MINN CMNTY DEV AGY.....		08/01/2014	CALLED @ 100.0000000.....		19,426	19,426	20,203	19,787		(40)		(40)		19,747		(321)	(321)	585	12/01/2038	1FE.....
31396P GT 2	FANNIE MAE - ACES.....		09/25/2014	PRINCIPAL RECEIPT.....		25,711	25,711	28,764	28,154		(2,443)		(2,443)		25,711			0	912	10/25/2032	1.....
3137AU XX 2	FEDERAL HOME LN MTG COR REMIC.....		09/15/2014	PRINCIPAL RECEIPT.....		6,192	6,192	6,335			(143)		(143)		6,192			0	15	05/15/2029	1.....
3137B7 R7 6	FHLMC REMIC SERIES 4298.....		09/15/2014	PRINCIPAL RECEIPT.....		126,219	126,219	127,955			(1,736)		(1,736)		126,219			0	1,300	02/15/2054	1.....
34073N V2 3	FLORIDA HSG FIN CORP REV MTG.....		07/01/2014	CALLED @ 100.0000000.....		15,000	15,000	13,658	13,801		13		13		13,814		1,186	1,186	705	07/01/2037	1FE.....
31403D GP 8	FNMA PASS-THRU PL#745506.....		09/25/2014	PRINCIPAL RECEIPT.....		10,895	10,895	11,741	11,085		(191)		(191)		10,895			0	422	02/01/2016	1.....
3138EK VT 9	FNMA PASS-THRU PL#AL3325.....		09/25/2014	PRINCIPAL RECEIPT.....		69,528	69,528	74,161	74,049		(4,521)		(4,521)		69,528			0	1,624	03/01/2033	1.....
3138W7 HB 3	FNMA PASS-THRU PL#AR9225.....		09/25/2014	PRINCIPAL RECEIPT.....		23,363	23,363	23,876	23,861		(499)		(499)		23,363			0	457	03/01/2043	1.....
31418A L5 5	FNMA PASS-THRU PL#MA1247.....		09/25/2014	PRINCIPAL RECEIPT.....		50,606	50,606	53,294	53,204		(2,599)		(2,599)		50,606			0	1,012	11/01/2042	1.....
3136AA JH 9	FNR 2012- 135 CA.....		09/25/2014	PRINCIPAL RECEIPT.....		79,683	79,683	79,546	79,547		136		136		79,683			0	1,061	11/25/2039	1.....
31395Q CY 4	FNS 411 A3.....		09/25/2014	PRINCIPAL RECEIPT.....		66,934	66,934	70,197	70,109		(3,175)		(3,175)		66,934			0	1,365	08/25/2042	1.....
647310 ZP 9	NM STATE SEVERANCE TAX.....		07/01/2014	MATURITY.....		1,150,000	1,150,000	1,284,861	1,158,123		(8,123)		(8,123)		1,150,000			0	57,500	07/01/2014	1FE.....
744387 AD 3	PUBLIC AUTH FOR COLO ENERGY NA NAT.....		07/11/2014	BAIRD, ROBERT W. & CO.....		2,518,000	2,000,000	1,976,000	1,978,309		267		267		1,978,576		539,424	539,424	87,028	11/15/2038	1FE.....
917436 YR 2	UTAH HSG CORP SINGLE FAMILY.....		07/01/2014	CALLED @ 100.0000000.....		15,000	15,000	15,248	15,070		(17)		(17)		15,053		(53)	(53)	803	01/01/2036	1FE.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....						4,186,557	3,668,556	3,796,399	3,535,445	0	(23,090)	0	(23,090)	0	3,646,648	0	539,909	539,909	155,098	XXX...	XXX...
Bonds - Industrial and Miscellaneous																					
767201 AC 0	RIO TINTO FIN USA LTD.....	F...	09/16/2014	Merrill Bos.....		1,165,200	1,000,000	1,117,190	1,071,069		(10,106)		(10,106)		1,060,962		104,238	104,238	76,556	07/15/2018	1FE.....
141781 AX 2	CARGILL INC.....		08/14/2014	GOLDMAN SACHS.....		1,143,490	1,000,000	1,120,700	1,067,155		(9,941)		(9,941)		1,057,214		86,276	86,276	43,667	11/27/2017	1FE.....
12667F VD 4	CWALT INC 2004-J10.....		09/25/2014	PRINCIPAL RECEIPT.....		17,846	17,846	17,578	17,619		227		227		17,846			0	596	10/25/2019	1FM.....
472319 AK 8	JEFFERIES GROUP INC.....		08/13/2014	Jefferies & Co.....		1,096,860	1,000,000	1,012,350	1,009,685		(1,274)		(1,274)		1,008,411		88,449	88,449	43,420	04/13/2018	2FE.....
59156R AR 9	METLIFE INC.....		09/16/2014	Merrill Bos.....		1,179,100	1,000,000	1,111,210	1,066,613		(9,216)		(9,216)		1,057,396		121,704	121,704	74,608	08/15/2018	1FE.....
590218 AF 0	ML MTG INV TR 2006-F1.....		09/25/2014	VARIOUS.....		3,334	3,359	3,346	3,136	209	14		223		3,359		(24)	(24)	142	04/25/2036	4FM.....
69336R CM 0	PHH MTG CAP LLC.....		09/18/2014	PRINCIPAL RECEIPT.....		19,816	19,816	19,519	19,578		238		238		19,816			0	709	11/18/2035	1FM.....
74432R AA 1	PRUDENTIAL FINL INC RETAIL.....		09/15/2014	Sink PMT @ 100.0000000.....		59,548	59,548	58,255	59,349		199		199		59,548			0	1,726	05/12/2015	1FE.....
78486Q AC 5	SVB FINL GROUP.....		08/12/2014	GOLDMAN SACHS.....		1,133,580	1,000,000	993,000	994,903		394		394		995,297		138,283	138,283	49,271	09/15/2020	1FE.....
907818 DA 3	UNION PAC CORP.....		09/16/2014	GOLDMAN SACHS.....		1,143,060	1,000,000	1,071,540	1,043,119		(6,029)		(6,029)		1,037,091		105,969	105,969	62,383	08/15/2018	1FE.....
05567L T3 1	BNP PARIBAS / BNP PARIBAS US.....	F...	07/07/2014	Merrill Bos.....		1,109,670	1,000,000	1,007,670	1,005,771		(360)		(360)		1,005,411		104,259	104,259	49,306	01/15/2021	1FE.....

QE05

SCHEDULE D - PART 4

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

1 CUSIP Identification	2 Description	3 F o r e i g n Date	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Consideration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change in Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value At Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Stated Contractual Maturity Date	22 NAIC Desig- nation or Market Indicator (a)
										11 Unrealized Valuation Increase/ (Decrease)	12 Current Year's (Amortization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recognized	14 Total Change in B./A.C.V. (11+12-13)	15 Total Foreign Exchange Change in B./A.C.V.							
3899999	Total Bonds - Industrial and Miscellaneous					8,071,504	7,100,569	7,532,358	7,357,997	209	(35,854)	0	(35,645)	0	7,322,351	0	749,154	749,154	402,384	XXX	XXX
8399997	Total Bonds - Part 4					14,542,310	21,047,612	13,458,179	13,144,272	209	(25,688)	0	(25,479)	0	13,253,085	0	1,289,225	1,289,225	570,147	XXX	XXX
8399999	Total Bonds					14,542,310	21,047,612	13,458,179	13,144,272	209	(25,688)	0	(25,479)	0	13,253,085	0	1,289,225	1,289,225	570,147	XXX	XXX
Preferred Stocks - Industrial and Miscellaneous																					
172967	ER 8 CITIGROUP INC		09/22/2014	VARIOUS	0.010	17,681	100.00						0				17,681	17,681		XXX	P1LFE
8499999	Total Preferred Stocks - Industrial and Miscellaneous					17,681	XXX	0	0	0	0	0	0	0	0	0	17,681	17,681	0	XXX	XXX
8999997	Total Preferred Stocks - Part 4					17,681	XXX	0	0	0	0	0	0	0	0	0	17,681	17,681	0	XXX	XXX
8999999	Total Preferred Stocks					17,681	XXX	0	0	0	0	0	0	0	0	0	17,681	17,681	0	XXX	XXX
9899999	Total Preferred and Common Stocks					17,681	XXX	0	0	0	0	0	0	0	0	0	17,681	17,681	0	XXX	XXX
9999999	Total Bonds, Preferred and Common Stocks					14,559,991	XXX	13,458,179	13,144,272	209	(25,688)	0	(25,479)	0	13,253,085	0	1,306,906	1,306,906	570,147	XXX	XXX

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

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

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

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

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

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

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

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

**Sch. DB-Pt D-Sn 1
NONE**

**Sch. DB-Pt D-Sn 2
NONE**

**Sch. DL-Pt. 1
NONE**

**Sch. DL-Pt. 2
NONE**

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 Govnt..... 5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	0.010		5,5615,5615,561	XXX..
MM: Fidelity Govt..... 500 Salem Street, Smithfield, RI 02917.....	0.010132	6,293,4125,793,1024,643,787	XXX..
MM: Black Rock..... One Financial Center, Boston, MA 02111.....	0.010		343343343	XXX..
The Bank of New York Mellon..... One Wall Street, NY, New York 10286.....	0.01011	282,78889,54190,135	XXX..
Deutsche Bank..... 60 Wall Street, New York, NY 10005.....				2,484,623873,517607,038	XXX..
JPMorgan Chase..... 100 E.Broad St, Columbus, OH 43215.....				1,219,450266,142393,241	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				1,913,1553,772,9005,142,001	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(67,561)(83,783)(78,574)	XXX..
JPMorgan Chase..... 100 E.Broad St, Columbus, OH 43215.....				(334,522)			XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(473,133)(595,370)(608,255)	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(814,193)(831,529)(699,566)	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(41,334)(17,377)(42,751)	XXX..
JPMorgan Chase..... 100 E.Broad St, Columbus, OH 43215.....				(729,079)(120)3,424	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(7,725,584)(7,138,653)(7,887,919)	XXX..
JPMorgan Chase..... 100 E.Broad St, Columbus, OH 43215.....				(33,687)			XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(261,122)(280,590)(274,778)	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(9,329)(9,001)(6,987)	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(62,303)(77,153)(62,124)	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				480,720496,373568,458	XXX..
Bank of America..... 100 Federal Street, Boston, MA 02110.....				(53,554)(35,670)(96,298)	XXX..
0199999. Total Open Depositories.....XXX.....XXX.....14302,074,6512,228,2331,696,736	XXX..
0399999. Total Cash on Deposit.....XXX.....XXX.....14302,074,6512,228,2331,696,736	XXX..
0599999. Total Cash.....XXX.....XXX.....14302,074,6512,228,2331,696,736	XXX..

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1 Description	2 Code	3 Date Acquired	4 Rate of Interest	5 Maturity Date	6 Book/Adjusted Carrying Value	7 Amount of Interest Due & Accrued	8 Amount Received During Year
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NONE