



QUARTERLY STATEMENT

As of March 31, 2015
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> cmulcahy@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.....	166,801,158		166,801,158	151,287,250
2. Stocks:				
2.1 Preferred stocks.....	1,538,501		1,538,501	2,312,700
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).....	1,469,296		1,469,296	1,502,792
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 (\$.....(2,039,281)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(2,039,281)		(2,039,281)	(83,835)
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).....	167,769,674	.0	167,769,674	155,018,907
13. Title plants less \$.....0 charged off (for Title insurers only).....			.0	
14. Investment income due and accrued.....	1,422,963		1,422,963	1,339,768
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	62,765,598		62,765,598	59,478,457
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.....	23,557,922		23,557,922	18,032,846
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.....	1,979,397		1,979,397	
18.2 Net deferred tax asset.....	6,751,095	99,687	6,651,408	5,009,075
19. Guaranty funds receivable or on deposit.....			.0	
20. Electronic data processing equipment and software.....	50,463		50,463	81,546
21. Furniture and equipment, including health care delivery assets (\$.....0).....	882,998	882,998	.0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			.0	
23. Receivables from parent, subsidiaries and affiliates.....			.0	4,050,866
24. Health care (\$.....0) and other amounts receivable.....			.0	
25. Aggregate write-ins for other than invested assets.....	71,949,669	2,814,174	69,135,495	67,445,218
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	337,129,779	3,796,859	333,332,920	310,456,683
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			.0	
28. Total (Lines 26 and 27).....	337,129,779	3,796,859	333,332,920	310,456,683

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.....	1,955,241	1,955,241	.0	
2502. Equity in pools and associations.....	69,132,460		69,132,460	67,441,202
2503. Arizona renewal business.....	858,933	858,933	.0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	3,035	.0	3,035	4,016
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	71,949,669	2,814,174	69,135,495	67,445,218

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....19,882,000).....	73,112,947	63,120,672
2. Reinsurance payable on paid losses and loss adjustment expenses.....	15,131,407	10,333,598
3. Loss adjustment expenses.....	16,129,387	13,820,472
4. Commissions payable, contingent commissions and other similar charges.....	3,652,349	4,329,608
5. Other expenses (excluding taxes, licenses and fees).....	909,693	925,407
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	711,023	1,106,381
7.1 Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....		1,249,812
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 \$.....193,936,011 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.....	95,211,588	87,120,649
10. Advance premium.....	6,488,770	4,141,520
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	18,512,301	18,868,158
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.....	5,890,944	
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.....	1,703,715	1,756,198
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	237,454,124	206,772,475
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	237,454,124	206,772,475
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).....	66,464,509	74,269,921
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).....	95,878,796	103,684,208
38. Totals (Page 2, Line 28, Col. 3).....	333,332,920	310,456,683

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,666,689	1,729,385
2502. Premium tax payable - Global.....	37,026	26,813
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).....	1,703,715	1,756,198
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

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 \$.....71,995,617).....	71,019,150	67,552,722	281,305,579
1.2 Assumed..... (written \$.....56,019,177).....	47,286,787	42,061,895	172,354,580
1.3 Ceded..... (written \$.....72,777,807).....	71,159,890	67,552,722	282,001,191
1.4 Net..... (written \$.....55,236,987).....	47,146,047	42,061,895	171,658,968
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....36,189,000):			
2.1 Direct.....	52,948,841	46,689,931	187,760,442
2.2 Assumed.....	37,469,438	27,944,557	112,204,796
2.3 Ceded.....	52,948,841	46,689,931	187,760,442
2.4 Net.....	37,469,438	27,944,557	112,204,796
3. Loss adjustment expenses incurred.....	6,860,411	4,945,512	19,258,821
4. Other underwriting expenses incurred.....	14,801,474	12,464,274	48,201,550
5. Aggregate write-ins for underwriting deductions.....	0	0	(15,925)
6. Total underwriting deductions (Lines 2 through 5).....	59,131,323	45,354,343	179,649,242
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(11,985,276)	(3,292,448)	(7,990,274)
INVESTMENT INCOME			
9. Net investment income earned.....	1,280,270	1,503,591	6,556,436
10. Net realized capital gains (losses) less capital gains tax of \$.....71,615.....	167,216	268,583	2,155,616
11. Net investment gain (loss) (Lines 9 + 10).....	1,447,486	1,772,174	8,712,052
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.....	549,135	576,255	2,292,127
14. Aggregate write-ins for miscellaneous income.....	17,868	19,672	111,218
15. Total other income (Lines 12 through 14).....	567,003	595,927	2,403,345
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	(9,970,787)	(924,347)	3,125,123
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).....	(9,970,787)	(924,347)	3,125,123
19. Federal and foreign income taxes incurred.....	(2,040,568)	(496,171)	66,823
20. Net income (Line 18 minus Line 19) (to Line 22).....	(7,930,219)	(428,176)	3,058,300
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	103,684,208	111,994,652	111,994,650
22. Net income (from Line 20).....	(7,930,219)	(428,176)	3,058,300
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....(69).....	128	117,684	(493,176)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	1,592,110	(164,326)	(184,438)
27. Change in nonadmitted assets.....	(585,730)	(101,404)	(261,332)
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)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	(881,701)	280,895	769,669
38. Change in surplus as regards policyholders (Lines 22 through 37).....	(7,805,412)	(295,327)	(8,310,442)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	95,878,796	111,699,325	103,684,208
DETAILS OF WRITE-INS			
0501. LAD program income.....			(15,925)
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	(15,925)
1401. Miscellaneous income.....	9,693	9,677	45,731
1402. Gain on sale of fixed assets.....	8,175	7,495	29,926
1403. Other technical income (other reinsurer).....		2,500	33,061
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	2,500
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	17,868	19,672	111,218
3701. STATUTORY POOLING ADJUSTMENT.....	544,378	280,895	769,669
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....	(1,426,079)		
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).....	(881,701)	280,895	769,669

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.....	53,941,238	44,510,717	174,374,393
2. Net investment income.....	1,334,150	1,518,843	7,002,021
3. Miscellaneous income.....	567,003	595,927	2,403,345
4. Total (Lines 1 through 3).....	55,842,391	46,625,487	183,779,759
5. Benefit and loss related payments.....	28,204,430	32,224,000	105,836,502
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	20,441,301	19,757,690	68,628,318
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$..... 1,108,149 tax on capital gains (losses).....	1,260,256	554,776	776,794
10. Total (Lines 5 through 9).....	49,905,987	52,536,466	175,241,614
11. Net cash from operations (Line 4 minus Line 10).....	5,936,404	(5,910,979)	8,538,145
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	7,185,455	10,376,680	57,216,164
12.2 Stocks.....	810,000	129,662	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).....	7,995,455	10,506,342	57,363,507
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	22,599,714	13,578,663	50,937,045
13.2 Stocks.....		0	
13.3 Mortgage loans.....			
13.4 Real estate.....			44,089
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	22,599,714	13,578,663	50,981,134
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).....	(14,604,259)	(3,072,322)	6,382,373
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.....			11,199,465
16.6 Other cash provided (applied).....	6,712,409	3,922,225	(11,350,599)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	6,712,409	3,922,225	(22,550,064)
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).....	(1,955,446)	(5,061,075)	(7,629,546)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(83,835)	7,545,711	7,545,711
19.2 End of period (Line 18 plus Line 19.1).....	(2,039,281)	2,484,636	(83,835)

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	2015	2014
NET INCOME	OH		
1. Net Income, state basis		\$ (7,930,219)	\$ 3,058,300
2. Effect of state prescribed practices		-	-
3. Effect of state permitted practices		-	-
4. Net Income, NAIC SAP basis		<u>\$ (7,930,219)</u>	<u>\$ 3,058,300</u>
SURPLUS	OH		
5. Policyholders' surplus, state basis		\$ 95,878,796	\$ 103,684,208
6. Effect of state prescribed practices		-	-
7. Effect of state permitted practices		-	-
8. Policyholders' surplus, NAIC SAP basis		<u>\$ 95,878,796</u>	<u>\$ 103,684,208</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:	\$ 42,580
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$ 144,643
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$ 1,237,735
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$ 8,173,919

5 The general categories of information considered in reaching the conclusion that the impairments are not other-than temporary include:

- . Probability of collecting all amounts due according to the contractual terms in effect at the time of acquisition.
- . Intent to sell: Is there intent to sell the security before recovery.
- . The length of time and the extent to which fair value has been less than amortized cost.
- . The financial conditions and short term prospects of the issuer.
- . Intent and Ability to hold: Is there a lack of ability to hold, where cash and working capital requirements and contractual or regulatory obligations indicate that the investment may need to be sold before the forecasted recovery occurs.

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

No significant change.

Note 7 - Investment Income

No significant change.

Note 8 - Derivative Instruments

No significant change.

Note 9 - Income Taxes

No significant change.

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

No significant change.

Note 11 - Debt

No significant change.

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 03/31/15**

Description	Level 1	Level 2	Level 3	TOTAL
Bonds	\$ -	\$ 1,401,724	\$ -	\$ 1,401,724
Preferred Stock	-	1,538,500	-	1,538,500
Common Stock	-	-	-	-
TOTALS	\$ -	\$ 2,940,224	\$ -	\$ 2,940,224

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

Description	Beginning Balance at 1/1/2015	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 3/31/2015
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	\$ 172,319,857	\$ 166,801,159	\$ 6,098,985	\$ 166,220,872	\$ -	\$ -
Preferred Stock	1,538,500	1,538,500	-	1,538,500	-	-
Common Stock	-	-	-	-	-	-
TOTALS	\$ 173,858,357	\$ 168,339,659	\$ 6,098,985	\$ 167,759,372	\$ -	\$ -

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 \$44,330,000 were lower by \$1,509,000 due to favorable development of prior year estimates. This redundancy was 1.5% of the unpaid losses and LAE of \$82,859,000 as of prior year-end.

Note 26 - Intercompany Pooling Arrangements

Effective January 1, 2015, the pooling agreement was expanded to include affiliate company Cube Insurance Company. The Company has submitted requests with the Departments of Insurance of the various states of domicile for this change. As we anticipate approval of this amendment to the pooling agreement, the Company has prepared this quarterly report using the new percentages. The revised percentages are as follows:

<u>COMPANY</u>	POOLING PERCENTAGES	
	<u>2015</u>	<u>2014</u>
The Commerce Insurance Company	65.1%	71.2%
Citation Insurance Company	8.1%	7.4%
American Commerce Insurance Company	9.8%	9.1%
Commerce West Insurance Company	5.4%	4.6%
MAPFRE Insurance Company of New York	5.0%	3.9%
MAPFRE Insurance Company of Florida	3.4%	2.1%
MAPFRE Insurance Company	2.4%	1.7%
Cube Insurance Company	0.8%	0.0%
	<u>100.0%</u>	<u>100.0%</u>

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.

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? If yes, complete Schedule Y, Parts 1 and 1A. Yes [X] No []
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes [X] No []
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.
The organizational chart has been updated to incorporate the addition of the new Cube Insurance Company, domiciled in Ohio, effective January 1, 2015.
- 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? If yes, attach an explanation. Yes [] No [X] N/A []
- 6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2013
- 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 because 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). 03/17/2010
- 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 the Department? 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 with 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]

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

FINANCIAL

- 10.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [] No [X]
- 10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$

INVESTMENT

- 11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) Yes [] No [X]
- 11.2 If yes, give full and complete information relating thereto:

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: \$
13. Amount of real estate and mortgages held in short-term investments: \$
- 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	\$	\$
14.22 Preferred Stock		
14.23 Common Stock		
14.24 Short-Term Investments		
14.25 Mortgage Loans on Real Estate		
14.26 All Other		
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	\$	\$
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above	\$	\$

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

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*?

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?

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

- 18.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Securities Valuation Office* been followed? Yes [X] No []
- 18.2 If no, list exceptions:

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 N/A
2. Has the reporting entity reinsured any risk with any other reporting entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on the risk, or portion thereof, reinsured? Yes No
- If yes, attach an explanation.

- 3.1 Have any of the reporting entity's primary reinsurance contracts been canceled? Yes No
- 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

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
	0.000	0.000								
Total	XXX	XXX								

- 5.1 Operating Percentages:
- 5.1 A&H loss percent 0.000%
- 5.2 A&H cost containment percent 0.000%
- 5.3 A&H expense percent excluding cost containment expenses 0.000%
- 6.1 Do you act as a custodian for health savings accounts? Yes No
- 6.2 If yes, please provide the amount of custodial funds held as of the reporting date.
- 6.3 Do you act as an administrator for health savings accounts? Yes No
- 6.4 If yes, please provide the amount of funds administered as of the reporting date.

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.....		104,467	95,176	(648)	2,964	28,505	59,560
2. Alaska.....AK.....L.....		37,411	2,292			7,103	4,284
3. Arizona.....AZ.....L.....		1,367,846	1,548,431	598,989	1,232,982	1,869,647	2,707,854
4. Arkansas.....AR.....L.....		41,429	32,369	4,508	3,688	26,493	20,243
5. California.....CA.....L.....		266,008	(276,833)	12,671		101,356	21,902
6. Colorado.....CO.....L.....		65,695	9,404	6,659	1,499	76,935	35,402
7. Connecticut.....CT.....L.....		13,796,569	10,834,983	6,311,335	4,771,566	23,054,132	13,337,733
8. Delaware.....DE.....L.....		45,394	(275)		29,806	1,146,851	1,278,493
9. District of Columbia.....DC.....L.....		17,952	2,263		1,192	14,714	15,966
10. Florida.....FL.....L.....		432,602	184,959	43,145	6,267	154,084	143,878
11. Georgia.....GA.....L.....		191,116	72,130	264,698	5,150	56,895	48,430
12. Hawaii.....HI.....L.....		9,092	8,740	191	316	1,448	4,255
13. Idaho.....ID.....L.....		800,521	727,446	677,647	308,999	1,227,708	1,095,909
14. Illinois.....IL.....L.....		289,793	320,826	16,309	280,024	84,515	400,980
15. Indiana.....IN.....L.....		1,277,376	1,681,132	1,265,898	1,578,451	3,375,409	2,790,556
16. Iowa.....IA.....L.....		48,549	27,437	6,550	2,580	11,337	4,504
17. Kansas.....KS.....L.....		148,614	13,803	13,899	6,489	16,613	16,549
18. Kentucky.....KY.....L.....		1,429,561	1,458,328	931,838	953,736	2,186,705	1,737,208
19. Louisiana.....LA.....L.....		116,476	98,932	11,908	98,175	111,023	150,475
20. Maine.....ME.....L.....		38,769	8,977	2,935		6,344	22,945
21. Maryland.....MD.....L.....		69,645	52,152	4,135	5,117	138,301	184,628
22. Massachusetts.....MA.....L.....		47,636	48,112			13,604	24,001
23. Michigan.....MI.....L.....		192,455	118,545	5,552	13,055	62,729	43,779
24. Minnesota.....MN.....L.....		158,378	85,038	1,768	(837)	23,811	16,666
25. Mississippi.....MS.....L.....		30,783	21,296	15,321		9,785	6,569
26. Missouri.....MO.....L.....		132,090	49,061	1,148	312	18,541	20,559
27. Montana.....MT.....L.....		10,688	1,897	1,959	321	6,540	4,024
28. Nebraska.....NE.....L.....		80,302	68,529	33,223	14,561	36,456	17,129
29. Nevada.....NV.....L.....		89,020	5,426	347,230	310,066	46,067	184,909
30. New Hampshire.....NH.....L.....		76,418	43,785		555	23,698	31,744
31. New Jersey.....NJ.....L.....		18,883,301	20,538,154	14,057,026	15,113,962	39,847,545	31,158,872
32. New Mexico.....NM.....L.....		35,134	18,737	578	998	7,438	3,826
33. New York.....NY.....L.....		314,831	255,779	1,306,459	2,418,094	6,985,855	10,899,451
34. North Carolina.....NC.....L.....		316,601	168,585	14,228	10,547	67,480	52,478
35. North Dakota.....ND.....L.....		12,537				5,050	3,587
36. Ohio.....OH.....L.....		4,772,765	4,128,993	2,664,876	2,693,561	7,626,740	6,229,436
37. Oklahoma.....OK.....L.....		56,430	2,983	18,174	903	(18,587)	53,378
38. Oregon.....OR.....L.....		4,591,563	5,564,059	3,559,284	3,538,650	8,670,760	8,996,606
39. Pennsylvania.....PA.....L.....		426,805	284,899	25,927	(4,483)	2,027,103	2,002,860
40. Rhode Island.....RI.....L.....		10,429,789	9,416,369	5,427,001	6,817,536	22,408,434	19,582,909
41. South Carolina.....SC.....L.....		239,249	203,236	1,990	381	15,451	48,576
42. South Dakota.....SD.....L.....		4,098	315	5,902	1,827	61,587	24,965
43. Tennessee.....TN.....L.....		2,606,326	3,736,043	2,649,228	2,324,199	4,924,848	3,155,584
44. Texas.....TX.....L.....		395,443	114,260	52,521	76,395	163,214	224,780
45. Utah.....UT.....L.....		43,507	5,983	728	(10,000)	43,634	34,196
46. Vermont.....VT.....L.....		38,429	26,051			1,430	2,718
47. Virginia.....VA.....L.....		194,154	132,273	667	14,896	54,892	41,195
48. Washington.....WA.....L.....		7,087,515	8,296,759	5,299,973	5,470,023	15,131,867	17,349,141
49. West Virginia.....WV.....L.....		1,555	481	(20)	(20)	887	25,469
50. Wisconsin.....WI.....L.....		130,919	69,635	3,664	4,716	42,492	97,093
51. Wyoming.....WY.....L.....		2,009	1,448	8,699		2,605	16,344
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.....		71,995,615	70,309,403	45,675,773	48,099,219	142,008,074	124,434,598

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

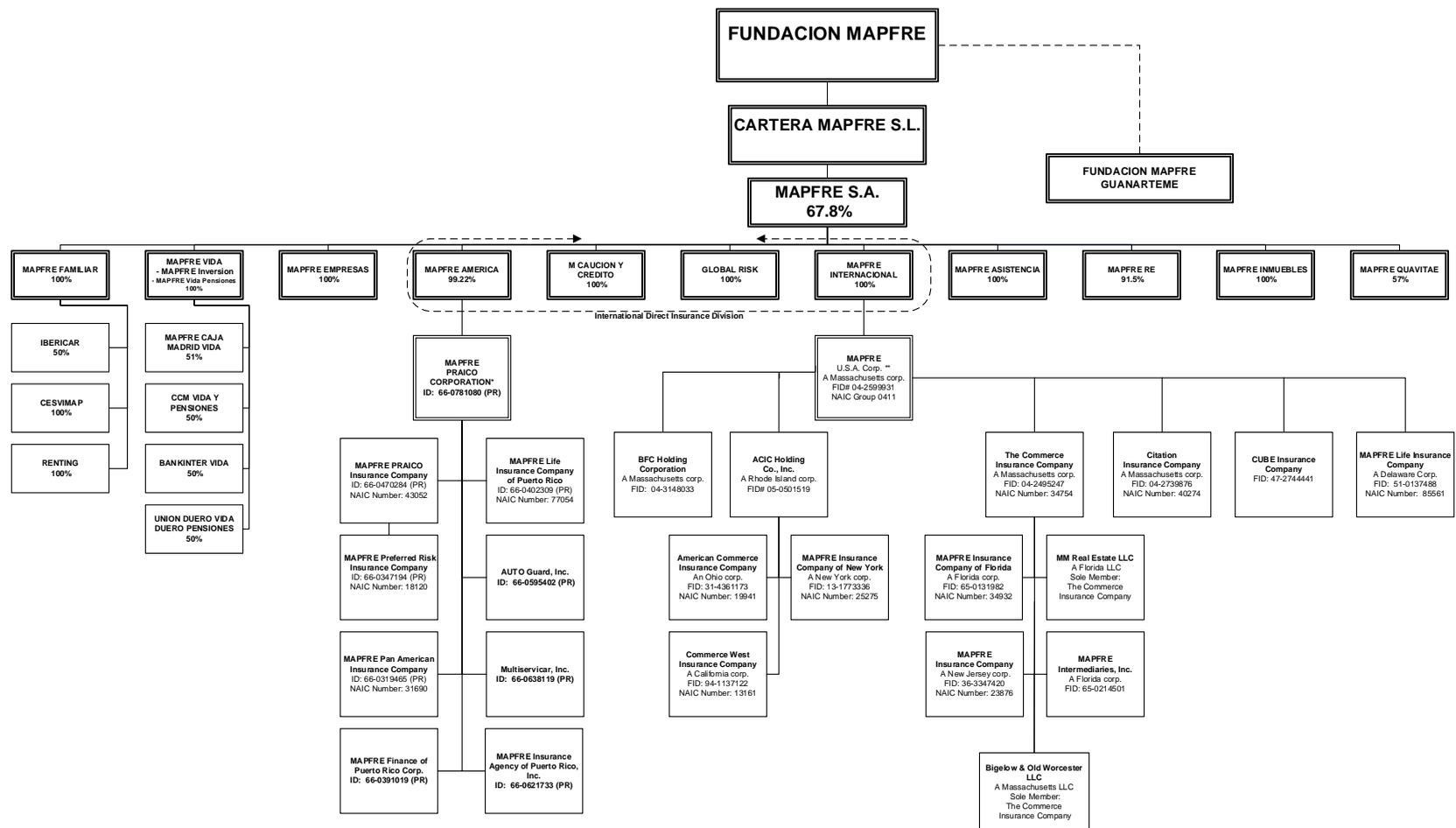
(L) - Licensed or Chartered - Licensed Insurance Carrier or Domiciled RRG; (R) - Registered - Non-domiciled RRGs; (Q) - Qualified - Qualified or Accredited Reinsurer;

(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



Q11

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

** All subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies, except ACIC Holding Co., Inc., which is 5% owned by AAA Southern New England and 0.06% owned by AAA Ohio Auto Club and AAA Oregon / Idaho each.

***See attached list for additional companies.

	% OWNED	NAIC	FED ID
FUNDACION MAPFRE			
CARTERA MAPFRE S.L.	100.0		
MAPFRE, S.A.	100.0		
MAPFRE FAMILIAR COMPAÑÍA 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, COMPAÑIA 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 ASSEGUANCES 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		
FUNERARIA CRESPO, S.L.	100.0		
TANATORIO SAN ALBERTO, S.A.	100.0		
FUNEGRUP, S.L.	100.0		
SALZILLO SERVICIOS FUNERARIOS S.L.	76.0		
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		
SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.	65.2		
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.	70.0		
FUNERARIA ZETA ORBITAL, S.L.	100.0		
FUNERARIA VALLE DEL EBRO, S.L.	100.0		
INICIATIVAS ALCAESAR, S.L.	64.9		
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.	67.5		
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 SEGUROS GERAIS S.A.	100.0		
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'ASSEGUANCES 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 COMPAÑIA 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 COMPAÑIA 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	
CLUB MAPFRE ARGENTINA	96.1	
MAPFRE ARGENTINA SEGUROS S.A.	100.0	
CESVI ARGENTINA, S.A.	65.0	
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	98.8	
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.0	
DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA	100.0	
PROTENSEG CORRETORA DE SEGUROS LTDA	90.0	
CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	100.0	
MAPFRE SAUDE LTDA	100.0	
MAPFRE BRASIL PARTICIPACOES, S.A.	91.7	
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.	100.0	
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 SERVICIOS EXEQUIALES SAS	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 SEGUROS Y REASEGUROS	99.3	
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	
AMA/ASISTENCIA MEDICA ADMISTRADA	99.7	
MAPFRE INTERNACIONAL S.A.	100.0	
MAPFRE USA CORPORATION INC.	100.0	04-2599931
MAPFRE LIFE INSURANCE COMPANY	100.0	85561 51-0137488
CUBE INSURANCE COMPANY	100.0	47-2744441

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
TURKIYE GENEL SIGORTA, A.S.	99.7		
GENEL YASAM SIFORTA, A.S.	100.0		
GENEL SERVISYEDEK PARCA DAGITIM TICARET ANONIM SIRKET	51.0		
MAPFRE INSULAR INSURANCE CORPORATION	74.9		
MIDDLESEA INSURANCE P.L.C.	54.6		
M.S.V. LIFE P.L.C.	50.0		
GROWTH INVESTMENTS LIMITED	100.0		
BEE INSURANCE MANAGEMENT LTD	100.0		
MIDDLESEA ASSIST LIMITED	49.0		
PT ASURANSI BINA DANA ARTA TBK	20.0		
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.0		
IBEROASISTENCIA, ARGENTINA 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		
ARABA 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		
INSURE AND GO AUSTRALIA	100.0		
BRASIL ASISTENCIA S/A	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 ASSIST	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		
ACI HOLDING USA	100.0		
EULER HERMES SEGUROS CHILE	75.4		
SOLUNION CHILE SERVICIOS	99.3		
SOLUNION COLUMBIA SERVICIOS	98.3		
EULER HERMES SEGUROS MEJICO	100.0		
SOLUNION MEJICO SERVICIOS	100.0		
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 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														
							FUNDACION MAPFRE.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							CARTERA MAPFRE, S.L.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							MAPFRE, S.A.....	ESP.....	UIP.....	CARTERA MAPFRE, S.L.....	OWNERSHIP....	...100.000	FUNDACION MAPFRE.....	
							MAPFRE FAMILIAR COMPAÑÍA 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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MULTISERVICAR.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE GESTION DE FLOTAS, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MAPFRE MULTICENTRO DEL AUTOMOVIL, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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 COMPAÑÍA 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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							BUSINESS LAB VENTURES, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...97.500	MAPFRE S.A.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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 COMPAÑÍA 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.....	
							DISENO URBANO, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	
							SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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	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 FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							CATALUNYA CAIXA ASSEGURANCES GENERALS	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							AUTOMOCION PENINSULAR INMUEBLES, S.A.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							ONLINE SHOPPING CLUB EUROPE, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	49.900	MAPFRE S.A.....	
							BANKINTER SEGUROS GENERALES, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	25.000	MAPFRE S.A.....	
							ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	22.500	MAPFRE S.A.....	
							AUDATEX ESPANA, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	12.500	MAPFRE S.A.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	16.400	MAPFRE S.A.....	
							FUNESPANA, S.A.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA 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.....	

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	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)	*
							KEGYELET TEMETKEZESI SZOLGALAT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							TANATORIUM 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.....	
							FUNERARIA 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.....	76.000	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.....	
							SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.....	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP.....	65.200	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.....	70.000	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.....	64.900	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	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	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)	*
							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.....	67.500	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 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.....	
							MAPFRE CHILE REASEGUROS, S.A.....	CHL.....	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	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 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.....	
							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.....	
							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.....	
							MAPFRE PAN AMERICAN INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	31690..	66-0319465..				MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0391019..				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0621733..				AUTO GUARD INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0595402..				MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0638119..				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	77054..	66-0402309..				MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
0411.....	MAPFRE INSURANCE GROUP.....	43052..	66-0470284..				MAPFRE PREFERRED RISK INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
0411.....	MAPFRE INSURANCE GROUP.....	18120..	66-0347194..				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.....	
							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.....	
							AMA-ASISTENCIA ADMISTRADA.....	VEN.....	NIA.....	MAPFRE AMERICA, 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.....	

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	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 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.....	98.800	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 DESENVOLVIMIENTO 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.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	DETECTAR DESENVOLVIMIENTO DE TECNICAS PARA TRANSFERENCIAS ES ADMINISTRACAO DE RISCOS LTDA	OWNERSHIP.....	90.000	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.....	91.700	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	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	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)	*
							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.....	100.000	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 SERVICIOS EXEQUIALES SAS.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP.....	100.000	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.....	99.300	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 SECUROS, S.A...	DOM.....	IA.....	MAPFRE DOMINICANA S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							CREDI PRIMAS, S.A.....	DOM.....	NIA.....	MAPFRE BHD COMPANIA DE SECUROS, 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.....	

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	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.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	55.700	MAPFRE S.A.....	
							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.....	
			47-2744441				CUBE INSURANCE COMPANY.....	OH.....	IA.....	MAPFRE USA CORPORATION INC.....	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	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 FAMILIAR COMPAÑIA DE SEGUROS Y REASEGUROS, 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 SERVISYEDEK PARCA DAGITIM TICARET ANONIM SIRKET	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.....	
							GROWTH INVESTMENTS LIMITED.....	MLT.....	NIA.....	MSV LIFE P.L.C.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							PT ASURANSI BINA DANA ARTA TBK.....	IND.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	20.000	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.....	

Q12.9

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 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 *
							FEDERAL ASSIST CO.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							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.....	
							ARABA 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	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Group Code	Group Name	NAIC Company Code	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)	*
							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.....	
							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 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.....	
							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.....	

Q12.11

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 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 *
							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.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	51.000	MAPFRE S.A.....	

Q12.12

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	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)	*
							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.....	
							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.....	

Q12.13

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	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 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.....	
							ACI HOLDING USA.....	USA.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							EULER HERMES SEGUROS CHILE.....	CHL.....	IA.....	ACI HOLDING USA.....	OWNERSHIP.....	75.400	MAPFRE S.A.....	
							SOLUNION CHILE SERVICIOS.....	CHL.....	NIA.....	ACI HOLDING USA.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	
							SOLUNION COLUMBIA SERVICIOS.....	COL.....	NIA.....	ACI HOLDING USA.....	OWNERSHIP.....	98.300	MAPFRE S.A.....	
							EULER HERMES SEGUROS MEJICO.....	MEX.....	IA.....	ACI HOLDING USA.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							SOLUNION MEJICO SERVICIOS.....	MEX.....	NIA.....	ACI HOLDING USA.....	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.....	
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	INVERSIONES IBERICAS.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	

Q12.14

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	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)	*
							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.....	

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.

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.....	620,069	414,466	66.8	50.5
2. Allied lines.....	21,995	2,503	11.4	35.5
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	23,031,556	18,229,422	79.1	71.1
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	306,472	221,686	72.3	91.5
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.....	21,331	21,897	102.7	10.6
14. Credit accident and health.....			0.0	
15. Other accident and health.....			0.0	
16. Workers' compensation.....			0.0	
17.1 Other liability-occurrence.....	1,190,587	3,331	0.3	0.4
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.....	27,874,672	22,319,108	80.1	77.7
19.3, 19.4 Commercial auto liability.....			0.0	
21. Auto physical damage.....	15,930,873	10,699,487	67.2	62.6
22. Aircraft (all perils).....	1,983,058	983,631	49.6	(5,195.7)
23. Fidelity.....			0.0	
24. Surety.....			0.0	
26. Burglary and theft.....			0.0	
27. Boiler and machinery.....			0.0	
28. Credit.....			0.0	
29. International.....			0.0	
30. Warranty.....			0.0	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	38,538	53,310	138.3	94.7
35. Totals.....	71,019,151	52,948,841	74.6	69.1
DETAILS OF WRITE-INS				
3401. Travel.....	38,538	53,310	138.3	94.7
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).....	38,538	53,310	138.3	94.7

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1	2	3
	Current Quarter	Current Year to Date	Prior Year Year to Date
1. Fire.....	591,599	591,599	611,323
2. Allied lines.....	21,497	21,497	19,782
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	21,652,427	21,652,427	20,878,286
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	435,151	435,151	243,184
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....	30,785	30,785	24,384
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1 Other liability-occurrence.....	3,160,935	3,160,935	2,695,522
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.....	27,687,864	27,687,864	29,581,071
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	16,059,033	16,059,033	16,200,722
22. Aircraft (all perils).....	2,305,242	2,305,242	16,165
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.....	51,085	51,085	38,963
35. Totals.....	71,995,618	71,995,618	70,309,402
DETAILS OF WRITE-INS			
3401. Travel.....	51,085	51,085	38,963
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).....	51,085	51,085	38,963

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)	2015 Loss and LAE Payments on Claims Reported as of Prior Year-End	2015 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2015 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. 2012 + Prior.....	24,887	(4,978)	19,909	2,755	26	2,781	21,420	65	(4,799)	16,686	(712)	270	(442)
2. 2013.....	19,047	(331)	18,716	2,701	63	2,764	16,605	40	(1,121)	15,524	259	(687)	(428)
3. Subtotals 2013 + Prior.....	43,934	(5,309)	38,625	5,456	89	5,545	38,025	105	(5,920)	32,210	(453)	(417)	(870)
4. 2014.....	33,694	10,540	44,234	10,582	1,378	11,960	27,349	309	3,977	31,635	4,237	(4,876)	(639)
5. Subtotals 2014 + Prior.....	77,628	5,231	82,859	16,038	1,467	17,505	65,374	414	(1,943)	63,845	3,784	(5,293)	(1,509)
6. 2015.....	XXX	XXX	XXX	XXX	20,442	20,442	XXX	22,295	3,101	25,396	XXX	XXX	XXX
7. Totals.....	77,628	5,231	82,859	16,038	21,909	37,947	65,374	22,709	1,158	89,241	3,784	(5,293)	(1,509)
8. Prior Year-End's Surplus As Regards Policyholders	103,684										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
											1.4.9%	2.(101.2)%	3.(1.8)%
													Col. 13, Line 7 Line 8
													4.(1.5)%

Q14

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 March 31, 2015 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.....	3,035		3,035	4,016
2597. Summary of remaining write-ins for Line 25.....	3,035	0	3,035	4,016

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Other Non-technical income.....			2,500
1497. Summary of remaining write-ins for Line 14.....	0	0	2,500

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.....	1,502,792	1,594,549
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		44,089
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.....	33,496	135,846
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,469,296	1,502,792
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,469,296	1,502,792

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.....	153,599,950	157,693,327
2. Cost of bonds and stocks acquired.....	22,599,714	50,937,045
3. Accrual of discount.....	80,722	441,431
4. Unrealized valuation increase (decrease).....	199	(758,733)
5. Total gain (loss) on disposals.....	238,830	3,282,488
6. Deduct consideration for bonds and stocks disposed of.....	7,995,455	57,363,507
7. Deduct amortization of premium.....	184,301	632,101
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other than temporary impairment recognized.....		
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	168,339,659	153,599,950
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	168,339,659	153,599,950

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).....	125,878,566	17,470,641	6,953,838	(2,177,347)	134,218,022			125,878,566
2. NAIC 2 (a).....	24,008,242	5,129,073		2,044,098	31,181,413			24,008,242
3. NAIC 3 (a).....	1,329,000			(1,329,000)				1,329,000
4. NAIC 4 (a).....	71,442		287	1,330,568	1,401,723			71,442
5. NAIC 5 (a).....								
6. NAIC 6 (a).....								
7. Total Bonds.....	151,287,250	22,599,714	6,954,125	(131,681)	166,801,158	0	0	151,287,250
PREFERRED STOCK								
8. NAIC 1.....								
9. NAIC 2.....	1,577,700		802,500	(11,699)	763,501			1,577,700
10. NAIC 3.....	735,000			40,000	775,000			735,000
11. NAIC 4.....								
12. NAIC 5.....								
13. NAIC 6.....								
14. Total Preferred Stock.....	2,312,700	0	802,500	28,301	1,538,501	0	0	2,312,700
15. Total Bonds and Preferred Stock.....	153,599,950	22,599,714	7,756,625	(103,380)	168,339,659	0	0	153,599,950

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

**Sch. DA-Pt 1
NONE**

**Sch. DA-Verification
NONE**

**Sch. DB-Pt A-Verification
NONE**

**Sch. DB-Pt B-Verification
NONE**

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

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

**Sch. DB-Verification
NONE**

**Sch. E-Verification
NONE**

**Sch. A-Pt 2
NONE**

**Sch. A-Pt 3
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 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. States, Territories and Possessions									
605581	FD 4 MISSISSIPPI ST.....		02/04/2015	RBC CAPITAL MARKETS.....		2,000,000	2,000,000		1FE.....
1799999. Total Bonds - U.S. States, Territories and Possessions.....						2,000,000	2,000,000	0	XXX
Bonds - U.S. Political Subdivisions of States, Territories and Possessions									
190335	DL 0 COAST CMNTY CLG DIST.....		03/25/2015	PIERPONT SECURITIES.....		1,887,325	5,500,000		1FE.....
23223P	CV 7 CUYAHOGA CNTY OHIO-BUILD AMERICA.....		03/24/2015	RAYMOND JAMES.....		1,498,635	1,275,000	22,152	1FE.....
2499999. Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....						3,385,960	6,775,000	22,152	XXX
Bonds - U.S. Special Revenue and Special Assessment									
199098	CC 6 COLUMBUS-FRANKLIN CNTY.....		02/27/2015	BAIRD, ROBERT W. & CO.....		977,990	1,000,000	1,333	1FE.....
927781	TM 6 VIRGINIA COLLEGE BLDG AUTH VA REV.....		03/23/2015	RAYMOND JAMES.....		2,271,400	2,000,000	16,194	1FE.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....						3,249,390	3,000,000	17,527	XXX
Bonds - Industrial and Miscellaneous									
13645R	AS 3 CANADIAN PACIFIC RR CO.....	F	03/02/2015	WELLS FARGO SECURITIES, LLC.....		991,460	1,000,000	2,658	2FE.....
25152R	XA 6 DEUTSCHE BK AG LONDON.....	F	01/14/2015	DEUTSCHE BANK.....		1,046,330	1,000,000	5,139	1FE.....
008117	AP 8 AETNA INC.....		03/24/2015	DEUTSCHE BANK.....		1,006,200	1,000,000	10,083	2FE.....
03073E	AM 7 AMERISOURCEBERGEN CORP.....		02/24/2015	CREDIT SUISSE.....		1,013,910	1,000,000	632	1FE.....
03524B	AE 6 ANHEUSER BUSCH.....		03/19/2015	PIERPONT SECURITIES.....		1,044,250	1,000,000	5,447	1FE.....
20826F	AD 8 CONOCOPHILLIPS CO.....		01/30/2015	RAYMOND JAMES.....		1,573,320	1,500,000	11,446	1FE.....
126650	BW 9 CVS HEALTH CORP.....		02/06/2015	PIERPONT SECURITIES.....		1,046,413	953,000	9,391	2FE.....
30161M	AH 6 EXELON GENERATION CO LLC.....		03/12/2015	RAYMOND JAMES.....		2,085,000	2,000,000	36,000	2FE.....
30291G	AN 9 FREMF MORTGAGE TRUST 2013-K27.....		03/10/2015	BAIRD, ROBERT W. & CO.....		508,906	500,000	583	1FE.....
61761J	VL 0 MORGAN STANLEY.....		02/03/2015	WELLS FARGO SECURITIES, LLC.....		1,579,575	1,500,000	15,879	1FE.....
68389X	AX 3 ORACLE CORP.....		03/19/2015	PIERPONT SECURITIES.....		1,014,500	1,000,000	10,375	1FE.....
828807	CR 6 SIMON PROPERTY GROUP LP.....		03/19/2015	PIERPONT SECURITIES.....		1,054,500	1,000,000	5,521	1FE.....
3899999. Total Bonds - Industrial and Miscellaneous.....						13,964,364	13,453,000	113,154	XXX
8399997. Total Bonds - Part 3.....						22,599,714	25,228,000	152,833	XXX
8399999. Total Bonds.....						22,599,714	25,228,000	152,833	XXX
9999999. Total Bonds, Preferred and Common Stocks.....						22,599,714	XXX	152,833	XXX

QE04

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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	For eig 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 Design- ation or Market Indicator (a)
Bonds - U.S. Government																					
36225B	GW 2 GNMA POOL #0781113.....		03/16/2015	PAYDOWN OF PRINCIPAL.....		3,993	3,993	4,139	4,101			(1)	(1)		4,101		(108)	(108)	46	11/15/2029	1.....
83162C	TA 1 SMALL BUS ADMIN GTD DEV PTC.....		01/02/2015	PRINCIPAL RECEIPT.....		273,772	273,772	302,133	300,304			(26,532)	(26,532)		273,772			0	6,221	01/01/2030	1.....
0599999. Total Bonds - U.S. Government.....						277,765	277,765	306,272	304,405	0		(26,533)	(26,533)	0	277,873	0	(108)	(108)	6,267	XXX	XXX
Bonds - U.S. Political Subdivisions of States, Territories and Possessions																					
64966K	KF 9 NEW YORK NY.....		03/02/2015	CALLED @ 100.0000000.....		1,370,000	1,370,000	1,379,102	1,370,766			(766)	(766)		1,370,000			0	34,250	03/01/2030	1.....
2499999. Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....						1,370,000	1,370,000	1,379,102	1,370,766	0		(766)	(766)	0	1,370,000	0	0	0	34,250	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																					
23410B	AB 7 DAKOTA CNTY MINN CMNTY DEV AGY.....		03/02/2015	CALLED @ 100.0000000.....		1,875	1,875	1,950	1,903			(1)	(1)		1,903		(28)	(28)	13	12/01/2038	1FE.....
31396P	GT 2 FANNIE MAE - ACES.....		03/25/2015	PRINCIPAL RECEIPT.....		7,911	7,911	8,850	8,602			(691)	(691)		7,911			70	10/25/2032	1.....	
3137AU	XX 2 FEDERAL HOME LN MTG COR REMIC.....		03/16/2015	PRINCIPAL RECEIPT.....		18,808	18,808	19,243	19,227			(419)	(419)		18,808			0	94	05/15/2029	1.....
3136A7	DJ 8 FEDERAL NATL MTG ASSN REMIC TR.....		03/25/2015	PRINCIPAL RECEIPT.....		48,949	48,949	48,758	48,737			212	212		48,949			0	122	02/25/2042	1.....
3137B7	R7 6 FHLMC REMIC SERIES 4298.....		03/16/2015	PRINCIPAL RECEIPT.....		291,777	291,777	295,789	295,294			(3,517)	(3,517)		291,777			0	1,939	02/15/2054	1.....
3137BD	3T 1 FHLMC REMIC SERIES 4379.....		03/16/2015	PRINCIPAL RECEIPT.....		30,891	30,891	32,513	32,446			(1,555)	(1,555)		30,891			0	180	08/15/2027	1.....
31403D	GP 8 FNMA PASS-THRU PL#745506.....		03/25/2015	PRINCIPAL RECEIPT.....		37,070	37,070	39,949	37,390			(319)	(319)		37,070			0	491	02/01/2016	1.....
3138EK	VT 9 FNMA PASS-THRU PL#AL3325.....		03/25/2015	PRINCIPAL RECEIPT.....		112,407	112,407	119,898	119,217			(6,810)	(6,810)		112,407			0	528	03/01/2033	1.....
3138W7	HB 3 FNMA PASS-THRU PL#AR9225.....		02/25/2015	VARIOUS.....		1,924,598	1,870,386	1,911,447	1,908,751			(559)	(559)		1,908,192		16,406	16,406	9,468	03/01/2043	1.....
31418A	L5 5 FNMA PASS-THRU PL#MA1247.....		03/25/2015	PRINCIPAL RECEIPT.....		46,501	46,501	48,972	48,847			(2,346)	(2,346)		46,501			0	208	11/01/2042	1.....
3136AA	JH 9 FNR 2012- 135 CA.....		03/25/2015	PRINCIPAL RECEIPT.....		72,343	72,343	72,218	72,228			115	115		72,343			0	225	11/25/2039	1.....
31395Q	CY 4 FNS 411 A3.....		03/25/2015	PRINCIPAL RECEIPT.....		65,749	65,749	68,954	68,718			(2,969)	(2,969)		65,749			0	361	08/25/2042	1.....
76221R	DJ 9 RHODE ISLAND HSG & MTG FIN.....		03/12/2015	CALLED @ 100.0000000.....		575,000	575,000	570,291	570,541			9	9		570,550		4,450	4,450	4,066	10/01/2049	1FE.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....						3,233,879	3,179,668	3,238,832	3,231,901	0		(18,850)	(18,850)	0	3,213,051	0	20,828	20,828	17,765	XXX	XXX
Bonds - Industrial and Miscellaneous																					
178566	AC 9 CITY NATL CORP.....		02/27/2015	GOLDMAN SACHS.....		1,149,240	1,000,000	1,036,070	1,026,074			(626)	(626)		1,025,448		123,792	123,792	24,646	09/15/2020	1FE.....
202795	HV 5 COMMONWEALTH EDISON CO.....		03/12/2015	PIERPONT SECURITIES.....		1,082,000	1,000,000	992,330	995,025			157	157		995,182		86,818	86,818	25,111	08/01/2020	1FE.....
12667F	VD 4 CWALT INC 2004-J10.....		03/25/2015	PRINCIPAL RECEIPT.....		11,430	11,430	11,259	11,304			127	127		11,430			0	133	10/25/2019	1FM.....
590218	AF 0 ML MTG INV TR 2006-F1.....		03/25/2015	PRINCIPAL RECEIPT.....		287	287	286	270			16	17		287			0	3	04/25/2036	4FM.....
74432R	AA 1 PRUDENTIAL FINL INC RETAIL.....		03/16/2015	Sink PMT @ 100.0000000.....		60,854	60,854	59,532	60,796			58	58		60,854			0	442	05/12/2015	1FE.....
3899999. Total Bonds - Industrial and Miscellaneous.....						2,303,811	2,072,571	2,099,477	2,093,469	16		(283)	(267)	0	2,093,201	0	210,610	210,610	50,335	XXX	XXX
8399997. Total Bonds - Part 4.....						7,185,455	6,900,004	7,023,683	7,000,541	16		(46,432)	(46,416)	0	6,954,125	0	231,330	231,330	108,617	XXX	XXX
8399999. Total Bonds.....						7,185,455	6,900,004	7,023,683	7,000,541	16		(46,432)	(46,416)	0	6,954,125	0	231,330	231,330	108,617	XXX	XXX
Preferred Stocks - Industrial and Miscellaneous																					
902973	86 6 US BANCORP.....		03/10/2015	WELLS FARGO SECURITIES, LLC	1,000,000	810,000	1,000,000	802,500	817,500	(15,000)			(15,000)		802,500		7,500	7,500	8,944	XXX	P2LFE.....
8499999. Total Preferred Stocks - Industrial and Miscellaneous.....						810,000	XXX	802,500	817,500	(15,000)		0	(15,000)	0	802,500	0	7,500	7,500	8,944	XXX	XXX
8999997. Total Preferred Stocks - Part 4.....						810,000	XXX	802,500	817,500	(15,000)		0	(15,000)	0	802,500	0	7,500	7,500	8,944	XXX	XXX

QE05

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	For eig 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 Desig- nation or Market Indicator (a)
8999999	Total Preferred Stocks.....					810,000	XXX	802,500	817,500	(15,000)	0	0	(15,000)	0	802,500	0	7,500	7,500	8,944	XXX	XXX
9899999	Total Preferred and Common Stocks.....					810,000	XXX	802,500	817,500	(15,000)	0	0	(15,000)	0	802,500	0	7,500	7,500	8,944	XXX	XXX
9999999	Total Bonds, Preferred and Common Stocks.....					7,995,455	XXX	7,826,183	7,818,041	(14,984)	(46,432)	0	(61,416)	0	7,756,625	0	238,830	238,830	117,561	XXX	XXX

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

QE05.1

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

**Sch. DB-Pt B-Sn 1
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**

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								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(3,111,962)	(6,781,155)	(6,641,064)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.010	12		393,991	140,832	99,364	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				1,747,029	2,486,210	1,376,629	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				879,043	255,306	257,388	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	0.010			343	343	343	XXX
MM: Fed Gov'n't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	0.010			5,561	5,561	5,561	XXX
MM: Fidelity Gov'n't 057.....	500 Salem Street, Smithfield, RI 02917.....	0.010	137		7,109,008	3,546,402	2,837,498	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....					25,000	25,000	XXX
0199999. Total Open Depositories.....	XXX	XXX	149	0	7,023,013	(321,501)	(2,039,281)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	149	0	7,023,013	(321,501)	(2,039,281)	XXX
0599999. Total Cash.....	XXX	XXX	149	0	7,023,013	(321,501)	(2,039,281)	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

QE13