



QUARTERLY STATEMENT

As of June 30, 2015
of the Condition and Affairs of the

American Commerce Insurance Company

NAIC Group Code.....0411, 0411
(Current Period) (Prior Period)

Organized under the Laws of OHIO

Incorporated/Organized..... September 18, 1946

Statutory Home Office

Main Administrative Office

Mail Address

Primary Location of Books and Records

Internet Web Site Address

Statutory Statement Contact

NAIC Company Code..... 19941

State of Domicile or Port of Entry OHIO

Commenced Business..... March 19, 1947

3590 TWIN CREEKS DRIVE..... COLUMBUS OH US 43218-2579
(Street and Number) (City or Town, State, Country and Zip Code)

211 MAIN STREET..... WEBSTER MA US 01570-0758
(Street and Number) (City or Town, State, Country and Zip Code)

211 MAIN STREET..... WEBSTER MA US 01570-0758
(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)

211 MAIN STREET..... WEBSTER MA US 01570-0758
(Street and Number) (City or Town, State, Country and Zip Code)

www.mapfreinsurance.com

CHRISTINE A MULCAHY
(Name)
cmulcahy@mapfreusa.com
(E-Mail Address)

Employer's ID Number..... 31-4361173

Country of Domicile US

508-943-9000
(Area Code) (Telephone Number)

508-943-9000
(Area Code) (Telephone Number)

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(Area Code) (Telephone Number) (Extension)
508-949-4246
(Fax Number)

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)	(Signature)	(Signature)
JAIME TAMAYO	DANIEL PATRICK OLOHAN	ROBERT EDWARD MCKENNA
1. (Printed Name)	2. (Printed Name)	3. (Printed Name)
PRESIDENT & CEO	SECRETARY, GENERAL COUNSEL, & EVP	TREASURER, CAO, & SVP
(Title)	(Title)	(Title)

Subscribed and sworn to before me

This _____ day of _____

a. Is this an original filing?

b. If no:

1. State the amendment number

2. Date filed

3. Number of pages attached

Yes [X] No []

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	153,103,386		153,103,386	151,287,250
2. Stocks:				
2.1 Preferred stocks.....	1,514,850		1,514,850	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).....	1,442,977		1,442,977	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 (\$....1,764,244), cash equivalents (\$.....0) and short-term investments (\$.....0).....	1,764,244		1,764,244	(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).....	157,825,457	.0	157,825,457	155,018,907
13. Title plants less \$.....0 charged off (for Title insurers only).....			.0	
14. Investment income due and accrued.....	1,310,185		1,310,185	1,339,768
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	76,250,771		76,250,771	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.....	19,575,267		19,575,267	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.....	2,694,175		2,694,175	
18.2 Net deferred tax asset.....	8,040,585	393,428	7,647,157	5,009,075
19. Guaranty funds receivable or on deposit.....			.0	
20. Electronic data processing equipment and software.....	20,376		20,376	81,546
21. Furniture and equipment, including health care delivery assets (\$.....0).....	829,697	829,697	.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.....	78,111,419	2,568,279	75,543,140	67,445,218
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	344,657,932	3,791,404	340,866,528	310,456,683
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			.0	
28. Total (Lines 26 and 27).....	344,657,932	3,791,404	340,866,528	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.....	1,773,766	1,773,766	.0	
2502. Equity in pools and associations.....	73,417,844		73,417,844	67,441,202
2503. Arizona renewal business.....	794,513	794,513	.0	
2598. Summary of remaining write-ins for Line 25 from overflow page.....	2,125,296	.0	2,125,296	4,016
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	78,111,419	2,568,279	75,543,140	67,445,218

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....29,791,000).....	73,898,372	63,120,672
2. Reinsurance payable on paid losses and loss adjustment expenses.....	10,635,886	10,333,598
3. Loss adjustment expenses.....	16,676,597	13,820,472
4. Commissions payable, contingent commissions and other similar charges.....	5,663,313	4,329,608
5. Other expenses (excluding taxes, licenses and fees).....	1,068,058	925,407
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	135,539	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 \$.....219,512,793 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.....	100,914,282	87,120,649
10. Advance premium.....	7,560,347	4,141,520
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	27,208,452	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.....	3,460,395	
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.....	1,593,477	1,756,198
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	248,814,718	206,772,475
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	248,814,718	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).....	62,637,523	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).....	92,051,810	103,684,208
38. Totals (Page 2, Line 28, Col. 3).....	340,866,528	310,456,683

DETAILS OF WRITE-INS		
2501. Unclaimed property.....	1,593,477	1,729,385
2502. Premium tax payable - Global.....		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).....	1,593,477	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

American Commerce Insurance Company
STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$171,391,899).....	145,428,787	137,216,928	281,305,579
1.2 Assumed..... (written \$110,470,454).....	95,445,233	84,139,362	172,354,580
1.3 Ceded..... (written \$172,914,678).....	145,719,979	137,216,928	282,001,191
1.4 Net..... (written \$108,947,675).....	95,154,041	84,139,362	171,658,968
DEDUCTIONS:			
2. Losses incurred (current accident year \$71,112,000):			
2.1 Direct.....	110,268,363	94,168,699	187,760,442
2.2 Assumed.....	72,859,007	54,873,055	112,204,796
2.3 Ceded.....	110,268,363	94,168,699	187,760,442
2.4 Net.....	72,859,007	54,873,055	112,204,796
3. Loss adjustment expenses incurred.....	13,221,124	9,454,561	19,258,821
4. Other underwriting expenses incurred.....	29,125,896	24,528,162	48,201,550
5. Aggregate write-ins for underwriting deductions.....	0	0	(15,925)
6. Total underwriting deductions (Lines 2 through 5).....	115,206,027	88,855,778	179,649,242
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(20,051,986)	(4,716,416)	(7,990,274)
INVESTMENT INCOME			
9. Net investment income earned.....	2,869,247	3,121,299	6,556,436
10. Net realized capital gains (losses) less capital gains tax of \$122,295.....	298,382	565,659	2,155,616
11. Net investment gain (loss) (Lines 9 + 10).....	3,167,629	3,686,958	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.....	1,125,051	1,144,556	2,292,127
14. Aggregate write-ins for miscellaneous income.....	31,376	34,191	111,218
15. Total other income (Lines 12 through 14).....	1,156,427	1,178,747	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).....	(15,727,930)	149,289	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).....	(15,727,930)	149,289	3,125,123
19. Federal and foreign income taxes incurred.....	(2,806,025)	(244,487)	66,823
20. Net income (Line 18 minus Line 19) (to Line 22).....	(12,921,905)	393,776	3,058,300
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	103,684,208	111,994,650	111,994,650
22. Net income (from Line 20).....	(12,921,905)	393,776	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 \$(149,529).....	(277,698)	144,134	(493,176)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	2,732,001	(219,101)	(184,438)
27. Change in nonadmitted assets.....	(580,276)	(5,441)	(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.....	(584,520)	449,354	769,669
38. Change in surplus as regards policyholders (Lines 22 through 37).....	(11,632,398)	762,722	(8,310,442)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	92,051,810	112,757,372	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.....	19,341	21,677	45,731
1402. Gain on sale of fixed assets.....	12,035	12,514	29,926
1403. Other technical income (other reinsurer).....			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).....	31,376	34,191	111,218
3701. STATUTORY POOLING ADJUSTMENT.....	841,559	449,354	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).....	(584,520)	449,354	769,669

American Commerce Insurance Company
CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	103,934,481	88,399,890	174,374,393
2. Net investment income.....	3,148,705	3,161,723	7,002,021
3. Miscellaneous income.....	1,156,427	1,178,748	2,403,345
4. Total (Lines 1 through 3).....	108,239,613	92,740,361	183,779,759
5. Benefit and loss related payments.....	63,321,440	53,318,373	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.....	38,985,381	36,257,144	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).....	1,260,257	554,779	776,794
10. Total (Lines 5 through 9).....	103,567,078	90,130,296	175,241,614
11. Net cash from operations (Line 4 minus Line 10).....	4,672,535	2,610,065	8,538,145
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	25,785,575	19,904,294	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.....		1,502,535	
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	26,595,575	21,536,491	57,363,507
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	27,804,414	25,716,223	50,937,045
13.2 Stocks.....		0	
13.3 Mortgage loans.....			
13.4 Real estate.....	6,057		44,089
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	27,810,471	25,716,223	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).....	(1,214,896)	(4,179,733)	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).....	(1,609,560)	(2,280,810)	(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).....	(1,609,560)	(2,280,810)	(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).....	1,848,079	(3,850,477)	(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).....	1,764,244	3,695,234	(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 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		\$ (12,921,905)	\$ 3,058,300
2. Effect of state prescribed practices		-	-
3. Effect of state permitted practices		-	-
4. Net Income, NAIC SAP basis		<u>\$ (12,921,905)</u>	<u>\$ 3,058,300</u>
SURPLUS	OH		
5. Policyholders' surplus, state basis		\$ 92,051,810	\$ 103,684,208
6. Effect of state prescribed practices		-	-
7. Effect of state permitted practices		-	-
8. Policyholders' surplus, NAIC SAP basis		<u>\$ 92,051,810</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

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:	\$ 305,694
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$ 285,304
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$ 23,260,864
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$ 7,725,892

- 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

- 9A. 1. The Components of the net deferred tax asset/(liability) at the end of each period are as follows:

	6/30/2015			12/31/2014			CHANGE		
	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL
1a. Gross deferred tax assets	\$ 7,702,973	\$ 546,006	\$ 8,248,979	\$ 4,961,084	\$ 377,958	\$ 5,339,042	\$ 2,741,889	\$ 168,048	\$ 2,909,937
1b. Statutory valuation allowance adjustment	-	-	-			-	-	-	-
1c. Adjusted gross deferred tax assets (1a-1b)	\$ 7,702,973	\$ 546,006	\$ 8,248,979	\$ 4,961,084	\$ 377,958	\$ 5,339,042	\$ 2,741,889	\$ 168,048	\$ 2,909,937
1d. Deferred tax liabilities	208,197	197	208,394	179,790	197	179,987	28,407	-	28,407
1e. Subtotal (net deferred tax assets) (1c-1d)	\$ 7,494,776	\$ 545,809	\$ 8,040,585	\$ 4,781,294	\$ 377,761	\$ 5,159,055	\$ 2,713,482	\$ 168,048	\$ 2,881,530
1f. Deferred tax assets nonadmitted	31,007	362,421	393,428	29,923	120,057	149,980	1,084	242,364	243,448
1g. Net admitted deferred tax assets (1e-1f)	\$ 7,463,769	\$ 183,388	\$ 7,647,157	\$ 4,751,371	\$ 257,704	\$ 5,009,075	\$ 2,712,398	\$ (74,316)	\$ 2,638,082

NOTES TO FINANCIAL STATEMENTS

9A. 2. Admission calculation components - SSAP 101, paragraphs 11.a., 11.b., 11.c.

(a) Federal Income taxes Paid in Prior years Recoverable through Carry-backs	\$ -	\$ -	\$ -	\$ 1,416,432	\$ 257,704	\$ 1,674,136	\$ (1,416,432)	\$ (257,704)	\$ (1,674,136)
(b) Adjusted Gross Deferred Tax Assets Expected to be Realized after Application of Threshold Limitation	7,463,769	183,387	7,647,156	3,334,938	-	3,334,938	4,128,831	183,387	4,312,218
(1) Adjusted Gross Deferred Tax Assets Expected to be Realized	7,463,769	183,387	7,647,156	3,334,938	-	3,334,938	4,128,831	183,387	4,312,218
(2) Adjusted Gross Deferred Tax Assets Allowed per Limitation on Threshold	XXX	XXX	7,647,157	XXX	XXX	14,789,038	XXX	XXX	(7,141,881)
(c) Adjusted Gross Deferred Tax Assets offset by Gross Deferred Tax Liabilities	\$ 208,197	\$ 198	\$ 208,395	\$ 179,791	\$ 197	\$ 179,988	\$ 28,406	\$ 1	\$ 28,407
(d) Deferred Tax Assets Admitted as the Result of Application of SSAP101 (Total 2(a) + 2(b) + 2(c))	\$ 7,671,966	\$ 183,585	\$ 7,855,551	\$ 4,931,161	\$ 257,901	\$ 5,189,062	\$ 2,740,805	\$ (74,316)	\$ 2,666,489

9A. 3. Realization Thresholds

(a) Ratio Percentage Used to Determine Recovery Period & Threshold Limitation Amount

(b) Amount of Adjusted Capial & Surplus used to Determine Recovery Period and Threshold Limitation in 2(b)(2) above

2015	2014
832%	919%
89,594,851	98,593,587

9A 4. Impact of Tax Planning Strategies

(a) Adjusted Gross DTA's (% of Total Adjusted Gross DTA's)

(b) Net Admitted Adjusted Gross DTA's (% of Total Net Admitted Adjusted Gross DTA's)

0.00%	33.59%	2.22%	0.00%	68.18%	4.83%	0.00%	-34.59%	-2.61%
0.00%	100.00%	2.40%	0.00%	100.00%	5.14%	0.00%	0.00%	-2.74%

The Company's tax planning strategies did not include the use of reinsurance-related tax planning strategies.

9B. There were no unrecognized deferred tax liabilities.

9C. 1. Current Income Tax

(a) Federal

(b) Foreign

(c) Subtotal

(d) Federal income tax on net capital gains

(e) Utilization of capital loss carry-forwards

(f) Other

(g) Federal and foreign income taxes incurred

6/30/2015	12/31/2014	CHANGE
\$ (2,806,024)	\$ 66,823	\$ (2,872,847)
-	-	-
\$ (2,806,024)	\$ 66,823	\$ (2,872,847)
122,295	1,126,871	(1,004,576)
-	-	-
-	-	-
\$ (2,683,729)	\$ 1,193,694	\$ (3,877,423)

9C. 2. Deferred Tax Assets

(a) Ordinary

(1) Discounting of Unpaid Losses

(2) Unearned premium reserve

(3) Policyholder reserve

(4) Investments

(5) Deferred acquisition costs

(6) Policyholder dividends accrual

(7) Fixed Assets

(8) Compensation and benefits accrual

(9) Pension accrual

(10) Receivables - nonadmitted

(11) Net operating loss carry-forward

(12) Tax Credit carry-forward

(13) Other

(14) Other assets - nonadmitted

(99) Subtotal

(b) Statutory valuation allowance adjustment

(c) Nonadmitted

(d) Admitted ordinary deferred tax assets (2a99-2b-2c)

6/30/2015	12/31/2014	CHANGE
\$ 1,005,876	\$ 1,105,525	\$ (99,649)
2,626,583	1,694,216	932,367
-	-	-
-	-	-
-	-	-
-	-	-
110,782	102,004	8,778
-	-	-
-	-	-
70,000	70,000	-
1,041,571	-	1,041,571
1,345,940	644,808	701,132
603,323	604,913	(1,590)
898,898	739,618	159,280
\$ 7,702,973	\$ 4,961,084	\$ 2,741,889
-	-	-
31,007	29,923	1,084
\$ 7,671,966	\$ 4,931,161	\$ 2,740,805

(e) Capital

(1) Investments

(2) Net capital loss carryforward

(3) Real estate

(4) Other

(99) Subtotal

(f) Statutory valuation allowance adjustment

(g) Nonadmitted

(h) Admitted capital deferred tax assets (2E99-2f-2g)

(i) Admitted deferred tax assets (2d+2h)

546,006	377,958	168,048
-	-	-
-	-	-
-	-	-
\$ 546,006	\$ 377,958	\$ 168,048
-	-	-
362,421	120,057	242,364
\$ 183,585	\$ 257,901	\$ (74,316)
\$ 7,855,551	\$ 5,189,062	\$ 2,666,489

3. Deferred Tax Liabilities

(a) Ordinary

(1) Investments

(2) Fixed Assets

(3) Deferred and uncollected premium

(4) Policyholder reserves

(5) Other

(99) Subtotal

6/30/2015	12/31/2014	CHANGE
75,751	76,487	(736)
-	-	-
-	-	-
-	-	-
132,446	103,303	29,143
\$ 208,197	\$ 179,790	\$ 28,407

(b) Capital

(1) Investments

(2) Real estate

(3) Other

(99) Subtotal

197	197	-
-	-	-
-	-	-
\$ 197	\$ 197	\$ -

NOTES TO FINANCIAL STATEMENTS

(c) Deferred tax liabilities (3a99+3b99)	\$ 208,394	\$ 179,987	\$ 28,407
--	------------	------------	-----------

4. Net deferred tax assets/liabilities (2i-3c)	\$ 7,647,157	\$ 5,009,075	\$ 2,638,082
--	--------------	--------------	--------------

9D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

The significant items causing a difference between the statutory federal income tax rate and the Company's effective income tax rate are as follows:

	6/30/2015	Effective Tax Rate
Provision computed at statutory rate	\$ (5,461,973)	35.0%
Tax preferred investment	(134,663)	0.9%
Nondeductible expenses	2,995	0.0%
Tax on change in non-admitted assets	(117,889)	0.7%
Tax on other surplus adjustments	294,543	-1.9%
True-ups and other adjustments to tax	1,257	0.0%
Total tax	\$ (5,415,730)	34.7%
<u>Reconciliation</u>		
Federal and foreign income taxes incurred	(2,806,024)	18.0%
Realized capital gains (losses) tax	122,295	-0.8%
Change in deferred tax	(2,732,001)	17.5%
Total tax	\$ (5,415,730)	34.7%

9E. Operating Loss and Tax Credit Carryforwards

(1) As of 6/30/2015, the Company had \$2,975,916 of net operating losses available to offset future taxable income and \$0 in capital losses available to offset future capital gain income. The Company had \$1,345,930 in Alternative Minimum Tax (AMT) credits available.

Net Operating losses were generated and expire as follows:

<u>Year Generated</u>	<u>Amount</u>	<u>Expiration</u>
2015	\$ 2,975,916	2035
	<u>\$ 2,975,916</u>	

AMT credits never expire. The Company's remaining credits were generated as follows:

<u>Year Generated</u>	<u>Carryover Remaining</u>
2009	\$ 466,343
2010	561,749
2012	149,258
2013	102,560
2014	66,020
	<u>\$ 1,345,930</u>

(2) The Company does not have any income tax expense that is available for recoupment in the event of future net losses.

(3) The Company did not have any protective tax deposits under Section 6603 of the Internal Revenue Code

9F. Consolidated Federal Income Tax Return

(1) For the period ending December 31, 2015, The Company will file as a part of the consolidated federal income tax return with its ultimate U.S. parent, Mapfre USA Corp and its subsidiaries, The Commerce Insurance Company, Citation Insurance Company, Commerce West Insurance Company, MAPFRE Insurance Company of New York, MAPFRE Insurance Company of Florida, MAPFRE Insurance Company, CUBE Insurance Company, ACIC Holding Company, Inc., Bay Finance Holding Company, and Mapfre Intermediaries, Inc. (said parties constituting an "Affiliated Group," as defined in and for the purposes of IRC §1504(a))

(2) Each affiliate is jointly and severally liable for federal income taxes of the Affiliated Group, and has entered into a written tax sharing agreement. Under this agreement, allocation is made primarily on a separate return basis, with current payment for losses and other tax items utilized in the consolidated return.

9G. Federal or foreign Federal Income Tax Loss Contingencies

The Company has no tax loss contingencies for which it is reasonably possible that the total liability will significantly increase within twelve months of the reporting date.

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

No significant change.

Note 11 - Debt

No significant change.

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

No significant change.

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

No significant change.

Note 14 - Contingencies

No significant change.

Note 15 - Leases

No significant change.

NOTES TO FINANCIAL STATEMENTS

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 06/30/15

Description	Level 1		Level 2		Level 3		TOTAL
Bonds	\$	-	\$	1,025,837	\$	-	\$ 1,025,837
Preferred Stock		-		1,514,850		-	1,514,850
Common Stock		-		-		-	-
TOTALS	\$	-	\$	2,540,687	\$	-	\$ 2,540,687

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

Description	Beginning Balance at 4/1/2015		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 6/30/2015
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	\$ 154,522,009	\$ 153,103,386	\$ 6,044,915	\$ 148,477,094	\$ -	\$ -
Preferred Stock	1,514,850	1,514,850	-	1,514,850	-	-
Common Stock	-	-	-	-	-	-
TOTALS	\$ 156,036,859	\$ 154,618,236	\$ 6,044,915	\$ 149,991,944	\$ -	\$ -

20D Not Practicable to Estimate Fair Value

NONE

Note 21 - Other Items

No significant change.

Note 22 - Events Subsequent

No significant change.

Note 23 – Reinsurance

No significant change.

Note 24 - Retrospectively Rated Contracts & Contracts Subject to Redetermination

No significant change.

Note 25 - Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$86,080,000 were lower by \$576,000 due to favorable development of prior year estimates. This redundancy was .7% of the unpaid losses and LAE of \$82,859,000 as of prior year-end.

NOTES TO FINANCIAL STATEMENTS

Note 26 - Intercompany Pooling Arrangements

Effective January 1, 2015, the pooling agreement was expanded to include affiliate company Cube Insurance Company. The revised percentages are as follows:

COMPANY	POOLING PERCENTAGES	
	2015	2014
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%
	100.0%	100.0%

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 [☒]
- 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 [☒]
- 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 [☒] No [☐]
- 3.2

Have there been any substantial changes in the organizational chart since the prior quarter end?

Yes [☐] No [☒]
- 3.3

If the response to 3.2 is yes, provide a brief description of those changes.

- 4.1

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

Yes [☐] No [☒]
- 4.2

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

1	2	3
Name of Entity	NAIC Company Code	State of Domicile
	0	

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 [☒] N/A [☐]

- 6.1

State as of what date the latest financial examination of the reporting entity was made or is being made.
- 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.
- 6.3

State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date).
- 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 [☒]
- 6.6

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

Yes [☐] No [☐] N/A [☒]
- 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 [☒]
- 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 [☒]
- 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 [☒]
- 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	2	3	4	5	6
Affiliate Name	Location (City, State)	FRB	OCC	FDIC	SEC

- 9.1

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

Yes [☒] 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 [☐]
- 9.21

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

Minor changes to align with Code of Good Governance and more closely resemble that of our Spanish parent.

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

Yes [☐] No [☒]
- 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 [☒]
- 10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount:

\$

0

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 [☒]
- 11.2 If yes, give full and complete information relating thereto:

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

\$

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

\$

0
- 14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates?

Yes [☐] No [☒]

14.2 If yes, please complete the following:

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

- 15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB?

Yes [☐] No [☒]
- 15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state?

Yes [☐] No [☐]

If no, attach a description with this statement.
16. For the reporting entity's security lending program, state the amount of the following as of current statement date:

16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2:

\$

0

16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2:

\$

0

16.3 Total payable for securities lending reported on the liability page:

\$

0

17. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*?

Yes [☒] No [☐]
- 17.1 For all agreements that comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, complete the following:
- | 1
Name of Custodian(s) | 2
Custodian Address |
|---------------------------|-------------------------------|
| Bank of New York Mellon | One Wall Street, New York, NY |
- 17.2 For all agreements that do not comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, provide the name, location and a complete explanation
- | 1
Name(s) | 2
Location(s) | 3
Complete Explanation(s) |
|--------------|------------------|------------------------------|
| | | |
- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter?

Yes [☐] No [☒]

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 [☒] No [☐]

18.2 If no, list exceptions:
- Q07.1

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

		1	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid	
			2	3	4	5	6	7
States, Etc.		Active Status	Current Year to Date	Prior Year to Date	Current Year to Date	Prior Year to Date	Current Year to Date	Prior Year to Date
1.	Alabama.....	AL.....L.....	215,287	194,618	14,024	6,044	18,623	42,266
2.	Alaska.....	AK.....L.....	68,685	2,964	275		4,431	296
3.	Arizona.....	AZ.....L.....	2,740,816	3,090,698	1,145,052	2,450,909	2,109,231	2,222,631
4.	Arkansas.....	AR.....L.....	187,547	68,244	12,759	4,809	24,430	12,525
5.	California.....	CA.....L.....	679,833	(131,639)	36,173		107,338	21,902
6.	Colorado.....	CO.....L.....	139,139	27,625	14,484	3,217	93,606	27,272
7.	Connecticut.....	CT.....L.....	47,892,617	22,619,395	15,814,626	9,831,747	26,133,638	14,652,186
8.	Delaware.....	DE.....L.....	115,520	3,929	15,613	32,176	1,163,329	1,266,837
9.	District of Columbia.....	DC.....L.....	27,477	3,855	2,000	1,192	15,626	14,229
10.	Florida.....	FL.....L.....	1,007,794	400,683	121,524	116,426	211,657	48,776
11.	Georgia.....	GA.....L.....	382,279	158,560	285,975	6,450	111,938	18,195
12.	Hawaii.....	HI.....L.....	17,273	10,763	191	1,923	2,611	819
13.	Idaho.....	ID.....L.....	1,739,211	1,629,448	1,498,870	1,015,171	1,392,916	876,290
14.	Illinois.....	IL.....L.....	858,632	643,932	96,017	387,984	99,351	364,547
15.	Indiana.....	IN.....L.....	2,524,006	3,346,830	2,312,586	2,970,938	3,204,930	3,018,411
16.	Iowa.....	IA.....L.....	82,820	58,759	26,532	4,711	6,672	2,946
17.	Kansas.....	KS.....L.....	191,781	32,035	52,644	9,989	71,902	11,476
18.	Kentucky.....	KY.....L.....	2,948,781	2,990,250	1,578,126	1,766,429	2,262,126	1,984,256
19.	Louisiana.....	LA.....L.....	225,502	177,567	32,488	113,671	105,669	112,747
20.	Maine.....	ME.....L.....	53,707	18,731	6,855		3,768	21,731
21.	Maryland.....	MD.....L.....	193,085	107,874	108,607	82,734	70,059	99,336
22.	Massachusetts.....	MA.....L.....	112,792	99,866		1,900	10,953	11,387
23.	Michigan.....	MI.....L.....	363,132	248,245	16,848	11,555	87,959	13,099
24.	Minnesota.....	MN.....L.....	312,084	177,283	3,060	(837)	42,677	5,207
25.	Mississippi.....	MS.....L.....	63,430	46,013	19,060		6,831	764
26.	Missouri.....	MO.....L.....	216,713	71,565	10,072	2,713	22,982	3,257
27.	Montana.....	MT.....L.....	53,069	6,586	1,959	321	11,927	1,920
28.	Nebraska.....	NE.....L.....	163,072	140,152	34,023	15,838	62,796	8,141
29.	Nevada.....	NV.....L.....	123,614	13,576	375,605	310,066	46,091	176,894
30.	New Hampshire.....	NH.....L.....	124,947	88,503		6,458	5,735	19,914
31.	New Jersey.....	NJ.....L.....	39,807,209	43,490,421	28,843,840	28,234,173	42,118,044	34,805,729
32.	New Mexico.....	NM.....L.....	84,915	39,787	1,405	1,125	8,378	1,369
33.	New York.....	NY.....L.....	756,736	523,245	3,511,130	4,912,906	5,548,075	8,936,548
34.	North Carolina.....	NC.....L.....	537,344	346,232	129,949	13,445	128,456	35,951
35.	North Dakota.....	ND.....L.....	16,957	1,962			5,637	2,603
36.	Ohio.....	OH.....L.....	10,630,929	8,739,232	4,947,240	5,070,411	9,170,086	6,770,157
37.	Oklahoma.....	OK.....L.....	104,280	11,651	64,666	132	(20,859)	(1,562)
38.	Oregon.....	OR.....L.....	9,665,132	11,816,301	6,780,975	6,643,031	8,773,620	9,288,256
39.	Pennsylvania.....	PA.....L.....	802,532	562,359	69,252	(4,208)	2,007,751	1,991,736
40.	Rhode Island.....	RI.....L.....	22,845,420	19,667,896	13,608,489	12,564,359	22,800,511	20,110,180
41.	South Carolina.....	SC.....L.....	469,885	406,913	2,192	5,682	15,439	30,766
42.	South Dakota.....	SD.....L.....	13,101	3,405	5,617	1,565	63,284	60,546
43.	Tennessee.....	TN.....L.....	6,006,943	8,451,053	4,754,269	4,628,671	5,281,532	3,883,953
44.	Texas.....	TX.....L.....	934,608	278,216	73,036	123,485	231,971	82,981
45.	Utah.....	UT.....L.....	64,726	13,811	24,303	(9,052)	17,693	24,693
46.	Vermont.....	VT.....L.....	67,609	52,501			2,088	96
47.	Virginia.....	VA.....L.....	385,839	266,760	6,128	22,421	61,217	30,100
48.	Washington.....	WA.....L.....	14,055,855	16,497,597	10,707,032	10,854,194	14,063,098	16,563,693
49.	West Virginia.....	WV.....L.....	3,907	2,103	(40)	(40)	1,475	25,053
50.	Wisconsin.....	WI.....L.....	298,947	144,754	3,936	23,319	29,076	60,529
51.	Wyoming.....	WY.....L.....	14,380	4,179	8,699		6,831	8,595
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	171,391,899	147,667,288	97,178,166	92,240,153	147,825,205	127,772,229

DETAILS OF WRITE-INS

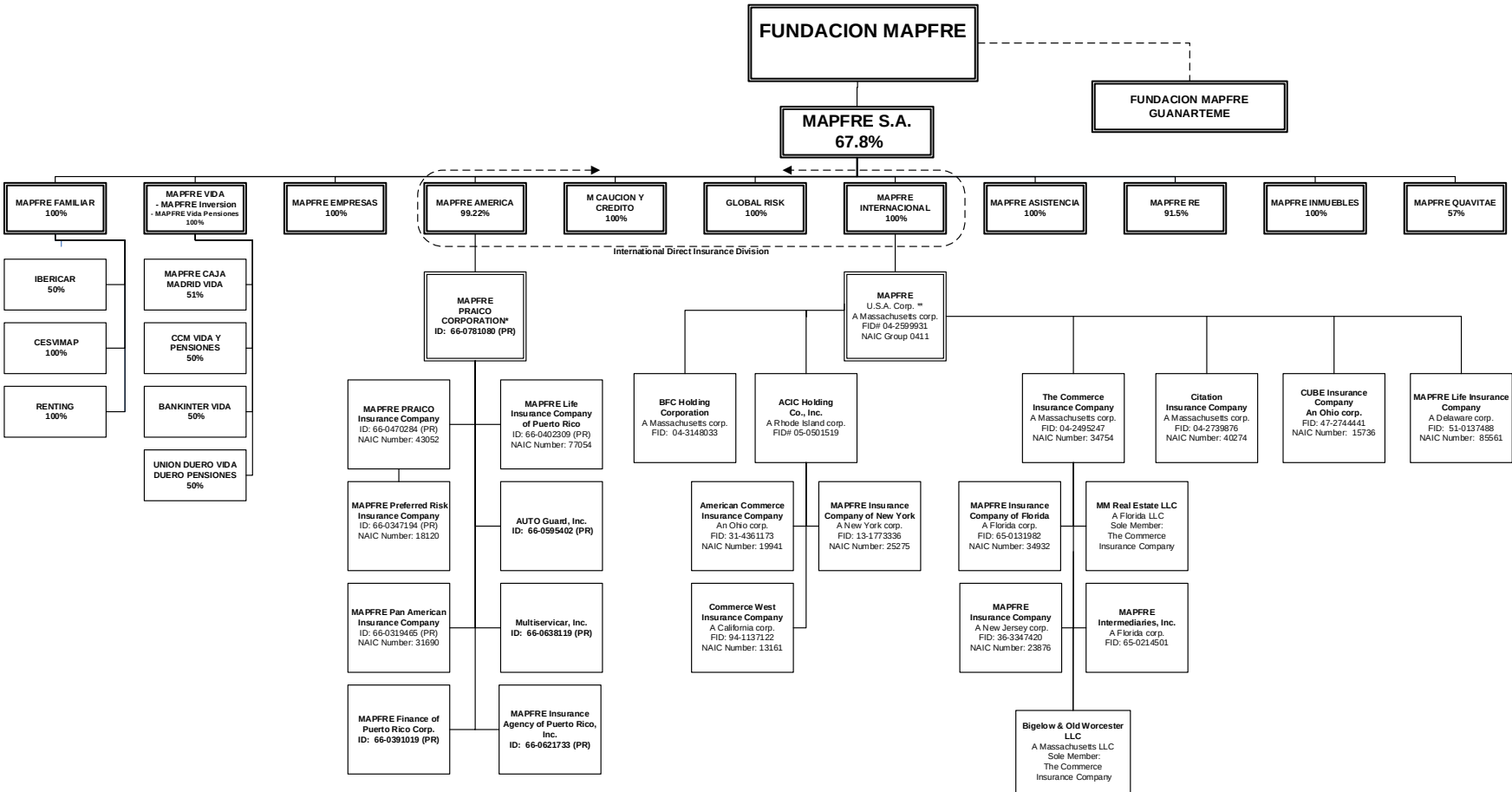
58001.....	XXX.....						
58002.....	XXX.....						
58003.....	XXX.....						
58998. Summary of remaining write-ins for Line 58 from overflow page....	XXX.....	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	XXX.....	0	0	0	0	0	0

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

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

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

PART 1 – ORGANIZATIONAL CHART



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

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

***See attached list for additional companies.

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE FAMILIAR 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 ASSEGURANCES GENERALS	50.0		
IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.	50.0		
AUTOMOCION PENINSULAR INMUEBLES, S.A.	50.0		
ONLINE SHOPPING CLUB EUROPE, S.L.	49.9		
BANKINTER SEGUROS GENERALES, S.A.	25.1		
RESTREATOR.COM LTD	25.0		
ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	22.5		
AUDATEX ESPANA, S.A.	12.5		
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0		
TECNOLOGÍAS 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		
BIOINGIENERIA 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'ASSEGURANCES I	50.0		
BANKINTER SEGUROS DE VIDA, S.A.	50.0		
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.0		
UNION DEL DUERO 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		

American Commerce Insurance Company

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 SEGURADORA 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 SEGURADORA	100.0		
MAPFRE ASSISTENCIA	100.0		
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0		
MAPFRE VIDA S.A.	100.0		
VIDA SEGURADORA	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 SEGUROLS 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 SECUROS, 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	15736	47-2744441
THE CITATION INSURANCE COMPANY	100.0	40274	04-2739876
BAY FINANCE HOLDING COMPANY	100.0		04-3148033

American Commerce Insurance Company

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	
IBEROASISTECIA INTERNACIONAL	99.8	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6	
EUROSOS	99.5	
URUGUAY ASISTENCIA	94.8	
SUR ASISTENCIA, S.A.	99.0	
NILE ASSIT	98.0	
TUR ASSIST	91.7	
ROAD CHINA ASSISTANCE CO., LTD.	60.3	
IBEROASISTENCIA, S.A.	99.9	
MIDDLESEA ASSIST LIMITED	51.0	
ASISTENCIA BOLIVIANA	99.5	
GULF ASSIST, B.S.C.	74.6	
CARIBE ASISTENCIA	73.7	
BENELUX ASSIST, S.A.	70.0	
PANAMA ASISTENCIA	58.0	
LIB ASSIST	51.0	
AFRIQUE ASSISTANCE, S.A.	49.0	
MAPFRE INMUEBLES, S.G.A.	10.0	
INMOBILIARIA MAPINVER S.A.	100.0	
DESARROLLOS URBANOS CIC, S.A.	99.9	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9	
MAPFRE GLOBAL RISKS	100.0	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0	
SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	100.0	
INDUSTRIAL RE MUSINI S.A.	100.0	
MAPFRE SERVICIOS DE CAUCION S.A.	99.7	
SOLUNION SEGUROS DE CREDITO S.A.	50.0	
SOLUNION SERVICIOS DE CREDITO, S.L.U.	100.0	
SOLUNION SERVICIOS DE CREDITO ARGENTINA	95.0	
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
BIOINGENERIA 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	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)	*
Q12	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.....	
							DISEÑO 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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.1

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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.2

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)	*
							KEYELET 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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.3

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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.4

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)	*
							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'ASEGUANCES 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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.5

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.....	
0411.....	MAPFRE INSURANCE GROUP.....	31690..	66-0319465..				MAPFRE PAN AMERICAN INSURANCE COMPANY	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0391019..				MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0621733..				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0595402..				AUTO GUARD INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
			66-0638119..				MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	77054..	66-0402309..				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
0411.....	MAPFRE INSURANCE GROUP.....	43052..	66-0470284..				MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
0411.....	MAPFRE INSURANCE GROUP.....	18120..	66-0347194..				MAPFRE PREFERRED RISK INSURANCE COMPANY	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	*
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							CLUB MAPFRE S.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CEFOPROSEG C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.6

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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.7

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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.8

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.. 04-3148033..				THE CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							BAY FINANCE HOLDING COMPANY.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							INSPOP USA, LLC.....	VA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	...10.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754..	04-2495247.. 65-0214501..				THE COMMERCE INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							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.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736..	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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.9

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

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.10

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)	*
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.11

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)	*
							EL SALVADOR ASISTENCIA, S.A.....	SLV.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.12

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)	*
							CIG SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	COL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	94.900	MAPFRE S.A.....	
							ECUASISTENCIA.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	94.500	MAPFRE S.A.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							CONSULTING DE SERVICIOS Y TECNOLOGIA SIAM, S.A.	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.900	MAPFRE S.A.....	
							IBEROASISTECIA INTERNACIONAL.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.600	MAPFRE S.A.....	
							EUROSOS.....	GRC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.500	MAPFRE S.A.....	
							URUGUAY ASISTENCIA.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	94.800	MAPFRE S.A.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.000	MAPFRE S.A.....	
							NILE ASSIT.....	EGY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	98.000	MAPFRE S.A.....	
							TUR ASSIST.....	TUR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	91.700	MAPFRE S.A.....	
							ROAD CHINA ASSISTANCE CO., LTD.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	60.300	MAPFRE S.A.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	51.000	MAPFRE S.A.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.13

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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.14

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)	*
							SOLUNION SERVICIOS DE CREDITO ARGENTINA	ARG.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP.....	...95.000	MAPFRE S.A.....	
							MAPFRE AMERICA CAUCION Y CREDITO.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							MAPFRE GARANTIAS Y CREDITO CIA DE SEGUROS, S.A.	CHL.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							MAPFRE SEGUROS DE CREDITO S.A.....	MEX.....	NIA.....	MAPFRE AMERICA CAUCION Y CREDITO.....	OWNERSHIP.....	...100.000	MAPFRE S.A.....	
							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.....	

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)	*
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	INVERSIONES IBERICAS.....	OWNERSHIP....	25.000	MAPFRE S.A.....	
							MAQUAVIT INMUEBLES, S.L.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	56.800	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAPFRE FAMILIAR COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	40.000	MAPFRE S.A.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	60.000	MAPFRE S.A.....	
							PROVITAE CENTROS ASISTENCIALES, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	
							FANCY INVESTMENT S.A.....	URY.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
							CENTRO INTERNACIONAL DE FORMACION DE DIRECTIVOS S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	
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.....	1,381,070	746,739	54.1	47.5
2. Allied lines.....	42,701	18,345	43.0	77.3
3. Farmowners multiple peril.....			0.0	
4. Homeowners multiple peril.....	47,171,531	36,227,903	76.8	68.2
5. Commercial multiple peril.....			0.0	
6. Mortgage guaranty.....			0.0	
8. Ocean marine.....			0.0	
9. Inland marine.....	826,355	758,924	91.8	70.0
10. Financial guaranty.....			0.0	
11.1. Medical professional liability - occurrence.....			0.0	
11.2. Medical professional liability - claims-made.....			0.0	
12. Earthquake.....			0.0	
13. Group accident and health.....	56,094	37,503	66.9	32.6
14. Credit accident and health.....			0.0	
15. Other accident and health.....			0.0	
16. Workers' compensation.....			0.0	
17.1 Other liability-occurrence.....	2,497,133	13,156	0.5	0.5
17.2 Other liability-claims made.....			0.0	
17.3 Excess workers' compensation.....			0.0	
18.1 Products liability-occurrence.....			0.0	
18.2 Products liability-claims made.....			0.0	
19.1, 19.2 Private passenger auto liability.....	56,231,248	48,637,151	86.5	77.9
19.3, 19.4 Commercial auto liability.....			0.0	
21. Auto physical damage.....	32,400,982	21,821,687	67.3	62.4
22. Aircraft (all perils).....	4,714,355	1,857,556	39.4	(4,432.3)
23. Fidelity.....			0.0	
24. Surety.....			0.0	
26. Burglary and theft.....			0.0	
27. Boiler and machinery.....			0.0	
28. Credit.....			0.0	
29. International.....			0.0	
30. Warranty.....			0.0	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	107,318	149,399	139.2	91.7
35. Totals.....	145,428,787	110,268,363	75.8	68.6
DETAILS OF WRITE-INS				
3401. TRAVEL.....	107,318	149,399	139.2	91.7
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).....	107,318	149,399	139.2	91.7

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	2,325,978	2,917,577	1,266,791
2. Allied lines.....	19,911	41,408	38,914
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	34,404,470	56,056,897	46,417,972
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	702,103	1,137,254	419,267
10. Financial guaranty.....			
11.1 Medical professional liability - occurrence.....			
11.2 Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....	45,370	76,155	38,905
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1 Other liability-occurrence.....	3,391,260	6,552,195	5,824,146
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.....	34,731,669	62,419,533	60,018,641
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	20,960,401	37,019,434	33,262,858
22. Aircraft (all perils).....	2,730,569	5,035,811	305,796
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.....	84,550	135,635	73,996
35. Totals.....	99,396,281	171,391,899	147,667,286
DETAILS OF WRITE-INS			
3401. TRAVEL.....	84,550	135,635	73,996
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).....	84,550	135,635	73,996

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

[illegible]

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

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

Explanation:

1.
2.
3.
4.

Bar Code:



American Commerce Insurance Company

Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4 December 31, Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. Miscellaneous assets.....	2,559		2,559	4,016
2505. Premium tax recoverable.....	2,122,737		2,122,737	
2597. Summary of remaining write-ins for Line 25.....	2,125,296	0	2,125,296	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	2
	Year to Date	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.....	6,057	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.....	65,872	135,846
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,442,977	1,502,792
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,442,977	1,502,792

SCHEDULE B - VERIFICATION
Mortgage Loans

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

SCHEDULE BA - VERIFICATION
Other Long-Term Invested Assets

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

SCHEDULE D - VERIFICATION
Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	153,599,950	157,693,327
2. Cost of bonds and stocks acquired.....	27,804,414	50,937,045
3. Accrual of discount.....	176,650	441,431
4. Unrealized valuation increase (decrease).....	(427,227)	(758,733)
5. Total gain (loss) on disposals.....	420,677	3,282,488
6. Deduct consideration for bonds and stocks disposed of.....	26,595,575	57,363,507
7. Deduct amortization of premium.....	360,653	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).....	154,618,236	153,599,950
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	154,618,236	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).....	134,218,022	3,132,200	10,264,829	(87,833)	134,218,022	126,997,560		125,878,566
2. NAIC 2 (a).....	31,181,413	2,072,500	8,150,363	(23,561)	31,181,413	25,079,989		24,008,242
3. NAIC 3 (a).....								1,329,000
4. NAIC 4 (a).....	1,401,723		3,081	(1,330,405)	1,401,723	68,237		71,442
5. NAIC 5 (a).....				957,600		957,600		
6. NAIC 6 (a).....								
7. Total Bonds.....	166,801,158	5,204,700	18,418,273	(484,199)	166,801,158	153,103,386	0	151,287,250
PREFERRED STOCK								
8. NAIC 1.....								
9. NAIC 2.....	763,501			(9,901)	763,501	753,600		1,577,700
10. NAIC 3.....	775,000			(13,750)	775,000	761,250		735,000
11. NAIC 4.....								
12. NAIC 5.....								
13. NAIC 6.....								
14. Total Preferred Stock.....	1,538,501	0	0	(23,651)	1,538,501	1,514,850	0	2,312,700
15. Total Bonds and Preferred Stock.....	168,339,659	5,204,700	18,418,273	(507,850)	168,339,659	154,618,236	0	153,599,950

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

Sch. DA-Pt 1
NONE

Sch. DA-Verification
NONE

Sch. DB-Pt A-Verification
NONE

Sch. DB-Pt B-Verification
NONE

Sch. DB-Pt C-Sn 1
NONE

Sch. DB-Pt C-Sn 2
NONE

Sch. DB-Verification
NONE

Sch. E-Verification
NONE

SCHEDULE A - PART 2

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

1	Location		4	5	6	7	8	9
	2	3						
Description of Property	City	State	Date Acquired	Name of Vendor	Actual Cost at Time of Acquisition	Amount of Encumbrances	Book/Adjusted Carrying Value Less Encumbrances	Additional Investment Made After Acquisition
Acquired by Purchase								
ADDITIONS TO: THREE STORY BUILDING, 37,077 SQUARE FEET, LOCATED ON 6.002 ACRES OF LAND ON FOUR SEPARATE PARCELS	COLUMBUS.....	OH.....	...06/30/2015	VARIOUS.....			1,442,977	6,057
0199999. Totals.....					0	0	1,442,977	6,057
0399999. Totals.....					0	0	1,442,977	6,057

QE01

SCHEDULE A - PART 3

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

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

NONE

Sch. B-Pt 2
NONE

Sch. B-Pt 3
NONE

Sch. BA-Pt 2
NONE

Sch. BA-Pt 3
NONE

SCHEDULE D - PART 3

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

1	2			3	4	5		6	7	8	9		10
Identification	Description			Foreign	Date Acquired	Name of Vendor		Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends		NAIC Designation or Market Indicator (a)
Bonds - U.S. Special Revenue and Special Assessment													
575175	HF	4	MASON CNTY WASH PUB UTIL DIST.....		06/02/2015	BAIRD, ROBERT W. & CO.....			1,146,020	1,000,000	705		1FE.....
914692	X6	0	UNIVERSITY NEW MEXICO - HOSP REF.....		05/07/2015	RBC CAPITAL MARKETS.....			1,000,000	1,000,000			1FE.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....									2,146,020	2,000,000	705		XXX
Bonds - Industrial and Miscellaneous													
05523U	AK	6	BAE SYSTEMS HOLDINGS INC.....		05/08/2015	BAIRD, ROBERT W. & CO.....			2,072,500	2,000,000	7,600		2FE.....
68389X	AP	0	ORACLE CORP 2.5 15OCT22.....		05/05/2015	PIERPONT SECURITIES.....			986,180	1,000,000	1,597		1FE.....
3899999. Total Bonds - Industrial and Miscellaneous.....									3,058,680	3,000,000	9,197		XXX
8399997. Total Bonds - Part 3.....									5,204,700	5,000,000	9,902		XXX
8399999. Total Bonds.....									5,204,700	5,000,000	9,902		XXX
9999999. Total Bonds, Preferred and Common Stocks.....									5,204,700	XXX	9,902		XXX

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

SCHEDULE D - PART 4

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

1	2	3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	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)
8399997. Total Bonds - Part 4.....						18,600,120	18,354,990	18,481,749	15,358,569	168	/(39,964)	0	/(39,796)	0	18,418,273	0	181,847	181,847	450,622	XXX	XXX
8399999. Total Bonds.....						18,600,120	18,354,990	18,481,749	15,358,569	168	/(39,964)	0	/(39,796)	0	18,418,273	0	181,847	181,847	450,622	XXX	XXX
9999999. Total Bonds, Preferred and Common Stocks.....						18,600,120	XXX	18,481,749	15,358,569	168	/(39,964)	0	/(39,796)	0	18,418,273	0	181,847	181,847	450,622	XXX	XXX

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

Sch. DB-Pt A-Sn 1
NONE

Sch. DB-Pt 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

American Commerce Insurance Company
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of Interest Accrued at Current Statement Date	First Month	Second Month	Third Month	*
Open Depositories								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(8,668,934)	(6,695,101)	(5,393,290)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.010	13		956,766	338,603	130,574	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				1,021,853	1,806,466	1,747,269	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				89,707	306,415	124,899	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	0.010			343	343	343	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	0.010			5,561	5,561	5,561	XXX
MM: Fidelity Govn't 057.....	500 Salem Street, Smithfield, RI 02917.....	0.010	128		4,480,162	3,081,753	4,804,300	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....				8,737	143,510	344,588	XXX
0199999. Total Open Depositories.....	XXX	XXX	141	0	(2,105,805)	(1,012,450)	1,764,244	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	141	0	(2,105,805)	(1,012,450)	1,764,244	XXX
0599999. Total Cash.....	XXX	XXX	141	0	(2,105,805)	(1,012,450)	1,764,244	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

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

QE13

NONE