



QUARTERLY STATEMENT

As of September 30, 2016
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

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)

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(Street and Number) (City or Town, State, Country and Zip Code)

www.mapfreinsurance.com

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

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

Country of Domicile US

Commenced Business..... March 19, 1947

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

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

508-943-9000-14376
(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. FRANCOIS JEAN FACON #	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
	1	2	3	December 31 Prior Year Net Admitted Assets
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	145,744,471		145,744,471	128,545,582
2. Stocks:				
2.1 Preferred stocks.....	788,793		788,793	1,475,100
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).....	1,293,970		1,293,970	1,453,687
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 (\$.....(3,393,449)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(3,393,449)		(3,393,449)	4,750,403
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).....	144,433,785	0	144,433,785	136,224,772
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,312,366		1,312,366	1,126,773
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	91,143,135		91,143,135	84,189,292
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) and contracts subject to redetermination (\$.....0).....			0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	24,290,242		24,290,242	22,938,544
16.2 Funds held by or deposited with reinsured companies.....			0	
16.3 Other amounts receivable under reinsurance contracts.....			0	
17. Amounts receivable relating to uninsured plans.....			0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....	1,461,677		1,461,677	2,921,918
18.2 Net deferred tax asset.....	7,315,723	232,250	7,083,473	6,684,244
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	243,656		243,656	90,669
21. Furniture and equipment, including health care delivery assets (\$.....0).....	829,369	829,369	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	8,609,272
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	84,915,557	1,604,106	83,311,451	67,112,917
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	355,945,510	2,665,725	353,279,785	329,898,401
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	355,945,510	2,665,725	353,279,785	329,898,401

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.....	1,131,693	1,131,693	0	
2502. Arizona renewal business.....	472,413	472,413	0	
2503. Miscellaneous assets.....	43,699		43,699	967
2598. Summary of remaining write-ins for Line 25 from overflow page.....	83,267,752	0	83,267,752	67,111,950
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	84,915,557	1,604,106	83,311,451	67,112,917

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....31,878,000).....	71,425,669	72,233,423
2. Reinsurance payable on paid losses and loss adjustment expenses.....	10,164,277	10,734,236
3. Loss adjustment expenses.....	15,259,741	15,368,461
4. Commissions payable, contingent commissions and other similar charges.....	5,892,258	4,789,466
5. Other expenses (excluding taxes, licenses and fees).....	1,196,990	1,457,815
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	240,955	291,897
7.1 Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....		
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 \$....300,590,232 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).....	99,906,145	91,038,992
10. Advance premium.....	7,236,200	5,285,010
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	26,944,096	22,632,982
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.....	6,814,771	
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.....	807,343	1,219,741
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	245,888,445	225,052,023
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	245,888,445	225,052,023
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.....	36,714,462	36,714,462
35. Unassigned funds (surplus).....	67,450,738	64,905,776
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).....	107,391,340	104,846,378
38. Totals (Page 2, Line 28, Col. 3).....	353,279,785	329,898,401

DETAILS OF WRITE-INS

2501. Unclaimed property.....	807,343	1,219,741
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	807,343	1,219,741
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$305,710,205).....	294,764,518	227,385,323	315,573,117
1.2 Assumed..... (written \$160,828,433).....	144,147,565	140,718,307	186,488,996
1.3 Ceded..... (written \$317,220,475).....	298,461,074	227,850,591	316,225,230
1.4 Net..... (written \$149,318,163).....	140,451,008	140,253,039	185,836,883
DEDUCTIONS:			
2. Losses incurred (current accident year \$87,985,000):			
2.1 Direct.....	183,494,402	168,099,818	232,792,363
2.2 Assumed.....	95,496,132	102,403,031	132,673,313
2.3 Ceded.....	187,063,062	168,099,818	232,792,363
2.4 Net.....	91,927,472	102,403,031	132,673,313
3. Loss adjustment expenses incurred.....	17,065,525	18,395,147	23,559,583
4. Other underwriting expenses incurred.....	37,288,958	37,155,985	48,871,586
5. Aggregate write-ins for underwriting deductions.....	0	0	(4,410)
6. Total underwriting deductions (Lines 2 through 5).....	146,281,955	157,954,163	205,100,072
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(5,830,946)	(17,701,124)	(19,263,189)
INVESTMENT INCOME			
9. Net investment income earned.....	3,599,153	4,095,373	6,019,743
10. Net realized capital gains (losses) less capital gains tax of \$442,661.....	943,692	868,817	1,121,277
11. Net investment gain (loss) (Lines 9 + 10).....	4,542,845	4,964,190	7,141,020
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.....	2,298,778	1,804,681	2,556,863
14. Aggregate write-ins for miscellaneous income.....	68,307	40,573	63,847
15. Total other income (Lines 12 through 14).....	2,367,086	1,845,254	2,620,710
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	1,078,984	(10,891,680)	(9,501,459)
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).....	1,078,984	(10,891,680)	(9,501,459)
19. Federal and foreign income taxes incurred.....	518,454	(2,807,172)	(3,001,015)
20. Net income (Line 18 minus Line 19) (to Line 22).....	560,530	(8,084,508)	(6,500,444)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	104,846,378	103,684,208	103,684,208
22. Net income (from Line 20).....	560,530	(8,084,508)	(6,500,444)
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$247,788.....	460,178	(346,041)	(408,658)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	270,701	2,804,313	1,913,709
27. Change in nonadmitted assets.....	535,359	(536,801)	10,044
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.....			10,526,315
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....			
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	718,194	(5,056,940)	(4,378,796)
38. Change in surplus as regards policyholders (Lines 22 through 37).....	2,544,962	(11,219,977)	1,162,170
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	107,391,340	92,464,231	104,846,378

DETAILS OF WRITE-INS			
0501. LAD program income.....			(4,410)
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	(4,410)
1401. Miscellaneous income.....	25,174	28,538	37,320
1402. Gain on sale of fixed assets.....	43,133	12,035	26,527
1403.			
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	68,307	40,573	63,847
3701. STATUTORY POOLING ADJUSTMENT.....	718,194	(3,630,861)	(3,451,844)
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....		(1,426,079)	(926,952)
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).....	718,194	(5,056,940)	(4,378,796)

CASH FLOW

	1	2	3
	Current Year	Prior Year	Prior Year Ended
	to Date	To Date	December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	148,626,622	132,031,714	169,952,707
2. Net investment income.....	3,884,633	4,617,987	6,649,457
3. Miscellaneous income.....	2,367,086	1,845,254	2,620,710
4. Total (Lines 1 through 3).....	154,878,340	138,494,955	179,222,874
5. Benefit and loss related payments.....	94,656,882	97,140,225	128,065,624
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	53,672,178	52,449,959	70,727,801
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$0 tax on capital gains (losses).....	(499,126)	1,260,257	1,174,525
10. Total (Lines 5 through 9).....	147,829,934	150,850,441	199,967,950
11. Net cash from operations (Line 4 minus Line 10).....	7,048,406	(12,355,486)	(20,745,076)
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	51,778,921	57,906,700	80,529,126
12.2 Stocks.....	773,441	810,000	810,000
12.3 Mortgage loans.....			
12.4 Real estate.....			
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....			
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	52,552,362	58,716,700	81,339,126
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	67,348,002	41,575,990	57,051,483
13.2 Stocks.....			
13.3 Mortgage loans.....			
13.4 Real estate.....	(66,022)	75,879	80,479
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....		(1,042,530)	
13.7 Total investments acquired (Lines 13.1 to 13.6).....	67,281,980	40,609,339	57,131,962
14. Net increase or (decrease) in contract loans and premium notes.....			
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14).....	(14,729,618)	18,107,361	24,207,164
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.....			10,526,315
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			
16.6 Other cash provided (applied).....	(462,640)	(8,815,545)	(9,154,165)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(462,640)	(8,815,545)	1,372,150
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).....	(8,143,852)	(3,063,670)	4,834,238
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	4,750,403	(83,835)	(83,835)
19.2 End of period (Line 18 plus Line 19.1).....	(3,393,449)	(3,147,505)	4,750,403

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	2016	2015
NET INCOME	OH		
1. Net Income, state basis		\$ 560,530	\$ (6,500,444)
2. Effect of state prescribed practices		-	-
3. Effect of state permitted practices		-	-
4. Net Income, NAIC SAP basis		\$ 560,530	\$ (6,500,444)
SURPLUS	OH		
5. Policyholders' surplus, state basis		\$ 107,391,340	\$ 104,846,378
6. Effect of state prescribed practices		-	-
7. Effect of state permitted practices		-	-
8. Policyholders' surplus, NAIC SAP basis		\$ 107,391,340	\$ 104,846,378

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:	\$ 5,407
A2. The aggregate amount of unrealized losses - 12 months or longer:	\$ 4,598
B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months:	\$ 2,839,144
B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer:	\$ 47,780

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

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

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

No significant change.

Note 7 - Investment Income

No significant change.

Note 8 - Derivative Instruments

No significant change.

Note 9 - Income Taxes

No significant change.

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

No significant change.

Note 11 - Debt

No significant change.

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

No significant change.

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

No significant change.

NOTES TO FINANCIAL STATEMENTS

Note 14 - Contingencies

No significant change.

Note 15 - Leases

No significant change.

Note 16 - Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk

No significant change.

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

C. No wash sales to report this quarter.

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

No significant change.

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

No significant change.

Note 20 - Fair Value Measurements

A1 Summary of Financial Assets Measured and Reported at Fair Value at 09/30/16

Description	Level 1	Level 2	Level 3	TOTAL
Bonds	\$ -	\$ 1,685,380	\$ -	\$ 1,685,380
Preferred Stock	-	-	-	-
Common Stock	-	-	-	-
TOTALS	\$ -	\$ 1,685,380	\$ -	\$ 1,685,380

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

Description	Beginning Balance at 6/30/2016	Transfers into Level 3	Transfers out of Level 3	Total gains & (losses) included in Net Income	Total gains and (losses) included in Surplus	Purchases	Issuances	Sales	Settlements	Ending Balance at 9/30/2016
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 or internal pricing determined by insurer.

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	\$ 150,672,159	\$ 145,744,471	\$ 5,841,296	\$ 144,830,863	\$ -	\$ -
Preferred Stock	815,000	788,793	-	815,000	-	-
Common Stock	-	-	-	-	-	-
TOTALS	\$ 151,487,159	\$ 146,533,264	\$ 5,841,296	\$ 145,645,863	\$ -	\$ -

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 \$108,993,000 were higher by \$2,125,000 due to unfavorable development of prior year estimates. This deficiency was 2.4% of the unpaid losses and LAE of \$87,601,000 as of prior year-end.

Note 26 - Intercompany Pooling Arrangements

No significant change.

NOTES TO FINANCIAL STATEMENTS

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

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.

12/31/2013
- 6.2

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

12/31/2013
- 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).

06/19/2015

- 6.4

By what department or departments?
State of Ohio Department of Insurance

- 6.5

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

Yes [☐] No [☐] N/A [☒]
- 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).

- 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

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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:

14.21 Bonds

14.22 Preferred Stock

14.23 Common Stock

14.24 Short-Term Investments

14.25 Mortgage Loans on Real Estate

14.26 All Other

14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)

14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above

1 Prior Year-End Book/Adjusted Carrying Value	2 Current Quarter Book/Adjusted Carrying Value
\$0	\$0
0	0
0	0
0	0
0	0
0	0
0	0
\$0	\$0
\$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 Investment Analysis Office* been followed?

Yes ☒ No ☐

18.2 If no, list exceptions:

American Commerce Insurance Company

GENERAL INTERROGATORIES (continued)

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

- | | | | | |
|-----|---|----------------------------------|--|--|
| 1. | If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change? | Yes [☐] | No [☒ X] | N/A [☐] |
| | If yes, attach an explanation. | | | |
| 2. | Has the reporting entity reinsured any risk with any other reporting entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on the risk, or portion thereof, reinsured? | | Yes [☐] | No [☒ X] |
| | If yes, attach an explanation. | | | |
| 3.1 | Have any of the reporting entity's primary reinsurance contracts been canceled? | Yes [☐] | No [☒ X] | |
| 3.2 | If yes, give full and complete information thereto: | | | |

- 4.1 Are any of the liabilities for unpaid losses and loss adjustment expenses other than certain workers' compensation tabular reserves (see *Annual Statement Instructions* pertaining to disclosure of discounting for definition of "tabular reserves,") discounted at a rate of interest greater than zero? Yes [] No [X]
- 4.2 If yes, complete the following schedule:

1 Line of Business	2 Maximum Interest	3 Disc. Rate	Total Discount				Discount Taken During Period			
			4 Unpaid Losses	5 Unpaid LAE	6 IBNR	7 Total	8 Unpaid Losses	9 Unpaid LAE	10 IBNR	11 Total
	0.000	0.000	0	0	0	0	0	0	0	0
Total	XXX	XXX	0	0	0	0	0	0	0	0

- | | | | |
|-----|---|---------|--------|
| 5.1 | Operating Percentages: | | |
| 5.1 | A&H loss percent | | 0.000% |
| 5.2 | A&H cost containment percent | | 0.000% |
| 5.3 | A&H expense percent excluding cost containment expenses | | 0.000% |
| 6.1 | Do you act as a custodian for health savings accounts? | Yes [] | No [X] |
| 6.2 | If yes, please provide the amount of custodial funds held as of the reporting date. | \$ | 0 |
| 6.3 | Do you act as an administrator for health savings accounts? | Yes [] | No [X] |
| 6.4 | If yes, please provide the amount of funds administered as of the reporting date. | \$ | 0 |

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

1	2	3	4	5	6	7
NAIC Company Code	ID Number	Name of Reinsurer	Domiciliary Jurisdiction	Type of Reinsurer	Certified Reinsurer Rating (1 through 6)	Effective Date of Certified Reinsurer Rating

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..	320,811	323,369	27,424	35,372	26,926	10,597
2.	Alaska.....AK	L..	58,257	70,001	1,053	8,079	9,223	11,571
3.	Arizona.....AZ	L..	3,262,984	4,251,691	2,368,188	2,167,378	1,680,310	2,345,717
4.	Arkansas.....AR	L..	217,718	228,620	70,332	12,250	52,724	37,004
5.	California.....CA	L..	4,236,462	1,168,855	732,699	85,525	128,774	271,809
6.	Colorado.....CO	L..	2,185,243	199,806	142,774	25,453	69,316	136,909
7.	Connecticut.....CT	L..	116,907,193	87,961,606	50,254,986	25,883,426	59,508,218	30,665,062
8.	Delaware.....DE	L..	117,045	169,225	55,707	28,692	1,134,807	1,159,724
9.	District of Columbia.....DC	L..	51,844	38,770	3,760	2,716	6,991	16,167
10.	Florida.....FL	L..	1,343,799	1,429,086	545,471	204,235	298,268	245,676
11.	Georgia.....GA	L..	575,187	555,935	106,696	293,831	175,019	129,339
12.	Hawaii.....HI	L..	35,668	29,249	7,510	491	10,455	7,664
13.	Idaho.....ID	L..	3,312,322	2,778,031	1,722,813	1,912,153	1,736,541	1,644,019
14.	Illinois.....IL	L..	1,495,242	1,394,496	234,598	134,520	180,550	162,405
15.	Indiana.....IN	L..	3,005,385	3,758,064	2,815,868	3,625,164	2,426,885	2,782,777
16.	Iowa.....IA	L..	151,007	126,446	19,008	28,461	12,774	14,211
17.	Kansas.....KS	L..	754,221	261,698	46,781	353,379	45,923	40,446
18.	Kentucky.....KY	L..	3,956,659	4,457,717	2,282,134	2,624,220	2,499,671	2,088,184
19.	Louisiana.....LA	L..	372,715	402,563	73,274	30,521	139,282	159,157
20.	Maine.....ME	L..	519,829	123,288	3,525	9,091	4,662	2,966
21.	Maryland.....MD	L..	232,563	286,630	228,629	120,636	64,633	89,858
22.	Massachusetts.....MA	L..	244,516	195,423	(4,566)		55,480	13,648
23.	Michigan.....MI	L..	530,752	551,333	205,259	134,019	110,442	115,759
24.	Minnesota.....MN	L..	420,275	442,727	87,647	8,913	102,647	56,943
25.	Mississippi.....MS	L..	98,327	94,927	14,345	20,070	8,635	8,135
26.	Missouri.....MO	L..	772,029	283,487	48,973	11,683	56,281	39,440
27.	Montana.....MT	L..	62,671	76,828	228,648	5,936	11,705	17,708
28.	Nebraska.....NE	L..	257,536	254,131	42,818	136,465	48,367	86,063
29.	Nevada.....NV	L..	186,430	151,188	32,080	384,994	37,569	33,057
30.	New Hampshire.....NH	L..	175,277	178,620	349	57	11,432	7,025
31.	New Jersey.....NJ	L..	51,100,350	59,204,661	36,808,699	44,780,235	49,981,720	41,769,839
32.	New Mexico.....NM	L..	132,907	132,174	32,506	6,139	26,088	17,562
33.	New York.....NY	L..	1,133,887	1,350,923	2,778,477	5,243,421	4,976,822	4,380,718
34.	North Carolina.....NC	L..	849,012	822,780	104,738	159,004	132,641	163,744
35.	North Dakota.....ND	L..	17,933	19,988			18,812	6,203
36.	Ohio.....OH	L..	19,087,079	16,802,893	10,601,877	8,918,496	9,831,341	9,165,787
37.	Oklahoma.....OK	L..	180,256	205,983	76,539	104,174	22,352	112,405
38.	Oregon.....OR	L..	12,447,109	14,490,362	8,032,936	10,018,407	7,224,289	9,018,718
39.	Pennsylvania.....PA	L..	1,066,589	1,121,977	336,106	81,114	2,202,517	2,060,396
40.	Rhode Island.....RI	L..	40,239,253	35,280,820	22,043,473	21,595,819	23,654,741	22,923,757
41.	South Carolina.....SC	L..	700,655	711,897	126,971	24,453	104,369	44,251
42.	South Dakota.....SD	L..	64,079	17,874	8,624	5,374	74,560	70,355
43.	Tennessee.....TN	L..	11,958,040	9,766,176	6,210,485	7,157,309	5,479,142	4,932,839
44.	Texas.....TX	L..	1,061,033	1,284,167	244,013	181,342	273,226	272,416
45.	Utah.....UT	L..	123,483	118,027	169,580	28,363	79,227	110,974
46.	Vermont.....VT	L..	217,192	125,899	2,225	984	3,663	3,866
47.	Virginia.....VA	L..	558,463	588,492	67,235	8,445	58,426	93,000
48.	Washington.....WA	L..	18,491,785	21,140,867	13,720,496	14,675,120	9,741,220	13,936,921
49.	West Virginia.....WV	L..	5,947	15,789	1,554	1,613	4,174	2,227
50.	Wisconsin.....WI	L..	390,487	397,777	47,570	7,453	50,093	49,004
51.	Wyoming.....WY	L..	24,699	19,357	28,766	8,699	9,548	7,107
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	305,710,205	275,862,693	163,841,653	151,293,694	184,603,481	151,541,129

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;

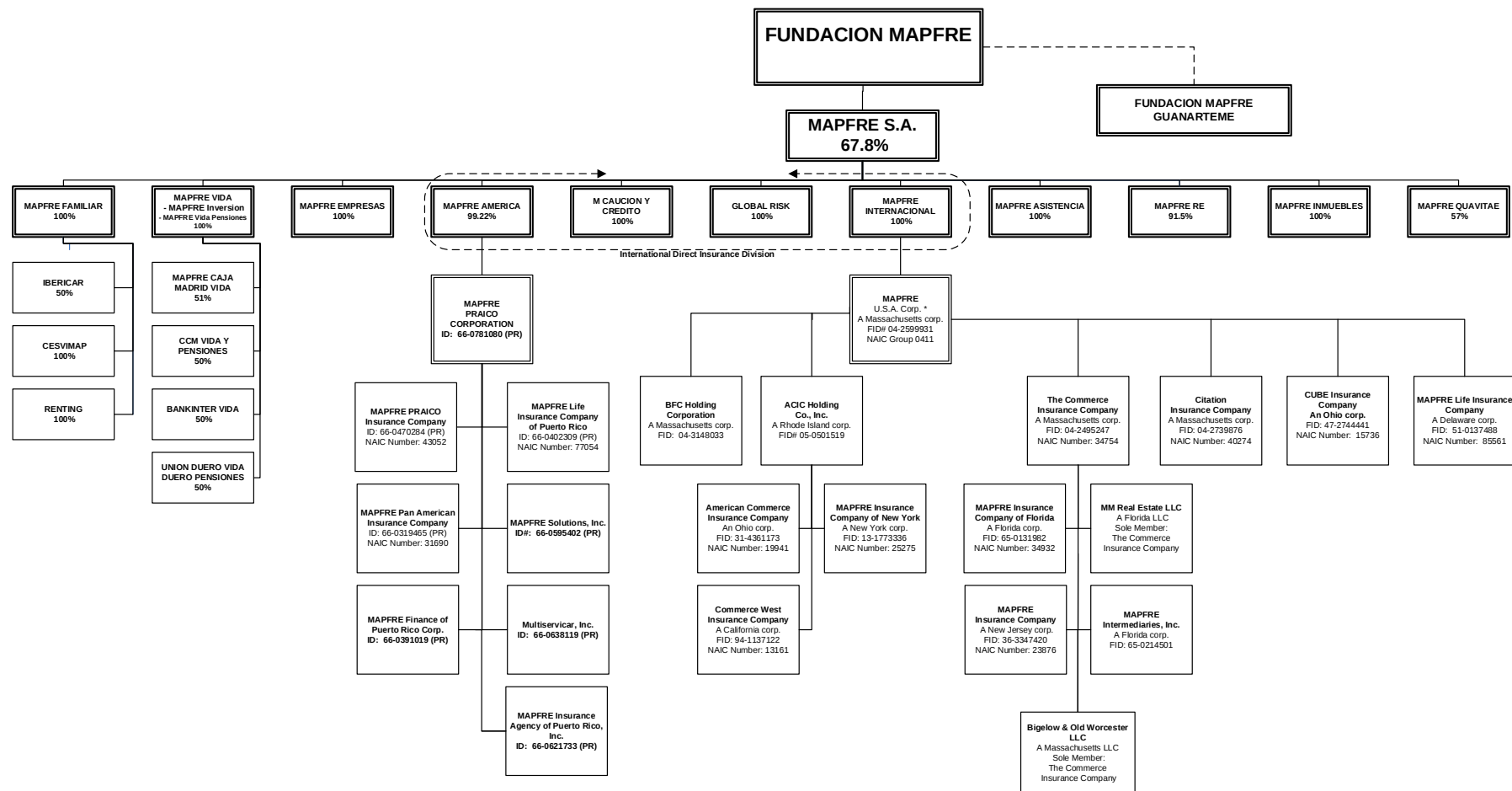
(E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) - None of the above - Not allowed to write business in the state.

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

American Commerce Insurance Company

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

PART 1 – ORGANIZATIONAL CHART



* 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, COMANIA 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 ECÍJA, 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 COMANIA 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 COMANIA 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 PROPIEADAES 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
MAPFRE SOLUTIONS, 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 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
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

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)	*
Q12.1							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 ASSEGUANCES 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

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)	*
Q12.2							KEGYELET TEMETKEZESI SZOLGALAT	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORIUM ZRT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							ALL FUNERAL SERVICES, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERARIA CRESPO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORIO SAN ALBERTO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNEGRUP, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SALZILLO SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...76.000	MAPFRE S.A.....	
							SERVICIOS Y GESTION FUNERARIA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS EL CARMEN, S.A.	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERARIA GIMENO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERARIA SANTO ROSTRO, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORI ALACANT, S.A.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORI BENIDORM, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORIO DE ARANJUEZ, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							TANATORI LA DAMA D'ELX, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...97.100	MAPFRE S.A.....	
							ZACARIAS NUNO, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A....	OWNERSHIP ...	...50.000	MAPFRE S.A.....	
							FUNERARIA TERRASA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS ALCALA-TORREJON, S.A.	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP ...	...65.200	MAPFRE S.A.....	
							CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	ESP.....	NIA.....	EUROPEA DE FINANZAS Y C.S.E., S.A.....	OWNERSHIP ...	...49.000	MAPFRE S.A.....	
							FUNETXEA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERARIA SARRIA, S.A.....	ESP.....	NIA.....	FUNETXEA, S.L.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...70.000	MAPFRE S.A.....	
							FUNERARIA ZETA ORBITAL, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERARIA VALLE DEL EBRO, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							INICIATIVAS ALCAESAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...64.900	MAPFRE S.A.....	
							ALCAESAR FUNERHERVAS, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							ALCAESAR FUNERCORIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							FUNERTRUJILLO, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP ...	...30.000	MAPFRE S.A.....	
							ALCAESAR FUNERPLASENCIA, S.L.....	ESP.....	NIA.....	INICIATIVAS ALCAESAR, S.L.....	OWNERSHIP ...	...50.000	MAPFRE S.A.....	
							NUEVO TANATORIO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP ...	...50.000	MAPFRE S.A.....	

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)	*
							NUEVOS SERVICIOS FUNERARIOS, S.L.....	ESP.....	NIA.....	NUEVO TANATORIO, S.L.....	OWNERSHIP...	50.000	MAPFRE S.A.....	
							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.....	

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)	*
							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.....	
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	99.800	MAPFRE S.A.....	
							MAPFRE CAJA MADRID VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	51.000	MAPFRE S.A.....	
							CATALUNYACAIXA VIDA S.A. D'ASSEGURANCES I	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	50.000	MAPFRE S.A.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	91.500	MAPFRE S.A.....	
							INVERSIONES IBERICAS, L.T.D.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							REINSURANCE MANAGEMENT INC.....	USA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	

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)	*
							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.....	
							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..				MAPFRE SOLUTIONS, 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.....	
							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.....	

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

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)	*
Q12.7							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.....	
							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.....	

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 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.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	...55.700	MAPFRE S.A.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	NIA.....	GRUPO CORPORATIVO LML S.A. DE C.V...	OWNERSHIP...	...44.300	MAPFRE S.A.....	
							UNIDAD MOVIL DE DIAGNOSTICO S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							TEPEYAC INC.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS MEXICANOS.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE FIANZAS S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...78.800	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	...51.000	MAPFRE S.A.....	
							TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...16.000	MAPFRE S.A.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP...	...14.000	MAPFRE S.A.....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA, S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE PANAMA.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...99.300	MAPFRE S.A.....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...78.900	MAPFRE S.A.....	
							MPF TENEDORA AC, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE COSTA RICA.....	CRI.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE GUATEMALA.....	GTM.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE NICARAGUA.....	NIC.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP...	...25.100	MAPFRE S.A.....	
							MAPFRE HONDURAS.....	HND.....	NIA.....	MPF TENEDORA AC, S.A.....	OWNERSHIP...	...73.000	MAPFRE S.A.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
			04-2599931..				MAPFRE USA CORPORATION INC.....	MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
	0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274...	04-2739876..			THE CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
				04-3148033..			BAY FINANCE HOLDING COMPANY.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
							INSPOP USA, LLC.....	VA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP...	...10.000	MAPFRE S.A.....	
	0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754...	04-2495247..			THE COMMERCE INSURANCE COMPANY...	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP...	...100.000	MAPFRE S.A.....	
				65-0214501..			MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP...	...100.000	MAPFRE S.A.....	
0411.....	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932...	65-0131982..				MAPFRE INSURANCE COMPANY OF FLORIDA	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP...	...100.000	MAPFRE S.A.....	

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	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.....	
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 COMPAÑÍA 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.....	

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)	*
							VENEASISTENCIA, S.A.....	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							IRELAND ASSIST, LTD.....	IRL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							MEXICO ASISTENCIA, S.A.....	MEX.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							FEDERAL ASSIST CO.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							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.....	

Q12.10

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

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)	*
Q12.12							CENTURY AUTOMOTIVE SERVICES COMPANY	NM.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							INSURE AND GO.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							INSURE AND GO AUSTRALASIA.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							CIG SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	
							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.....	

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)	*
							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.....	
							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 COMPAÑÍA 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.....	

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)	*
							MAPFRE GLOBAL RISKS.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							INDUSTRIAL RE MUSINI S.A.....	LUX.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							MAPFRE SERVICIOS DE CAUCION S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP ...	...99.700	MAPFRE S.A.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP ...	...50.000	MAPFRE S.A.....	
							SOLUNION SERVICIOS DE CREDITO, S.L.U.....	ESP.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP ...	...100.000	MAPFRE S.A.....	
							SOLUNION SERVICIOS DE CREDITO ARGENTINA	ARG.....	NIA.....	SOLUNION SEGUROS DE CREDITO S.A.....	OWNERSHIP ...	...95.000	MAPFRE S.A.....	
							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.....	

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)	*
Q12.15							ITSEMAP BRASIL, LTDA.....	BRA.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ITSEMAP MEXICO, S.A.....	MEX.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ITSEMAP PORTUGAL, LTDA.....	PRT.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	ITSEMAP SERVICIOS TECNOLOGICOS MAPFRE, S.A.	OWNERSHIP....	75.000	MAPFRE S.A.....	
							ITSEMAP CHILE, S.A.....	CHL.....	NIA.....	INVERSIONES IBERICAS.....	OWNERSHIP....	25.000	MAPFRE S.A.....	
							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 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.....	7,669,231	4,077,539	53.168	42.738
2. Allied lines.....	73,161	40,430	55.262	47.642
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	101,386,631	44,253,368	43.648	73.883
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	2,041,319	2,097,907	102.772	90.008
10. Financial guaranty.....			0.000	
11.1. Medical professional liability - occurrence.....			0.000	
11.2. Medical professional liability - claims-made.....			0.000	
12. Earthquake.....			0.000	
13. Group accident and health.....	116,270	147,089	126.506	82.210
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1. Other liability-occurrence.....	10,800,315	15,557	0.144	0.446
17.2. Other liability-claims made.....			0.000	
17.3. Excess workers' compensation.....			0.000	
18.1. Products liability-occurrence.....			0.000	
18.2. Products liability-claims made.....			0.000	
19.1. 19.2 Private passenger auto liability.....	101,306,357	91,383,020	90.205	86.478
19.3. 19.4 Commercial auto liability.....			0.000	
21. Auto physical damage.....	63,048,906	38,245,427	60.660	63.104
22. Aircraft (all perils).....	8,095,416	3,004,492	37.113	47.585
23. Fidelity.....			0.000	
24. Surety.....			0.000	
26. Burglary and theft.....			0.000	
27. Boiler and machinery.....			0.000	
28. Credit.....			0.000	
29. International.....			0.000	
30. Warranty.....			0.000	
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.....	226,912	229,573	101.173	114.4
35. Totals.....	294,764,518	183,494,402	62.251	73.927

DETAILS OF WRITE-INS

3401. TRAVEL.....	226,912	229,573	101.2	114.4
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).....	226,912	229,573	101.2	114.4

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	2,770,511	7,818,396	5,903,746
2. Allied lines.....	36,788	80,483	65,684
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	36,277,769	104,105,333	92,968,583
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	222,726	1,708,608	1,973,913
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....	8,784	91,303	120,918
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	1,093,290	16,453,658	9,997,158
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.....	34,067,933	103,197,263	97,764,920
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	21,694,752	64,803,383	58,831,441
22. Aircraft (all perils).....	2,489,975	7,266,085	8,005,144
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.....	15,453	185,693	231,187
35. Totals.....	98,677,981	305,710,205	275,862,694

DETAILS OF WRITE-INS

3401. TRAVEL.....	15,453	185,693	231,187
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).....	15,453	185,693	231,187

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 Insurance Coverage Supplement be filed with the state of domicile and the NAIC with this statement?	NO

Explanation:

1.

The data for this supplement is not required to be filed.
2.

The data for this supplement is not required to be filed.
3.

The data for this supplement is not required to be filed.
4.

The data for this supplement is not required to be filed.

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. Equity in pools and associations.....	83,267,752		83,267,752	67,111,950
2597. Summary of remaining write-ins for Line 25.....	83,267,752	0	83,267,752	67,111,950

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.....	1,453,687	1,502,792
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....	(66,022)	80,479
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.....	93,695	129,584
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,293,970	1,453,687
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,293,970	1,453,687

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.....	130,020,682	153,599,950
2. Cost of bonds and stocks acquired.....	67,348,002	57,051,483
3. Accrual of discount.....	305,426	361,523
4. Unrealized valuation increase (decrease).....	707,967	(628,704)
5. Total gain (loss) on disposals.....	1,386,353	1,624,214
6. Deduct consideration for bonds and stocks disposed of.....	52,552,362	81,339,126
7. Deduct amortization of premium.....	682,804	648,658
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).....	146,533,264	130,020,682
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	146,533,264	130,020,682

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).....	115,669,754	14,611,807	15,037,629	(133,667)	119,267,289	115,669,754	115,110,265	100,375,018
2. NAIC 2 (a).....	25,897,399	9,811,261	6,728,760	(31,074)	36,397,215	25,897,399	28,948,826	26,248,659
3. NAIC 3 (a).....	51,486		4,087	381		51,486	47,780	840,000
4. NAIC 4 (a).....					998,794		0	58,105
5. NAIC 5 (a).....							0	
6. NAIC 6 (a).....	1,472,600			165,000	1,247,800	1,472,600	1,637,600	1,023,800
7. Total Bonds.....	143,091,239	24,423,068	21,770,476	640	157,911,098	143,091,239	145,744,471	128,545,582
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....					752,400		0	770,100
10. NAIC 3.....	748,920			39,873	715,500	748,920	788,793	705,000
11. NAIC 4.....							0	
12. NAIC 5.....							0	
13. NAIC 6.....							0	
14. Total Preferred Stock.....	748,920	0	0	39,873	1,467,900	748,920	788,793	1,475,100
15. Total Bonds and Preferred Stock.....	143,840,159	24,423,068	21,770,476	40,513	159,378,998	143,840,159	146,533,264	130,020,682

(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..	09/30/2016....	VARIOUS.....			1,293,970	(159,998)
0199999. Totals.....					0	0	1,293,970	(159,998)
0399999. Totals.....					0	0	1,293,970	(159,998)

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
CUSIP Identification	Description			Foreign	Date Acquired	Name of Vendor			Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation or Market Indicator (a)
Bonds - U.S. States, Territories and Possessions													
442403	FR	7	HOUSTON TEX INDPT SCH DIST.....		07/21/2016...	RAYMOND JAMES.....				2,744,750	2,500,000	68,962	1FE.....
1799999. Total Bonds - U.S. States, Territories and Possessions.....										2,744,750	2,500,000	68,962	XXX
Bonds - U.S. Special Revenue and Special Assessment													
3133EG	NR	2	FEDERAL FARM CREDIT BANK.....		07/26/2016...	RW PRESSPRICH & CO.....				1,500,000	1,500,000	102	1.....
3135G0	K3	6	FEDERAL NATL MTG ASSN.....		08/05/2016...	RW PRESSPRICH & CO.....				3,072,180	3,000,000	18,063	1.....
3138WG	RK	2	FNCL PL#AS6789.....		08/30/2016...	BAIRD, ROBERT W. & CO.....				1,027,227	966,802	2,820	1.....
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....										5,599,407	5,466,802	20,985	XXX
Bonds - Industrial and Miscellaneous													
714264	AM	0	PERNOD RICARD S A.....	F.....	08/10/2016...	Merrill Bos.....				1,033,100	1,000,000	6,049	2FE.....
822582	BT	8	SHELL INTERNATIONAL FIN.....	F.....	07/26/2016...	PIERPONT SECURITIES.....				1,528,230	1,500,000	9,464	1FE.....
037833	CD	0	APPLE INC.....		08/08/2016...	RBC CAPITAL MARKETS.....				2,060,300	2,000,000	1,497	1FE.....
06051G	FX	2	BANK OF AMERICA CORP.....		09/01/2016...	DEUTSCHE BANK.....				1,047,500	1,000,000	13,417	2FE.....
10112R	AX	2	BOSTON PROPERTIES LP.....		09/21/2016...	Merrill Bos.....				1,549,621	1,468,000	8,186	2FE.....
20030N	BS	9	COMCAST CORP.....		08/25/2016...	GOLDMAN SACHS.....				530,320	500,000	8,181	1FE.....
126650	CU	2	CVS HEALTH CORP.....		07/14/2016...	DEUTSCHE BANK.....				2,066,000	2,000,000	8,625	2FE.....
260543	CJ	0	DOW CHEMICAL CO.....		08/30/2016...	DEUTSCHE BANK.....				1,064,440	1,000,000	14,583	2FE.....
29078P	AA	8	EMBARCADERO AIRCRAFT.....		08/31/2016...	LIQUIDATION.....					0		6FE.....
60871R	AG	5	MOLSON COORS BREWING CO.....		08/10/2016...	GOLDMAN SACHS.....				2,035,360	2,000,000	6,333	2FE.....
771196	BE	1	ROCHE HOLDING INC.....		09/15/2016...	PIERPONT SECURITIES.....				2,148,800	2,000,000	31,639	1FE.....
94106L	BD	0	WASTE MANAGEMENT INC.....		08/24/2016...	BAIRD, ROBERT W. & CO.....				1,015,240	1,000,000	6,867	2FE.....
3899999. Total Bonds - Industrial and Miscellaneous.....										16,078,911	15,468,000	114,841	XXX
8399997. Total Bonds - Part 3.....										24,423,068	23,434,802	204,788	XXX
8399999. Total Bonds.....										24,423,068	23,434,802	204,788	XXX
9999999. Total Bonds, Preferred and Common Stocks.....										24,423,068	XXX	204,788	XXX

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

QE04

SCHEDULE D - PART 4

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

1	2			3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22	
												11	12	13	14	15								
CUSIP Identification	Description			F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amortization)/ Accretion	Current Year's Other-Than- Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest / Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Design- ation or Market Indicator (a)	
Bonds - U.S. Government																								
36225B	GW	2	GNMA POOL #0781113.....	.	09/15/2016.	PAYDOWN OF PRINCIPAL.....		3,722	3,722	3,858	3,819		(3)		(3)		3,816		(94)	(94)	174	11/15/2029....	1.....	
83162C	TA	1	SMALL BUS ADMIN GTD DEV PTC.....	.	07/01/2016.	PRINCIPAL RECEIPT.....		208,925	208,925	230,568	228,816		(19,891)		(19,891)		208,925			0	9,643	01/01/2030....	1.....	
911759	EA	2	U S DEPT HSG & URBAN DEV GOVT.....	.	08/01/2016.	MATURITY.....		80,000	80,000	83,016	80,000				0		80,000			0	6,286	08/01/2016....	1.....	
0599999. Total Bonds - U.S. Government.....								292,647	292,647	317,442	312,635	0	(19,894)	0	(19,894)	0	292,741	0	(94)	(94)	16,103	XXX	XXX	
Bonds - U.S. Political Subdivisions of States, Territories and Possessions																								
190335	DL	0	COAST CMNTY CLG DIST.....	.	08/01/2016.	CALLED @ 35.7340000.....		1,965,370	5,500,000	1,887,325	1,931,248		34,122		34,122		1,965,370			0		08/01/2035....	1FE.....	
2499999. Total Bonds - U.S. Political Subdivisions of States, Territories and Possessions.....								1,965,370	5,500,000	1,887,325	1,931,248	0	34,122	0	34,122	0	1,965,370	0	0	0	0	0	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																								
23410B	AB	7	DAKOTA CNTY MINN CMNTY DEV AGY.....	.	09/01/2016.	CALLED @ 100.0000000.....		9,937	9,937	10,334	10,049		(20)		(20)		10,029		(92)	(92)	265	12/01/2038....	1FE.....	
31396P	GT	2	FANNIE MAE - ACES.....	.	09/26/2016.	PRINCIPAL RECEIPT.....		32,707	32,707	36,591	35,308		(2,601)		(2,601)		32,707			0	948	10/25/2032....	1.....	
3136A7	DJ	8	FEDERAL NATL MTG ASSN REMIC TR.....	.	09/26/2016.	PRINCIPAL RECEIPT.....		151,865	151,865	151,272	151,239		625		625		151,865			0	2,798	01/25/2042....	1.....	
3137B7	R7	6	FHLMC REMIC SERIES 4298.....	.	09/15/2016.	PRINCIPAL RECEIPT.....		206,843	206,843	209,687	210,354		(3,511)		(3,511)		206,843			0	5,567	02/15/2054....	1.....	
3138WG	RK	2	FNCL PL#AS6789.....	.	09/26/2016.	PRINCIPAL RECEIPT.....		14,680	14,680	15,597			(917)		(917)		14,680			0	43	03/01/2046....	1.....	
31418A	L5	5	FNMA PASS-THRU PL#MA1247.....	.	09/26/2016.	PRINCIPAL RECEIPT.....		69,821	69,821	73,530	72,848		(3,027)		(3,027)		69,821			0	1,358	11/01/2042....	1.....	
31395Q	CY	4	FNS 411 A3.....	.	07/25/2016.	VARIOUS.....		2,976,122	2,884,155	3,024,757	3,009,469		(13,355)		(13,355)		2,996,114		(19,992)	(19,992)	56,604	08/25/2042....	1.....	
66285W	BW	5	NORTH TEX TWY AUTH REV FIR.....	.	09/15/2016.	WELLS FARGO SECURITIES, LLC....		2,632,920	4,000,000	2,364,000			42,163		42,163		2,406,163		226,757	226,757		01/01/2031....	1FE.....	
3199999. Total Bonds - U.S. Special Revenue and Special Assessment.....								6,094,895	7,370,007	5,885,768	3,489,267	0	19,357	0	19,357	0	5,888,222	0	206,673	206,673	67,583	XXX	XXX	
Bonds - Industrial and Miscellaneous																								
714264	AF	5	PERNOD RICARD S A.....	F	08/10/2016.	Merrill Bos.....		1,007,080	1,000,000	1,011,500			(6,667)		(6,667)		1,004,833		2,247	2,247	31,958	01/15/2017....	2FE.....	
037833	AS	9	APPLE INC.....	.	08/08/2016.	RBC CAPITAL MARKETS.....		1,625,790	1,500,000	1,559,700			(3,498)		(3,498)		1,556,202		69,588	69,588	39,531	05/06/2024....	1FE.....	
06051G	EH	8	BANK OF AMERICA CORP.....	.	09/01/2016.	DEUTSCHE BANK.....		1,683,045	1,500,000	1,641,450			(16,151)		(16,151)		1,625,299		57,746	57,746	61,250	05/13/2021....	2FE.....	
126650	BW	9	CVS HEALTH CORP.....	.	07/14/2016.	DEUTSCHE BANK.....		1,378,338	1,250,000	1,366,950	1,353,002		(10,195)		(10,195)		1,342,807		35,531	35,531	34,948	05/15/2021....	2FE.....	
12667F	VD	4	CWALT INC 2004-J10.....	.	07/25/2016.	VARIOUS.....		227,236	228,922	225,489	220,368		6,845		6,845		227,213		23	23	6,864	10/25/2019....	1FM.....	
29078P	AA	8	EMBARCADERO AIRCRAFT.....	.	08/31/2016.	LIQUIDATION.....		12,847	0						0				12,847	12,847		08/15/2025....	6FE.....	
594918	BJ	2	MICROSOFT CORP.....	.	08/16/2016.	RBC CAPITAL MARKETS.....		2,141,540	2,000,000	2,081,000			(3,291)		(3,291)		2,077,709		63,831	63,831	49,653	11/03/2025....	1FE.....	
590218	AF	0	ML MTG INV TR 2006-F1.....	.	09/26/2016.	PRINCIPAL RECEIPT.....		4,087	4,087	4,071	3,790	285	12		297		4,087			0	165	04/25/2036....	3FM.....	
60871R	AC	4	MOLSON COORS BREWING CO.....	.	08/10/2016.	GOLDMAN SACHS.....		1,605,660	1,500,000	1,510,050			(864)		(864)		1,509,186		96,474	96,474	41,417	05/01/2022....	2FE.....	
674599	CE	3	OCCIDENTAL PETE CORP DEL.....	.	08/18/2016.	PIERPONT SECURITIES.....		1,531,500	1,500,000	1,461,195	1,470,466		2,371		2,371		1,472,836		58,664	58,664	41,400	02/15/2023....	1FE.....	
771196	BE	1	ROCHE HOLDING INC.....	.	09/15/2016.	PIERPONT SECURITIES.....		1,611,150	1,500,000	1,563,069	1,561,944		(4,608)		(4,608)		1,557,336		53,814	53,814	48,854	09/30/2024....	1FE.....	
94106L	AW	9	WASTE MGMT INC DEL.....	.	08/24/2016.	BAIRD, ROBERT W. & CO.....		1,392,212	1,250,000	1,242,350	1,246,129		506		506		1,246,635		145,577	145,577	39,418	06/30/2020....	2FE.....	
3899999. Total Bonds - Industrial and Miscellaneous.....								14,220,485	13,233,009	13,666,824	5,855,699	285	(35,540)	0	(35,255)	0	13,624,143	0	596,342	596,342	395,458	XXX	XXX	
8399997. Total Bonds - Part 4.....								22,573,397	26,395,663	21,757,359	11,588,849	285	(1,955)	0	(1,670)	0	21,770,476	0	802,921	802,921	479,144	XXX	XXX	
8399999. Total Bonds.....								22,573,397	26,395,663	21,757,359	11,588,849	285	(1,955)	0	(1,670)	0	21,770,476	0	802,921	802,921	479,144	XXX	XXX	
9999999. Total Bonds, Preferred and Common Stocks.....								22,573,397	XXX	21,757,359	11,588,849	285	(1,955)	0	(1,670)	0	21,770,476	0	802,921	802,921	479,144	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.....				(,4774,298)	(,8,544,391)	(,7,478,302)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.010	8		100,152	112,902	151,459	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				892,483	1,142,157	631,550	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				225,013	282,447	129,674	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	0.220			343	343	343	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	0.270	3		5,568	5,569	5,570	XXX
MM: Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	0.310	4,411		5,992,973	4,058,490	3,635,574	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....				94,548	21,404	(469,316)	XXX
0199999. Total Open Depositories.....	XXX	XXX	4,422	0	2,536,782	(2,921,079)	(3,393,448)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	4,422	0	2,536,782	(2,921,079)	(3,393,448)	XXX
0599999. Total Cash.....	XXX	XXX	4,422	0	2,536,782	(2,921,079)	(3,393,448)	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

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

NONE