



ANNUAL STATEMENT

For the Year Ended December 31, 2016

of the Condition and Affairs of the

American Commerce Insurance Company

NAIC Group Code.....0411, 0411 (Current Period) (Prior Period)	NAIC Company Code..... 19941	Employer's ID Number..... 31-4361173
Organized under the Laws of OH	State of Domicile or Port of Entry OH	Country of Domicile US
Incorporated/Organized..... September 18, 1946	Commenced Business..... March 19, 1947	
Statutory Home Office	3590 TWIN CREEKS DRIVE..... COLUMBUS OH US 43218-2579 (Street and Number) (City or Town, State, Country and Zip Code)	
Main Administrative Office	211 MAIN STREET..... WEBSTER MA US..... 01570-0758 (Street and Number) (City or Town, State, Country and Zip Code)	508-943-9000 (Area Code) (Telephone Number)
Mail Address	211 MAIN STREET..... WEBSTER MA US 01570-0758 (Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)	
Primary Location of Books and Records	211 MAIN STREET..... WEBSTER MA US 01570-0758 (Street and Number) (City or Town, State, Country and Zip Code)	508-943-9000 (Area Code) (Telephone Number)
Internet Web Site Address	www.mapfreinsurance.com	
Statutory Statement Contact	CHRISTINE A CONRAD (Name) cconrad@mapfreusa.com (E-Mail Address)	508-943-9000-14376 (Area Code) (Telephone Number) (Extension) 508-949-4246 (Fax Number)

OFFICERS

Name	Title	Name	Title
1. ALFREDO CASTELO #	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	KIRK RICHARD NELSON #	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)
ALFREDO CASTELO	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 23rd day of February 2017

a. Is this an original filing?
b. If no
1. State the amendment number
2. Date filed
3. Number of pages attached

Yes No


MARIA G. GIARD
Notary Public
Commonwealth of Massachusetts
My Commission Expires
June 1, 2018

Annual Statement for the year 2016 of the **American Commerce Insurance Company**
ASSETS

	Current Year			Prior Year
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	4 Net Admitted Assets
1. Bonds (Schedule D).....	137,378,499		137,378,499	128,545,582
2. Stocks (Schedule D):				
2.1 Preferred stocks.....	.789,374		.789,374	1,475,100
2.2 Common stocks.....			0	
3. Mortgage loans on real estate (Schedule B):				
3.1 First liens.....			0	
3.2 Other than first liens.....			0	
4. Real estate (Schedule A):				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....	1,262,841		1,262,841	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 (\$....(2,614,557), Schedule E-Part 1), cash equivalents (\$.....0, Schedule E-Part 2) and short-term investments (\$.....0, Schedule DA).....	(2,614,557)		(2,614,557)	4,750,403
6. Contract loans (including \$.....0 premium notes).....			0	
7. Derivatives (Schedule DB).....			0	
8. Other invested assets (Schedule BA).....			0	
9. Receivables for securities.....			0	
10. Securities lending reinvested collateral assets (Schedule DL).....			0	
11. Aggregate write-ins for invested assets.....	.0	.0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	136,816,157	.0	136,816,157	136,224,772
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,273,164		1,273,164	1,126,773
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	.87,529,176		.87,529,176	.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.....	.23,912,349		.23,912,349	.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.....			0	2,921,918
18.2 Net deferred tax asset.....	.6,604,694	.612,817	.5,991,877	.6,684,244
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	.229,541		.229,541	.90,669
21. Furniture and equipment, including health care delivery assets (\$.....0).....	.798,043	.798,043	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....	.4,428,325		.4,428,325	.8,609,272
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other-than-invested assets.....	.77,305,113	1,346,562	.75,958,551	.67,112,917
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25).....	338,896,563	2,757,423	336,139,140	329,898,401
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. TOTAL (Lines 26 and 27).....	338,896,563	2,757,423	336,139,140	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 through 1103 plus 1198) (Line 11 above).....	.0	.0	0	0
2501. Prepaid expenses.....	.938,569	.938,569	0	
2502. Arizona renewal business.....	.407,993	.407,993	0	
2503. Miscellaneous assets.....			0	.967
2598. Summary of remaining write-ins for Line 25 from overflow page.....	.75,958,551	.0	.75,958,551	.67,111,950
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	.77,305,113	1,346,562	.75,958,551	.67,112,917

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Year	2 Prior Year
1. Losses (Part 2A, Line 35, Column 8).....	76,283,509	72,233,423
2. Reinsurance payable on paid losses and loss adjustment expenses (Schedule F, Part 1, Column 6).....	8,614,097	10,734,236
3. Loss adjustment expenses (Part 2A, Line 35, Column 9).....	15,304,370	15,368,461
4. Commissions payable, contingent commissions and other similar charges.....	6,683,141	4,789,466
5. Other expenses (excluding taxes, licenses and fees).....	1,389,664	1,457,815
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....		291,897
7.1 Current federal and foreign income taxes (including \$... 497,014 on realized capital gains (losses)).....	874,397	
7.2 Net deferred tax liability.....		
8. Borrowed money \$.....0 and interest thereon \$.....0.....		
9. Unearned premiums (Part 1A, Line 38, Column 5) (after deducting unearned premiums for ceded reinsurance of \$....293,854,492 and including warranty reserves of \$.....0 and accrued accident and health experience rating refunds including \$.....0 for medical loss ratio rebate per the Public Health Service Act).....	95,937,837	91,038,992
10. Advance premium.....	4,914,272	5,285,010
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	16,941,765	22,632,982
13. Funds held by company under reinsurance treaties (Schedule F, Part 3, Column 19).....		
14. Amounts withheld or retained by company for account of others.....		
15. Remittances and items not allocated.....		
16. Provision for reinsurance (including \$.....0 certified) (Schedule F, Part 8).....		
17. Net adjustments in assets and liabilities due to foreign exchange rates.....		
18. Drafts outstanding.....		
19. Payable to parent, subsidiaries and affiliates.....		
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.....	934,770	1,219,741
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	227,877,822	225,052,023
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	227,877,822	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).....	68,320,717	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) (Page 4, Line 39).....	108,261,319	104,846,378
38. TOTAL (Page 2, Line 28, Col. 3).....	336,139,141	329,898,401

DETAILS OF WRITE-INS

2501. Unclaimed property.....	929,755	1,219,741
2502. Miscelaneous Liabilities.....	5,015	
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	934,770	1,219,741
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 through 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 through 3203 plus 3298) (Line 32 above).....	0	0

Annual Statement for the year 2016 of the **American Commerce Insurance Company**
STATEMENT OF INCOME

	1 Current Year	2 Prior Year
UNDERWRITING INCOME		
1. Premiums earned (Part 1, Line 35, Column 4).....	188,549,665	185,836,885
DEDUCTIONS:		
2. Losses incurred (Part 2, Line 35, Column 7).....	124,455,047	132,673,315
3. Loss adjustment expenses incurred (Part 3, Line 25, Column 1).....	22,887,713	23,559,583
4. Other underwriting expenses incurred (Part 3, Line 25, Column 2).....	48,755,833	48,871,586
5. Aggregate write-ins for underwriting deductions.....	0	(4,410)
6. Total underwriting deductions (Lines 2 through 5).....	196,098,593	205,100,074
7. Net income of protected cells.....		
8. Net underwriting gain (loss) (Line 1 minus Line 6 plus Line 7).....	(7,548,928)	(19,263,189)
INVESTMENT INCOME		
9. Net investment income earned (Exhibit of Net Investment Income, Line 17).....	5,529,867	6,019,743
10. Net realized capital gains (losses) less capital gains tax of \$....503,012 (Exhibit of Capital Gains (Losses)).....	1,063,786	1,121,277
11. Net investment gain (loss) (Lines 9 + 10).....	6,593,653	7,141,020
OTHER INCOME		
12. Net gain (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.....	3,034,051	2,556,863
14. Aggregate write-ins for miscellaneous income.....	101,656	63,847
15. Total other income (Lines 12 through 14).....	3,135,707	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).....	2,180,433	(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).....	2,180,433	(9,501,459)
19. Federal and foreign income taxes incurred.....	357,774	(3,001,015)
20. Net income (Line 18 minus Line 19) (to Line 22).....	1,822,659	(6,500,444)
CAPITAL AND SURPLUS ACCOUNT		
21. Surplus as regards policyholders, December 31 prior year (Page 4, Line 39, Column 2).....	104,846,378	103,684,208
22. Net income (from Line 20).....	1,822,659	(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 \$....211,337.....	392,483	(408,658)
25. Change in net unrealized foreign exchange capital gain (loss).....		
26. Change in net deferred income tax.....	(476,778)	1,913,709
27. Change in nonadmitted assets (Exhibit of Nonadmitted Assets, Line 28, Column 3).....	443,661	10,044
28. Change in provision for reinsurance (Page 3, Line 16, Column 2 minus Column 1).....		
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 (Page 3, Lines 36.1 and 36.2, Column 2 minus Column 1).....		
37. Aggregate write-ins for gains and losses in surplus.....	1,232,916	(4,378,796)
38. Change in surplus as regards policyholders for the year (Lines 22 through 37).....	3,414,941	1,162,170
39. Surplus as regards policyholders, December 31 current year (Line 21 plus Line 38) (Page 3, Line 37).....	108,261,319	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
0599. Totals (Lines 0501 through 0503 plus 0598) (Line 5 above).....	0	(4,410)
1401. Miscellaneous income.....	32,121	37,320
1402. Gain on sale of fixed assets.....	69,535	26,527
1403. Other technical income (other reinsurer).....		
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0
1499. Totals (Lines 1401 through 1403 plus 1498) (Line 14 above).....	101,656	63,847
3701. STATUTORY POOLING ADJUSTMENT.....	1,232,916	(3,451,844)
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....		(926,952)
3703.		
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0
3799. Totals (Lines 3701 through 3703 plus 3798) (Line 37 above).....	1,232,916	(4,378,796)

American Commerce Insurance Company

CASH FLOW

	1 Current Year	2 Prior Year
CASH FROM OPERATIONS		
1. Premiums collected net of reinsurance.....	184,046,672	169,952,707
2. Net investment income.....	5,936,853	6,649,457
3. Miscellaneous income.....	3,135,707	2,620,710
4. Total (Lines 1 through 3).....	193,119,232	179,222,874
5. Benefit and loss related payments.....	123,498,905	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.....	70,174,011	70,727,801
8. Dividends paid to policyholders.....		
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	(2,935,529)	1,174,525
10. Total (Lines 5 through 9).....	190,737,387	199,967,950
11. Net cash from operations (Line 4 minus Line 10).....	2,381,845	(20,745,076)
CASH FROM INVESTMENTS		
12. Proceeds from investments sold, matured or repaid:		
12.1 Bonds.....	71,472,119	80,529,126
12.2 Stocks.....	773,441	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).....	72,245,560	81,339,126
13. Cost of investments acquired (long-term only):		
13.1 Bonds.....	78,650,686	57,051,483
13.2 Stocks.....		
13.3 Mortgage loans.....		
13.4 Real estate.....	(66,022)	80,479
13.5 Other invested assets.....		
13.6 Miscellaneous applications.....		
13.7 Total investments acquired (Lines 13.1 to 13.6).....	78,584,664	57,131,962
14. Net increase (decrease) in contract loans and premium notes.....		
15. Net cash from investments (Line 12.8 minus Lines 13.7 minus Line 14).....	(6,339,104)	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).....	(3,407,701)	(9,154,165)
17. Net cash from financing and miscellaneous sources (Lines 16.1 to 16.4 minus Line 16.5 plus Line 16.6).....	(3,407,701)	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 Lines 15 and 17).....	(7,364,959)	4,834,238
19. Cash, cash equivalents and short-term investments:		
19.1 Beginning of year.....	4,750,403	(83,835)
19.2 End of year (Line 18 plus Line 19.1).....	(2,614,557)	4,750,403

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

20.0001
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American Commerce Insurance Company
UNDERWRITING AND INVESTMENT EXHIBIT

PART 1 - PREMIUMS EARNED

Line of Business	1 Net Premiums Written per Column 6, Part 1B	2 Unearned Premiums December 31 Prior Year- per Col. 3, Last Year's Part 1	3 Unearned Premiums December 31 Current Year- per Col. 5, Part 1A	4 Premiums Earned During Year (Cols. 1 + 2 - 3)
1. Fire.....	851,011	480,930	481,258	850,683
2. Allied lines.....	55,595	44,804	52,075	48,324
3. Farmowners multiple peril.....	0	0	0	0
4. Homeowners multiple peril.....	12,971,981	7,617,311	7,926,490	12,662,802
5. Commercial multiple peril.....	1,576,737	978,434	963,426	1,591,745
6. Mortgage guaranty.....	0	0	0	0
8. Ocean marine.....	148,769	73,218	72,505	149,482
9. Inland marine.....	296,315	161,962	118,750	339,527
10. Financial guaranty.....	0	0	0	0
11.1 Medical professional liability - occurrence.....	0	0	0	0
11.2 Medical professional liability - claims-made.....	0	0	0	0
12. Earthquake.....	0	0	0	0
13. Group accident and health.....	4,516	2,164	329	6,351
14. Credit accident and health (group and individual).....	0	0	0	0
15. Other accident and health.....	0	0	0	0
16. Workers' compensation.....	0	0	0	0
17.1 Other liability - occurrence.....	529,759	1,544,491	1,694,380	379,870
17.2 Other liability - claims-made.....	0	0	0	0
17.3 Excess workers' compensation.....	0	0	0	0
18.1 Products liability - occurrence.....	12,251	26,186	31,610	6,827
18.2 Products liability - claims-made.....	0	0	0	0
19.1, 19.2 Private passenger auto liability.....	93,509,095	42,877,176	44,451,311	91,934,960
19.3, 19.4 Commercial auto liability.....	10,370,056	4,963,995	5,199,319	10,134,732
21. Auto physical damage.....	73,113,041	32,257,898	34,939,017	70,431,922
22. Aircraft (all perils).....	0	0	0	0
23. Fidelity.....	0	0	0	0
24. Surety.....	0	0	0	0
26. Burglary and theft.....	0	0	0	0
27. Boiler and machinery.....	0	0	0	0
28. Credit.....	0	0	0	0
29. International.....	0	0	0	0
30. Warranty.....	0	0	0	0
31. Reinsurance - nonproportional assumed property.....	0	0	0	0
32. Reinsurance - nonproportional assumed liability.....	0	0	0	0
33. Reinsurance - nonproportional assumed financial lines.....	0	0	0	0
34. Aggregate write-ins for other lines of business.....	9,383	10,423	7,366	12,440
35. TOTALS.....	193,448,509	91,038,992	95,937,836	188,549,665

DETAILS OF WRITE-INS

3401. TRAVEL.....	9,383	10,423	7,366	12,440
3402.	0	0	0	0
3403.	0	0	0	0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	9,383	10,423	7,366	12,440

American Commerce Insurance Company
UNDERWRITING AND INVESTMENT EXHIBIT

PART 1A - RECAPITULATION OF ALL PREMIUMS

Line of Business	1 Amount Unearned (Running One Year or Less from Date of Policy) (a)	2 Amount Unearned (Running More Than One Year from Date of Policy) (a)	3 Earned But Unbilled Premium	4 Reserve for Rate Credits and Retrospective Adjustments Based on Experience	5 Total Reserve for Unearned Premiums Cols. 1 + 2 + 3 + 4
1. Fire.....	481,258				481,258
2. Allied lines.....	52,075				52,075
3. Farmowners multiple peril.....					0
4. Homeowners multiple peril.....	7,926,490				7,926,490
5. Commercial multiple peril.....	963,426				963,426
6. Mortgage guaranty.....					0
8. Ocean marine.....	72,505				72,505
9. Inland marine.....	118,750				118,750
10. Financial guaranty.....					0
11.1 Medical professional liability - occurrence.....					0
11.2 Medical professional liability - claims-made.....					0
12. Earthquake.....					0
13. Group accident and health.....	329				329
14. Credit accident and health (group and individual).....					0
15. Other accident and health.....					0
16. Workers' compensation.....					0
17.1 Other liability - occurrence.....	1,694,380				1,694,380
17.2 Other liability - claims-made.....					0
17.3 Excess workers' compensation.....					0
18.1 Products liability - occurrence.....	31,610				31,610
18.2 Products liability - claims-made.....					0
19.1, 19.2 Private passenger auto liability.....	44,451,311				44,451,311
19.3, 19.4 Commercial auto liability.....	5,199,319				5,199,319
21. Auto physical damage.....	34,939,017				34,939,017
22. Aircraft (all perils).....					0
23. Fidelity.....					0
24. Surety.....					0
26. Burglary and theft.....					0
27. Boiler and machinery.....					0
28. Credit.....					0
29. International.....					0
30. Warranty.....					0
31. Reinsurance - nonproportional assumed property.....					0
32. Reinsurance - nonproportional assumed liability.....					0
33. Reinsurance - nonproportional assumed financial lines.....					0
34. Aggregate write-ins for other lines of business.....	7,366	0	0	0	7,366
35. TOTALS.....	95,937,836	0	0	0	95,937,836
36. Accrued retrospective premiums based on experience.....					
37. Earned but unbilled premiums.....					0
38. Balance (sum of Lines 35 through 37).....					95,937,836

DETAILS OF WRITE-INS

3401. TRAVEL.....	7,366				7,366
3402.					0
3403.					0
3498. Summary of remaining write-ins for Line 34 from overflow page	0	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	7,366	0	0	0	7,366

(a) State here basis of computation used in each case: Daily Pro Rata

American Commerce Insurance Company
UNDERWRITING AND INVESTMENT EXHIBIT

PART 1B - PREMIUMS WRITTEN

Line of Business	1 Direct Business (a)	Reinsurance Assumed		Reinsurance Ceded		6 Net Premiums Written (Cols. 1 + 2 + 3 - 4 - 5)
		2 From Affiliates	3 From Non-Affiliates	4 To Affiliates	5 To Non-Affiliates	
1. Fire.....	10,316,375	.851,011		10,316,375		.851,011
2. Allied lines.....	7,543,159	55,595		7,543,159		55,595
3. Farmowners multiple peril.....	-					0
4. Homeowners multiple peril.....	129,959,047	12,971,981		129,959,047		12,971,981
5. Commercial multiple peril.....	-	1,576,737				1,576,737
6. Mortgage guaranty.....	-					0
8. Ocean marine.....	-	148,769				148,769
9. Inland marine.....	1,776,321	296,315		1,776,321		296,315
10. Financial guaranty.....	-					0
11.1 Medical professional liability - occurrence.....	-					0
11.2 Medical professional liability - claims-made.....	-					0
12. Earthquake.....	-					0
13. Group accident and health.....	92,166	4,516		92,166		4,516
14. Credit accident and health (group and individual).....	-					0
15. Other accident and health.....	-					0
16. Workers' compensation.....	-					0
17.1 Other liability - occurrence.....	11,762,928	.529,759	20,361,169	.32,124,097		.529,759
17.2 Other liability - claims-made.....	-					0
17.3 Excess workers' compensation.....	-					0
18.1 Products liability - occurrence.....	-		12,251			12,251
18.2 Products liability - claims-made.....	-					0
19.1, 19.2 Private passenger auto liability.....	134,578,393	.93,509,095		134,578,393		.93,509,095
19.3, 19.4 Commercial auto liability.....	-	10,370,056				10,370,056
21. Auto physical damage.....	84,946,708	.73,113,041		84,946,708		.73,113,041
22. Aircraft (all perils).....	10,844,506			10,844,506		0
23. Fidelity.....						0
24. Surety.....						0
26. Burglary and theft.....						0
27. Boiler and machinery.....						0
28. Credit.....						0
29. International.....						0
30. Warranty.....						0
31. Reinsurance - nonproportional assumed property.....	XXX					0
32. Reinsurance - nonproportional assumed liability.....	XXX					0
33. Reinsurance - nonproportional assumed financial lines.....	XXX					0
34. Aggregate write-ins for other lines of business.....	191,487	9,383	0	191,487	0	9,383
35. TOTALS.....	392,011,090	193,448,509	20,361,169	412,372,259	0	193,448,509

DETAILS OF WRITE-INS

3401. TRAVEL.....	191,487	9,383		191,487		9,383
3402.						0
3403.						0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	191,487	9,383	0	191,487	0	9,383

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No [X]

If yes: 1. The amount of such installment premiums \$.....0.

2. Amount at which such installment premiums would have been reported had they been recorded on an annualized basis \$.....0.

UNDERWRITING AND INVESTMENT EXHIBIT**PART 2 - LOSSES PAID AND INCURRED**

Line of Business	Losses Paid Less Salvage				5 Net Losses Unpaid Current Year (Part 2A, Col. 8)	6 Net Losses Unpaid Prior Year	7 Losses Incurred Current Year (Cols. 4 + 5 - 6)	8 Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned (Col. 4, Part 1)
	1 Direct Business	2 Reinsurance Assumed	3 Reinsurance Recovered	4 Net Payments (Cols. 1 + 2 - 3)				
1. Fire.....	2,921,772	522,081	2,921,772	522,081	690,950	538,647	674,384	79.3
2. Allied lines.....	44,122	6,793	44,122	6,793	56,881	3,903	59,771	123.7
3. Farmowners multiple peril.....					0	0	0	0.0
4. Homeowners multiple peril.....	57,811,839	5,995,935	57,811,839	5,995,935	(1,173,972)	1,750,165	3,071,798	24.3
5. Commercial multiple peril.....		701,888		701,888	816,380	928,746	589,522	37.0
6. Mortgage guaranty.....					0	0	0	0.0
8. Ocean marine.....		47,695		47,695	77,943	84,974	40,664	27.2
9. Inland marine.....	2,749,380	279,746	2,749,380	279,746	85,317	103,120	261,943	77.1
10. Financial guaranty.....					0	0	0	0.0
11.1 Medical professional liability - occurrence.....					0	0	0	0.0
11.2 Medical professional liability - claims-made.....					0	0	0	0.0
12. Earthquake.....					0	0	0	0.0
13. Group accident and health.....	180,793	12,775	180,793	12,775	82,376	82,645	12,506	196.9
14. Credit accident and health (group and individual).....					0	0	0	0.0
15. Other accident and health.....					0	0	0	0.0
16. Workers' compensation.....		70		70	3,807	3,920	(43)	0.0
17.1 Other liability - occurrence.....	2,476,002	7,130,887	9,432,361	174,528	437,523	519,958	92,093	24.2
17.2 Other liability - claims-made.....				0	0	0	0	0.0
17.3 Excess workers' compensation.....				0	0	0	0	0.0
18.1 Products liability - occurrence.....		88,424		88,424	101,044	101,044	88,424	1,295.2
18.2 Products liability - claims-made.....				0	0	0	0	0.0
19.1, 19.2 Private passenger auto liability.....	95,111,754	63,990,163	95,111,754	63,990,163	65,587,632	59,850,470	69,727,325	75.8
19.3, 19.4 Commercial auto liability.....		5,011,702		5,011,702	10,108,513	8,662,353	6,457,862	63.7
21. Auto physical damage.....	50,737,393	43,556,621	50,737,393	43,556,621	(664,481)	(469,645)	43,361,785	61.6
22. Aircraft (all perils).....	3,716,810		3,716,810	0	0	0	0	0.0
23. Fidelity.....				0	0	0	0	0.0
24. Surety.....		(145)		(145)	68,016	68,016	(145)	0.0
26. Burglary and theft.....				0	0	0	0	0.0
27. Boiler and machinery.....				0	0	0	0	0.0
28. Credit.....				0	0	0	0	0.0
29. International.....				0	0	0	0	0.0
30. Warranty.....				0	0	0	0	0.0
31. Reinsurance - nonproportional assumed property.....	XXX	3,359		3,359	5,069	3,166	.5,262	0.0
32. Reinsurance - nonproportional assumed liability.....	XXX			0	0	0	0	0.0
33. Reinsurance - nonproportional assumed financial lines.....	XXX			0	0	0	0	0.0
34. Aggregate write-ins for other lines of business.....	271,949	13,326	271,949	13,326	511	1,941	11,896	95.6
35. TOTALS.....	216,021,814	127,361,320	222,978,173	120,404,961	76,283,509	72,233,423	124,455,047	66.0

DETAILS OF WRITE-INS

3401. TRAVEL.....	271,949	13,326	271,949	13,326	511	1,941	11,896	95.6
3402.				0	0	0	0	0.0
3403.				0	0	0	0	0.0
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	XX.
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	271,949	13,326	271,949	13,326	511	1,941	11,896	95.6

UNDERWRITING AND INVESTMENT EXHIBIT**PART 2A - UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES**

Line of Business	Reported Losses				Incurred But Not Reported			8	9
	1 Direct	2 Reinsurance Assumed	3 Deduct Reinsurance Recoverable	4 Net Losses Excluding Incurred but not Reported (Cols. 1 + 2 - 3)	5 Direct	6 Reinsurance Assumed	7 Reinsurance Ceded		
1. Fire.....	3,620,817	599,228	3,620,817	599,228	667,180	91,722	667,180	690,950	113,795
2. Allied lines.....	27,656	16,751	(12,474)	56,881				56,881	1,746
3. Farmowners multiple peril.....				0				0	
4. Homeowners multiple peril.....	24,863,439	3,695,699	24,903,569	3,655,569	7,052,498	(4,829,541)	7,052,498	(1,173,972)	2,267,157
5. Commercial multiple peril.....		734,355		734,355		82,025		816,380	559,392
6. Mortgage guaranty.....				0				0	
8. Ocean marine.....		70,543		70,543		7,400		77,943	498
9. Inland marine.....	387,125	48,190	387,125	48,190		37,127		85,317	2,766
10. Financial guaranty.....				0				0	
11.1 Medical professional liability - occurrence.....				0				0	
11.2 Medical professional liability - claims-made.....				0				0	
12. Earthquake.....				0				0	
13. Group accident and health.....	26,159	82,376	26,159	82,376				(a). 82,376	
14. Credit accident and health (group and individual).....				0				0	
15. Other accident and health.....				0				(a). 0	
16. Workers' compensation.....		3,807		3,807				3,807	
17.1 Other liability - occurrence.....	2,156,901	155,322	2,156,901	155,322		282,201		437,523	86,422
17.2 Other liability - claims-made.....				0				0	
17.3 Excess workers' compensation.....				0				0	
18.1 Products liability - occurrence.....		101,044		101,044				101,044	
18.2 Products liability - claims-made.....				0				0	
19.1, 19.2 Private passenger auto liability.....	120,184,842	61,075,282	120,184,842	61,075,282	25,361,858	4,512,350	25,361,858	.65,587,632	9,383,908
19.3, 19.4 Commercial auto liability.....		7,460,065		7,460,065		2,648,448		10,108,513	1,622,942
21. Auto physical damage.....	(6,470,444)	(4,245,089)	(6,470,444)	(4,245,089)	8,240,712	3,580,608	8,240,712	(664,481)	1,265,744
22. Aircraft (all perils).....	2,982,729		2,982,729		1,902,558		1,902,558		
23. Fidelity.....				0				0	
24. Surety.....		68,016		68,016				68,016	
26. Burglary and theft.....				0				0	
27. Boiler and machinery.....				0				0	
28. Credit.....				0				0	
29. International.....				0				0	
30. Warranty.....				0				0	
31. Reinsurance - nonproportional assumed property.....	XXX	5,069		5,069	XXX			5,069	
32. Reinsurance - nonproportional assumed liability.....	XXX			0	XXX			0	
33. Reinsurance - nonproportional assumed financial lines.....	XXX			0	XXX			0	
34. Aggregate write-ins for other lines of business.....	10,439	511	10,439	511	0	0	0	511	0
35. TOTALS.....	147,789,663	69,871,169	147,789,663	69,871,169	43,224,806	6,412,340	43,224,806	76,283,509	15,304,370

DETAILS OF WRITE-INS

3401. TRAVEL.....	10,439	511	10,439	511				511	
3402.				0				0	
3403.				0				0	
3498. Summary of remaining write-ins for Line 34 from overflow page.....	0	0	0	0	0	0	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498) (Line 34 above).....	10,439	511	10,439	511	0	0	0	511	0

(a) Including \$.....0 for present value of life indemnity claims.

American Commerce Insurance Company
UNDERWRITING AND INVESTMENT EXHIBIT

PART 3 - EXPENSES

	1 Loss Adjustment Expenses	2 Other Underwriting Expenses	3 Investment Expenses	4 Total
1. Claim adjustment services:				
1.1 Direct.....	15,953,403			15,953,403
1.2 Reinsurance assumed.....	4,542,938			4,542,938
1.3 Reinsurance ceded.....	15,953,403			15,953,403
1.4 Net claim adjustment services (1.1 + 1.2 - 1.3).....	4,542,938	0	0	4,542,938
2. Commission and brokerage:				
2.1 Direct, excluding contingent.....		58,803,680		58,803,680
2.2 Reinsurance assumed, excluding contingent.....		20,984,793		20,984,793
2.3 Reinsurance ceded, excluding contingent.....		58,803,680		58,803,680
2.4 Contingent - direct.....		3,244,781		3,244,781
2.5 Contingent - reinsurance assumed.....		1,717,919		1,717,919
2.6 Contingent - reinsurance ceded.....		3,244,781		3,244,781
2.7 Policy and membership fees.....				0
2.8 Net commission and brokerage (2.1 + 2.2 - 2.3 + 2.4 + 2.5 - 2.6 + 2.7).....	0	22,702,712	0	22,702,712
3. Allowances to manager and agents.....				0
4. Advertising.....	45,352	794,188	2,264	841,804
5. Boards, bureaus and associations.....	5,186	667,762		672,948
6. Surveys and underwriting reports.....	2,187	1,352,686		1,354,873
7. Audit of assureds' records.....				0
8. Salary and related items:				
8.1 Salaries.....	9,916,080	7,910,627		17,826,707
8.2 Payroll taxes.....	740,591	608,295		1,348,886
9. Employee relations and welfare.....	1,972,208	1,470,400	9	3,442,617
10. Insurance.....	96,969	69,255	11	166,235
11. Directors' fees.....	9,846	9,846	1,333	21,025
12. Travel and travel items.....	324,694	286,620	153	611,467
13. Rent and rent items.....	183,079	854,378		1,037,457
14. Equipment.....	208,105	232,914		441,019
15. Cost or depreciation of EDP equipment and software.....	2,064,892	1,839,076		3,903,968
16. Printing and stationery.....	133,802	117,062	523	251,387
17. Postage, telephone and telegraph, exchange and express.....	720,303	513,892	6	1,234,201
18. Legal and auditing.....	134,723	103,293	476	238,492
19. Totals (Lines 3 to 18).....	16,558,017	16,830,294	4,775	33,393,086
20. Taxes, licenses and fees:				
20.1 State and local insurance taxes deducting guaranty association credits of \$.....0.....	20	5,174,027	(291,311)	4,882,736
20.2 Insurance department licenses and fees.....	52,997	727,893	785	781,675
20.3 Gross guaranty association assessments.....		35,503		35,503
20.4 All other (excluding federal and foreign income and real estate).....	9,814	34,344	3,380	47,538
20.5 Total taxes, licenses and fees (20.1 + 20.2 + 20.3 + 20.4).....	62,831	5,971,767	(287,146)	5,747,452
21. Real estate expenses.....			345,466	345,466
22. Real estate taxes.....			65,615	65,615
23. Reimbursements by uninsured plans.....				0
24. Aggregate write-ins for miscellaneous expenses.....	1,723,927	3,251,058	248,153	5,223,138
25. Total expenses incurred.....	22,887,713	48,755,831	376,863	(a) 72,020,407
26. Less unpaid expenses - current year.....	15,304,370	8,072,805		23,377,175
27. Add unpaid expenses - prior year.....	15,368,461	6,539,178		21,907,639
28. Amounts receivable relating to uninsured plans, prior year.....				0
29. Amounts receivable relating to uninsured plans, current year.....				0
30. TOTAL EXPENSES PAID (Lines 25 - 26 + 27 - 28 + 29).....	22,951,804	47,222,204	376,863	70,550,871

DETAILS OF WRITE-INS

2401. MANAGEMENT FEES.....	1,398,787	2,179,759	94	3,578,640
2403. OTHER LICENSES AND FEES.....	325,140	1,071,299	18,960	1,415,399
2498. Summary of remaining write-ins for Line 24 from overflow page.....	0	0	0	0
2499. Totals (Lines 2401 through 2403 plus 2498) (Line 24 above).....	1,723,927	3,251,058	248,153	5,223,138

(a) Includes management fees of \$....229,099 to affiliates and \$.....0 to non-affiliates.

EXHIBIT OF NET INVESTMENT INCOME

	1 Collected During Year	2 Earned During Year
1. U.S. government bonds.....	(a).....239,540231,866
1.1 Bonds exempt from U.S. tax.....	(a).....692,155687,022
1.2 Other bonds (unaffiliated).....	(a).....3,700,1943,859,392
1.3 Bonds of affiliates.....	(a).....
2.1 Preferred stocks (unaffiliated).....	(b).....54,86854,868
2.11 Preferred stocks of affiliates.....	(b).....
2.2 Common stocks (unaffiliated).....
2.21 Common stocks of affiliates.....
3. Mortgage loans.....	(c).....
4. Real estate.....	(d).....519,080
5. Contract loans.....
6. Cash, cash equivalents and short-term investments.....	(e).....17,95117,951
7. Derivative instruments.....	(f).....
8. Other invested assets.....
9. Aggregate write-ins for investment income.....661,376661,376
10. Total gross investment income.....5,366,0836,031,554
11. Investment expenses.....	(g).....664,009
12. Investment taxes, licenses and fees, excluding federal income taxes.....	(g).....(287,146)
13. Interest expense.....	(h).....
14. Depreciation on real estate and other invested assets.....	(i).....124,824
15. Aggregate write-ins for deductions from investment income.....0
16. Total deductions (Lines 11 through 15).....501,687
17. Net investment income (Line 10 minus Line 16).....5,529,867

DETAILS OF WRITE-INS

0901. Fair Plan.....35,16835,168
0902. ANI.....626,208626,208
0903.....
0998. Summary of remaining write-ins for Line 9 from overflow page.....00
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....661,376661,376
1501.....
1502.....
1503.....
1598. Summary of remaining write-ins for Line 15 from overflow page.....0
1599. Totals (Lines 1501 through 1503 plus 1598) (Line 15 above).....0

- (a) Includes \$....377,909 accrual of discount less \$....808,738 amortization of premium and less \$....625,312 paid for accrued interest on purchases.
- (b) Includes \$....2,276 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued dividends on purchases.
- (c) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (d) Includes \$.....0 for company's occupancy of its own buildings; and excludes \$.....0 interest on encumbrances.
- (e) Includes \$.....0 accrual of discount less \$.....0 amortization of premium and less \$.....0 paid for accrued interest on purchases.
- (f) Includes \$.....0 accrual of discount less \$.....0 amortization of premium.
- (g) Includes \$.....0 investment expenses and \$.....0 investment taxes, licenses and fees, excluding federal income taxes, attributable to segregated and Separate Accounts.
- (h) Includes \$.....0 interest on surplus notes and \$.....0 interest on capital notes.
- (i) Includes \$....124,824 depreciation on real estate and \$.....0 depreciation on other invested assets.

EXHIBIT OF CAPITAL GAINS (LOSSES)

	1 Realized Gain (Loss) on Sales or Maturity	2 Other Realized Adjustments	3 Total Realized Capital Gain (Loss) (Columns 1 + 2)	4 Change in Unrealized Capital Gain (Loss)	5 Change in Unrealized Foreign Exchange Capital Gain (Loss)
1. U.S. government bonds.....(406)(406)
1.1 Bonds exempt from U.S. tax.....260,011260,011414,766
1.2 Other bonds (unaffiliated).....1,246,2521,246,252164,556
1.3 Bonds of affiliates.....0
2.1 Preferred stocks (unaffiliated).....60,94160,94124,498
2.11 Preferred stocks of affiliates.....0
2.2 Common stocks (unaffiliated).....0
2.21 Common stocks of affiliates.....0
3. Mortgage loans.....0
4. Real estate.....0
5. Contract loans.....0
6. Cash, cash equivalents and short-term investments.....0
7. Derivative instruments.....0
8. Other invested assets.....0
9. Aggregate write-ins for capital gains (losses).....00000
10. Total capital gains (losses).....1,566,79801,566,798603,8200

DETAILS OF WRITE-INS

0901.....0
0902.....0
0903.....0
0998. Summary of remaining write-ins for Line 9 from overflow page.....00000
0999. Totals (Lines 0901 through 0903 plus 0998) (Line 9 above).....00000

EXHIBIT OF NONADMITTED ASSETS

	1 Current Year Total Nonadmitted Assets	2 Prior Year Total Nonadmitted Assets	3 Change in Total Nonadmitted Assets (Col. 2 - Col. 1)
1. Bonds (Schedule D).....			0
2. Stocks (Schedule D):			0
2.1 Preferred stocks.....			0
2.2 Common stocks.....			0
3. Mortgage loans on real estate (Schedule B):			0
3.1 First liens.....			0
3.2 Other than first liens.....			0
4. Real estate (Schedule A):			0
4.1 Properties occupied by the company.....			0
4.2 Properties held for the production of income.....			0
4.3 Properties held for sale.....			0
5. Cash (Schedule E-Part 1), cash equivalents (Schedule E-Part 2) and short-term investments (Schedule DA).....			0
6. Contract loans.....			0
7. Derivatives (Schedule DB).....			0
8. Other invested assets (Schedule BA).....			0
9. Receivables for securities.....			0
10. Securities lending reinvested collateral assets (Schedule DL).....			0
11. Aggregate write-ins for invested assets.....	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	0	0	0
13. Title plants (for Title insurers only).....			0
14. Investment income due and accrued.....			0
15. Premiums and considerations:			0
15.1 Uncollected premiums and agents' balances in the course of collection.....			0
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due.....			0
15.3 Accrued retrospective premiums and contracts subject to redetermination.....			0
16. Reinsurance:			0
16.1 Amounts recoverable from reinsurers.....			0
16.2 Funds held by or deposited with reinsured companies.....			0
16.3 Other amounts receivable under reinsurance contracts.....			0
17. Amounts receivable relating to uninsured plans.....			0
18.1 Current federal and foreign income tax recoverable and interest thereon.....			0
18.2 Net deferred tax asset.....	612,817	608,566	(4,251)
19. Guaranty funds receivable or on deposit.....			0
20. Electronic data processing equipment and software.....			0
21. Furniture and equipment, including health care delivery assets.....	798,043	761,516	(36,527)
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0
23. Receivables from parent, subsidiaries and affiliates.....			0
24. Health care and other amounts receivable.....			0
25. Aggregate write-ins for other-than-invested assets.....	1,346,562	1,831,001	484,439
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	2,757,422	3,201,083	443,661
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0
28. TOTALS (Lines 26 and 27).....	2,757,422	3,201,083	443,661

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
1199. Totals (Lines 1101 through 1103 plus 1198) (Line 11 above).....	0	0	0
2501. PREPAID EXPENSES.....	938,569	1,165,328	226,759
2502. ARIZONA RENEWAL BUSINESS.....	407,993	665,673	257,680
2503.....			0
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598) (Line 25 above).....	1,346,562	1,831,001	484,439

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 (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:

	<u>SSAP #</u>	<u>F/S Page</u>	<u>F/S Line #</u>	<u>2016</u>	<u>2015</u>
NET INCOME					
1. State basis (Page 4, Line 20, Columns 1 & 2)				\$ 1,822,659	\$ (6,500,444)
2. State Prescribed Practices that increase/(decrease) NAIC SAP				-	-
3. State Permitted Practices that increase/(decrease) NAIC SAP				-	-
4. NAIC SAP basis				\$ 1,822,659	\$ (6,500,444)
SURPLUS					
5. State basis (Page 3, Line 37, Columns 1 & 2)				\$ 108,261,319	\$ 104,846,378
6. State Prescribed Practices that increase/(decrease) NAIC SAP				-	-
7. State Permitted Practices that increase/(decrease) NAIC SAP				-	-
8. NAIC SAP basis				\$ 108,261,319	\$ 104,846,378

B. Use of Estimates

The preparation of financial statements in conformity with Statutory Accounting Principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities. It also requires disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates.

C. Accounting Policies

Premiums are recognized as income ratably over the terms of the related insurance policies. Unearned premium reserves are established to cover the unexpired portion of premiums written. Such reserves are computed by pro rata methods for direct business.

Expenses incurred in connection with acquiring new insurance business, including such acquisition costs as sales commissions, are charged to operations as incurred. Expenses incurred are reduced for ceding allowances received or receivable.

Net investment income earned consists primarily of interest, dividends and rent income less investment related expenses. Interest is recognized on an accrual basis and dividends are recognized on an ex-dividend basis. Rent income includes an imputed rent for the Company's occupancy of its own building. Net realized capital gains (losses) are recognized on a specific identification basis when securities are sold, redeemed or otherwise disposed. Realized capital losses include write downs for impairments considered to be other than temporary.

In addition, the Company adheres to the following accounting policies:

- (1) Short-term investments are accounted for in the same manner as similar long-term investments in accordance with SSAP No. 2.
- (2) Bonds, excluding loan-backed and structured securities are accounted for in accordance with SAAP No. 26. Amortized cost is calculated using the scientific interest method. Bonds containing call provisions are amortized to either the call or maturity value and date which produces the lowest asset value (yield to worst). Investment grade bonds are stated at amortized cost. Non-investment grade bonds are stated at the lower of amortized cost or fair value. Bonds whose decline has been determined to be other than temporary are written down to a new cost basis and the write-down amount is accounted for as a realized loss.
- (3) Common stocks of unaffiliated entities are stated at fair value and accounted for in accordance with SSAP No. 30.
- (4) Preferred stocks of unaffiliated entities are accounted for in accordance with SSAP No. 32. Investment grade redeemable preferred stocks are stated at amortized cost. Investment grade perpetual preferred stocks are stated at fair value. Non-investment grade preferred stocks are stated at the lower of book value or fair value. Preferred stocks whose decline has been determined to be other than temporary are written down to a new cost basis and the write-down amount is accounted for as a realized loss.
- (5) The Company does not hold mortgage loans.
- (6) Loan-backed and Structured securities are accounted for in accordance with SSAP No. 43R. Amortized cost is calculated retrospectively using the scientific interest method. The carrying value and NAIC Designation for non-agency loan-backed and structured securities is determined using a two-step NAIC process. Those bonds assigned a NAIC designation 1 or 2 in the first step are stated at amortized cost. Those bonds assigned a 3 through 6 designation are stated at the lower of amortized cost or fair value. The NAIC designation assigned under the second step of the process is reported for these securities in Schedule D and is used in the risk-based capital calculation. Investment grade bonds not subject to the above prescribed process are stated at amortized cost and the non-investment grade bonds are stated at the lower of amortized cost or fair value. Bonds whose decline has been determined to be other than temporary are written down to a new cost basis and the write down amount is accounted for as a realized loss.
- (7) The Company does not hold investments in Subsidiary, controlled and Affiliated Entities.
- (8) The Company does not hold investments in Joint Ventures, Partnerships or Limited Liability Companies.
- (9) The Company does not hold derivatives.
- (10) The Company anticipates investment income as a factor in the premium deficiency calculation, in accordance with SSAP No. 53, Property-Casualty Contracts - Premiums.
- (11) Unpaid losses and loss adjustment expenses include an amount determined from individual case estimates and loss reports and an amount, based on past experience, for losses incurred but not reported. Such liabilities are necessarily based on assumptions and estimates and while management believes the amount is adequate, the ultimate liability may be in excess of or less than the amount provided. The methods for making such estimates and for establishing the resulting liabilities are continually reviewed and any adjustments are reflected in the period determined.
- (12) The Company has a written capitalization policy for purchases of items such as electronic data processing equipment, software, furniture, vehicles, other equipment and leasehold improvements. The predefined capitalization thresholds under this policy have increased to \$5,000, effective January 1, 2014.
- (13) The company does not have pharmaceutical rebate receivables.

D. Going Concern

Based on its evaluation of relevant conditions and events, management does not have substantial doubt about the Company's ability to continue as a going concern.

NOTES TO FINANCIAL STATEMENTS**Note 2 - Accounting Changes and Corrections of Errors**

Accounting Changes and Corrections of Errors

None

Note 3 - Business Combinations and Goodwill

A. Statutory Purchase Method

None

B. Statutory Merger

None

C. Impairment Loss

None

Note 4 - Discontinued Operations

None

Note 5 - Investments

A. Mortgage Loans, including Mezzanine Real Estate Loans

None

B. Debt Restructuring

None

C. Reverse Mortgages

None

D. Loan-backed Securities

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

2. During 2016 the Company recognized no Other-Than-Temporary Impairments on Loan-Backed Securities.

3. Currently held structured securities with recognized OTTI

CUSIP	Book/Adj Carrying Amortized Cost Before Current Period OTTI	Present Value of Projected Cashflows	OTTI Recognized	Amortized Cost After OTTI	Fair Value at time of OTTI	Date of Financial Stmt Where Reported
TOTALS		\$ _____				

4. Impaired securities for which an OTTI has not been recognized

A1. The aggregate amount of unrealized losses - Less than 12 months: \$ 187,422

A2. The aggregate amount of unrealized losses - 12 months or longer: \$ 4,734

B1. The aggregate related fair value of securities with unrealized losses - Less than 12 months: \$ 6,248,433

B2. The aggregate related fair value of securities with unrealized losses - 12 months or longer: \$ 44,654

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.

E. Repurchase Agreements and/or Securities Lending Transactions

None

F. Real Estate

None

G. Low Income Housing Credits

None

NOTES TO FINANCIAL STATEMENTS**H. Restricted Assets****1 Restricted Assets (Including Pledged)**

Restricted Asset Category	Gross (Admitted & Nonadmitted) Restricted Current Year							Current Year							
	1		2		3		4		5	6	7	8	9	10	11
	Total General Account (G/A)	G/A Supporting Protected Cell Account Activity (a)	Total Protected Cell Account Restricted Assets	Protected Cell Account Assets Supporting G/A Activity (b)	Total (1 plus 3)	Total From Prior Year	Increase/ (Decrease) (5 minus 6)	Total Nonadmitted Restricted	Total Admitted Restricted (5 minus 8)	Gross (Admitted & Nonadmitted) Restricted to Total Assets (c)	Admitted Restricted to Total Admitted Assets (d)				
a. Subject to contractual obligation for which liability is not shown															
b. Collateral held under security lending agreements															
c. Subject to repurchase agreements															
d. Subject to reverse repurchase agreements															
e. Subject to dollar repurchase agreements															
f. Subject to dollar reverse repurchase agreements															
g. Placed under option contracts															
h. Letter stock or securities restricted as to sale															
i. FHLB capital stock															
j. On deposit with states	5,735,512					5,735,512	5,727,813	7,699	-	5,735,512	1.69%	1.71%			
k. On deposit with other regulatory bodies															
l. Pledged collateral to															
m. Pledged as collateral not captured in other categories															
n. Other restricted assets															
o. Total Restricted Assets	5,735,512	-	-	-	-	5,735,512	5,727,813	7,699	-	5,735,512	1.69%	1.71%			

(a) Subset of column 1

(b) Subset of column 3

(c) Column 5 divided by Asset Page, Column 1, Line 28

(c) Column 9 divided by Asset Page, Column 3, Line 28

I. Working Capital Finance Investments

None

J. Offsetting and Netting of Assets and Liabilities

None

K. Structured Notes

None

L. 5* Securities

None

Note 6 - Joint Ventures, Partnerships and Limited Liability Companies

None

Note 7 - Investment Income**A. Accrued Investment Income**

Investment income due and accrued with amounts over 90 days past due are non-admitted assets and excluded from surplus.

B. Amounts Non-admitted

None

Note 8 - Derivative Instruments

None

NOTES TO FINANCIAL STATEMENTS**Note 9 - Income Taxes**

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

	12/31/2016			12/31/2015			CHANGE		
	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL	ORDINARY	CAPITAL	TOTAL
1a. Gross deferred tax assets	\$ 6,402,471	\$ 391,247	\$ 6,793,718	\$ 6,885,546	\$ 576,578	\$ 7,462,124	\$ (483,075)	\$ (185,331)	\$ (668,406)
1b. Statutory valuation allowance adjustment	-	-	-	-	-	-	-	-	-
1c. Adjusted gross deferred tax assets (1a-1b)	\$ 6,402,471	\$ 391,247	\$ 6,793,718	\$ 6,885,546	\$ 576,578	\$ 7,462,124	\$ (483,075)	\$ (185,331)	\$ (668,406)
1d. Deferred tax liabilities	188,826	197	189,023	169,117	197	169,314	19,709	0	19,709
1e. Subtotal (net deferred tax assets) (1c-1d)	\$ 6,213,645	\$ 391,050	\$ 6,604,695	\$ 6,716,429	\$ 576,381	\$ 7,292,810	\$ (502,784)	\$ (185,331)	\$ (688,115)
1f. Deferred tax assets nonadmitted	302,233	310,584	612,817	147,233	461,333	608,566	155,000	(150,749)	4,251
1g. Net admitted deferred tax assets (1e-1f)	\$ 5,911,412	\$ 80,466	\$ 5,991,878	\$ 6,569,196	\$ 115,048	\$ 6,684,244	\$ (657,784)	\$ (34,582)	\$ (692,366)

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

(a) Federal Income taxes Paid in Prior years Recoverable through Carry-backs	\$ 351,802	\$ 80,466	\$ 432,268	\$ -	\$ -	\$ -	\$ 351,802	\$ 80,466	\$ 432,268
(b) Adjusted Gross Deferred Tax Assets Expected to be Realized after Application of Threshold Limitation	5,559,610	-	5,559,610	6,569,195	115,048	6,684,243	(1,009,585)	(115,048)	(1,124,633)
(1) Adjusted Gross Deferred Tax Assets Expected to be Realized	5,559,610	-	5,559,610	6,569,195	115,048	6,684,243	(1,009,585)	(115,048)	(1,124,633)
(2) Adjusted Gross Deferred Tax Assets Allowed per Limitation on Threshold	XXX	XXX	15,583,077	XXX	XXX	14,972,139	XXX	XXX	610,938
(c) Adjusted Gross Deferred Tax Assets offset by Gross Deferred Tax Liabilities	\$ 188,826	\$ 197	\$ 189,023	\$ 169,118	\$ 197	\$ 169,315	\$ 19,708	\$ -	\$ 19,708
(d) Deferred Tax Assets Admitted as the Result of Application of SSAP101 (Total 2(a) + 2(b) + 2(c))	\$ 6,100,238	\$ 80,663	\$ 6,180,901	\$ 6,738,313	\$ 115,245	\$ 6,853,558	\$ (638,075)	\$ (34,582)	\$ (672,657)

9A. 3. Realization Thresholds

	2016	2015
(a) Ratio Percentage Used to Determine Recovery Period & Threshold Limitation Amount	896%	885%
(b) Amount of Adjusted Capital & Surplus used to Determine Recovery Period and Threshold Limitation in 2(b)(2) above	102,269,441	99,814,262

9A. 4. Impact of Tax Planning Strategies

(a) Adjusted Gross DTA's (% of Total Adjusted Gross DTA's)	0.00%	20.57%	1.18%	0.00%	19.95%	1.54%	0.00%	0.62%	-0.36%
(b) Net Admitted Adjusted Gross DTA's (% of Total Net Admitted Adjusted Gross DTA's)	0.00%	100.00%	1.34%	0.00%	100.00%	1.72%	0.00%	0.00%	-0.38%

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

9B. There were no unrecognized deferred tax liabilities.

9C. 1. Current Income Tax

	12/31/2016	12/31/2015	CHANGE
(a) Federal	\$ 357,774	\$ (3,001,015)	\$ 3,358,789
(b) Foreign	-	-	-
(c) Subtotal	\$ 357,774	\$ (3,001,015)	\$ 3,358,789
(d) Federal income tax on net capital gains	503,012	502,937	75
(e) Utilization of capital loss carry-forwards	-	-	-
(f) Other	-	-	-
(g) Federal and foreign income taxes incurred	\$ 860,786	\$ (2,498,078)	\$ 3,358,864

9C. 2. Deferred Tax Assets

	12/31/2016	12/31/2015	CHANGE
(a) Ordinary			
(1) Discounting of Unpaid Losses	\$ 905,103	\$ 989,705	\$ (84,602)
(2) Unearned premium reserve	1,669,709	1,494,165	175,544
(3) Policyholder reserve	-	-	-
(4) Investments	-	-	-
(5) Deferred acquisition costs	-	-	-
(6) Policyholder dividends accrual	-	-	-
(7) Fixed Assets	78,918	88,083	(9,165)
(8) Compensation and benefits accrual	-	-	-
(9) Pension accrual	-	-	-
(10) Receivables - nonadmitted	70,000	70,000	-
(11) Net operating loss carry-forward	-	1,031,645	(1,031,645)
(12) Tax Credit carry-forward	1,591,362	1,345,939	245,423
(13) Other	1,616,082	1,225,158	390,924
(14) Other assets - nonadmitted	471,297	640,851	(169,554)
(99) Subtotal	\$ 6,402,471	\$ 6,885,546	\$ (483,075)
(b) Statutory valuation allowance adjustment	-	-	-
(c) Nonadmitted	302,233	147,233	155,000
(d) Admitted ordinary deferred tax assets (2a99-2b-2c)	\$ 6,100,238	\$ 6,738,313	\$ (638,075)
(e) Capital			
(1) Investments	391,247	576,578	(185,331)
(2) Net capital loss carryforward	-	-	-
(3) Real estate	-	-	-
(4) Other	-	-	-
(99) Subtotal	\$ 391,247	\$ 576,578	\$ (185,331)

NOTES TO FINANCIAL STATEMENTS

(f) Statutory valuation allowance adjustment
 (g) Nonadmitted
 (h) Admitted capital deferred tax assets (2E99-2f-2g)
 (i) Admitted deferred tax assets (2d+2h)

-	-	-
310,584	461,333	(150,749)
\$ 80,663	\$ 115,245	\$ (34,582)
\$ 6,180,901	\$ 6,853,558	\$ (672,657)

3. Deferred Tax Liabilities

12/31/2016	12/31/2015	CHANGE
------------	------------	--------

(a) Ordinary

(1) Investments
 (2) Fixed Assets
 (3) Deferred and uncollected premium
 (4) Policyholder reserves
 (5) Other
 (99) Subtotal

91,264	75,664	15,600
-	-	-
-	-	-
-	-	-
97,563	93,453	4,110
\$ 188,827	\$ 169,117	\$ 19,710

(b) Capital

(1) Investments
 (2) Real estate
 (3) Other
 (99) Subtotal

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

(c) Deferred tax liabilities (3a99+3b99)

\$ 189,024	\$ 169,314	\$ 19,710
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4. Net deferred tax assets/liabilities (2i-3c)

\$ 5,991,877	\$ 6,684,244	\$ (692,367)
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9D. Reconciliation of Federal Income Tax Rate to Actual Effective Rate

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

	12/31/2016	Effective Tax Rate
Provision computed at statutory rate	\$ 939,206	35.0%
Tax preferred investments	(205,923)	-7.7%
Nondeductible expenses	15,991	0.6%
Tax on change in non-admitted assets	156,769	5.8%
Tax on other surplus adjustments	431,520	16.1%
True-ups and other adjustments to tax	1	0.0%
Total Tax	\$ 1,337,564	49.8%
Reconciliation		
Federal and foreign income taxes incurred	357,774	13.3%
Realized capital gains (losses) tax	503,012	18.7%
Change in Deferred Tax	476,778	17.8%
Total Tax	\$ 1,337,564	49.8%

9E. Operating Loss and Tax Credit Carryforwards

(1) As of 12/31/2016, the Company had \$0 of net operating losses available to offset future taxable income and \$0 in capital losses available to offset future capital gain income. The Company had \$1,591,362 in Alternative Minimum Tax (AMT) credits available.

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

Year Generated	Carryover	Remaining
2009	\$ 70,245	
2010	561,749	
2012	149,258	
2013	348,541	
2014	212,405	
2016	249,164	
	\$ 1,591,362	

(2) The Company has the following income tax expense that is available for recoupment in the event of future net losses:

Year	Ordinary	Capital	Total
2016	\$ -	\$ 432,268	\$ 432,268
	\$ -	\$ 432,268	\$ 432,268

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

9F. Consolidated Federal Income Tax Return

(1) For the period ending December 31, 2016, The Company will file as a part of the consolidated federal income tax return with its ultimate U.S. parent, Mapfre USA Corp and its subsidiaries, The Commerce Insurance Company, Citation Insurance Company, Commerce West Insurance Company, MAPFRE Insurance Company of New York, MAPFRE Insurance Company of Florida, MAPFRE Insurance Company, Cube Insurance Company, ACIC Holding Company, Inc., Bay Finance Holding Company, and Mapfre Intermediaries, Inc. (said parties constituting an "Affiliated Group," as defined in and for the purposes of IRC §1504(a)

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

9G. Federal or foreign Federal Income Tax Loss Contingencies

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

NOTES TO FINANCIAL STATEMENTS**Note 10 - Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties****A. Nature of Relationship**

All outstanding shares of the Company are owned by ACIC Holding Company, Inc (AHC), an insurance holding company domiciled in Rhode Island. 94.88% of the common stock of AHC is owned by MAPFRE USA Corp. (MUSA). The remaining 5.12% of the common stock is owned by AAA Southern New England (AAA SNE), AAA Oregon/Idaho, and the Ohio Automobile Club.

B. Detail of Transaction Greater than 1/2% of Admitted Assets

None

C. Change in Terms of Intercompany Arrangements

None

D. Amounts Due (To) or From Related Parties

	2016		2015	
	Due (To) From			
MAPFRE USA	\$ (1,933)	\$ (1,934)		
Commerce Insurance Company	4,641,522	\$ 8,731,883		
Commerce West Insurance Company	(211,027)	(106,733)		
MAPFRE Insurance Company of New York	6,165	(5,382)		
MAPFRE Insurance Company	(6,401)	(8,562)		
	<u>\$ 4,428,326</u>	<u>\$ 8,609,272</u>		

E. Guarantees or Contingencies for Related Parties

None

F. Management, Service Contracts, Cost Sharing Arrangements

In 2015, The Company amended its Management Cost Allocation Agreement "Fifth Amended and Restated Management Cost Allocation Agreement". The "Fifth Amended and Restated Management Cost Allocation Agreement" provides that the Company is charged or reimbursed for services rendered by the Company or its insurance affiliates and entails 1) investment related and 2) non-investment related services. Costs pertaining to investment related services are actual costs borne by the Company which, per agreement, were determined to be the total rate of 15 basis points per annum times the investment balance at each regular calendar quarter. The non-investment related charges are costs borne by the Company and or its affiliates for functions supporting the affiliated companies. Loss adjustment expenses will be apportioned through studies in accordance with SSAP No. 70 which such studies shall be conducted no less than annually. Expenses other than investment related expenses and loss adjustment expenses will be apportioned to each company based on its direct written premium relative to that of the other companies.

G. Nature of Relationships that could Affect Operations

The outstanding shares of The Company are 100% owned by AHC and AHC is 5.12% owned by AAA of Southern New England, AAA Oregon/Idaho, and the Ohio Automobile Club, which are producing agents of the Company.

H. Amount Deducted for Investment in Upstream Company

None

I. Detail of Investments in Affiliates Greater than 10% of Admitted Assets

None

J. Writedown for Impairments of Investments in Affiliates

None

K. Foreign Insurance Subsidiary Valued Using CARVM

None

L. Downstream Holding Company Valued Using Look-Through Method

None

M. SCA Investments per SSAP 97

None

N. SCA Investments per SSAP 97 that departs from the NAIC statutory accounting practices and procedures

None

Note 11 - Debt**A. Amount, Interest, Maturities, Collateral, Covenants**

None

B. FHLB (Federal Home Loan Bank) Agreements

None

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

None

B. Investment Policies

None

NOTES TO FINANCIAL STATEMENTS**C. Fair Value of Plan Assets**

None

D. Rate of Return Assumptions

None

E. Defined Contribution Plans

The Company's ultimate parent company, MUSA, sponsors a 401(k) retirement plan feature for which substantially all employees are eligible. See Note 12G.

F. Multiemployer Plans

None

G. Consolidated/Holding Company Plans

MUSA has an Incentive Compensation Plan (the Plan) which provides for the award of Incentive Awards (IAs). At the discretion of MUSA's Board of Directors, all officers and other management employees, including those of MUSA's subsidiaries, are eligible to participate in the Plan. IAs entitle recipients to cash payments at a specified settlement date, subject to certain specified conditions. The cash payments are based upon reported net earnings and direct written premium of MUSA over the one year period of the grant. The awards are generally paid out over a three-year period subsequent to their earning period. During 2016 and 2015, 4,610,330 and 4,946,848 IA units were issued to MUSA and subsidiaries' officers and management personnel. In addition, certain business development personnel receive annual bonus payments based upon premiums written and other factors. A small number of officers have alternative plans based upon individual agreements. The total expense for these programs was \$12,867,000 and \$5,299,000 in 2016 and 2015, respectively. Expense is allocated to individual insurance companies based upon our Intercompany Pooling Arrangement. See Note 26 for details.

IAs granted to officers and other management personnel of MUSA and subsidiaries and outstanding at December 31, 2016 follow:

Year Granted	Awards Outstanding	Net Value Per Award 12/31/2016	Net Accrued Bal 12/31/2016
2016	4,551,760	\$1.50	\$ 6,827,707
2015	3,900,947	1.17	4,554,871
2014	3,974,593	0.71	2,797,149

Eligible employees of the Company may participate in a Company-sponsored 401(k) retirement plan. This 401(k) plan includes a matching contribution from the Company of 50% of the first 6% of eligible compensation contributed by the participant to the plan. In addition to the matching contribution, profit sharing contributions may be made by the Company with respect to each plan year in an amount equal to 3% of each eligible participant's covered compensation (or in such different amount as may be determined by the Company).

H. Postemployment Benefits and Compensated Absences

None

I. Impact of Medicare Modernization Act on Postretirement Benefits

None

Note 13 - Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations**A. Outstanding Shares**

The Company has 1,000,000 common stock shares authorized, 107,538 shares issued and outstanding with a par value of \$30. ACIC Holding Co., Inc. owns 100% of the Company. All shares are Class A.

B. Dividend Rate of Preferred Stock

The Company has no preferred stock outstanding.

C,D,E and F. Dividend Restrictions

The maximum amount of dividends that can be paid by the State of Ohio insurance companies to shareholders or policyholders without prior approval of the insurance Commissioner is subject to restrictions. Without prior approval from the commissioner, dividends can not exceed the greater of 10% of surplus or net income for the 12 month period ending the 31st day of December.

The Company did not declare common stock dividends to its parent company during 2016 or 2015.

The total amount of dividends charged to unassigned funds in 2016 was \$0.

Ordinary dividends in the amount of \$10,826,132 are eligible for payment in 2017.

G. Mutual Surplus Advances

Not applicable.

H. Company Stock Held for Special Purposes

The Company did not hold any stock for special purposes.

I. Changes in Special Surplus funds

None

J. Changes in Unassigned Funds

The portion of unassigned funds (surplus) represented or reduced by cumulative unrealized gains/(losses) is (\$927,319) less applicable deferred taxes of \$324,562, for a net balance of (\$602,757).

K. Surplus Notes

The Company did not issue any surplus debentures or similar obligations.

NOTES TO FINANCIAL STATEMENTS**L.M. Impact of Quasi-reorganizations**

None

Note 14 - Contingencies**A. (1) Contingent Commitments**

None

(2) Information concerning guarantees

None

(3) Aggregate compilation of guarantee obligations

None

B. Assessments

The Company is subject to assessments by the states in which it writes business. These amounts are expensed when received. The Company anticipates that there will be additional assessments from time to time relating to various insolvencies.

C. Gain Contingencies

None

D. Claims Related Extra Contractual Obligation and Bad Faith Losses

The Company paid the following amounts in the current year to settle claims related extra contractual obligations (ECO) and bad faith losses resulting from lawsuits.

	Direct
Claims related ECO and bad faith losses paid during current year	\$ 1,659,437

The number of claims for which amounts were paid to settle claims related extra contractual obligations and bad faith losses resulting during the current year

0-25 Claims	26-50 Claims	51-100 Claims	101-500 Claims	> 500 Claims
X				

Per Claim Per Claimant

E. Product Warranties

None

F. Joint and Several Liabilities

None

G. All Other Contingencies

The Company is a defendant in various legal actions arising from the normal course of business. These proceedings are considered to be ordinary to operations or without foundation in fact. Management is of the opinion that these actions will not have a material adverse effect on the financial statements of the Company.

Note 15 - Leases**A. Lessee Leasing Arrangements**

In 2012, ACIC entered into a lease for a branch location in Westlake, OH. The lease, effective August 2012, is for a five year term expiring July, 2017. In addition to the minimum lease payment, ACIC is required to pay its pro rata share of the building's operating expenses, as defined.

ACIC entered into five year leases for two additional branch locations. The first, in Powell, OH, was effective March 2015. The second, in Grove City, IL, was effective January 2016. In addition to the minimum lease payment, ACIC is required to pay its pro rata share of the building's operating expenses, as defined.

In 2015, ACIC entered into a lease for additional office space in Middletown, CT. The lease is for a five year term expiring March, 2020 with one five-year extension available. In addition to the minimum lease payment, ACIC is required to pay its pro rata share of the building's operating expenses, as defined.

Rent expense for 2016 and 2015 was \$233,000 and \$169,000, respectively. At December 31, 2016, future minimum lease payments under non-cancelable operating leases are as follows:

Year	Minimum Rent
2017	\$ 167,000
2018	155,000
2019	161,000
2020	92,000
Total	<u>\$ 575,000</u>

B. Lessor Leasing Agreements

None

Note 16 - Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk**A. Face or Contracts Amounts**

None

B. Nature and Terms

None

NOTES TO FINANCIAL STATEMENTS

C. Exposure to Credit Related Losses

None

D. Collateral Policy

None

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

A. Transfers or Receivables Reported as Sales

None

B. Transfers and Servicing of Financial Assets

None

C. Wash Sales

None

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

A. Administrative Services Only (ASO) Plans

None

B. Administrative Services Contract (ASC) Plans

None

C. Medicare or Similarly Structured Cost Based Reimbursement Contracts

None

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

None

Note 20 - Fair Value Measurements

A. 1. Summary of Financial Assets Measured and Reported at Fair Value at 12/31/16

Description	Level 1	Level 2	Level 3	TOTAL
Bonds	\$ -	\$ 1,610,854	\$ -	\$ 1,610,854
Preferred Stock				
Common Stock				
TOTALS	\$ -	\$ 1,610,854	\$ -	\$ 1,610,854

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

Description	Beginning Balance at 1/1/2016	Transfers into Level 3	Transfers out of Level 3	Net Income	Total gains & (losses)	Total gains and (losses)	Purchases	Issuances	Sales	Settlem-ents	Ending Balance at 12/31/2016
					included in Net Income	included in Surplus					
Bonds	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Preferred Stock											
Common Stock											
TOTALS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

3. 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.

4. 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.

5. The Company does not hold derivative assets or liabilities.

B. Other Fair Value Disclosures

Not Applicable

C. 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	\$ 136,442,033	\$ 137,378,499	\$ 5,770,723	\$ 130,671,310	\$ -	\$ -
Preferred Stock	816,090	789,374			816,090	
Common Stock	\$ 137,258,123	\$ 138,167,873	\$ 5,770,723	\$ 131,487,400	\$ -	\$ -

D. Reasons Not Practical to Estimate Fair Values

Not Applicable

NOTES TO FINANCIAL STATEMENTS**Note 21 - Other Items****A. Unusual or Infrequent Items**

In 2016 and 2015, MAPFRE Insurance Company of New York (MICNY) entered into agreements with unaffiliated insurance companies for the purpose of the sale of "Youthful Male Operator Credits" (Class Credits) that can be used to reduce New York Automobile Insurance Plan (NYAIP) quota share obligations. These credits derived from voluntary business written in 2015 and 2014 and applicable to the 2016 and 2015, respectively, quota obligations. The purchase prices of the credits for 2016 and 2015 derived from voluntary business written are listed below.

The total sale amounts for the LAD Credits are:

	<u>2016</u>	<u>2015</u>
MICNY	\$ -	\$ 45,000

The total amount of the sale was recorded as a credit to Underwriting Expenses (Underwriting Income) for MICNY and pooled according to the Intercompany Pooling Agreement. See Note 26 for more information regarding the pooling agreement.

	2016		2015	
	Pooling %	Credit	Pooling %	Credit
The Commerce Insurance Company	65.1%	\$ -	65.1%	\$ 29,295
Citation Insurance Company	8.1%	-	8.1%	3,645
American Commerce Insurance Company	9.8%	-	9.8%	4,410
Commerce West Insurance Company	5.4%	-	5.4%	2,430
MAPFRE Insurance Company of New York	5.0%	-	5.0%	2,250
MAPFRE Insurance Company of Florida	3.4%	-	3.4%	1,530
MAPFRE Insurance Company	2.4%	-	2.4%	1,080
CUBE Insurance Company	0.8%	-	0.8%	360
	<u>\$ -</u>		<u>\$ 45,000</u>	

The credit amount is recorded in each company's Annual Statement on Page 4 Line 5 as prescribed by the New York Insurance Circular Letter 1985-16 dated October 21, 1985.

B. Troubled Debt Restructuring for Debtors

None

C. Other Disclosures

Assets in the amount of \$5,735,512 and \$5,727,813 at December 31, 2016 and 2015 respectively, were on deposit with government authorities as required by state law.

D. Business Interruptions Insurance Recoveries

None

E. State Transferable and Non-transferable Tax Credits

None

F. Subprime-Mortgage-Related Risk Exposure

None

G. Insurance-linked Securities (ILS)

None

Note 22 - Events Subsequent

None

Note 23 – Reinsurance**A. Unsecured Reinsurance Recoverables**

None

B. Reinsurance Recoverables in Dispute

None

C. Reinsurance Assumed and Ceded and Protected Cells

1. The following table summarizes ceded and assumed unearned premiums and the related commission equity at the end of the current year:

	Assumed Reinsurance		Ceded Reinsurance		Net Reinsurance	
	Unearned Premium	Commission Equity	Unearned Premium	Commission Equity	Unearned Premium	Commission Equity
	\$ 95,937,837	\$ -	\$ 293,854,492	\$ -	\$ (197,916,655)	\$ -
Affiliates	\$ 95,937,837	\$ -	\$ 293,854,492	\$ -	\$ (197,916,655)	\$ -
All others	42,393,910	576,305	-	-	42,393,910	576,305
Total	<u>\$ 138,331,747</u>	<u>\$ 576,305</u>	<u>\$ 293,854,492</u>	<u>\$ -</u>	<u>\$ (155,522,745)</u>	<u>\$ 576,305</u>

Direct Unearned Premium Reserve:

\$ 251,460,583

NOTES TO FINANCIAL STATEMENTS

2. The additional or return commission, predicated on loss experience or on any other form of profit sharing arrangements in this annual statement as a result of existing contractual arrangements are accrued as follows:

	Direct	Assumed	Ceded	Net
Contingent Commissions	\$ 2,599,656	\$ -	\$ -	\$ 2,599,656
Sliding Scale Adjustments	-	-	-	-
Total	\$ 2,599,656	\$ -	\$ -	\$ 2,599,656

3. The Company does not use protected cells as an alternative to traditional reinsurance.

D. Uncollectible Reinsurance

None

E. Commutation of Ceded Reinsurance

None

F. Retroactive Reinsurance

None

G. Reinsurance Accounted for as a Deposit

None

H. Disclosure for the Transfer of Property and Casualty Run Off Agreements

None

I. Certified Reinsurer Rating Downgraded or Status Subject to Revocation

None

J. Reinsurance Agreements Qualifying for Reinsurer Aggregation

None

Note 24 - Retrospectively Rated Contracts & Contracts Subject to Redetermination

A. Method Used to Estimate

The Company is a member company of American Nuclear Insurers (ANI). ANI is a voluntary, non-profit, unincorporated association of insurers through which members provide, on several and not joint basis, property insurance protection and nuclear energy liability insurance protection. This protection covers hazards arising out of risks related to nuclear installations, operations or facilities. Membership is on a percentage participation basis with this percentage being applied through each pool in which the member participates. Members can increase their participation percentages at any time; however, this increase is only effective upon ANI Board of Directors approval. Members can also terminate or reduce their participation by giving written notice to the Association by June 30th of any calendar year with the effective date for the termination or reduction being December 31st of that year. Members may participate in the pool by being a direct writing member, a ceding member, an assuming member or any combination of the three. ACIC is a direct writing member.

B. Method Used to Record (Written or Earned)

The Company records the retrospective reserve by adjusting the unearned premium reserve.

C. Amount and Percent of Net Retrospective Premiums

None

D. Medical Loss Ratio Rebates

None

E. Calculation of Non-admitted Accrued Retrospective Premiums

None

F. Risk-Sharing Provisions of the Affordable Care Act (ACA)

None

Note 25 - Change in Incurred Losses and Loss Adjustment Expenses

A. Reasons for Changes Prior Year Incurred

Current year losses and LAE reflected on the Statement of Income of \$147,342,760 were higher by \$3,979,760 due to unfavorable development of prior year estimates. This deficiency was 4.54% of the unpaid losses and LAE of \$87,601,884 as of prior year-end.

Note 26 - Intercompany Pooling Arrangements

Companies, Percentages, Lines of Business, Non-Affiliated Reinsurance, Right of Direct Recovery and Sharing of Schedule F Penalty and Write-offs and Amounts Due to/from Lead Entity Participants.

The Company and its insurance affiliates have an inter-company reinsurance pooling agreement in which the companies share underwriting profit and losses in proportion to the pool participation percentages. The pooling agreement permits all companies to rely on the capacity of the entire pool rather than on their own capital and surplus.

NOTES TO FINANCIAL STATEMENTS

Effective January 1, 2015, the pooling agreement was expanded to include affiliate company Cube Insurance Company. The pooling percentages were revised to reflect the ratio of each subsidiary policyholders' surplus to the aggregate policyholders' surplus at December 31, 2014. The resulting revised percentages are as follows:

Company	NAIC Code	2016	2015
The lead company The Commerce Insurance Company	34754	65.1%	65.1%
Affiliate company Citation Insurance Company	40274	8.1%	8.1%
Affiliate company American Commerce Insurance Company	19941	9.8%	9.8%
Affiliate company Commerce West Insurance Company	13161	5.4%	5.4%
Affiliate company MAPFRE Insurance Company of New York	25275	5.0%	5.0%
Affiliate company MAPFRE Insurance Company of Florida	34932	3.4%	3.4%
Affiliate company MAPFRE Insurance Company	23876	2.4%	2.4%
Affiliate company Cube Insurance Company	15736	0.8%	0.8%
		100.0%	100.0%

The Commerce Insurance Company (CIC), as the lead company, assumes the direct and third party assumed business of its affiliates. All external reinsurance, in the form of catastrophe, quota share, facultative and excess of loss contracts, is ceded to the external reinsurers by CIC under the terms of the reinsurance contracts. CIC then cedes the net business after external reinsurance back to its affiliates at the stated pooled participation percentages.

Note 27 - Structured Settlements

A. Reserves Released Due to the Purchase of Annuities

None

B. Annuity Interest with Balances Due Greater than 1% of Policyholders' Surplus

None

Note 28 - Health Care Receivables

None

Note 29 - Participating Policies

Not Applicable

Note 30 - Premium Deficiency Reserves

The Company evaluated the need to record a premium deficiency reserve as of the end of the current year. This evaluation was completed on February 22, 2017 and it was determined that the Company did not have a premium deficiency reserve. The Company anticipates investment income as a factor in the premium deficiency calculation.

Note 31 - High Deductibles

None

Note 32 - Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

Not Applicable

Note 33 - Asbestos/Environmental Reserves

A,B,C.

None

D. Five-Year Rollforward of Environmental Reserves, Direct, Assumed and Net

		2012	2013	2014	2015	2016
1. Environmental, Direct						
a. Beg Reserves incl case, bulk, IBNR & LAE	\$ 43,434	\$ 53,749	\$ 19,777	\$ -	\$ 149,012	
b. Losses & LAE Incurred	118,146	(28,732)	(4,528)	155,372	(25,564)	
c. Calendar year payments for loss & LAE	107,831	5,240	15,249	6,360	1,120	
d. End Reserves incl case, bulk, IBNR & LAE	\$ 53,749	\$ 19,777	\$ -	\$ 149,012	\$ 122,328	
2. Environmental, Assumed						
a. Beg Reserves incl case, bulk, IBNR & LAE	\$ 357,258	\$ 294,127	\$ 177,475	\$ 201,504	\$ 231,613	
b. Losses & LAE Incurred	390,107	83,154	230,065	54,207	11,766	
c. Calendar year payments for loss & LAE	453,238	199,806	206,036	24,098	20,403	
d. End Reserves incl case, bulk, IBNR & LAE	\$ 294,127	\$ 177,475	\$ 201,504	\$ 231,613	\$ 222,976	
3. Environmental, Net						
a. Beg Reserves incl case, bulk, IBNR & LAE	\$ 357,258	\$ 294,127	\$ 177,475	\$ 201,504	\$ 231,613	
b. Losses & LAE Incurred	390,107	83,154	230,065	54,207	11,766	
c. Calendar year payments for loss & LAE	453,238	199,806	206,036	24,098	20,403	
d. End Reserves incl case, bulk, IBNR & LAE	\$ 294,127	\$ 177,475	\$ 201,504	\$ 231,613	\$ 222,976	

E. Environmental IBNR and Bulk Reserve, Direct, Assumed and Net

None

F. Environmental LAE Reserve, Direct, Assumed and Net

None

Note 34 - Subscriber Savings Accounts

None

Note 35 - Multiple Peril Crop Insurance

None

NOTES TO FINANCIAL STATEMENTS

Note 36 - Financial Guaranty Insurance

A,B. Not Applicable

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES****GENERAL**

1.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes [X] No []
If yes, complete Schedule Y, Parts 1, 1A and 2.

1.2 If yes, did the reporting entity register and file with its domiciliary State Insurance Commissioner, Director or Superintendent or with such regulatory official of the state of domicile of the principal insurer in the Holding Company System, a registration statement providing disclosure substantially similar to the standards adopted by the National Association of Insurance Commissioners (NAIC) in its Model Insurance Holding Company System Regulatory Act and model regulations pertaining thereto, or is the reporting entity subject to standards and disclosure requirements substantially similar to those required by such Act and regulations? Yes [X] No [] N/A []

1.3 State regulating? OHIO

2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes [] No [X]

2.2 If yes, date of change:

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

12/31/2013

3.2 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

3.3 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

3.4 By what department or departments?

STATE OF OHIO DEPARTMENT OF INSURANCE

3.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with departments? Yes [] No [] N/A [X]

3.6 Have all of the recommendations within the latest financial examination report been complied with? Yes [] No [] N/A [X]

4.1 During the period covered by this statement, did any agent, broker, sales representative, non-affiliated sales/service organization or any combination thereof under common control (other than salaried employees of the reporting entity) receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:

4.11 sales of new business?

Yes [] No [X]

4.12 renewals?

Yes [] No [X]

4.2 During the period covered by this statement, did any sales/service organization owned in whole or in part by the reporting entity or an affiliate, receive credit or commissions for or control a substantial part (more than 20 percent of any major line of business measured on direct premiums) of:

4.21 sales of new business?

Yes [] No [X]

4.22 renewals?

Yes [] No [X]

5.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes [] No [X]

5.2 If yes, provide the 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 NAIC Company Code	3 State of Domicile
Name of Entity		

6.1 Has the reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes [] No [X]

6.2 If yes, give full information:

7.1 Does any foreign (non-United States) person or entity directly or indirectly control 10% or more of the reporting entity? Yes [X] No []

7.2 If yes,

7.21 State the percentage of foreign control

100.000%

7.22 State the nationality(s) of the foreign person(s) or entity(s); or if the entity is a mutual or reciprocal, the nationality of its manager or attorney-in-fact and identify the type of entity(s) (e.g., individual, corporation, government, manager or attorney-in-fact).

1 Nationality	2 Type of Entity
Spain	Corporation

8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes [] No [X]

8.2 If response to 8.1 is yes, please identify the name of the bank holding company.

8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes [] No [X]

8.4 If the response to 8.3 is yes, please provide below the names and locations (city and state of the main office) of any affiliates regulated by a federal financial regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

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

9. What is the name and address of the independent certified public accountant or accounting firm retained to conduct the annual audit?

KPMG, 100 Westminster Street, Suite 6A, Providence RI, 02903

10.1 Has the insurer been granted any exemptions to the prohibited non-audit services provided by the certified independent public accountant requirements as allowed in Section 7H of the Annual Financial Reporting Model Regulation (Model Audit Rule), or substantially similar state law or regulation? Yes [] No [X]

10.2 If the response to 10.1 is yes, provide information related to this exemption:

10.3 Has the insurer been granted any exemptions related to other requirements of the Annual Financial Reporting Model Regulation as allowed for in Section 18A of the Model Regulation, or substantially similar state law or regulation? Yes [] No [X]

10.4 If the response to 10.3 is yes, provide information related to this exemption:

10.5 Has the reporting entity established an Audit Committee in compliance with the domiciliary state insurance laws? Yes [X] No [] N/A []

10.6 If the response to 10.5 is no or n/a, please explain:

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES**

11. What is the name, address and affiliation (officer/employee of the reporting entity or actuary/consultant associated with an actuarial consulting firm) of the individual providing the statement of actuarial opinion/certification?

Warren Ehrlich, F.C.A.S., Assistant Vice President - Officer - Actuary - Commerce Insurance Company, 211 Main Street, Webster, MA 01570

12.1 Does the reporting entity own any securities of a real estate holding company or otherwise hold real estate indirectly? Yes [] No [X]

12.11 Name of real estate holding company _____
12.12 Number of parcels involved _____
12.13 Total book/adjusted carrying value \$ _____ 0

12.2 If yes, provide explanation

13. FOR UNITED STATES BRANCHES OF ALIEN REPORTING ENTITIES ONLY:

13.1 What changes have been made during the year in the United States manager or the United States trustees of the reporting entity?

13.2 Does this statement contain all business transacted for the reporting entity through its United States Branch on risks wherever located? Yes [] No []

13.3 Have there been any changes made to any of the trust indentures during the year? Yes [] No []

13.4 If answer to (13.3) is yes, has the domiciliary or entry state approved the changes? Yes [] No [] N/A []

14.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? Yes [X] No []

(a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
(b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
(c) Compliance with applicable governmental laws, rules and regulations;
(d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
(e) Accountability for adherence to the code.

14.11 If the response to 14.1 is no, please explain:

14.2 Has the code of ethics for senior managers been amended? Yes [] No [X]

14.21 If the response to 14.2 is yes, provide information related to amendment(s).

14.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [] No [X]

14.31 If the response to 14.3 is yes, provide the nature of any waiver(s).

15.1 Is the reporting entity the beneficiary of a Letter of Credit that is unrelated to reinsurance where the issuing or confirming bank is not on the SVO Bank List? Yes [] No [X]

15.2 If the response to 15.1 is yes, indicate the American Bankers Association (ABA) Routing Number and the name of the issuing or confirming bank of the Letter of Credit and describe the circumstances in which the Letter of Credit is triggered.

1 American Bankers Association (ABA) Routing Number	2 Issuing or Confirming Bank Name	3 Circumstances That Can Trigger the Letter of Credit	4 Amount

BOARD OF DIRECTORS

16. Is the purchase or sale of all investments of the reporting entity passed upon either by the Board of Directors or a subordinator committee thereof? Yes [X] No []
17. Does the reporting entity keep a complete permanent record of the proceedings of its Board of Directors and all subordinate committees thereof? Yes [X] No []
18. Has the reporting entity an established procedure for disclosure to its Board of Directors or trustees of any material interest or affiliation on the part of any of its officers, directors, trustees or responsible employees that is in conflict or is likely to conflict with the official duties of such person? Yes [X] No []

FINANCIAL

19. Has this statement been prepared using a basis of accounting other than Statutory Accounting Principles (e.g., Generally Accepted Accounting Principles)? Yes [] No [X]

20.1 Total amount loaned during the year (inclusive of Separate Accounts, exclusive of policy loans):

20.11 To directors or other officers	\$ _____ 0
20.12 To stockholders not officers	\$ _____ 0
20.13 Trustees, supreme or grand (Fraternal only)	\$ _____ 0

20.2 Total amount of loans outstanding at the end of year (inclusive of Separate Accounts, exclusive of policy loans):

20.21 To directors or other officers	\$ _____ 0
20.22 To stockholders not officers	\$ _____ 0
20.23 Trustees, supreme or grand (Fraternal only)	\$ _____ 0

21.1 Were any assets reported in this statement subject to a contractual obligation to transfer to another party without the liability for such obligation being reporting in the statement? Yes [] No [X]

21.2 If yes, state the amount thereof at December 31 of the current year:

21.21 Rented from others	\$ _____
21.22 Borrowed from others	\$ _____
21.23 Leased from others	\$ _____
21.24 Other	\$ _____

22.1 Does this statement include payments for assessments as described in the *Annual Statement Instructions* other than guaranty fund or guaranty association assessments? Yes [] No [X]

22.2 If answer is yes:

22.21 Amount paid as losses or risk adjustment	\$ _____
22.22 Amount paid as expenses	\$ _____
22.23 Other amounts paid	\$ _____

23.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [X] No []

23.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ _____ 0

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES****INVESTMENT**

24.01 Were all of stocks, bonds and other securities owned December 31 of current year, over which the reporting entity has exclusive control, in the actual possession of the reporting entity on said date (other than securities lending programs addressed in 24.03)? Yes [X] No []

24.02 If no, give full and complete information, relating thereto:

24.03 For security lending programs, provide a description of the program including value for collateral and amount of loaned securities, and whether collateral is carried on or off-balance sheet (an alternative is to reference Note 17 where this information is also provided).

24.04 Does the company's security lending program meet the requirements for a conforming program as outlined in the *Risk-Based Capital Instructions*? Yes [] No [] N/A [X]

24.05 If answer to 24.04 is yes, report amount of collateral for conforming programs. \$ _____

24.06 If answer to 24.04 is no, report amount of collateral for other programs \$ _____

24.07 Does your securities lending program require 102% (domestic securities) and 105% (foreign securities) from the counterparty at the outset of the contract? Yes [] No [] N/A [X]

24.08 Does the reporting entity non-admit when the collateral received from the counterparty falls below 100%? Yes [] No [] N/A [X]

24.09 Does the reporting entity or the reporting entity's securities lending agent utilize the Master Securities Lending Agreement (MSLA) to conduct securities lending? Yes [] No [] N/A [X]

24.10 For the reporting entity's security lending program, state the amount of the following as of December 31 of the current year:

24.101 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ _____ 0

24.102 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ _____ 0

24.103 Total payable for securities lending reported on the liability page: \$ _____ 0

25.1 Were any of the stocks, bonds or other assets of the reporting entity owned at December 31 of the current year not exclusively under the control of the reporting entity or has the reporting entity sold or transferred any assets subject to a put option contract that is current in force? (Exclude securities subject to Interrogatory 21.1 and 24.03.) Yes [X] No []

25.2 If yes, state the amount thereof at December 31 of the current year:

25.21 Subject to repurchase agreements \$ _____ 0

25.22 Subject to reverse repurchase agreements \$ _____ 0

25.23 Subject to dollar repurchase agreements \$ _____ 0

25.24 Subject to reverse dollar repurchase agreements \$ _____ 0

25.25 Placed under option agreements \$ _____ 0

25.26 Letter stock or securities restricted as sale – excluding FHLB Capital Stock \$ _____ 0

25.27 FHLB Capital Stock \$ _____ 0

25.28 On deposit with states \$ _____ 5,735,512

25.29 On deposit with other regulatory bodies \$ _____ 0

25.30 Pledged as collateral – excluding collateral pledged to an FHLB \$ _____ 0

25.31 Pledged as collateral to FHLB – including assets backing funding agreements \$ _____ 0

25.32 Other \$ _____ 0

25.3 For category (25.26) provide the following:

1 Nature of Restriction	2 Description	3 Amount
		\$ _____

26.1 Does the reporting entity have any hedging transactions reported on Schedule DB? Yes [] No [X]

26.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A [X]
If no, attach a description with this statement.

27.1 Were any preferred stocks or bonds owned as of December 31 of the current year mandatorily convertible into equity, or, at the option of the issuer, convertible into equity? Yes [] No [X]

27.2 If yes, state the amount thereof at December 31 of the current year: \$ _____

28.1 Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes [X] No []

28.01 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's Address
Bank of New York Mellon	One Wall Street, New York, NY

28.02 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)

28.03 Have there been any changes, including name changes, in the custodian(s) identified in 28.01 during the current year? Yes [] No [X]

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

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

28.05 Investment management – Identify all investment advisors, investment managers, broker/dealers, including individuals that have the authority to make investment decisions on behalf of the reporting entity. For assets that are managed internally by employees of the reporting entity, note as such. ["...that have access to the investment accounts", "... handle securities"].

1 Name of Firm or Individual	2 Affiliation
Eric Trigilio	I

GENERAL INTERROGATORIES**PART 1 - COMMON INTERROGATORIES**

28.0597 For those firms/individuals listed in the table for Question 28.05, do any firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") manage more than 10% of the reporting entity's assets?

Yes [] No []

28.0598 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 28.05, does the total assets under management aggregate to more than 50% of the reporting entity's assets?

Yes [] No []

28.06 For those firms or individuals listed in the table for 28.05 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed

29.1 Does the reporting entity have any diversified mutual funds reported in Schedule D-Part 2 (diversified according to the Securities and Exchange Commission (SEC) in the Investment Company Act of 1940 [Section 5 (b) (1)])?

Yes [] No [X]

29.2 If yes, complete the following schedule:

1 CUSIP	2 Name of Mutual Fund	3 Book/Adjusted Carrying Value
29,2999 TOTAL		

29.3 For each mutual fund listed in the table above, complete the following schedule:

1 Name of Mutual Fund (from above table)	2 Name of Significant Holding of the Mutual Fund	3 Amount of Mutual Fund's Book/Adjusted Carrying Value Attributable to the Holding	4 Date of Valuation

30. Provide the following information for all short-term and long-term bonds and all preferred stocks. Do not substitute amortized value or statement value for fair value.

		1 Statement (Admitted) Value	2 Fair Value	3 Excess of Statement over Fair Value (-), or Fair Value over Statement (+)
30.1	Bonds	137,378,499	136,442,033	(936,466)
30.2	Preferred Stocks	789,374	816,090	26,716
30.3	Totals	138,167,873	137,258,123	(909,750)

30.4 Describe the sources or methods utilized in determining the fair values:

Custodial Bank

31.1 Was the rate used to calculate fair value determined by a broker or custodian for any of the securities in Schedule D?

Yes [X] No []

31.2 If the answer to 31.1 is yes, does the reporting entity have a copy of the broker's or custodian's pricing policy (hard copy or electronic copy) for all brokers or custodians used as a pricing source?

Yes [X] No []

31.3 If the answer to 31.2 is no, describe the reporting entity's process for determining a reliable pricing source for purposes of disclosure of fair value for Schedule D:

32.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* been followed?

Yes [X] No []

32.2 If no, list exceptions:

OTHER

33.1 Amount of payments to trade associations, service organizations and statistical or rating bureaus, if any?

\$ 105,199

33.2 List the name of the organization and the amount paid if any such payment represented 25% or more of the total payments to trade associations, service organizations and statistical or rating bureaus during the period covered by this statement.

1 Name	2 Amount Paid
National Insurance Crime Bureau Inc.	\$ 26,941

34.1 Amount of payments for legal expenses, if any?

\$ 106,024

34.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payments for legal expenses during the period covered by this statement.

1 Name	2 Amount Paid
	\$

35.1 Amount of payments for expenditures in connection with matters before legislative bodies, officers or departments of government, if any?

\$ 3,633

35.2 List the name of the firm and the amount paid if any such payment represented 25% or more of the total payment expenditures in connection with matters before legislative bodies, officers or departments of government during the period covered by this statement.

1 Name	2 Amount Paid
Thomas Cremin	\$ 3,528

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

1.1	Does the reporting entity have any direct Medicare Supplement Insurance in force?	Yes []	No [X]																		
1.2	If yes, indicate premium earned on U.S. business only.	\$	0																		
1.3	What portion of Item (1.2) is not reported on the Medicare Supplement Insurance Experience Exhibit?	\$	0																		
1.31	Reason for excluding:																				
1.4	Indicate amount of earned premium attributable to Canadian and/or Other Alien not included in Item (1.2) above.	\$	0																		
1.5	Indicate total incurred claims on all Medicare Supplement insurance.	\$	0																		
1.6	Individual policies:																				
	Most current three years:																				
1.61	Total premium earned	\$	0																		
1.62	Total incurred claims	\$	0																		
1.63	Number of covered lives		0																		
	All years prior to most current three years:																				
1.64	Total premium earned	\$	0																		
1.65	Total incurred claims	\$	0																		
1.66	Number of covered lives		0																		
1.7	Group policies:																				
	Most current three years:																				
1.71	Total premium earned	\$	0																		
1.72	Total incurred claims	\$	0																		
1.73	Number of covered lives		0																		
	All years prior to most current three years:																				
1.74	Total premium earned	\$	0																		
1.75	Total incurred claims	\$	0																		
1.76	Number of covered lives		0																		
2.	Health Test:																				
		1 Current Year	2 Prior Year																		
2.1	Premium Numerator	\$ 0	\$ 0																		
2.2	Premium Denominator	\$ 188,549,665	\$ 185,836,885																		
2.3	Premium Ratio (2.1/2.2)																				
2.4	Reserve Numerator	\$ 82,705	\$ 84,809																		
2.5	Reserve Denominator	\$ 196,139,812	\$ 189,375,112																		
2.6	Reserve Ratio (2.4/2.5)	0.042	0.045																		
3.1	Does the reporting entity issue both participating and non-participating policies?	Yes [] No [X]																			
3.2	If yes, state the amount of calendar year premiums written on:																				
3.21	Participating policies	\$ 0	0																		
3.22	Non-participating policies	\$ 0	0																		
4.	FOR MUTUAL REPORTING ENTITIES AND RECIPROCAL EXCHANGES ONLY:																				
4.1	Does the reporting entity issue assessable policies?	Yes []	No []																		
4.2	Does the reporting entity issue non-assessable policies?	Yes []	No []																		
4.3	If assessable policies are issued, what is the extent of the contingent liability of the policyholders?	%																			
4.4	Total amount of assessments paid or ordered to be paid during the year on deposit notes or contingent premiums.	\$ 0	0																		
5.	FOR RECIPROCAL EXCHANGES ONLY:																				
5.1	Does the exchange appoint local agents?	Yes []	No []																		
5.2	If yes, is the commission paid:																				
5.21	Out of Attorney's-in-fact compensation	Yes []	No []																		
5.22	As a direct expense of the exchange	Yes []	N/A []																		
5.3	What expenses of the exchange are not paid out of the compensation of the Attorney-in-fact?	Yes []	No []																		
5.4	Has any Attorney-in-fact compensation, contingent on fulfillment of certain conditions, been deferred?	Yes []	No []																		
5.5	If yes, give full information:																				
6.1	What provision has this reporting entity made to protect itself from an excessive loss in the event of a catastrophe under a workers' compensation contract issued without limit of loss?																				
6.2	Describe the method used to estimate this reporting entity's probable maximum insurance loss, and identify the type of insured exposures comprising that probable maximum loss, the locations of concentrations of those exposures and the external resources (such as consulting firms or computer software models), if any, used in the estimation process: The Probable Maximum Loss (PML) for Commerce, Citation, ACIC, MAPFRE NY, MIC and Commerce West, on other than automobile business, was calculated by two catastrophe modeling companies, Risk Management Solutions (v.15) and Applied Insurance Research (Touchstone v.3.1). We utilized a weighted average of RMS and AIR in order to determine our 100 and 250 year PMLs. Based on previous actual historical results, we weight the models at 75% for AIR and 25% for RMS. The weighted average estimated result from these two companies' analyses amounts to \$1.0 billion for a "100 year loss event" and \$1.7 billion for a "250 year loss event". MAPFRE Florida's estimated combined total loss was also calculated using a weighted average of RMS (v.13.1) results with AIR's results (Touchstone v.2.0) using the projected October 1, 2015 exposures. The weighted average amount of loss is \$22.4 million for a "100 year loss event" and \$35.2 million for a "250 year loss event".																				
6.3	What provision has this reporting entity made (such as catastrophic reinsurance program) to protect itself from an excessive loss arising from the types and concentrations of insured exposures comprising its probable maximum property insurance loss? The company along with its' affiliated companies has placed two reinsurance programs - one specifically for MAPFRE Florida and one for the remaining MAPFRE USA companies. The MAPFRE USA portion of the coverage is shown directly below: Mapfre USA (Effective July 1, 2016) <table border="1"><thead><tr><th>Layer</th><th>Quota Share Placed %</th><th>Pure CAT Placed %</th><th>Limit</th><th>Net Retention</th><th>Maximum Net Recovery First \$50 million</th></tr></thead><tbody><tr><td>million</td><td>70.00%</td><td>0.00%</td><td>\$50,000,000</td><td>\$15,000,000</td><td>\$1.55 billion x \$50 million</td></tr><tr><td>70.00%</td><td>30.00%</td><td>\$1,550,000,000</td><td>\$0</td><td>\$1,550,000,000</td><td>Total MAPFRE USA</td></tr></tbody></table>	Layer	Quota Share Placed %	Pure CAT Placed %	Limit	Net Retention	Maximum Net Recovery First \$50 million	million	70.00%	0.00%	\$50,000,000	\$15,000,000	\$1.55 billion x \$50 million	70.00%	30.00%	\$1,550,000,000	\$0	\$1,550,000,000	Total MAPFRE USA		
Layer	Quota Share Placed %	Pure CAT Placed %	Limit	Net Retention	Maximum Net Recovery First \$50 million																
million	70.00%	0.00%	\$50,000,000	\$15,000,000	\$1.55 billion x \$50 million																
70.00%	30.00%	\$1,550,000,000	\$0	\$1,550,000,000	Total MAPFRE USA																

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

\$1,600,000,000	\$15,000,000	\$1,585,000,000	As in prior years, the July 1, 2016 Program utilizes a combination of a Quota Share Treaty and CAT reinsurance. The QS Treaty, which excludes Florida risks, provides first dollar coverage for all layers including the first \$50 million of an event. It provides for a sliding scale commission based on loss ratio. The MAPFRE USA program had previously been expanded to cover comprehensive automobile. It also covers all FAIR Plan-type participation in excess of reinsurance purchased by any of the Plans. Lastly, an aggregate Property and Auto Comprehensive stop loss cover was purchased to protect against winter losses and/or the amalgamation of certain multiple smaller events and reduce the potential retained loss by \$60 million after a \$15 million retention, which is an increase over the prior year. MAPFRE Florida does not participate in the Quota Share and it has a stand-alone CAT program as depicted below: Mapfre Florida Protection Layer			
Placed %	Limit	Net Retention	Maximum Net Recovery	Initial Retention	(\$30 million x \$5 million)	100.00%
Retention	\$5,000,000	\$5,000,000	\$ 0	\$30 million x \$5 million		
\$30,000,000	\$ 0	\$30,000,000	Total	\$35,000,000	\$5,000,000	
\$30,000,000 MAPFRE Florida's Reinsurance purchase was increased from the past year to provide additional coverage in the state.				MAPFRE Florida will have no additional reinsurance recoveries for a single event catastrophe in excess of a total loss of \$35 million.		

6.4 Does the reporting entity carry catastrophe reinsurance protection for at least one reinstatement, in an amount sufficient to cover its estimated probable maximum loss attributable to a single loss event or occurrence? Yes [X] No []

6.5 If no, describe any arrangements or mechanisms employed by the reporting entity to supplement its catastrophe reinsurance program or to hedge its exposure to unreinsured catastrophic loss:

7.1 Has the reporting entity reinsured any risk with any other entity under a quota share reinsurance contract that includes a provision that would limit the reinsurer's losses below the stated quota share percentage (e.g., a deductible, a loss ratio corridor, a loss cap, an aggregate limit or any similar provisions)? Yes [X] No []

7.2 If yes, indicate the number of reinsurance contracts containing such provisions. 1

7.3 If yes, does the amount of reinsurance credit taken reflect the reduction in quota share coverage caused by any applicable limiting provision(s)? Yes [] No [X]

8.1 Has this reporting entity reinsured any risk with any other entity and agreed to release such entity from liability, in whole or in part, from any loss that may occur on this risk, or portion thereof, reinsured? Yes [] No [X]

8.2 If yes, give full information

9.1 Has the reporting entity ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates) for which during the period covered by the statement: (i) it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; (ii) it accounted for that contract as reinsurance and not as a deposit; and (iii) the contract(s) contain one or more of the following features or other features that would have similar results:

- (a) A contract term longer than two years and the contract is noncancelable by the reporting entity during the contract term;
- (b) A limited or conditional cancellation provision under which cancellation triggers an obligation by the reporting entity, or an affiliate of the reporting entity, to enter into a new reinsurance contract with the reinsurer, or an affiliate of the reinsurer;
- (c) Aggregate stop loss reinsurance coverage;
- (d) A unilateral right by either party (or both parties) to commute the reinsurance contract, whether conditional or not, except for such provisions which are only triggered by a decline in the credit status of the other party;
- (e) A provision permitting reporting of losses, or payment of losses, less frequently than on a quarterly basis (unless there is no activity during the period); or
- (f) Payment schedule, accumulating retentions from multiple years or any features inherently designed to delay timing of the reimbursement to the ceding entity?

Yes [] No [X]

9.2 Has the reporting entity during the period covered by the statement ceded any risk under any reinsurance contract (or under multiple contracts with the same reinsurer or its affiliates), for which, during the period covered by the statement, it recorded a positive or negative underwriting result greater than 5% of prior year-end surplus as regards policyholders or it reported calendar year written premium ceded or year-end loss and loss expense reserves ceded greater than 5% of prior year-end surplus as regards policyholders; excluding cessions to approved pooling arrangements or to captive insurance companies that are directly or indirectly controlling, controlled by, or under common control with (i) one or more unaffiliated policyholders of the reporting entity, or (ii) an association of which one or more unaffiliated policyholders of the reporting entity is a member where:

- (a) The written premium ceded to the reinsurer by the reporting entity or its affiliates represents fifty percent (50%) or more of the entire direct and assumed premium written by the reinsurer based on its most recently available financial statement; or
- (b) Twenty-five percent (25%) or more of the written premium ceded to the reinsurer has been retroceded back to the reporting entity or its affiliates in a separate reinsurance contract.

Yes [] No [X]

9.3 If yes to 9.1 or 9.2, please provide the following information in the Reinsurance Summary Supplemental Filing for General Interrogatory 9:

- (a) The aggregate financial statement impact gross of all such ceded reinsurance contracts on the balance sheet and statement of income;
- (b) A summary of the reinsurance contract terms and indicate whether it applies to the contracts meeting the criteria in 9.1 or 9.2; and
- (c) A brief discussion of management's principle objectives in entering into the reinsurance contract including the economic purpose to be achieved.

Yes [] No [X]

9.4 Except for transactions meeting the requirements of paragraph 31 of SSAP No. 62R, *Property and Casualty Reinsurance*, has the reporting entity ceded any risk under any reinsurance contract (or multiple contracts with the same reinsurer or its affiliates) during the period covered by the financial statement, and either:

- (a) Accounted for that contract as reinsurance (either prospective or retroactive) under statutory accounting principles ("SAP") and as a deposit under generally accepted accounting principles ("GAAP"); or
- (b) Accounted for that contract as reinsurance under GAAP and as a deposit under SAP?

Yes [] No [X]

9.5 If yes to 9.4, explain in the Reinsurance Summary Supplemental Filing for General Interrogatory 9 (Section D) why the contract(s) is treated differently for GAAP and SAP.

9.6 The reporting entity is exempt from the Reinsurance Attestation Supplement under one or more of the following criteria:

- (a) The entity does not utilize reinsurance; or
- (b) The entity only engages in a 100% quota share contract with an affiliate and the affiliated or lead company has filed an attestation supplement; or
- (c) The entity has no external cessions and only participates in an intercompany pool and the affiliated or lead company has filed an attestation supplement.

Yes [X] No []

10. If the reporting entity has assumed risks from another entity, there should be charged on account of such reinsurance a reserve equal to that which the original entity would have been required to charge had it retained the risks. Has this been done? Yes [X] No [] N/A []

11.1 Has the reporting entity guaranteed policies issued by any other entity and now in force? Yes [] No [X]

11.2 If yes, give full information

12.1 If the reporting entity recorded accrued retrospective premiums on insurance contracts on Line 15.3 of the assets schedule, Page 2, state the amount of corresponding liabilities recorded for:

12.11 Unpaid losses	\$	0
12.12 Unpaid underwriting expenses (including loss adjustment expenses)	\$	0

GENERAL INTERROGATORIES**PART 2 – PROPERTY & CASUALTY INTERROGATORIES**

12.2	Of the amount on Line 15.3, Page 2, state the amount that is secured by letters of credit, collateral and other funds?	\$ _____ 0			
12.3	If the reporting entity underwrites commercial insurance risks, such as workers' compensation, are premium notes or promissory notes accepted from its insureds covering unpaid premiums and/or unpaid losses?	Yes [] No [] N/A [X]			
12.4	If yes, provide the range of interest rates charged under such notes during the period covered by this statement:	% _____			
12.41	From	% _____			
12.42	To				
12.5	Are letters of credit or collateral and other funds received from insureds being utilized by the reporting entity to secure premium notes or promissory notes taken by a reporting entity, or to secure any of the reporting entity's reported direct unpaid loss reserves, including unpaid losses under loss deductible features of commercial policies?	Yes [] No [X]			
12.6	If yes, state the amount thereof at December 31 of current year:				
12.61	Letters of Credit	\$ 0			
12.62	Collateral and other funds	\$ 0			
13.1	Largest net aggregate amount insured in any one risk (excluding workers' compensation):	\$ 2,000,000			
13.2	Does any reinsurance contract considered in the calculation of this amount include an aggregate limit of recovery without also including a reinstatement provision?	Yes [X] No []			
13.3	State the number of reinsurance contracts (excluding individual facultative risk certificates, but including facultative programs, automatic facilities or facultative obligatory contracts) considered in the calculation of the amount.	1			
14.1	Is the reporting entity a cedant in a multiple cedant reinsurance contract?	Yes [] No [X]			
14.2	If yes, please describe the method of allocating and recording reinsurance among the cedants:				
14.3	If the answer to 14.1 is yes, are the methods described in item 14.2 entirely contained in the respective multiple cedant reinsurance contracts?	Yes [] No []			
14.4	If the answer to 14.3 is no, are all the methods described in 14.2 entirely contained in written agreements?	Yes [] No []			
14.5	If the answer to 14.4 is no, please explain:				
15.1	Has the reporting entity guaranteed any financed premium accounts?	Yes [] No [X]			
15.2	If yes, give full information				
16.1	Does the reporting entity write any warranty business?	Yes [] No [X]			
If yes, disclose the following information for each of the following types of warranty coverage:					
	1 Direct Losses Incurred	2 Direct Losses Unpaid	3 Direct Written Premium	4 Direct Premium Unearned	5 Direct Premium Earned
16.11	Home	\$ 0 \$	0 \$	0 \$	0 \$
16.12	Products	\$ 0 \$	0 \$	0 \$	0 \$
16.13	Automobile	\$ 0 \$	0 \$	0 \$	0 \$
16.14	Other*	\$ 0 \$	0 \$	0 \$	0 \$
* Disclose type of coverage:					
17.1	Does the reporting entity include amounts recoverable on unauthorized reinsurance in Schedule F-Part 3 that it excludes from Schedule F-Part 5.	Yes [] No [X]			
Incurred but not reported losses on contracts in force prior to July 1, 1984, and not subsequently renewed are exempt from inclusion in Schedule F-Part 5. Provide the following information for this exemption:					
17.11	Gross amount of unauthorized reinsurance in Schedule F-Part 3 excluded from Schedule F-Part 5	\$ 0			
17.12	Unfunded portion of Interrogatory 17.11	\$ 0			
17.13	Paid losses and loss adjustment expenses portion of Interrogatory 17.11	\$ 0			
17.14	Case reserves portion of Interrogatory 17.11	\$ 0			
17.15	Incurred but not reported portion of Interrogatory 17.11	\$ 0			
17.16	Unearned premium portion of Interrogatory 17.11	\$ 0			
17.17	Contingent commission portion of Interrogatory 17.11	\$ 0			
Provide the following information for all other amounts included in Schedule F-Part 3 and excluded from Schedule F-Part 5, not included above.					
17.18	Gross amount of unauthorized reinsurance in Schedule F-Part 3 excluded from Schedule F-Part 5	\$ 0			
17.19	Unfunded portion of Interrogatory 17.18	\$ 0			
17.20	Paid losses and loss adjustment expenses portion of Interrogatory 17.18	\$ 0			
17.21	Case reserves portion of Interrogatory 17.18	\$ 0			
17.22	Incurred but not reported portion of Interrogatory 17.18	\$ 0			
17.23	Unearned premium portion of Interrogatory 17.18	\$ 0			
17.24	Contingent commission portion of Interrogatory 17.18	\$ 0			
18.1	Do you act as a custodian for health savings accounts?	Yes [] No [X]			
18.2	If yes, please provide the amount of custodial funds held as of the reporting date.	\$ 0			
18.3	Do you act as an administrator for health savings accounts?	Yes [] No [X]			
18.4	If yes, please provide the balance of the funds administered as of the reporting date.	\$ 0			

American Commerce Insurance Company
FIVE-YEAR HISTORICAL DATA

Show amounts in whole dollars only, no cents; show percentages to one decimal place, i.e. 17.6.

	1 2016	2 2015	3 2014	4 2013	5 2012
Gross Premiums Written (Page 8, Part 1B, Cols. 1, 2 & 3)					
1. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	271,123,651	249,632,541	219,314,902	215,056,172	204,566,807
2. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	178,898,525	162,869,034	129,143,099	124,277,496	114,883,012
3. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	155,501,040	152,237,469	125,178,020	110,878,055	105,805,725
4. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	297,552	524,404	237,127	73,609	
5. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
6. Total (Line 35).....	605,820,768	565,263,448	473,873,148	450,285,332	425,255,544
Net Premiums Written (Page 8, Part 1B, Col. 6)					
7. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	104,421,161	104,096,831	89,547,285	87,321,763	88,446,872
8. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	74,315,962	71,404,966	60,199,252	58,673,345	58,786,241
9. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	14,697,487	14,228,852	25,360,192	22,748,082	21,041,930
10. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	13,899	24,579	10,319	3,198	
11. Nonproportional reinsurance lines (Lines 31, 32 & 33).....					
12. Total (Line 35).....	193,448,509	189,755,228	175,117,048	168,746,388	168,275,043
Statement of Income (Page 4)					
13. Net underwriting gain (loss) (Line 8).....	(7,548,928)	(19,263,189)	(7,990,274)	(3,695,060)	(3,715,421)
14. Net investment gain (loss) (Line 11).....	6,593,653	7,141,020	8,712,052	8,727,081	10,783,472
15. Total other income (Line 15).....	3,135,707	2,620,710	2,403,345	2,216,836	1,702,664
16. Dividends to policyholders (Line 17).....					
17. Federal and foreign income taxes incurred (Line 19).....	357,774	(3,001,015)	66,823	739,788	2,028,729
18. Net income (Line 20).....	1,822,659	(6,500,444)	3,058,300	6,509,069	6,741,986
Balance Sheet Lines (Pages 2 and 3)					
19. Total admitted assets excluding protected cell business (Page 2, Line 26, Col. 3).....	336,139,141	329,898,401	310,456,683	306,059,404	312,778,669
20. Premiums and considerations (Page 2, Col. 3):					
20.1 In course of collection (Line 15.1).....	87,529,176	84,189,292	59,478,457	56,861,485	45,263,362
20.2 Deferred and not yet due (Line 15.2).....					
20.3 Accrued retrospective premiums (Line 15.3).....					
21. Total liabilities excluding protected cell business (Page 3, Line 26).....	227,877,822	225,052,023	206,772,475	194,064,754	194,627,508
22. Losses (Page 3, Line 1).....	76,283,509	72,233,423	63,120,672	55,632,980	53,198,460
23. Loss adjustment expenses (Page 3, Line 3).....	15,304,370	15,368,461	13,820,472	13,826,366	14,400,154
24. Unearned premiums (Page 3, Line 9).....	95,937,837	91,038,992	87,120,649	83,662,569	79,298,057
25. Capital paid up (Page 3, Lines 30 & 31).....	3,226,140	3,226,140	3,226,140	3,226,140	3,226,140
26. Surplus as regards policyholders (Page 3, Line 37).....	108,261,319	104,846,378	103,684,208	111,994,650	118,151,160
Cash Flow (Page 5)					
27. Net cash from operations (Line 11).....	2,381,845	(20,745,076)	8,538,145	17,211,492	9,755,826
Risk-Based Capital Analysis					
28. Total adjusted capital.....	108,261,319	104,846,378	103,684,208	111,994,650	118,151,160
29. Authorized control level risk-based capital.....	11,446,106	11,130,583	10,767,779	10,006,923	8,737,449
Percentage Distribution of Cash, Cash Equivalents and Invested Assets (Page 2, Col. 3) (Item divided by Page 2, Line 12, Col. 3) x 100.0					
30. Bonds (Line 1).....	100.4	94.4	97.6	93.2	94.0
31. Stocks (Lines 2.1 & 2.2).....	0.6	1.1	1.5	1.3	1.4
32. Mortgage loans on real estate (Lines 3.1 & 3.2).....					
33. Real estate (Lines 4.1, 4.2 & 4.3).....	0.9	1.1	1.0	1.0	1.0
34. Cash, cash equivalents and short-term investments (Line 5).....	(1.9)	3.5	(0.1)	4.5	3.7
35. Contract loans (Line 6).....					
36. Derivatives (Line 7).....					
37. Other invested assets (Line 8).....					
38. Receivables for securities (Line 9).....					
39. Securities lending reinvested collateral assets (Line 10).....					
40. Aggregate write-ins for invested assets (Line 11).....					
41. Cash, cash equivalents and invested assets (Line 12).....	100.0	100.0	100.0	100.0	100.0
Investments in Parent, Subsidiaries and Affiliates					
42. Affiliated bonds (Sch. D, Summary, Line 12, Col. 1).....					
43. Affiliated preferred stocks (Sch. D, Summary, Line 18, Col. 1).....					
44. Affiliated common stocks (Sch. D, Summary, Line 24, Col. 1).....					
45. Affiliated short-term investments (subtotals included in Schedule DA, Verification, Column 5, Line 10).....					
46. Affiliated mortgage loans on real estate.....					
47. All other affiliated.....					
48. Total of above lines 42 to 47.....	0	0	0	0	0
49. Total investment in parent included in Lines 42 to 47 above.....					
50. Percentage of investments in parent, subsidiaries and affiliates to surplus as regards policyholders (Line 48 above divided by Page 3, Col. 1, Line 37 x 100.0).....	0.0	0.0	0.0	0.0	0.0

Annual Statement for the year 2016 of the **American Commerce Insurance Company**
FIVE-YEAR HISTORICAL DATA
(Continued)

	1 2016	2 2015	3 2014	4 2013	5 2012
Capital and Surplus Accounts (Page 4)					
51. Net unrealized capital gains (losses) (Line 24).....	392,483(408,658)(493,176)(122,584)330,723
52. Dividends to stockholders (Line 35).....		(11,199,465)(11,815,116)(12,876,826)
53. Change in surplus as regards policyholders for the year (Line 38).....	3,414,9411,162,170(8,310,442)(6,156,510)(10,617,097)
Gross Losses Paid (Page 9, Part 2, Cols. 1 & 2)					
54. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	173,809,002149,016,615143,235,923137,597,900134,440,568
55. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	100,817,90890,764,82276,969,93069,766,74173,517,396
56. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	68,274,16785,867,72863,131,06660,736,40265,209,515
57. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	478,698487,715248,50118,736(164,505)
58. Nonproportional reinsurance lines (Lines 31, 32 & 33).....3,3593238076,661(11,322)
59. Total (Line 35).....	343,383,134326,137,203283,586,227268,126,440272,991,652
Net Losses Paid (Page 9, Part 2, Col. 4)					
60. Liability lines (Lines 11.1, 11.2, 16, 17.1, 17.2, 17.3, 18.1, 18.2, 19.1, 19.2 & 19.3, 19.4).....	69,264,88759,936,77057,024,96055,977,71851,186,560
61. Property lines (Lines 1, 2, 9, 12, 21 & 26).....	44,365,24145,373,40636,630,51533,204,94932,819,394
62. Property and liability combined lines (Lines 3, 4, 5, 8, 22 & 27).....	6,745,51818,110,09611,048,83410,764,23512,643,980
63. All other lines (Lines 6, 10, 13, 14, 15, 23, 24, 28, 29, 30 & 34).....	25,956139,96911,9884,421(164,505)
64. Nonproportional reinsurance lines (Lines 31, 32 & 33).....3,3593238076,661(11,322)
65. Total (Line 35).....	120,404,961123,560,564104,717,10499,957,98496,474,107
Operating Percentages (Page 4) (Item divided by Page 4, Line 1) x 100.0					
66. Premiums earned (Line 1).....	100.0100.0100.0100.0100.0
67. Losses incurred (Line 2).....	66.071.465.462.362.9
68. Loss expenses incurred (Line 3).....	12.112.711.211.212.1
69. Other underwriting expenses incurred (Line 4).....	25.926.328.128.827.3
70. Net underwriting gain (loss) (Line 8).....(4.0)(10.4)(4.7)(2.2)(2.3)
Other Percentages					
71. Other underwriting expenses to net premiums written (Page 4, Lines 4 + 5 - 15 divided by Page 8, Part 1B, Col. 6, Line 35 x 100.0).....	23.624.426.126.725.5
72. Losses and loss expenses incurred to premiums earned (Page 4, Lines 2 + 3 divided by Page 4, Line 1 x 100.0).....	78.184.176.673.575.0
73. Net premiums written to policyholders' surplus (Page 8, Part 1B, Col. 6, Line 35, divided by Page 3, Line 37, Col. 1 x 100.0).....	178.7181.0168.9150.7142.4
One Year Loss Development (000 omitted)					
74. Development in estimated losses and loss expenses incurred prior to current year (Schedule P, Part 2-Summary, Line 12, Col. 11).....	3,3903,5057,2355,4421,655
75. Percent of development of losses and loss expenses incurred to policyholders' surplus of prior year-end (Line 74 above divided by Page 4, Line 21, Col. 1 x 100).....	3.23.46.54.61.3
Two Year Loss Development (000 omitted)					
76. Development in estimated losses and loss expenses incurred 2 years before the current year and prior year (Schedule P, Part 2-Summary, Line 12, Col. 12).....	4,7779,06411,4819,5892,471
77. Percent of development of losses and loss expenses incurred to reported policyholders' surplus of second prior-year end (Line 76 above divided by Page 4, Line 21, Col. 2 x 100.0).....	4.68.19.77.41.8

If a party to a merger, have the two most recent years of this exhibit been restated due to a merger in compliance with the disclosure requirements of SSAP No. 3, *Accounting Changes and Correction of Errors*?

Yes No

If no, please explain:

SCHEDULE P - ANALYSIS OF LOSSES AND LOSS EXPENSES**SCHEDULE P - PART 1 - SUMMARY**

(\$000 Omitted)

Years in Which Premiums Were Earned and Losses Were Incurred	Premiums Earned			Loss and Loss Expense Payments								12 Number of Claims Reported-Direct and Assumed	
	1 Direct and Assumed	2 Ceded	3 Net (Cols. 1 - 2)	Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments		10 Salvage and Subrogation Received	11 Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9)		
				4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded				
1. Prior.....	XXX.....	XXX.....	XXX.....59437920687	XXX.....	
2. 2007.....	197,511	17,442	180,069	108,808	11,017	4,382	653	15,518	1,307	23,690	115,731	XXX.....	
3. 2008.....	186,196	15,725	170,471	109,739	9,374	4,111	553	16,564	982	23,111	119,505	XXX.....	
4. 2009.....	173,372	10,572	162,801	105,543	4,719	4,153	362	15,365	490	22,685	119,490	XXX.....	
5. 2010.....	177,169	8,944	168,225	115,413	2,103	4,713	184	15,642	204	24,212	133,277	XXX.....	
6. 2011.....	188,382	9,454	178,928	132,227	1,800	4,047	144	17,942	206	25,578	152,066	XXX.....	
7. 2012.....	190,376	14,358	176,018	112,222	4,398	2,994	324	17,223	235	24,559	127,482	XXX.....	
8. 2013.....	195,285	18,258	177,027	108,466	5,371	2,358	357	17,041	266	24,628	121,871	XXX.....	
9. 2014.....	204,185	19,321	184,864	112,557	6,489	1,798	357	18,515	335	25,006	125,689	XXX.....	
10. 2015.....	216,930	31,093	185,837	137,161	24,026	1,143	1,169	21,842	354	24,652	134,597	XXX.....	
11. 2016.....	236,767	48,219	188,548	89,840	11,313	441	615	16,714	268	14,113	94,799	XXX.....	
12. Totals.....	XXX.....	XXX.....	XXX.....	1,132,038	80,615	30,178	4,725	172,367	4,649	232,240	1,244,594	XXX.....	

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23 Salvage and Subrogation Anticipated	24 Total Net Losses and Expenses Unpaid	25 Number of Claims Outstanding-Direct and Assumed
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR		21	22			
	13 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded	Direct and Assumed	Ceded			
1. Prior.....52577302241171025513	XXX.....
2. 2007.....16431(59)(5)238168197	XXX.....
3. 2008.....222104(15)(23)411137102162	XXX.....
4. 2009.....34738(85)286511772910279	XXX.....
5. 2010.....74039(209)1193911710125672	XXX.....
6. 2011.....1,13720(388)261331326811858960	XXX.....
7. 2012.....2,546139(881)(10)336104452001202,102	XXX.....
8. 2013.....5,988390(1,654)31636198284282575,033	XXX.....
9. 2014.....11,215789(1,009)1671,187482082076070011,338	XXX.....
10. 2015.....20,1191,8598651,0732,07988423401,4411,86521,868	XXX.....
11. 2016.....35,0104,65616,8045,6882,79679654313,75710,84648,564	XXX.....
12. Totals.....78,0138,14213,3996,9877,4143061,4671496,878013,88591,587	XXX.....

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred/Premiums Earned)			Nontabular Discount		34 Inter-Company Pooling Participation Percentage	Net Balance Sheet Reserves after Discount		
	26 Direct and Assumed	27 Ceded	28 Net	29 Direct and Assumed	30 Ceded	31 Net	32 Loss	33 Loss Expense		35 Losses Unpaid	36 Loss Expenses Unpaid	
1. Prior..XXX.....XXX.....XXX.....XXX.....XXX.....XXX.....XXX.....47736	
2. 2007.....128,84413,017115,82765.274.664.39.807918	
3. 2008.....130,67611,008119,66770.270.070.29.8012537	
4. 2009.....125,4255,656119,76972.353.573.69.8019683	
5. 2010.....136,5042,556133,94977.028.679.69.80482190	
6. 2011.....155,2432,217153,02682.423.585.59.80703256	
7. 2012.....134,6855,101129,58470.735.573.69.801,537565	
8. 2013.....133,3466,442126,90468.335.371.79.803,9131,119	
9. 2014.....145,2328,204137,02771.142.574.19.809,2502,088	
10. 2015.....185,07428,609156,46585.392.084.29.8018,0523,816	
11. 2016.....166,01522,652143,36370.147.076.09.8041,4697,095	
12. Totals.....XXX.....XXX.....XXX.....XXX.....XXX.....XXX.....00XXX.....76,28415,304	

Note: Parts 2 and 4 are gross of all discounting, including tabular discounting. Part 1 is gross of only nontabular discounting, which is reported in Columns 32 and 33 of

Part 1. The tabular discount, if any, is reported in the Notes to Financial Statements, which will reconcile Part 1 with Parts 2 and 4.

SCHEDULE P - PART 2 - SUMMARY

Years in Which Losses Were Incurred	Incurred Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										DEVELOPMENT	
	1 2007	2 2008	3 2009	4 2010	5 2011	6 2012	7 2013	8 2014	9 2015	10 2016	11 One Year	12 Two Year
1. Prior....	37,159	35,213	33,643	33,262	33,669	33,783	33,930	34,075	33,997	34,027	30	(48)
2. 2007....	106,355	102,288	100,889	100,406	100,925	101,401	101,548	101,706	101,564	101,609	45	(97)
3. 2008....	XXX....	105,081	102,982	102,162	102,783	103,522	103,930	104,043	104,217	104,075	(142)	31
4. 2009....	XXX....	XXX....	106,639	103,095	103,421	103,937	104,502	104,831	104,889	104,865	(24)	34
5. 2010....	XXX....	XXX....	XXX....	115,657	113,482	114,599	116,783	118,111	118,277	118,410	133	299
6. 2011....	XXX....	XXX....	XXX....	XXX....	128,467	127,287	132,380	134,640	135,070	135,171	101	532
7. 2012....	XXX....	XXX....	XXX....	XXX....	XXX....	112,520	109,836	112,007	112,223	112,397	173	390
8. 2013....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	107,281	108,569	109,016	109,701	685	1,132
9. 2014....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	115,584	117,817	118,087	271	2,503
10. 2015....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	131,418	133,537	2,119	XXX....	XXX....
11. 2016....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	123,161	XXX....	XXX....
										12. Totals....	3,390	4,777

SCHEDULE P - PART 3 - SUMMARY

Years in Which Losses Were Incurred	Cumulative Paid Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)										11 Number of Claims Closed With Loss Payment	12 Number of Claims Closed Without Loss Payment
	1 2007	2 2008	3 2009	4 2010	5 2011	6 2012	7 2013	8 2014	9 2015	10 2016		
1. Prior....	000....	16,277	24,657	29,307	32,016	32,635	33,066	33,238	33,456	33,540	XXX....	XXX....
2. 2007....	64,249	85,575	92,692	96,722	99,380	100,764	101,300	101,448	101,493	101,520	XXX....	XXX....
3. 2008....	XXX....	65,214	88,619	95,119	99,797	102,137	103,207	103,621	103,869	103,923	XXX....	XXX....
4. 2009....	XXX....	XXX....	66,980	88,600	95,862	100,438	102,799	104,105	104,547	104,616	XXX....	XXX....
5. 2010....	XXX....	XXX....	XXX....	72,970	98,883	107,485	112,988	115,861	117,234	117,839	XXX....	XXX....
6. 2011....	XXX....	XXX....	XXX....	XXX....	90,080	114,808	123,843	129,837	132,670	134,329	XXX....	XXX....
7. 2012....	XXX....	XXX....	XXX....	XXX....	XXX....	71,910	95,404	102,981	108,240	110,495	XXX....	XXX....
8. 2013....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	68,705	91,176	100,229	105,096	XXX....	XXX....
9. 2014....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	74,793	98,472	107,510	XXX....	XXX....
10. 2015....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	87,449	113,110	XXX....	XXX....	XXX....
11. 2016....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	78,353	XXX....	XXX....	XXX....

SCHEDULE P - PART 4 - SUMMARY

Years in Which Losses Were Incurred	Bulk and IBNR Reserves on Net Losses and Defense and Cost Containment Expenses Reported at Year End (\$000 omitted)									
	1 2007	2 2008	3 2009	4 2010	5 2011	6 2012	7 2013	8 2014	9 2015	10 2016
1. Prior....	4,572	912	(1,547)	(294)	(957)	(311)	(95)	7	30	26
2. 2007....	14,256	2,764	.99	(300)	(869)	(502)	(154)	(41)	(6)	(59)
3. 2008....	XXX....	13,016	1,583	.857	(1,040)	(1,142)	(420)	(124)	(18)	4
4. 2009....	XXX....	XXX....	13,116	2,357	(876)	(1,406)	(1,111)	(288)	(70)	(113)
5. 2010....	XXX....	XXX....	XXX....	12,886	(831)	(2,669)	(3,161)	(1,091)	(433)	(215)
6. 2011....	XXX....	XXX....	XXX....	XXX....	11,145	(3,620)	(4,490)	(1,972)	(1,127)	(395)
7. 2012....	XXX....	XXX....	XXX....	XXX....	XXX....	15,293	(3,005)	(1,468)	(1,476)	(832)
8. 2013....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	8,340	(331)	(1,726)	(1,610)
9. 2014....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	10,541	.598	(988)
10. 2015....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	12,368	175
11. 2016....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	XXX....	11,738

American Commerce Insurance Company
SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Allocated by States and Territories

States, Etc.	1 Active Status	Gross Premiums, Including Policy and Membership Fees Less Return Premiums and Premiums on Policies Not Taken		4 Dividends Paid or Credited to Policyholders on Direct Business	5 Direct Losses Paid (Deducting Salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Finance and Service Charges not Included in Premiums	9 Direct Premiums Written for Federal Purchasing Groups (Incl. in Col. 2)
		2 Direct Premiums Written	3 Direct Premiums Earned						
1. Alabama.....	AL L.....	239,953	149,589		28,781	46,546	38,016		
2. Alaska.....	AK L.....	62,709	66,144		1,902	1,551	9,384		
3. Arizona.....	AZ L.....	4,044,726	4,561,208		3,079,518	2,435,890	1,587,609	12,201	
4. Arkansas.....	AR L.....	201,962	185,833		71,173	92,148	64,341		
5. California.....	CA L.....	3,763,311	2,314,178		1,094,086	884,137	54,786		
6. Colorado.....	CO L.....	2,730,352	2,758,414		1,378,210	1,360,699	69,118		
7. Connecticut.....	CT L.....	156,567,215	149,586,359		66,685,870	96,224,759	67,641,758	1,620,681	
8. Delaware.....	DE L.....	173,619	191,511		48,493	(1,044,450)	64,707		
9. District of Columbia.....	DC L.....	56,704	55,194		3,760	(274)	7,009		
10. Florida.....	FL L.....	1,328,509	1,256,730		632,917	623,209	282,035		
11. Georgia.....	GA L.....	638,145	581,339		187,875	197,707	194,650		
12. Hawaii.....	HI L.....	46,619	46,940		11,563	14,317	6,765		
13. Idaho.....	ID L.....	4,526,397	4,023,908		2,167,173	2,786,912	1,960,649	30,174	
14. Illinois.....	IL L.....	1,318,639	1,978,694		416,344	803,060	542,076		
15. Indiana.....	IN L.....	3,669,350	4,215,702		3,312,623	2,887,663	2,314,853	39,274	
16. Iowa.....	IA L.....	91,582	67,013		(1,957)	(2,967)	10,711		
17. Kansas.....	KS L.....	680,091	669,975		264,670	257,736	50,288		
18. Kentucky.....	KY L.....	5,120,916	5,480,497		2,807,818	2,681,219	2,293,482	.22,641	
19. Louisiana.....	LA L.....	400,284	324,356		76,210	92,507	152,306		
20. Maine.....	ME L.....	902,960	617,684		4,454	6,573	5,272		
21. Maryland.....	MD L.....	210,294	231,401		232,571	231,176	76,106		
22. Massachusetts.....	MA L.....	225,532	184,407		39,068	67,390	56,706		
23. Michigan.....	MI L.....	487,652	436,106		210,477	206,001	132,017		
24. Minnesota.....	MN L.....	345,244	309,115		98,185	61,468	86,330		
25. Mississippi.....	MS L.....	74,688	61,809		18,255	16,730	10,833		
26. Missouri.....	MO L.....	965,510	955,034		400,176	404,915	60,418		
27. Montana.....	MT L.....	74,151	80,225		230,674	215,454	14,768		
28. Nebraska.....	NE L.....	311,256	232,351		72,811	80,618	80,962		
29. Nevada.....	NV L.....	200,868	218,011		23,595	55,281	73,774		
30. New Hampshire.....	NH L.....	126,163	91,081		4,496	11,071	15,900		
31. New Jersey.....	NJ L.....	63,769,497	70,807,639		47,302,769	50,723,984	49,684,353	370,743	
32. New Mexico.....	NM L.....	149,532	74,855		49,237	58,308	23,838		
33. New York.....	NY L.....	1,218,062	1,337,369		3,418,826	3,791,181	4,288,104		
34. North Carolina.....	NC L.....	770,912	613,101		121,532	169,121	163,133		
35. North Dakota.....	ND L.....	23,242	22,387		5,872	10,176	14,279		
36. Ohio.....	OH L.....	24,112,024	23,394,736		14,110,072	15,036,623	10,370,647	.248,510	
37. Oklahoma.....	OK L.....	206,698	226,582		83,741	65,404	11,630		
38. Oregon.....	OR L.....	15,791,035	16,490,417		10,162,846	7,844,539	6,960,819	100,223	
39. Pennsylvania.....	PA L.....	816,300	402,565		379,491	298,283	2,002,411		
40. Rhode Island.....	RI L.....	53,445,638	50,380,094		29,519,503	29,252,442	23,644,729	330,418	
41. South Carolina.....	SC L.....	438,745	313,309		169,543	159,271	68,748		
42. South Dakota.....	SD L.....	36,872	34,424		8,362	14,491	75,714		
43. Tennessee.....	TN L.....	15,822,155	14,571,872		8,556,390	8,921,906	5,422,110	121,360	
44. Texas.....	TX L.....	1,116,733	1,131,829		285,647	299,581	310,375		
45. Utah.....	UT L.....	142,284	157,676		181,441	149,177	81,614		
46. Vermont.....	VT L.....	236,864	191,697		2,225	(1,012)	4,278		
47. Virginia.....	VA L.....	419,223	366,415		381,417	397,082	100,334		
48. Washington.....	WA L.....	23,527,960	25,002,742		17,596,610	13,090,195	9,744,994	137,826	
49. West Virginia.....	WV L.....	10,368	13,906		2,119	1,743	2,145		
50. Wisconsin.....	WI L.....	338,370	309,000		53,616	71,863	70,707		
51. Wyoming.....	WY L.....	33,176	32,278		28,766	32,147	11,884		
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	0	0
59. Totals.....	(a) 51	392,011,091	387,805,701	0	216,021,816	242,085,551	191,014,473	3,034,051	0

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	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above)	XXX	0	0	0	0	0	0	0	0

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

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

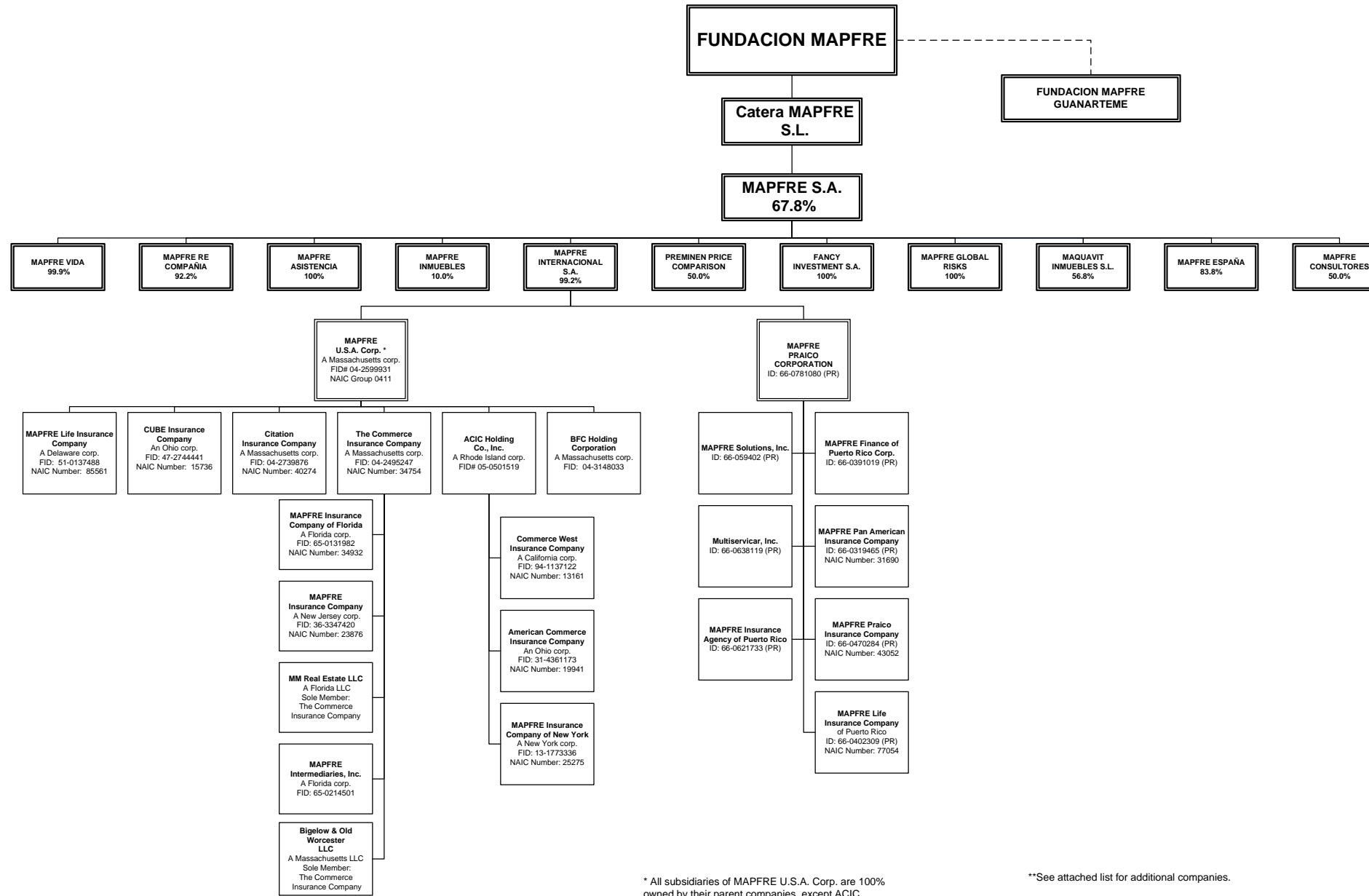
(E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state; (N) - None of the above - Not allowed to write business in the state.

Explanation of Basis of Allocation of Premiums by States, etc.

Premiums are allocated to those states where the insured risks are located: principal garage for automobile, physical address for homeowners, commercial multiple peril and other liability.

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.

MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.

POLICLINICO SALUD 4, S.A.

CLUB MAPFRE, S.A.

MAPFRE AUTOMOCION S.A.U.

CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.

VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.

MULTISERVICIOS MAPFRE MULTIMAP, S.A.

MAPFRE TECH

MAPFRE VIDEO Y COMUNICACION, S.A.

DISENO URBANO, S.L.

SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.

MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.

FINLOG-ALUGUER E COMERCIO DE AUTOMOVEIS, S.A.

LAETANA SEGUROS GENERALES

MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY

SERVICIOS DE PERITACION MAPFRE S.A.

AGROSEGURO, S.A.

IBERICAR, SOCIEDAD IBERICA DEL AUTOMOVIL, S.A.

ONLINE SHOPPING CLUB EUROPE, S.L.

BANKINTER SEGUROS GENERALES, S.A.

RASTREATORE.COM LTD

ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.

AUDATEX ESPANA, S.A.

INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.

TECHNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.

MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.

FUNESPAÑA, S.A.

FUNERARIA PEDROLA, S.L.

TANATORIUM ZRT

ALL FUNERAL SERVICES, S.L.

SALZILLO SERVICIOS FUNERARIOS S.L.

SERVICIOS Y GESTION FUNERARIA, S.A.

TANATORI BENIDORM, S.L.

TANATORI LA DAMA D'ELX, S.L.

ZACARIAS NUNO, S.L.

SERVICIOS FUNERARIOS FUNEMADRID, S.A.

CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.

FUNETXEA, S.L.

SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.

INICIATIVAS ALCAESAR, S.L.

ALCAESAR FUNERHERVAS, S.L.

ALCAESAR FUNERCORIA, S.L.

FUNERTRUJILLO, S.L.

SERVICIOS FUNERARIOS NUESTRA SENORA DE LA LUZ, S.L.

ALCAESAR FUNERPLASENCIA, S.L.

NUEVO TANATORIO, S.L.

NUEVOS SERVICIOS FUNERARIOS, S.L.

SERVICIOS FUNERARIOS LA CARIDAD, S.L.

TANATORIO Y CEMENTERIO DE SANLUCAR, S.L.

EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.

GESTION DE CEMENTERIS DE TARRAGONA

GAB MANAGEMENT & CONSULTING, S.R.L.

POMPES FUNEBRES DOMINGO, S.L.

DE MENA SERVICIOS FUNERARIOS S.L.

CEMENTERIO PARQUE ANDUJAR, S.L.

FUNBIERZO, S.L.

FUNERARIA HISPALENSE, S.L.

ISABELO ALVAREZ MAYORGA, S.A.

SERVICIOS FUNERARIOS DEL NERVION, S.L.

EMPRESA MIXTA SERVICIOS FUNERARIOS MADRID, S.A.

TANATORIO DE ECIJA, S.L.

TANATORIO SE-30 SEVILLA, S.L.

FUNESPAÑA CHILE, S.A.

FUNEUROPEA CHILE, S.A.

FUNERARIAS REUNIDAS EL BIERZO, S.A.

MAPFRE INMUEBLES, S.G.A.

INMOBILIARIA MAPINVER S.A.

DESARROLLOS URBANOS CIC, S.A.

SERVICIOS INMOBILIARIOS MAPFRE S.A.

MEDISEMAP, AGENCIA DE SEGUROS, S.L.

MAPFRE SEGUROS GERAIS S.A.

MAPFRE PORTUGAL SEGUROS DE VIDA S.A.

MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.

MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA

MAPFRE TECH

MAPFRE VIDEO Y COMUNICACION, S.A.

MIRACETI S.A.

MAPFRE INVERSION SOCIEDAD DE VALORES S.A.

MAPFRE INVERSION DOS SOCIEDAD GESTORA DE INSTITUCIONES DE INVERSION COLECTIVA S.A.

MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.

CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.

GESTION MODA SHOPPING S.A.

BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS

BANKINTER SEGUROS DE VIDA, S.A.

CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.

UNION DEL DUERO COMPAÑIA DE SEGUROS DE VIDA, S.A.

DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.

MEDISEMAP, AGENCIA DE SEGUROS, S.L.

LAETANA VIDA

ASEGURADORA VALENCIANA DE SEGUROS Y REAS. (ASEVAL)

MAPFRE RE COMPANIA DE REASEGUROS, S.A.

CIAR INVESTMENT

INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.

REINSURANCE MANAGEMENT INC.

MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS, S.A.

MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS

MAPFRE CHILE REASEGUROS, S.A.

C R ARGENTINA, S.A.

CAJA REASEGURADORA DE CHILE, S.A.

INMOBILIARIA COSTA DE MONTEMAR, S.A.

MAPFRE MANDATOS Y SERVICIOS, S.A.

% OWNED

83.8 MAPFRE S.A.

100.0 MAPFRE S.A.

99.5 MAPFRE S.A.

100.0 MAPFRE S.A.

99.2 MAPFRE S.A.

99.1 MAPFRE S.A.

97.0 MAPFRE S.A.

79.3 MAPFRE S.A.

75.0 MAPFRE S.A.

50.0 MAPFRE S.A.

50.0 MAPFRE S.A.

50.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

96.0 MAPFRE S.A.

20.6 MAPFRE S.A.

50.0 MAPFRE S.A.

49.9 MAPFRE S.A.

50.1 MAPFRE S.A.

25.0 MAPFRE S.A.

22.2 MAPFRE S.A.

12.5 MAPFRE S.A.

10.0 MAPFRE S.A.

16.4 MAPFRE S.A.

50.0 MAPFRE S.A.

95.2 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

76.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

49.0 MAPFRE S.A.

100.0 MAPFRE S.A.

100.0 MAPFRE S.A.

75.0 MAPFRE S.A.

49.0 MAPFRE S.A.

50.0 MAPFRE S.A.

Annual Statement for the year 2016 of the **American Commerce Insurance Company**

MAPFRE INTERNACIONAL S.A.	99.2	MAPFRE S.A.	
MAPFRE ARGENTINA HOLDING S.A.	100.0	MAPFRE S.A.	
CLUB MAPFRE ARGENTINA	97.0	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS S.A.	100.0	MAPFRE S.A.	
CESVI ARGENTINA, S.A.	60.6	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0	MAPFRE S.A.	
MAPFRE PRAICO CORPORATION	100.0	MAPFRE S.A.	66-0781080
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0	MAPFRE S.A.	31690 66-0319465
MAPFRE FINANCE OF PUERTO RICO CORP	100.0	MAPFRE S.A.	66-0391019
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0	MAPFRE S.A.	66-0621733
MAPFRE SOLUTIONS, INC.	100.0	MAPFRE S.A.	66-0595402
MULTISERVICAR INC.	100.0	MAPFRE S.A.	66-0638119
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0	MAPFRE S.A.	77054 66-0402309
MAPFRE PRAICO INSURANCE COMPANY	100.0	MAPFRE S.A.	43052 66-0470284
MAPFRE LA SEGURIDAD S.A.	99.5	MAPFRE S.A.	
CLUB MAPFRE S.A.	100.0	MAPFRE S.A.	
CEFOPROSEG C.A.	100.0	MAPFRE S.A.	
INVERSORA SEGURIDAD C.A.	100.0	MAPFRE S.A.	
AUTOMOTRIZ MULTISERVICAR, C.A.	100.0	MAPFRE S.A.	
UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	100.0	MAPFRE S.A.	
MAPFRE CHILE SEGUROS S.A.	100.0	MAPFRE S.A.	
MAPFRE CHILE ASESORIAS, S.A.	100.0	MAPFRE S.A.	
MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	18.1	MAPFRE S.A.	
MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	81.9	MAPFRE S.A.	
MAPFRE CHILE VIDA S.A.	100.0	MAPFRE S.A.	
MAPFRE COMPAÑIA DE SEGUROS DE VIDA DE CHILE	100.0	MAPFRE S.A.	
MAPFRE HOLDING DO BRASIL LTDA	98.8	MAPFRE S.A.	
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.0	MAPFRE S.A.	
PROTENSEG CORRETORA DE SEGUROS LTDA	100.0	MAPFRE S.A.	
CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	100.0	MAPFRE S.A.	
MAPFRE SAUDE LTDA	100.0	MAPFRE S.A.	
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	100.0	MAPFRE S.A.	
MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	100.0	MAPFRE S.A.	
MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	100.0	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	91.7	MAPFRE S.A.	
MAPFRE PREVIDENCIA S.A.	100.0	MAPFRE S.A.	
MAPFRE CAPITALIZACAO	100.0	MAPFRE S.A.	
MAPFRE BB SH2 PARTICIPACOES, S.A.	50.0	MAPFRE S.A.	
ALIANCA DO BRASIL SEGUROS S.A.	100.0	MAPFRE S.A.	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	100.0	MAPFRE S.A.	
MAPFRE ASSISTENCIA	100.0	MAPFRE S.A.	
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0	MAPFRE S.A.	
MAPFRE VIDA S.A.	100.0	MAPFRE S.A.	
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	94.3	MAPFRE S.A.	
CREDIMAPFRE	94.9	MAPFRE S.A.	
AUTOMOTORES CAPITAL LTDA	100.0	MAPFRE S.A.	
MAPFRE SERVICIOS EXEQUIALES SAS	100.0	MAPFRE S.A.	
MAPFRE COLOMBIA VIDA S.A.	94.4	MAPFRE S.A.	
GESTIMAP S.A.	92.3	MAPFRE S.A.	
CESVI COLOMBIA, S.A.	62.3	MAPFRE S.A.	
MAPFRE PERU VIDA, COMPAÑIA DE SEGUROS, S.A.	67.3	MAPFRE S.A.	
CORPORACION FINISTERRE, S.A.	100.0	MAPFRE S.A.	
MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	99.3	MAPFRE S.A.	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.6	MAPFRE S.A.	
MAPFRE ATLAS COMPAÑIA DE SEGUROS, S.A.	60.0	MAPFRE S.A.	
MAPFRE SOFT S.A.	100.0	MAPFRE S.A.	
MAPFRE PARAGUAY COMPAÑIA DE SEGUROS, S.A.	89.5	MAPFRE S.A.	
APOINT S.A.	100.0	MAPFRE S.A.	
MAPFRE LA URUGUAYA S.A.	100.0	MAPFRE S.A.	
MAPFRE DOMINICANA S.A.	100.0	MAPFRE S.A.	
MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	51.0	MAPFRE S.A.	
CREDI PRIMAS, S.A.	100.0	MAPFRE S.A.	
GRUPO CORPORATIVO LML S.A. DE C.V.	100.0	MAPFRE S.A.	
MAPFRE TEPEYAC S.A.	44.3	MAPFRE S.A.	
MAPFRE TEPEYAC S.A.	55.7	MAPFRE S.A.	
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	100.0	MAPFRE S.A.	
MAPFRE TEPEYAC INC.	100.0	MAPFRE S.A.	
MAPFRE SERVICIOS MEXICANOS	100.0	MAPFRE S.A.	
MAPFRE FIANZAS S.A.	100.0	MAPFRE S.A.	
MAPFRE ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	78.8	MAPFRE S.A.	
MAPFRE TEPEYAC ASESORES	16.0	MAPFRE S.A.	
CESVI MEXICO, S.A.	16.7	MAPFRE S.A.	
MAPFRE TEPEYAC ASESORES	51.0	MAPFRE S.A.	
MAPFRE AMERICA CENTRAL, S.A.	100.0	MAPFRE S.A.	
MAPFRE PANAMA	99.3	MAPFRE S.A.	
INMOBILIARIA AMERICANA S.A.	78.9	MAPFRE S.A.	
MAPFRE TENEDORA DE ACC, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS HONDURAS S.A.	73.0	MAPFRE S.A.	
MAPFRE SEGUROS COSTA RICA, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GUATEMALA, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS NICARAGUA, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS HONDURAS S.A.	25.1	MAPFRE S.A.	
MAPFRE LA CENTRO AMERICANA, S.A.	72.9	MAPFRE S.A.	
AMA/ASISTENCIA MEDICA ADMISTRADA, C.A.	99.7	MAPFRE S.A.	
MAPFRE USA CORPORATION INC.	100.0	MAPFRE S.A.	04-2599931
MAPFRE LIFE INSURANCE COMPANY	100.0	MAPFRE S.A.	85561 51-0137488
CUBE INSURANCE COMPANY	100.0	MAPFRE S.A.	15736 47-2744441
THE CITATION INSURANCE COMPANY	100.0	MAPFRE S.A.	40274 04-2739876
BFC HOLDING CORPORATION	100.0	MAPFRE S.A.	04-3148033
INSPOP USA, LLC	11.3	MAPFRE S.A.	
THE COMMERCE INSURANCE COMPANY	100.0	MAPFRE S.A.	34754 04-2495247
MAPFRE INTERMEDIARIES	100.0	MAPFRE S.A.	65-0214501
MAPFRE INSURANCE COMPANY OF FLORIDA	100.0	MAPFRE S.A.	34932 65-0131982
MAPFRE INSURANCE COMPANY	100.0	MAPFRE S.A.	23876 36-3347420
MM REAL ESTATE, LLC	100.0	MAPFRE S.A.	
BIGELOW & OLD WORCESTER, LLC	100.0	MAPFRE S.A.	04-2495247
ACIC HOLDINGS COMPANY, INC.	95.0	MAPFRE S.A.	05-0501519
THE COMMERCE WEST INSURANCE COMPANY	100.0	MAPFRE S.A.	13161 94-1137122
AMERICAN COMMERCE INSURANCE COMPANY	100.0	MAPFRE S.A.	19941 31-4361173

MAPFRE INSURANCE COMPANY OF NEW YORK	100.0	MAPFRE S.A.	25275 13-1773336
MAPFRE GENEL SIGORTA, A.S.	99.7	MAPFRE S.A.	
MAPFRE GENEL YASAM SIGORTA, A.S.	100.0	MAPFRE S.A.	
GENEL SERVIS A.S.	51.0	MAPFRE S.A.	
MAPFRE INSULAR INSURANCE CORPORATION	74.9	MAPFRE S.A.	
MIDDLESEA INSURANCE P.L.C.	54.6	MAPFRE S.A.	
MIDDLESEA ASSIST LIMITED	49.0	MAPFRE S.A.	
M.S.V. LIFE P.L.C.	50.0	MAPFRE S.A.	
GROWTH INVESTMENTS LIMITED	100.0	MAPFRE S.A.	
CHURCH WARF PROPERTIES	50.0	MAPFRE S.A.	
CHURCH WARF PROPERTIES	50.0	MAPFRE S.A.	
BEE INSURANCE MANAGEMENT LTD	100.0	MAPFRE S.A.	
EURO GLOBE HOLDINGS LIMITED	100.0	MAPFRE S.A.	
EUROMED RISK SOLUTIONIS LIMITED	100.0	MAPFRE S.A.	
PT ASURANSI BINA DANA ARTA TBK	20.0	MAPFRE S.A.	
PT MAPFRE ABDA ASSISTANCE	49.0	MAPFRE S.A.	
DIRECT LINE VERSICHERUNG AKTIENGESELLSCHAFT	100.0	MAPFRE S.A.	
DIRECT LINE INSURANCE S.P.A.	100.0	MAPFRE S.A.	
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.0	MAPFRE S.A.	
IBEROASISTENCIA, ARGENTINA S.A.	100.0	MAPFRE S.A.	
VENEASISTENCIA, S.A.	100.0	MAPFRE S.A.	
IRELAND ASSIST, LTD	100.0	MAPFRE S.A.	
MEXICO ASISTENCIA, S.A.	100.0	MAPFRE S.A.	
CENTRO INTERNACIONAL DE SERVICIOS Y ASISTENCIA, S.A.	100.0	MAPFRE S.A.	
ALLMAP ASSIST GESELLSCHAFT FUR BEISTANDSLEISTUNGEN MBH	100.0	MAPFRE S.A.	
ARABA ASSIST FOR LOGISTIC SERVICES	100.0	MAPFRE S.A.	
LLC MAPFRE WARRANTY	100.0	MAPFRE S.A.	
MAPFRE ASISTENCIA LIMITED	100.0	MAPFRE S.A.	
MAPFRE ASISTENCIA COMPANY LIMITED	100.0	MAPFRE S.A.	
MAPFRE WARRANTY JAPAN KABUSHIKI KAISHA	100.0	MAPFRE S.A.	
INSURE AND GO INSURANCE SERVICES USA CORP.	100.0	MAPFRE S.A.	
COSTA RICA ASISTENCIA	100.0	MAPFRE S.A.	
QUETZAL ASISTENCIA, S.A.	100.0	MAPFRE S.A.	
NICASSIT, S.A.	100.0	MAPFRE S.A.	
EL SALVADOR ASISTENCIA, S.A.	100.0	MAPFRE S.A.	
NORASIST, INC D/B/A ROAD CANADA	100.0	MAPFRE S.A.	
BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	100.0	MAPFRE S.A.	
VIAJES MAPFRE CCI, S.L.	100.0	MAPFRE S.A.	
INSURE AND GO AUSTRALIA	100.0	MAPFRE S.A.	
BRASIL ASSISTENCIA S/A	100.0	MAPFRE S.A.	
MAPFRE SOLUTIONS DO BRASIL LTDA	100.0	MAPFRE S.A.	
MAPFRE ABRAXAS SOFTWARE, LTD	100.0	MAPFRE S.A.	
ABRAXAS INSURANCE	100.0	MAPFRE S.A.	
MAPFRE WARRANTY UK LIMITED	100.0	MAPFRE S.A.	
HOME 3	50.0	MAPFRE S.A.	
MAPFRE WARRANTY S.P.A.	100.0	MAPFRE S.A.	
MAPFRE WARRANTIES	100.0	MAPFRE S.A.	
FRANCE ASSIST	100.0	MAPFRE S.A.	
MAPFRE INSURANCE SERVICES S.L.R.	100.0	MAPFRE S.A.	
MAPFRE ASSISTANCE USA INC.	100.0	MAPFRE S.A.	
CENTURY AUTOMOTIVE SERVICES COMPANY	100.0	MAPFRE S.A.	
FEDERAL ASSIST Co.	100.0	MAPFRE S.A.	
INSURE AND GO	100.0	MAPFRE S.A.	
TRAVEL CLAIMS SERVICES LIMITED	100.0	MAPFRE S.A.	
INSURE AND GO AUSTRALASIA	100.0	MAPFRE S.A.	
CIG SERVICES LIMITED	100.0	MAPFRE S.A.	
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	94.9	MAPFRE S.A.	
ECUASISTENCIA S.A.	94.5	MAPFRE S.A.	
PERU ASISTENCIA, S.A.	99.9	MAPFRE S.A.	
CONSULTING DE SOLUCIONES Y TECNOLOGIAS SIAM, S.A.	99.9	MAPFRE S.A.	
IBEROASISTECIA INTERNACIONAL	99.8	MAPFRE S.A.	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6	MAPFRE S.A.	
EUROSOS ASSISTANCE S.A.	99.5	MAPFRE S.A.	
URUGUAY ASISTENCIA, S.A.	94.8	MAPFRE S.A.	
SUR ASSISTENCIA, S.A.	99.0	MAPFRE S.A.	
NILE ASSIT	98.0	MAPFRE S.A.	
TUR ASSIST, LTD.	91.7	MAPFRE S.A.	
ROAD CHINA ASSISTANCE CO., LTD.	100.0	MAPFRE S.A.	
IBERO ASISTENCIA, S.A.	100.0	MAPFRE S.A.	
MIDDLESEA ASSIST LIMITED	51.0	MAPFRE S.A.	
ASISTENCIA BOLIVIANA, S.A.	99.5	MAPFRE S.A.	
GULF ASSIST, B.S.C.	74.6	MAPFRE S.A.	
CARIBE ASISTENCIA	79.5	MAPFRE S.A.	
BENELUX ASSIST, S.A.	100.0	MAPFRE S.A.	
PANAMA ASISTENCIA, S.A.	76.0	MAPFRE S.A.	
LIB ASSIST	51.0	MAPFRE S.A.	
ROADSIDE ASSIST ALGERIE SPA	60.3	MAPFRE S.A.	
PT MAPFRE ABDA ASSISTANCE	51.0	MAPFRE S.A.	
AFRIQUE ASSISTANCE, S.A.	49.0	MAPFRE S.A.	
MAPFRE INMUEBLES, S.G.A.	10.0	MAPFRE S.A.	
MAPFRE GLOBAL RISKS	100.0	MAPFRE S.A.	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0	MAPFRE S.A.	
MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	16.2	MAPFRE S.A.	
SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	100.0	MAPFRE S.A.	
INDUSTRIAL RE S.A.	100.0	MAPFRE S.A.	
SOLUNION SEGUROS DE CREDITO S.A.	50.0	MAPFRE S.A.	
MAQUAVIT INMUEBLES, S.L.	56.8	MAPFRE S.A.	
BIOINGENIERIA ARAGONESA, S.L.	100.0	MAPFRE S.A.	
PROVITAE CENTROS ASISTENCIALES, S.L.	50.0	MAPFRE S.A.	
FANCY INVESTMENT S.A.	100.0	MAPFRE S.A.	
PREMINEN PRICE COMPARISON HOLDINGS LIMITED	50.0	MAPFRE S.A.	

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