



QUARTERLY STATEMENT

As of September 30, 2017
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

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(Area Code) (Telephone Number) (Extension)
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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	ALFREDO CASTELO #	DAVID HILL COCHRANE	DENNIS JOHN CROSSLEY
FREDERICK LAWRENCE GRUEL	TIMOTHY JOHN MORGAN	KIRK RICHARD NELSON	DANIEL PATRICK OLOHAN
MARK ALLEN SHAW	MARK HARRY SHAW		

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)

ALFREDO CASTELO

1. (Printed Name)

PRESIDENT & CEO

(Title)

(Signature)

DANIEL PATRICK OLOHAN

2. (Printed Name)

SECRETARY, GENERAL COUNSEL, & EVP

(Title)

(Signature)

ROBERT EDWARD MCKENNA

3. (Printed Name)

TREASURER, CAO, & SVP

(Title)

Subscribed and sworn to before me,
This 14th day of November 2017

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

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

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	161,543,375		161,543,375	137,378,499
2. Stocks:				
2.1 Preferred stocks.....	791,029		791,029	789,374
2.2 Common stocks.....			0	
3. Mortgage loans on real estate:				
3.1 First liens.....			0	
3.2 Other than first liens.....			0	
4. Real estate:				
4.1 Properties occupied by the company (less \$.....0 encumbrances).....	1,377,365		1,377,365	1,262,841
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 (\$....667,960), cash equivalents (\$.....0) and short-term investments (\$.....0).....	667,960		667,960	(2,614,557)
6. Contract loans (including \$.....0 premium notes).....			0	
7. Derivatives.....			0	
8. Other invested assets.....			0	
9. Receivables for securities.....	1,072,310		1,072,310	
10. Securities lending reinvested collateral assets.....			0	
11. Aggregate write-ins for invested assets.....	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	165,452,039	0	165,452,039	136,816,157
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,304,749		1,304,749	1,273,164
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	83,906,375		83,906,375	87,529,176
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.....	19,465,426		19,465,426	23,912,349
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.....	6,619,493	611,030	6,008,463	5,991,877
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	815,328		815,328	229,541
21. Furniture and equipment, including health care delivery assets (\$.....0).....	635,987	635,987	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	4,428,325
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	81,042,072	1,398,246	79,643,826	75,958,551
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	359,241,469	2,645,263	356,596,206	336,139,140
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	359,241,469	2,645,263	356,596,206	336,139,140

DETAILS OF WRITE-INS

1101.			0	
1102.			0	
1103.			0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0	0
2501. Prepaid expenses.....	1,183,512	1,183,512	0	
2502. Arizona renewal business.....	214,733	214,733	0	
2503. Equity in pools and associations.....	78,429,825		78,429,825	75,607,550
2598. Summary of remaining write-ins for Line 25 from overflow page.....	1,214,001	0	1,214,001	351,000
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	81,042,072	1,398,246	79,643,826	75,958,551

LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Statement Date	2 December 31 Prior Year
1.	Losses (current accident year \$35,290,000).....	78,133,650	76,283,509
2.	Reinsurance payable on paid losses and loss adjustment expenses.....	9,680,411	8,614,097
3.	Loss adjustment expenses.....	15,673,736	15,304,370
4.	Commissions payable, contingent commissions and other similar charges.....	6,553,075	6,683,141
5.	Other expenses (excluding taxes, licenses and fees).....	1,076,360	1,389,664
6.	Taxes, licenses and fees (excluding federal and foreign income taxes).....	374,079	
7.1	Current federal and foreign income taxes (including \$(243,023) on realized capital gains (losses)).....	970,126	874,397
7.2	Net deferred tax liability.....		
8.	Borrowed money \$0 and interest thereon \$0.....		
9.	Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$286,117,746 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).....	101,131,306	95,937,837
10.	Advance premium.....	7,146,214	4,914,272
11.	Dividends declared and unpaid:		
11.1	Stockholders.....		
11.2	Policyholders.....		
12.	Ceded reinsurance premiums payable (net of ceding commissions).....	23,817,776	16,941,765
13.	Funds held by company under reinsurance treaties.....		
14.	Amounts withheld or retained by company for account of others.....		
15.	Remittances and items not allocated.....		
16.	Provision for reinsurance (including \$0 certified).....		
17.	Net adjustments in assets and liabilities due to foreign exchange rates.....		
18.	Drafts outstanding.....		
19.	Payable to parent, subsidiaries and affiliates.....	655,318	
20.	Derivatives.....		
21.	Payable for securities.....	1,049,499	
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.....	723,454	934,770
26.	Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	246,985,003	227,877,822
27.	Protected cell liabilities.....		
28.	Total liabilities (Lines 26 and 27).....	246,985,003	227,877,822
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).....	69,670,601	68,320,717
36.	Less treasury stock, at cost:		
36.1	0.000 shares common (value included in Line 30 \$0).....		
36.2	0.000 shares preferred (value included in Line 31 \$0).....		
37.	Surplus as regards policyholders (Lines 29 to 35, less 36).....	109,611,203	108,261,319
38.	Totals (Page 2, Line 28, Col. 3).....	356,596,206	336,139,141

DETAILS OF WRITE-INS

2501.	Unclaimed property.....	723,454	929,755
2502.	Miscellaneous Liabilities.....		5,015
2503.			
2598.	Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599.	Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	723,454	934,770
2901.			
2902.			
2903.			
2998.	Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999.	Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.			
3202.			
3203.			
3298.	Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299.	Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$274,975,765).....	282,721,340	294,764,518	387,805,697
1.2 Assumed..... (written \$150,313,091).....	145,110,795	144,147,565	201,092,565
1.3 Ceded..... (written \$274,985,866).....	282,722,613	298,461,074	400,348,598
1.4 Net..... (written \$150,302,990).....	145,109,521	140,451,008	188,549,664
DEDUCTIONS:			
2. Losses incurred (current accident year \$91,634,000):			
2.1 Direct.....	170,013,106	183,494,402	242,085,551
2.2 Assumed.....	95,589,508	95,496,132	131,411,404
2.3 Ceded.....	170,013,106	187,063,062	249,041,910
2.4 Net.....	95,589,508	91,927,472	124,455,045
3. Loss adjustment expenses incurred.....	17,827,428	17,065,525	22,887,713
4. Other underwriting expenses incurred.....	37,141,954	37,288,958	48,755,833
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	150,558,890	146,281,955	196,098,591
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(5,449,369)	(5,830,946)	(7,548,928)
INVESTMENT INCOME			
9. Net investment income earned.....	3,512,647	3,599,153	5,529,867
10. Net realized capital gains (losses) less capital gains tax of \$(243,023).....	(368,182)	943,692	1,063,786
11. Net investment gain (loss) (Lines 9 + 10).....	3,144,465	4,542,845	6,593,653
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$0 amount charged off \$0).....	0		
13. Finance and service charges not included in premiums.....	2,088,860	2,298,778	3,034,051
14. Aggregate write-ins for miscellaneous income.....	216,875	68,307	101,656
15. Total other income (Lines 12 through 14).....	2,305,735	2,367,086	3,135,707
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	831	1,078,984	2,180,433
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).....	831	1,078,984	2,180,433
19. Federal and foreign income taxes incurred.....	873,580	518,454	357,774
20. Net income (Line 18 minus Line 19) (to Line 22).....	(872,749)	560,530	1,822,659
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	108,261,319	104,846,378	104,846,378
22. Net income (from Line 20).....	(872,749)	560,530	1,822,659
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$320,563.....	595,331	460,178	392,483
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	335,361	270,701	(476,778)
27. Change in nonadmitted assets.....	112,160	535,359	443,661
28. Change in provision for reinsurance.....			
29. Change in surplus notes.....			
30. Surplus (contributed to) withdrawn from protected cells.....			
31. Cumulative effect of changes in accounting principles.....			
32. Capital changes:			
32.1 Paid in.....			
32.2 Transferred from surplus (Stock Dividend).....			
32.3 Transferred to surplus.....			
33. Surplus adjustments:			
33.1 Paid in.....			
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....			
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	1,179,780	718,194	1,232,916
38. Change in surplus as regards policyholders (Lines 22 through 37).....	1,349,884	2,544,962	3,414,941
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	109,611,203	107,391,340	108,261,319

DETAILS OF WRITE-INS			
0501.			
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	0	0	0
1401. Miscellaneous income.....	20,676	25,174	32,121
1402. Gain on sale of fixed assets.....	86,306	43,133	69,535
1403. Other technical income (other reinsurer).....	109,893		
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	216,875	68,307	101,656
3701. STATUTORY POOLING ADJUSTMENT.....	1,179,780	718,194	1,232,916
3702.			
3703.			
3798. Summary of remaining write-ins for Line 37 from overflow page.....	0	0	0
3799. Totals (Lines 3701 thru 3703 plus 3798) (Line 37 above).....	1,179,780	718,194	1,232,916

American Commerce Insurance Company
CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	163,033,744	148,626,622	184,046,672
2. Net investment income.....	4,092,524	3,884,633	5,936,853
3. Miscellaneous income.....	2,305,735	2,367,086	3,135,707
4. Total (Lines 1 through 3).....	169,432,003	154,878,340	193,119,232
5. Benefit and loss related payments.....	88,226,130	94,656,882	123,498,905
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	53,489,526	53,672,178	70,174,011
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	534,828	(499,126)	(2,935,529)
10. Total (Lines 5 through 9).....	142,250,484	147,829,934	190,737,387
11. Net cash from operations (Line 4 minus Line 10).....	27,181,519	7,048,406	2,381,845
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	31,696,911	51,778,921	71,472,119
12.2 Stocks.....	17,248	773,441	773,441
12.3 Mortgage loans.....			
12.4 Real estate.....			
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....	1,049,499		
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	32,763,658	52,552,362	72,245,560
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	56,094,507	67,348,002	78,650,686
13.2 Stocks.....			
13.3 Mortgage loans.....			
13.4 Real estate.....	207,480	(66,022)	(66,022)
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....	1,072,310		
13.7 Total investments acquired (Lines 13.1 to 13.6).....	57,374,297	67,281,980	78,584,664
14. Net increase or (decrease) in contract loans and premium notes.....			
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14).....	(24,610,640)	(14,729,618)	(6,339,104)
CASH FROM FINANCING AND MISCELLANEOUS SOURCES			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes.....			
16.2 Capital and paid in surplus, less treasury stock.....			
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			
16.6 Other cash provided (applied).....	711,637	(462,640)	(3,407,701)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	711,637	(462,640)	(3,407,701)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11 plus Line 15 plus Line 17).....	3,282,516	(8,143,852)	(7,364,959)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(2,614,557)	4,750,403	4,750,403
19.2 End of period (Line 18 plus Line 19.1).....	667,960	(3,393,449)	(2,614,557)

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

20.0001			
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NOTES TO FINANCIAL STATEMENTS

Note 1 – Summary of Significant Accounting Policies and Going Concern

A. Accounting Practices, Impact of NAIC/State Differences

The accompanying financial statements of American Commerce Insurance Company (the Company) have been prepared in conformity with the accounting practices prescribed or permitted by the National Association of Insurance Commissioners (NAIC) and the State of Ohio. The NAIC Accounting Practices and Procedures manual, version effective January 1, 2001, (NAIC SAP) has been adopted as a component of prescribed or permitted practices by the State of Ohio.

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

	SSAP #	F/S Page	F/S Line #	Current Period	2016
NET INCOME					
(1) American Commerce Insurance Company state basis (Page 4, Line 20, Columns 1 & 2)	XXX	XXX	XXX	\$ (872,749)	\$ 1,822,659
(2) State Prescribed Practice that is an increase/(decrease) from NAIC SAP					
				\$	\$
(3) State Permitted Practice that is an increase/(decrease) from NAIC SAP					
				\$	\$
(4) NAIC SAP (1 – 2 – 3 = 4)	XXX	XXX	XXX	\$ (872,749)	\$ 1,822,659
SURPLUS					
(5) American Commerce Insurance Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 109,611,203	\$ 108,261,319
(6) State Prescribed Practice that is an increase/(decrease) from NAIC SAP					
				\$	\$
(7) State Permitted Practice that is an increase/(decrease) from NAIC SAP					
				\$	\$
(8) NAIC SAP (5 – 6 – 7 = 8)	XXX	XXX	XXX	\$ 109,611,203	\$ 108,261,319

C. Accounting Policy
(6) No significant changes

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.

Note 2 – Accounting Changes and Corrections of Errors

No significant changes

Note 3 – Business Combinations and Goodwill

No significant changes

Note 4 – Discontinued Operations

No significant changes

Note 5 – Investments

D. Loan-Backed Securities

- (1) Prepayment assumptions are obtained from broker-dealer surveys, internal estimates or Bloomberg
- (2) This note is used to disclose any loan-backed security that has recognized an other-than-temporary impairment during the quarter and is classified with an intent to sell or inability or lack of intent to hold. During the current quarter, no securities that have recognized an other-than-temporary impairment fit this criteria.
- (3) There are no structured securities with recognized OTTI as of the reporting date.
- (4) All impaired securities (fair value is less than cost or amortized cost) for which an other-than-temporary impairment has not been recognized in earnings as a realized loss (including securities with a recognized other-than-temporary impairment for non-interest related declines when a non-recognized interest related impairment remains):

a. The aggregate amount of unrealized losses:	1. Less than 12 Months	\$ 50,365
	2. 12 Months or Longer	\$ 92,218
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$ 17,391,322
	2. 12 Months or Longer	\$ 2,462,190

- (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.

NOTES TO FINANCIAL STATEMENTS

- **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

(3) Not applicable

I. Working Capital Finance Investments

(2) Not applicable

(3) Not applicable

J. Offsetting and Netting of Assets and Liabilities

Not applicable

Note 6 – Joint Ventures, Partnerships and Limited Liability Companies

No significant changes

Note 7 – Investment Income

No significant changes

Note 8 – Derivative Instruments

No significant changes

Note 9 – Income Taxes

No significant changes

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

No significant changes

Note 11 – Debt

B. FHLB (Federal Home Loan Bank) Agreements

Not applicable

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

A(4). Defined Benefit Plan

Not applicable

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

No significant changes

Note 14 – Liabilities, Contingencies and Assessments

G. Other Contingencies

No significant changes

Note 15 – Leases

No significant changes

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

No significant changes

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

B. Transfer and Servicing of Financial Assets

(2) Information About All Servicing Assets and Liabilities

Not applicable

(4) Transfer Accounted for as Sales with Continuing Involvement

(a) and (b) Not applicable

C. Wash Sales

NOTES TO FINANCIAL STATEMENTS

Not applicable

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

No significant changes

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

No significant changes

Note 20 – Fair Value Measurements

A.

(1) Fair Value Measurements at Reporting Date

	Level 1	Level 2	Level 3	Total
Assets at Fair Value				
Bonds	\$ -	\$ 1,030,461	\$ -	\$ 1,030,461
Total	\$	\$ 1,030,461	\$	\$ 1,030,461
Liabilities at Fair Value				
	\$	\$	\$	\$
Total	\$	\$	\$	\$

(2) Fair Value Measurements in (Level 3) of the Fair Value Hierarchy

	Ending Balance as of Prior Quarter End	Transfers Into Level 3	Transfers Out of Level 3	Total Gains and (Losses) Included in Net Income	Total Gains and (Losses) Included in Surplus	Purchases	Issuances	Sales	Settle- ments	Ending Balance for Current Quarter End
a. Assets										
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Total	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
b. Liabilities										
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Total	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$

(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 Values Disclosures

Not applicable

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

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Not Practicable (Carrying Value)
Bonds	\$ 162,197,981	\$ 161,543,375	\$ 5,758,789	\$ 156,439,192	\$	\$
Preferred Stock	\$ 897,500	\$ 791,029	\$ -	\$ 897,500	\$	\$

D. Not Practicable to Estimate Fair Value

None

Note 21 – Other Items

No significant changes

Note 22 – Events Subsequent

No significant changes

Note 23 – Reinsurance

No significant changes

Note 24 – Retrospectively Rated Contracts and Contracts Subject to Redetermination

F. Risk Sharing Provisions of the Affordable Care Act

Not applicable

Note 25 – Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$113,417,000 were higher by \$2,886,000 due to unfavorable development of prior year estimates. This deficiency was 3.2% of the unpaid losses and LAE of \$91,588,000 as of prior year-end.

NOTES TO FINANCIAL STATEMENTS

Note 26 – Intercompany Pooling Arrangements

No significant changes

Note 27 – Structured Settlements

No significant changes

Note 28 – Health Care Receivables

No significant changes

Note 29 – Participating policies

No significant changes

Note 30 – Premium Deficiency Reserves

No significant changes

Note 31 – High Deductibles

No significant changes

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

No significant changes

Note 33 – Asbestos/Environmental Reserves

No significant changes

Note 34 – Subscriber Savings Accounts

No significant changes

Note 35 – Multiple Peril Crop Insurance

No significant changes

Note 36 – Financial Guaranty Insurance

B. Not applicable

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

- 1.1

Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act?

Yes [☐] No [☒ X]
- 1.2

If yes, has the report been filed with the domiciliary state?

Yes [☐] No [☐]
- 2.1

Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity?

Yes [☐] No [☒ X]
- 2.2

If yes, date of change:
- 3.1

Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer?
If yes, complete Schedule Y, Parts 1 and 1A.

Yes [☒ X] No [☐]
- 3.2

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

Yes [☐] No [☒ X]
- 3.3

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

- 4.1

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

Yes [☐] No [☒ X]
- 4.2

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

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

5.

If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved?
If yes, attach an explanation.

Yes [☐] No [☒ X] N/A [☐]

- 6.1

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

12/31/2013
- 6.2

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

12/31/2013
- 6.3

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

06/19/2015

- 6.4

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

- 6.5

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

Yes [☐] No [☐] N/A [☒ X]
- 6.6

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

Yes [☐] No [☐] N/A [☒ X]
- 7.1

Has this reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period?

Yes [☐] No [☒ X]
- 7.2

If yes, give full information:

- 8.1

Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board?

Yes [☐] No [☒ X]
- 8.2

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

- 8.3

Is the company affiliated with one or more banks, thrifts or securities firms?

Yes [☐] No [☒ X]

- 8.4

If the response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator].
- | 1 | 2 | 3 | 4 | 5 | 6 |
|----------------|------------------------|-----|-----|------|-----|
| Affiliate Name | Location (City, State) | FRB | OCC | FDIC | SEC |
| | | | | | |

- 9.1

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

Yes [☒ X] No [☐]

(a)

Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;

(b)

Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;

(c)

Compliance with applicable governmental laws, rules and regulations;

(d)

The prompt internal reporting of violations to an appropriate person or persons identified in the code; and

(e)

Accountability for adherence to the code.
- 9.11

If the response to 9.1 is No, please explain:

- 9.2

Has the code of ethics for senior managers been amended?

Yes [☐] No [☒ X]
- 9.21

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

- 9.3

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

Yes [☐] No [☒ X]
- 9.31

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

FINANCIAL

- 10.1

Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement?

Yes [☐] No [☒ X]

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount:

\$0

INVESTMENT

11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.)

Yes [] No [X]

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

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

\$0

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

\$0

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

Yes [] No [X]

14.2 If yes, please complete the following:

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

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

Yes [] No [X]

15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state?

Yes [] No []

If no, attach a description with this statement.

16. For the reporting entity's security lending program, state the amount of the following as of current statement date:

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

\$0

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

\$0

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

\$0

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

Yes [X] No []

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

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

17.2 For all agreements that do not comply with the requirements of the NAIC *Financial Condition Examiners Handbook*, provide the name, location and a complete explanation:

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

17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter?

Yes [] No [X]

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

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

17.5 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

17.5097 For those firms/individuals listed in the table for Question 17.5, 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 []

17.5098 For firms/individuals unaffiliated with the reporting entity (i.e., designated with a "U") listed in the table for Question 17.5, does the total assets under management aggregate to more than 50% of the reporting entity's assets?

Yes [] No []

17.6 For those firms or individuals listed in the table for 17.5 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

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

Yes [X] No []

18.2 If no, list exceptions:

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

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

NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

		1	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid	
			2	3	4	5	6	7
States, Etc.		Active Status	Current Year to Date	Prior Year to Date	Current Year to Date	Prior Year to Date	Current Year to Date	Prior Year to Date
1.	Alabama.....	AL.....L.....	159,602	320,811	30,335	27,424	27,949	26,926
2.	Alaska.....	AK.....L.....	52,798	58,257	325	1,053	10,544	9,223
3.	Arizona.....	AZ.....L.....	2,726,635	3,262,984	2,380,921	2,368,188	1,582,734	1,680,310
4.	Arkansas.....	AR.....L.....	173,155	217,718	22,983	70,332	45,132	52,724
5.	California.....	CA.....L.....	5,123,023	4,236,462	1,904,100	732,699	4,818	128,774
6.	Colorado.....	CO.....L.....	5,528,526	2,185,243	3,385,464	142,774	68,951	69,316
7.	Connecticut.....	CT.....L.....	106,555,612	116,907,193	53,056,479	50,254,986	80,140,210	59,508,218
8.	Delaware.....	DE.....L.....	106,662	117,045	11,883	55,707	387,828	1,134,807
9.	District of Columbia.....	DC.....L.....	33,225	51,844	140	3,760	9,573	6,991
10.	Florida.....	FL.....L.....	840,680	1,343,799	219,523	545,471	439,375	298,268
11.	Georgia.....	GA.....L.....	383,854	575,187	77,120	106,696	176,947	175,019
12.	Hawaii.....	HI.....L.....	13,416	35,668	6,235	7,510	4,339	10,455
13.	Idaho.....	ID.....L.....	3,949,182	3,312,322	2,646,245	1,722,813	2,002,780	1,736,541
14.	Illinois.....	IL.....L.....	764,267	1,495,242	252,160	234,598	613,445	180,550
15.	Indiana.....	IN.....L.....	3,075,920	3,005,385	2,601,432	2,815,868	2,647,047	2,426,885
16.	Iowa.....	IA.....L.....	210,502	151,007	132,636	19,008	26,454	12,774
17.	Kansas.....	KS.....L.....	1,870,913	754,221	646,636	46,781	56,655	45,923
18.	Kentucky.....	KY.....L.....	3,190,025	3,956,659	1,900,574	2,282,134	2,255,943	2,499,671
19.	Louisiana.....	LA.....L.....	216,369	372,715	117,965	73,274	137,877	139,282
20.	Maine.....	ME.....L.....	808,382	519,829	2,668	3,525	4,302	4,662
21.	Maryland.....	MD.....L.....	95,510	232,563	(33,957)	228,629	63,379	64,633
22.	Massachusetts.....	MA.....L.....	167,868	244,516	26,351	(4,566)	67,481	55,480
23.	Michigan.....	MI.....L.....	258,529	530,752	85,071	205,259	90,601	110,442
24.	Minnesota.....	MN.....L.....	290,463	420,275	32,865	87,647	82,326	102,647
25.	Mississippi.....	MS.....L.....	41,141	98,327	3,640	14,345	8,437	8,635
26.	Missouri.....	MO.....L.....	1,883,281	772,029	643,584	48,973	59,234	56,281
27.	Montana.....	MT.....L.....	66,039	62,671	9,401	228,648	20,914	11,705
28.	Nebraska.....	NE.....L.....	195,897	257,536	69,361	42,818	92,350	48,367
29.	Nevada.....	NV.....L.....	276,493	186,430	220,718	32,080	48,531	37,569
30.	New Hampshire.....	NH.....L.....	63,658	175,277	-	349	11,815	11,432
31.	New Jersey.....	NJ.....L.....	33,578,004	51,100,350	27,739,959	36,808,699	47,853,735	49,981,720
32.	New Mexico.....	NM.....L.....	82,074	132,907	9,636	32,506	24,303	26,088
33.	New York.....	NY.....L.....	689,471	1,133,887	1,416,517	2,778,477	3,191,477	4,976,822
34.	North Carolina.....	NC.....L.....	436,955	849,012	68,807	104,738	167,339	132,641
35.	North Dakota.....	ND.....L.....	17,009	17,933	288		15,603	18,812
36.	Ohio.....	OH.....L.....	16,608,027	19,087,079	10,799,096	10,601,877	8,744,451	9,831,341
37.	Oklahoma.....	OK.....L.....	165,448	180,256	38,314	76,539	326,384	22,352
38.	Oregon.....	OR.....L.....	10,842,815	12,447,109	8,003,065	8,032,936	7,026,808	7,224,289
39.	Pennsylvania.....	PA.....L.....	477,319	1,066,589	(244,731)	336,106	1,858,173	2,202,517
40.	Rhode Island.....	RI.....L.....	44,043,773	40,239,253	22,139,521	22,043,473	24,309,123	23,654,741
41.	South Carolina.....	SC.....L.....	264,005	700,655	(1,142)	126,971	107,959	104,369
42.	South Dakota.....	SD.....L.....	15,744	64,079	6,662	8,624	92,417	74,560
43.	Tennessee.....	TN.....L.....	11,579,259	11,958,040	8,787,760	6,210,485	4,491,229	5,479,142
44.	Texas.....	TX.....L.....	814,093	1,061,033	165,549	244,013	326,410	273,226
45.	Utah.....	UT.....L.....	80,587	123,483	60,626	169,580	45,191	79,227
46.	Vermont.....	VT.....L.....	206,109	217,192	11,400	2,225	4,136	3,663
47.	Virginia.....	VA.....L.....	221,983	558,463	11,054	67,235	51,406	58,426
48.	Washington.....	WA.....L.....	15,426,048	18,491,785	11,174,647	13,720,496	10,431,340	9,741,220
49.	West Virginia.....	WV.....L.....	8,285	5,947	-	1,554	2,660	4,174
50.	Wisconsin.....	WI.....L.....	270,756	390,487	55,810	47,570	55,881	50,093
51.	Wyoming.....	WY.....L.....	26,374	24,699	5,492	28,766	12,388	9,548
52.	American Samoa.....	AS.....N.....						
53.	Guam.....	GU.....N.....						
54.	Puerto Rico.....	PR.....N.....						
55.	US Virgin Islands.....	VI.....N.....						
56.	Northern Mariana Islands.....	MP.....N.....						
57.	Canada.....	CAN.....N.....						
58.	Aggregate Other Alien.....	OT.....XXX.....	0	0	0	0	0	0
59.	Totals.....	(a)...51	274,975,765	305,710,205	160,701,187	163,841,653	200,326,387	184,603,481

DETAILS OF WRITE-INS

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

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

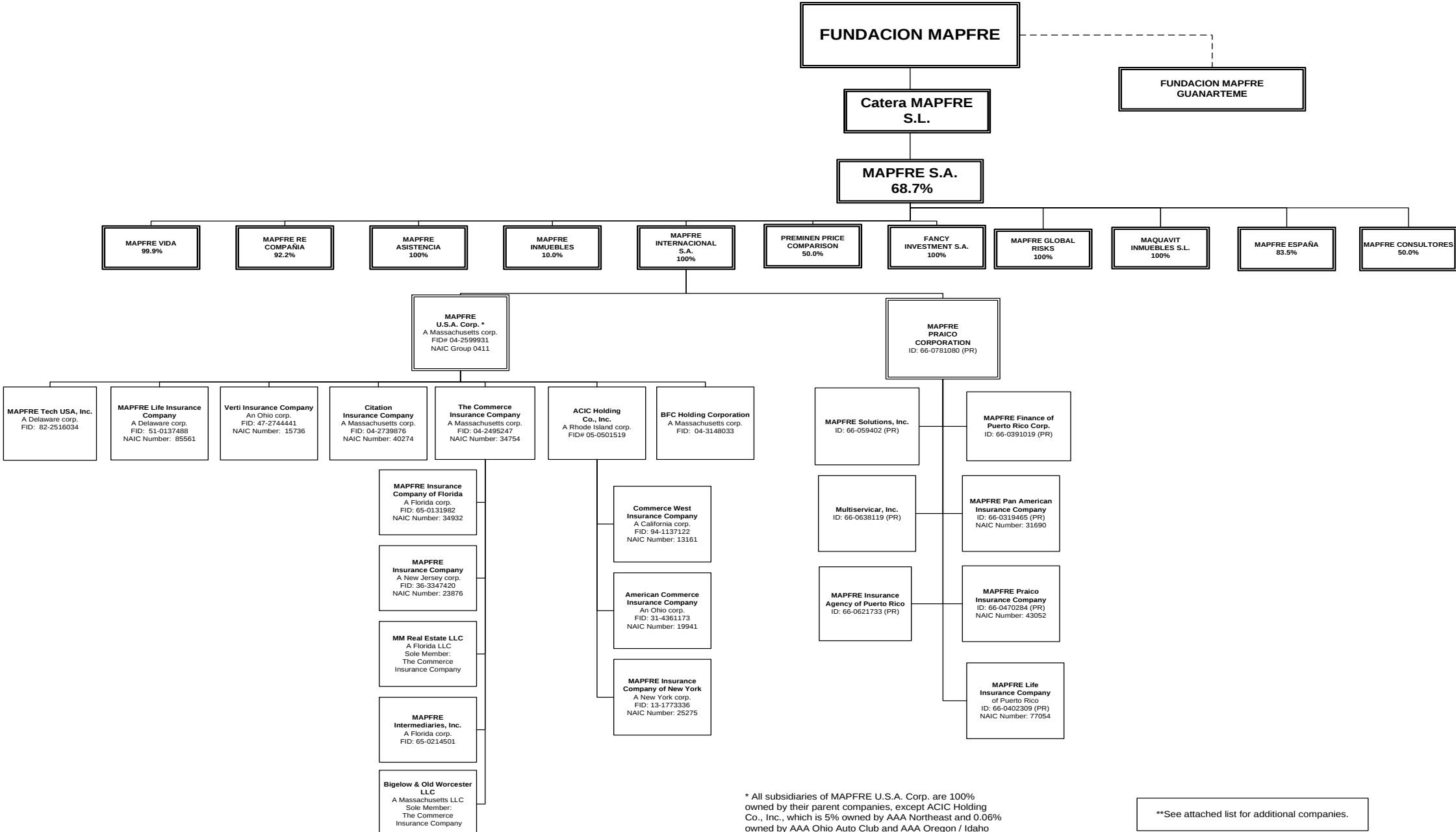
(E) - Eligible - Reporting Entities eligible or approved to write Surplus Lines in the state (other than their state of domicile see DSLI); (D) - DSLI - Domestic Surplus Lines Insurer

(DSLI) - Reporting entities authorized to write Surplus Lines in the state of domicile; (N) - None of the above - Not allowed to write business in the state.

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

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

PART 1 – ORGANIZATIONAL CHART



American Commerce Insurance Company

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	83.5		
CENTROS MEDICOS MAPFRE, S.A.	100.0		
CLUB MAPFRE, S.A.	100.0		
MAPFRE AUTOMOCION S.A.U.	100.0		
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	100.0		
VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	100.0		
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5		
MAPFRE TECH	63.5		
MAPFRE VIDEO Y COMUNICACION, S.A.	75.0		
DISENO URBANO, S.L.	50.0		
SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.	50.0		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	100.0		
AGROSEGURO, S.A.	20.8		
SALVADOR CAETANO AUTO (SGPS), S.A.	26.0		
ONLINE SHOPPING CLUB EUROPE, S.L.	49.9		
BANKINTER SEGUROS GENERALES, S.A.	50.1		
RASTREATOR.COM LTD	25.0		
ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	22.5		
AUDATEX ESPANA, S.A.	12.5		
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0		
TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	23.0		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
FUNESPANA, S.A.	95.8		
FUNERARIA PEDROLA, S.L.	100.0		
TANATORIUM ZRT	100.0		
ALL FUNERAL SERVICES, S.L.	100.0		
SALZILLO SERVICIOS FUNERARIOS S.L.	45.0		
SERVICIOS Y GESTION FUNERARIA, S.A.	100.0		
TANATORI BENIDORM, S.L.	100.0		
TANATORI LA DAMA D'ELX, S.L.	97.1		
ZACARIAS NUNO, S.L.	50.0		
SERVICIOS FUNERARIOS FUNEMADRID, S.A.	100.0		
CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	49.0		
FUNETXEA, S.L.	100.0		
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.0		
INICIATIVAS ALCAESAR, S.L.	40.0		
NUEVO TANATORIO, S.L.	50.0		
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.0		
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.0		
GAB MANAGEMENT & CONSULTING, S.R.L.	77.6		
POMPES FUNEBRES DOMINGO, S.L.	75.0		
DE MENA SERVICIOS FUNERARIOS S.L.	70.0		
CEMENTERIO PARQUE ANDUJAR, S.L.	60.0		
FUNERARIA HISPALENSE, S.L.	50.0		
ISABELO ALVAREZ MAYORGA, S.A.	50.0		
SERVICIOS FUNERARIOS DEL NERVION, S.L.	50.0		
TANATORIO DE ECIJA, S.L.	25.0		
TANATORIO SE-30 SEVILLA, S.L.	10.0		
FUNESPANA CHILE, S.A.	50.0		
FUNEUROPEA CHILE, S.A.	50.0		
FUNERARIAS REUNIDAS EL BIERZO, S.A.	85.8		
MAPFRE INMUEBLES, S.G.A.	76.8		
DESARROLLOS URBANOS CIC, S.A.	99.9		
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9		
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.7		
MAPFRE SEGUROS GERAIS S.A.	100.0		
MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	100.0		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.9		
MAPFRE TECH	12.0		
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0		
MIRACETI S.A.	100.0		
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	100.0		
MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	100.0		
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	100.0		
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.9		
GESTION MODA SHOPPING S.A.	99.8		
BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	51.0		
BANKINTER SEGUROS DE VIDA, S.A.	50.0		
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.0		
UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	50.0		
DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	50.0		
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3		
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	92.2		
CIAR INVESTMENT	100.0		
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.0		
REINSURANCE MANAGEMENT INC.	100.0		
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	100.0		
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	100.0		
MAPFRE CHILE REASEGUROS, S.A.	100.0		
C R ARGENTINA, S.A.	100.0		
CAJA REASEGURADORA DE CHILE, S.A.	99.8		
INMOBILIARIA COSTA DE MONTEMAR, S.A.	31.4		
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.0		
MAPFRE INTERNACIONAL S.A.	100.0		
MAPFRE TECH	20.0		
MAPFRE ARGENTINA HOLDING S.A.	100.0		
CLUB MAPFRE ARGENTINA	97.0		
MAPFRE ARGENTINA SEGUROS S.A.	100.0		
CESVI ARGENTINA, S.A.	60.6		
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0		
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0		
MAPFRE PRAICO CORPORATION	100.0		66-0781080
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0	31690	66-0319465
MAPFRE FINANCE OF PUERTO RICO CORP	100.0		66-0391019
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0		66-0621733
MAPFRE SOLUTIONS, INC.	100.0		66-0595402
MULTISERVICAR INC.	100.0		66-0638119
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0	77054	66-0402309

American Commerce Insurance Company

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 COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	12.7	MAPFRE S.A.		
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	87.3	MAPFRE S.A.		
MAPFRE CHILE VIDA S.A.	100.0	MAPFRE S.A.		
MAPFRE COMPANIA 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 ASISTENCIA S.A.	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, COMPANIA 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 COMPANIA DE SEGUROS, S.A.	60.0	MAPFRE S.A.		
MAPFRE SOFT S.A.	100.0	MAPFRE S.A.		
MAPFRE PARAGUAY COMPANIA 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 COMPANIA DE SECUROS, 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.	100.0	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.	99.9	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.	73.3	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.	78.0	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
VERTI 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	6.8	MAPFRE S.A.		
MAPFRE TECH USA, INC	100.0	MAPFRE S.A.		82-2516034
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 SIGORTA, A.S.	99.7	MAPFRE S.A.		
MAPFRE YASAM SIGORTA, A.S.	99.5	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.		

American Commerce Insurance Company

EUROMED RISK SOLUTIONIS LIMITED	100.0	MAPFRE S.A.
EURO GLOBE HOLDINGS 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.	98.4	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 INTERNATIONAL 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.
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.
INSURE AND GO AUSTRALIA	100.0	MAPFRE S.A.
BRASIL ASISTENCIA 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 LIMITES	100.0	MAPFRE S.A.
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	98.1	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.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6	MAPFRE S.A.
URUGUAY ASISTENCIA, S.A.	97.9	MAPFRE S.A.
SUR ASISTENCIA, S.A.	99.0	MAPFRE S.A.
IBEROASISTENCIA, S.A.	99.9	MAPFRE S.A.
NILE ASSIT	98.0	MAPFRE S.A.
TUR ASSIST, LTD.	97.0	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.
GULF ASSIST, B.S.C.	74.6	MAPFRE S.A.
CARIBE ASISTENCIA	83.6	MAPFRE S.A.
BENELUX ASSIST, S.A.	100.0	MAPFRE S.A.
PANAMA ASISTENCIA, S.A.	82.1	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.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	98.9	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 COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	16.5	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.	100.0	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.

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12	Members														
							FUNDACION MAPFRE.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	100.000	FUNDACION MAPFRE.....	N.....	
							CARTERA MAPFRE, S.L.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	100.000	FUNDACION MAPFRE.....	N.....	
							MAPFRE, S.A.....	ESP.....	UIP.....	CARTERA MAPFRE, S.L.....	OWNERSHIP....	68.700	FUNDACION MAPFRE.....	N.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	83.500	MAPFRE S.A.....	N.....	
							CENTROS MEDICOS MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE AUTOMOCION S.A.U.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.500	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	63.500	MAPFRE S.A.....	N.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	75.000	MAPFRE S.A.....	N.....	
							DISENO URBANO, S.L.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS COMERCIALES Y ENERGETICOS DE BENIDORM, S.L.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							AGROSEGURO, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	20.800	MAPFRE S.A.....	N.....	
							SALVADOR CAETANO AUTO (SGPS), S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	26.000	MAPFRE S.A.....	N.....	
							ONLINE SHOPPING CLUB EUROPE, S.L.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	49.900	MAPFRE S.A.....	N.....	
							BANKINTER SEGUROS GENERALES, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	50.100	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.1							RASTREATOR.COM LTD.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	25.000	MAPFRE S.A.....	N.....	
							ESPACIOS AVANZADOS DEL MEDITERRANEO, S.L.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	22.500	MAPFRE S.A.....	N.....	
							AUDATEX ESPANA, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	12.500	MAPFRE S.A.....	N.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	10.000	MAPFRE S.A.....	N.....	
							TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	22.950	MAPFRE S.A.....	N.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNESPANA, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	95.800	MAPFRE S.A.....	N.....	
							FUNERARIA PEDROLA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							TANATORIUM ZRT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ALL FUNERAL SERVICES, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							SALZILLO SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	45.000	MAPFRE S.A.....	N.....	
							SERVICIOS Y GESTION FUNERARIA, S.A.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							TANATORI BENIDORM, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A...	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							TANATORI LA DAMA D'ELX, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A...	OWNERSHIP....	97.100	MAPFRE S.A.....	N.....	
							ZACARIAS NUNO, S.L.....	ESP.....	NIA.....	SERVICIOS Y GESTION FUNERARIA, S.A...	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS FUNEMADRID, S.A.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	ESP.....	NIA.....	SERVICIOS FUNERARIOS FUNEMADRID, S.A.	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	
							FUNETXEA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	70.000	MAPFRE S.A.....	N.....	
							INICIATIVAS ALCAESAR, S.L.....	ESP.....	NIA.....	SERVICIOS FUNERARIOS FUNEMADRID, S.A.	OWNERSHIP....	40.000	MAPFRE S.A.....	N.....	
							NUEVO TANATORIO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.2

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							GAB MANAGEMENT & CONSULTING, S.R.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	77.600	MAPFRE S.A.....	N.....	
							POMPES FUNEBRES DOMINGO, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	75.000	MAPFRE S.A.....	N.....	
							DE MENA SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	70.000	MAPFRE S.A.....	N.....	
							CEMENTERIO PARQUE ANDUJAR, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	60.000	MAPFRE S.A.....	N.....	
							FUNERARIA HISPALENSE, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							ISABELO ALVAREZ MAYORGA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS DEL NERVION, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							TANATORIO DE ECJA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	25.000	MAPFRE S.A.....	N.....	
							TANATORIO SE-30 SEVILLA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	N.....	
							FUNESPANA CHILE, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							FUNEUROPEA CHILE, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							FUNERARIAS REUNIDAS EL BIERZO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	85.800	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	76.800	MAPFRE S.A.....	N.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	66.700	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PORTUGAL SEGUROS DE VIDA S.A.....	PRT.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE, S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP.....	NIA.....	MAPFRE, S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	12.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	25.000	MAPFRE S.A.....	N.....	
							MIRACETI S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.3

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.800	MAPFRE S.A.....	N.....	
							BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							UNION DEL DUERO COMPANIA DE SEGUROS DE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							DUERO PENSIONES ENTIDAD GESTORA DE FONDOS DE PENSIONES, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L...	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	33.300	MAPFRE S.A.....	N.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE, S.A.....	OWNERSHIP....	92.200	MAPFRE S.A.....	N.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.4

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
0411	MAPFRE INSURANCE GROUP	31690	66-0781080				REINSURANCE MANAGEMENT INC.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE CHILE REASEGUROS, S.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							C R ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CAJA REASEGURADORA DE CHILE, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	99.800	MAPFRE S.A.....	N.....	
							INMOBILIARIA COSTA DE MONTEMAR, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	31.400	MAPFRE S.A.....	N.....	
							MAPFRE MANDATOS Y SERVICIOS, S.A.....	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	95.000	MAPFRE S.A.....	N.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	NIA.....	MAPFRE, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	20.000	MAPFRE S.A.....	N.....	
	MAPFRE INSURANCE GROUP	31690	66-0319465				MAPFRE ARGENTINA HOLDING S.A.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	97.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CESVI ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP....	60.600	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	36.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	64.000	MAPFRE S.A.....	N.....	
							MAPFRE PRAICO CORPORATION.....	PR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PAN AMERICAN INSURANCE COMPANY	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE FINANCE OF PUERTO RICO CORP	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
0411	MAPFRE INSURANCE GROUP	77054	66-0402309				MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
0411	MAPFRE INSURANCE GROUP	43052	66-0402309				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PRAICO INSURANCE COMPANY....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.5

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.500	MAPFRE S.A.....	...N....	
							CLUB MAPFRE S.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							CEFOPROSEG C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							INVERSORA SEGURIDAD C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							AUTOMOTRIZ MULTISERVICAR, C.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE CHILE SEGUROS S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE CHILE ASESORIAS, S.A.....	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE ASESORIAS, S.A.....	OWNERSHIP....	12.700	MAPFRE S.A.....	...N....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	NIA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP....	87.300	MAPFRE S.A.....	...N....	
							MAPFRE CHILE VIDA S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	CHL.....	NIA.....	MAPFRE CHILE VIDA S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	98.800	MAPFRE S.A.....	...N....	
							MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	BRA.....	IA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE SAUDE LTDA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	91.700	MAPFRE S.A.....	...N....	
							MAPFRE PREVIDENCIA S.A.....	BRA.....	IA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE CAPITALIZACAO.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N....	
							MAPFRE BB SH2 PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.6

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							ALIANCA DO BRASIL SEGUROS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	BRA.....	IA.....	MAPFRE BB SH2 PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSISTENCIA S.A.....	BRA.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							BB MAPFRE SH1 PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	25.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA S.A.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.....	BRA.....	IA.....	BB MAPFRE SH1 PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.....	COL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	94.300	MAPFRE S.A.....	N.....	
							CREDIMAPFRE.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.....	OWNERSHIP....	94.900	MAPFRE S.A.....	N.....	
							AUTOMOTORES CAPITAL LTDA.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SERVICIOS EXEQUIALES SAS.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE COLOMBIA VIDA S.A.....	COL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	94.400	MAPFRE S.A.....	N.....	
							GESTIMAP S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP....	92.300	MAPFRE S.A.....	N.....	
							CESVI COLOMBIA, S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP....	62.300	MAPFRE S.A.....	N.....	
							MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.....	PER.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	67.300	MAPFRE S.A.....	N.....	
							CORPORACION FINISTERRE, S.A.....	PER.....	NIA.....	MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS.....	PER.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.300	MAPFRE S.A.....	N.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD.....	PER.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	98.600	MAPFRE S.A.....	N.....	
							MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.....	ECU.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	60.000	MAPFRE S.A.....	N.....	
							MAPFRE SOFT S.A.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.....	PRY.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	89.500	MAPFRE S.A.....	N.....	
							APOINT S.A.....	URY.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE LA URUGUAYA S.A.....	URY.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE DOMINICANA S.A.....	DOM.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE BHD COMPANIA DE SECUROS, S.A.....	DOM.....	NIA.....	MAPFRE DOMINICANA S.A.....	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.7

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							CREDI PRIMAS, S.A.....	DOM.....	NIA.....	MAPFRE BHD COMPANIA DE SECUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							GRUPO CORPORATIVO LML S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	IA.....	GRUPO CORPORATIVO LML S.A. DE C.V....	OWNERSHIP.....	44.300	MAPFRE S.A.....	N.....	
							MAPFRE TEPEYAC S.A.....	MEX.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	55.700	MAPFRE S.A.....	N.....	
							MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TEPEYAC INC.....	CA.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SERVICIOS MEXICANOS.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE FIANZAS S.A.....	MEX.....	IA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	16.000	MAPFRE S.A.....	N.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	16.700	MAPFRE S.A.....	N.....	
							MAPFRE TEPEYAC ASESORES.....	MEX.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	N.....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							MAPFRE PANAMA.....	PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	99.300	MAPFRE S.A.....	N.....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	78.900	MAPFRE S.A.....	N.....	
							MAPFRE TENEDORA DE ACC, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP.....	73.300	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS COSTA RICA, S.A.....	CRI.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GUATEMALA, S.A.....	GTM.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS NICARAGUA, S.A.....	NIC.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	25.100	MAPFRE S.A.....	N.....	
							MAPFRE LA CENTRO AMERICANA, S.A.....	SLV.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP.....	78.000	MAPFRE S.A.....	N.....	
							AMA/ASISTENCIA MEDICA ADMISTRADA, C.A.	VEN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	99.700	MAPFRE S.A.....	N.....	
			04-2599931..				MAPFRE USA CORPORATION INC.....	MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	85561...	51-0137488..				MAPFRE LIFE INSURANCE COMPANY.....	DE.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736...	47-2744441..				VERTI INSURANCE COMPANY.....	OH.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274...	04-2739876..				THE CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.8

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
0411			04-3148033..				BFC HOLDING CORPORATION.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							INSPOP USA, LLC.....	VA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	6.800	MAPFRE S.A.....	...N.....	
			82-2516034..				MAPFRE TECH USA, INC.....	DE.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754...	04-2495247..				THE COMMERCE INSURANCE COMPANY....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			65-0214501..				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932...	65-0131982..				MAPFRE INSURANCE COMPANY OF FLORIDA	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876...	36-3347420..				MAPFRE INSURANCE COMPANY.....	NJ.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MM REAL ESTATE, LLC.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			04-2495247..				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			05-0501519..				ACIC HOLDINGS COMPANY, INC.....	RI.....	UDP.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	95.000	MAPFRE S.A.....	...N.....	*.....
	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161...	94-1137122..				THE COMMERCE WEST INSURANCE COMPANY	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941...	31-4361173..				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	25275...	13-1773336..				MAPFRE INSURANCE COMPANY OF NEW YORK	NY.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SIGORTA, A.S.....	TUR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.700	MAPFRE S.A.....	...N.....	
							MAPFRE YASAM SIGORTA, A.S.....	TUR.....	NIA.....	GENEL SIGORTA, A.S.....	OWNERSHIP....	99.500	MAPFRE S.A.....	...N.....	
							GENEL SERVIS A.S.....	TUR.....	NIA.....	GENEL SIGORTA, A.S.....	OWNERSHIP....	51.000	MAPFRE S.A.....	...N.....	
							MAPFRE INSULAR INSURANCE CORPORATION	PHL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	74.900	MAPFRE S.A.....	...N.....	
							MIDDLESEA INSURANCE P.L.C.....	MLT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	54.600	MAPFRE S.A.....	...N.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	49.000	MAPFRE S.A.....	...N.....	
							M.S.V. LIFE P.L.C.....	MLT.....	IA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							GROWTH INVESTMENTS LIMITED.....	MLT.....	NIA.....	M.S.V. LIFE P.L.C.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	M.S.V. LIFE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							BEE INSURANCE MANAGEMENT LTD.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.9

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.9							EUROMED RISK SOLUTIONIS LIMITED.....	MLT.....	NIA.....	BEE INSURANCE MANAGEMENT LTD.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							EURO GLOBE HOLDINGS LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							PT ASURANSI BINA DANA ARTA TBK.....	IDN.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	20.000	MAPFRE S.A.....	N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	NIA.....	PT ASURANSI BINA DANA ARTA TBK.....	OWNERSHIP.....	49.000	MAPFRE S.A.....	N.....	
							DIRECT LINE VERSICHERUNG AKTIENGESELLSCHAFT.....	DEU.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							DIRECT LINE INSURANCE S.P.A.....	ITA.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	98.400	MAPFRE S.A.....	N.....	
							VENEASISTENCIA, S.A.....	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							IRELAND ASSIST, LTD.....	IRL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MEXICO ASISTENCIA, S.A.....	MEX.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							CENTRO INTERNATIONAL DE SERVICIOS Y ASISTENCIA, S.A.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							ALLMAP ASSIST GESELLSCHAFT FUR BEISTANDSLEISTUNGEN MBH.....	DEU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							ARABA ASSIST FOR LOGISTIC SERVICES.....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							LLC MAPFRE WARRANTY.....	RUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA LIMITED.....	HKG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA COMPANY LIMITED....	TWN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE WARRANTY JAPAN KABUSHIKI KAISHA	JPN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INSURE AND GO INSURANCE SERVICES USA CORP.	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							QUETZAL ASISTENCIA, S.A.....	GTM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							NICASSIT, S.A.....	NIC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							EL SALVADOR ASISTENCIA, S.A.....	SLV.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							NORASIST, INC D/B/A ROAD CANADA.....	CAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							BRICKELL FINANCIAL SERVICES MOTOR CLUB INC.	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INSURE AND GO AUSTRALIA.....	AUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							BRASIL ASISTENCIA S.A.....	BRA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SOLUTIONS DO BRASIL LTDA	BRA.....	NIA.....	BRASIL ASISTENCIA S/A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ABRAXAS SOFTWARE, LTD.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ABRAXAS INSURANCE	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE WARRANTY UK LIMITED.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							HOME 3.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE WARRANTY S.P.A.....	ITA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.11

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE WARRANTIES.....	LUX.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FRANCE ASSIST.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE INSURANCE SERVICES S.L.R.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSISTANCE USA INC.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CENTURY AUTOMOTIVE SERVICES COMPANY	NM.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FEDERAL ASSIST Co.....	FL.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INSURE AND GO.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INSURE AND GO AUSTRALASIA.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CIG SERVICES LIMITES.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	COL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.100	MAPFRE S.A.....	N.....	
							ECUASISTENCIA S.A.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	94.500	MAPFRE S.A.....	N.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							CONSULTING DE SOLUCIONES Y TECNOLOGIAS SIAM, S.A.	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.600	MAPFRE S.A.....	N.....	
							URUGUAY ASISTENCIA, S.A.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.900	MAPFRE S.A.....	N.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.12

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							IBEROASISTENCIA, S.A.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							NILE ASSIT.....	EGY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.000	MAPFRE S.A.....	N.....	
							TUR ASSIST, LTD.....	TUR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.000	MAPFRE S.A.....	N.....	
							ROAD CHINA ASSISTANCE CO., LTD.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							IBERO ASISTENCIA, S.A.....	PRT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	74.600	MAPFRE S.A.....	N.....	
							CARIBE ASISTENCIA.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	83.600	MAPFRE S.A.....	N.....	
							BENELUX ASSIST, S.A.....	BEL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							PANAMA ASISTENCIA, S.A.....	PAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	82.100	MAPFRE S.A.....	N.....	
							ROADSIDE ASSIST ALGERIE SPA.....	DZA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	60.300	MAPFRE S.A.....	N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							AFRIQUE ASSISTANCE, S.A.....	TUN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.13							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	PRY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	98.900	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	N.....	
							MAPFRE GLOBAL RISKS.....	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	10.000	MAPFRE S.A.....	N.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	16.500	MAPFRE S.A.....	N.....	
							SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							INDUSTRIAL RE S.A.....	LUX.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							MAQUAVIT INMUEBLES, S.L.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							PROVITAE CENTROS ASISTENCIALES, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	
							FANCY INVESTMENT S.A.....	URY.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							PREMINEN PRICE COMPARISON HOLDINGS LIMITED	GBR.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	50.000	MAPFRE S.A.....	N.....	

AsterExplanation

*	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 Northeast and 0.06% owned by AAA Ohio Auto Club and AAA Oregon/Idaho each.
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PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	7,439,797	2,950,799	39.662	53.168
2. Allied lines.....	6,079,414	68,024	1.119	55.262
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	93,526,845	42,751,796	45.711	43.648
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	310,384	(37,329)	(12.027)	102.772
10. Financial guaranty.....			0.000	
11.1. Medical professional liability - occurrence.....			0.000	
11.2. Medical professional liability - claims-made.....			0.000	
12. Earthquake.....			0.000	
13. Group accident and health.....	8,305	10,018	120.626	126.506
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1. Other liability-occurrence.....	13,228,825	6,907,735	52.217	0.144
17.2. Other liability-claims made.....			0.000	
17.3. Excess workers' compensation.....			0.000	
18.1. Products liability-occurrence.....			0.000	
18.2. Products liability-claims made.....			0.000	
19.1, 19.2. Private passenger auto liability.....	94,824,844	79,965,803	84.330	90.205
19.3, 19.4. Commercial auto liability.....			0.000	
21. Auto physical damage.....	58,952,375	34,664,978	58.802	60.660
22. Aircraft (all perils).....	8,328,438	2,710,516	32.545	37.113
23. Fidelity.....			0.000	
24. Surety.....			0.000	
26. Burglary and theft.....			0.000	
27. Boiler and machinery.....			0.000	
28. Credit.....			0.000	
29. International.....			0.000	
30. Warranty.....			0.000	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	22,114	20,767	93.909	101.173
35. Totals.....	282,721,341	170,013,107	60.135	62.251
DETAILS OF WRITE-INS				
3401. TRAVEL.....	22,114	20,767	93.909	101.173
3402.			0.000	
3403.			0.000	
3498. Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0.000	XXX
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	22,114	20,767	93.909	101.173

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	2,475,899	7,001,166	7,818,396
2. Allied lines.....	2,013,860	5,875,489	80,483
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	31,099,414	89,790,640	104,105,333
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	55,947	199,567	1,708,608
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....		2,179	91,303
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	6,627,159	18,205,758	16,453,658
17.2. Other liability-claims made.....			
17.3. Excess workers' compensation.....			
18.1. Products liability-occurrence.....			
18.2. Products liability-claims made.....			
19.1 19.2. Private passenger auto liability.....	30,188,516	91,324,481	103,197,263
19.3 19.4. Commercial auto liability.....			
21. Auto physical damage.....	18,157,235	54,534,431	64,803,383
22. Aircraft (all perils).....	3,023,130	8,033,894	7,266,085
23. Fidelity.....			
24. Surety.....			
26. Burglary and theft.....			
27. Boiler and machinery.....			
28. Credit.....			
29. International.....			
30. Warranty.....			
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	0	8,159	185,693
35. Totals.....	93,641,160	274,975,764	305,710,205
DETAILS OF WRITE-INS			
3401. TRAVEL.....		8,159	185,693
3402.			
3403.			
3498. Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	0	8,159	185,693

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

[illegible]

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

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

Explanation:

1.

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

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

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

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

Bar Code:



American Commerce Insurance Company

Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31, Prior Year Net Admitted Assets
2504. Premium Tax Recoverable.....	1,214,001		1,214,001	351,000
2597. Summary of remaining write-ins for Line 25.....	1,214,001	0	1,214,001	351,000

American Commerce Insurance Company

SCHEDULE A - VERIFICATION

Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,262,841	1,453,687
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....	207,480	(66,022)
3. Current year change in encumbrances.....		
4. Total gain (loss) on disposals.....		
5. Deduct amounts received on disposals.....		
6. Total foreign exchange change in book/adjusted carrying value.....		
7. Deduct current year's other-than-temporary impairment recognized.....		
8. Deduct current year's depreciation.....	92,957	124,824
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,377,364	1,262,841
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,377,364	1,262,841

SCHEDULE B - VERIFICATION

Mortgage Loans

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

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

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

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	138,167,873	130,020,682
2. Cost of bonds and stocks acquired.....	56,094,507	78,650,686
3. Accrual of discount.....	102,195	380,185
4. Unrealized valuation increase (decrease).....	915,894	603,820
5. Total gain (loss) on disposals.....	392,743	1,566,798
6. Deduct consideration for bonds and stocks disposed of.....	31,714,159	72,245,560
7. Deduct amortization of premium.....	620,700	808,738
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other-than-temporary impairment recognized.....	1,003,949	
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	162,334,404	138,167,873
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	162,334,404	138,167,873

SCHEDULE D - PART 1B

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

	1	2	3	4	5	6	7	8
NAIC Designation	Book/Adjusted Carrying Value Beginning of Current Quarter	Acquisitions During Current Quarter	Dispositions During Current Quarter	Non-Trading Activity During Current Quarter	Book/Adjusted Carrying Value End of First Quarter	Book/Adjusted Carrying Value End of Second Quarter	Book/Adjusted Carrying Value End of Third Quarter	Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	128,362,744	12,073,459	7,337,658	(218,231)	120,613,356	128,362,744	132,880,314	108,044,475
2. NAIC 2 (a).....	24,669,459	3,024,700		(61,559)	26,724,158	24,669,459	27,632,600	26,723,639
3. NAIC 3 (a).....	976,830		4,291	57,922	975,030	976,830	1,030,461	999,531
4. NAIC 4 (a).....							0	44,654
5. NAIC 5 (a).....							0	
6. NAIC 6 (a).....	1,462,000		1,523,622	61,622	1,482,400	1,462,000	0	1,566,200
7. Total Bonds.....	155,471,033	15,098,159	8,865,571	(160,246)	149,794,944	155,471,033	161,543,375	137,378,499
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....							0	
10. NAIC 3.....	790,472			557	789,966	790,472	791,029	789,374
11. NAIC 4.....							0	
12. NAIC 5.....							0	
13. NAIC 6.....							0	
14. Total Preferred Stock.....	790,472	0	0	557	789,966	790,472	791,029	789,374
15. Total Bonds and Preferred Stock.....	156,261,505	15,098,159	8,865,571	(159,689)	150,584,910	156,261,505	162,334,404	138,167,873

(a) Book/Adjusted Carrying Value column for the end of the current reporting period includes the following amount of short-term and cash equivalent bonds by NAIC designation:

NAIC 1 \$.....0; NAIC 2 \$.....0; NAIC 3 \$.....0; NAIC 4 \$.....0; NAIC 5 \$.....0; NAIC 6 \$.....0.

QSI02

Sch. DA - Pt. 1
NONE

Sch. DA - Verification
NONE

Sch. DB - Pt. A - Verification
NONE

Sch. DB - Pt. B - Verification
NONE

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

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

Sch. DB - Verification
NONE

Sch. E - Verification
NONE

Sch. B - Pt. 2
NONE

Sch. B - Pt. 3
NONE

Sch. BA - Pt. 2
NONE

Sch. BA - Pt. 3
NONE

SCHEDULE D - PART 3

Showing all Long-Term Bonds and Stocks ACQUIRED During Current Quarter

1	2		3	4	5	6	7	8	9	10		
CUSIP Identification	Description		Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation or Market Indicator (a)		
Bonds - U.S. Political Subdivisions of States												
447025	JM	0	HUNTSVILLE ALA	GO.....		09/29/2017.....	RAYMOND JAMES.....		1,046,000	1,000,000	3,499	1FE.....
2499999	Total - Bonds - U.S. Political Subdivisions of States.....								1,046,000	1,000,000	3,499	XXX.....
Bonds - U.S. Special Revenue and Special Assessment												
3133EH	NR	0	FEDERAL FARM CREDIT BANK.....		07/26/2017.....	RW PRESSPRICH & CO.....		1,496,730	1,500,000	4,515	1.....	
3133EH	NS	8	FEDERAL FARM CREDIT BANK.....		07/26/2017.....	RW PRESSPRICH & CO.....		1,495,500	1,500,000	4,865	1.....	
3199999	Total - Bonds - U.S. Special Revenue and Special Assessments.....								2,992,230	3,000,000	9,380	XXX.....
Bonds - Industrial and Miscellaneous												
404280	BB	4	HSBC HOLDINGS PLC.....	D.....	07/25/2017.....	BAIRD, ROBERT W. & CO.....		1,038,270	1,000,000	6,825	1FE.....	
75625Q	AE	9	RECKITT BENCKISER TSY.....	D.....	08/01/2017.....	RAYMOND JAMES.....		1,997,420	2,000,000	6,333	1FE.....	
035242	AP	1	ANHEUSER BUSCH INBEV FIN INC.....		09/11/2017.....	PIERPONT SECURITIES.....		1,038,840	1,000,000	4,258	2FE.....	
124857	AS	2	CBS CORP.....		09/13/2017.....	WELLS FARGO SECURITIES, LLC.....		1,985,860	2,000,000	10,000	2FE.....	
19416Q	EG	1	COLGATE-PALMOLIVE CO.....		07/20/2017.....	RAYMOND JAMES.....		1,895,719	1,811,000	21,254	1FE.....	
233851	CS	1	DAIMLER FINANCE NA LLC.....		08/29/2017.....	RAYMOND JAMES.....		2,036,080	2,000,000	8,708	1FE.....	
665859	AP	9	NORTHERN TRUST CORP.....		09/27/2017.....	GOLDMAN SACHS.....		1,067,740	1,000,000	16,349	1FE.....	
3899999	Total - Bonds - Industrial and Miscellaneous.....								11,059,929	10,811,000	73,727	XXX.....
8399997	Total - Bonds - Part 3.....								15,098,159	14,811,000	86,606	XXX.....
8399999	Total - Bonds.....								15,098,159	14,811,000	86,606	XXX.....
9999999	Total - Bonds, Preferred and Common Stocks.....								15,098,159	XXX	86,606	XXX.....

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

SCHEDULE D - PART 4

Showing all Long-Term Bonds and Stocks SOLD, REDEEMED or Otherwise DISPOSED OF During Current Quarter

1	2		3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
											11	12	13	14	15							
CUSIP Identification	Description		F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase (Decrease)	Current Year's (Amortization) / Accretion	Current Year's Other-Than- Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest / Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation or Market Indicator (a)
Bonds - U.S. Government																						
36225B	GW	2	..	09/15/2017.	PAYDOWN OF PRINCIPAL.....		3,880	3,880	4,022	3,977		(3)		(3)		3,974		(94)	(94)	176	11/15/2029.	1.....
83162C	TA	1		07/03/2017.	PRINCIPAL RECEIPT.....		289,506	289,506	319,497	305,745		(16,239)		(16,239)		289,506			0	13,354	01/01/2030.	1.....
0599999. Total - Bonds - U.S. Government.....						293,386	293,386	323,519	309,722	0	(16,242)	0	(16,242)	0	293,480	0	(94)	(94)	13,530	XXX	XXX	
Bonds - U.S. Political Subdivisions of States																						
447025	JQ	1	..	09/29/2017.	RAYMOND JAMES.....		1,068,080	1,000,000	1,000,000	1,000,000				0		1,000,000		68,080	68,080	51,820	09/01/2027.	1FE.....
2499999. Total - Bonds - U.S. Political Subdivisions of States.....						1,068,080	1,000,000	1,000,000	1,000,000	0	0	0	0	0	1,000,000	0	68,080	68,080	51,820	XXX	XXX	
Bonds - U.S. Special Revenue and Special Assessment																						
23410B	AB	7	..	09/01/2017.	CALLED @ 100.0000000.....		1,436	1,436	1,493	1,447		(3)		(3)		1,443		(7)	(7)	49	12/01/2038.	1FE.....
254840	AN	1		07/03/2017.	MATURITY.....		1,120,000	1,120,000	608,328	1,094,527		25,473		25,473		1,120,000			0		07/01/2017.	1FE.....
31396P	GT	2	..	09/25/2017.	PRINCIPAL RECEIPT.....		29,864	29,864	33,410	32,092		(2,229)		(2,229)		29,864			0	979	10/25/2032.	1.....
3136A7	DJ	8		09/25/2017.	PRINCIPAL RECEIPT.....		35,453	35,453	35,314	35,326		127		127		35,453			0	694	01/25/2042.	1.....
3137B7	R7	6	..	09/15/2017.	PRINCIPAL RECEIPT.....		184,898	184,898	187,441	186,320		(1,421)		(1,421)		184,898			0	5,097	02/15/2054.	1.....
3138ER	2K	5		09/25/2017.	PRINCIPAL RECEIPT.....		358,097	358,097	387,751		(29,655)		(29,655)		358,097			0	7,093	01/01/2047.	1.....	
3138WG	RK	2	..	09/25/2017.	PRINCIPAL RECEIPT.....		27,167	27,167	28,865	28,896		(1,729)		(1,729)		27,167			0	650	03/01/2046.	1.....
3138WJ	B3	1		09/25/2017.	PRINCIPAL RECEIPT.....		675,313	675,313	727,545		(52,231)		(52,231)		675,313			0	15,846	10/01/2046.	1.....	
31418A	L5	5	..	09/25/2017.	PRINCIPAL RECEIPT.....		32,722	32,722	34,460	34,163		(1,441)		(1,441)		32,722			0	654	11/01/2042.	1.....
74529J	AQ	8		08/24/2017.	WELLS FARGO SECURITIES, LLC.....		1,530,000	20,000,000	1,528,800	1,566,200	922,585	38,785	1,003,949	(42,579)		1,523,622		6,378	6,378		08/01/2056.	6FE.....
3199999. Total - Bonds - U.S. Special Revenue and Special Assessments.....						3,994,950	22,464,949	3,573,407	2,978,971	922,585	(24,324)	1,003,949	(105,688)	0	3,988,579	0	6,371	6,371	31,062	XXX	XXX	
Bonds - Industrial and Miscellaneous																						
03073E	AM	7	..	09/13/2017.	MERRILL NY.....		1,015,660	1,000,000	1,013,910	1,011,583		(915)		(915)		1,010,667		4,993	4,993	33,764	03/01/2025.	1FE.....
03524B	AE	6		09/11/2017.	PIERPONT SECURITIES.....		1,057,890	1,000,000	1,044,250	1,036,300		(3,216)		(3,216)		1,033,084		24,806	24,806	41,317	02/01/2024.	1FE.....
12189L	AV	3	..	09/27/2017.	BAIRD, ROBERT W. & CO.....		506,850	500,000	507,750	507,130		(595)		(595)		506,535		315	315	14,917	04/01/2025.	1FE.....
590218	AF	0		09/25/2017.	VARIOUS.....		3,886	4,293	4,277	3,864	410	17		427		4,291		(405)	(405)	155	04/25/2036.	3FM.....
91324P	CP	5	..	09/11/2017.	PIERPONT SECURITIES.....		1,063,750	1,000,000	1,035,030	1,031,152		(2,217)		(2,217)		1,028,935		34,815	34,815	43,542	07/15/2025.	1FE.....
3899999. Total - Bonds - Industrial and Miscellaneous.....						3,648,036	3,504,293	3,605,217	3,590,029	410	(6,926)	0	(6,516)	0	3,583,512	0	64,524	64,524	133,695	XXX	XXX	
8399997. Total - Bonds - Part 4.....						9,004,452	27,262,629	8,502,143	7,878,722	922,995	(47,492)	1,003,949	(128,446)	0	8,865,571	0	138,881	138,881	230,107	XXX	XXX	
8399999. Total - Bonds.....						9,004,452	27,262,629	8,502,143	7,878,722	922,995	(47,492)	1,003,949	(128,446)	0	8,865,571	0	138,881	138,881	230,107	XXX	XXX	
9999999. Total - Bonds, Preferred and Common Stocks.....						9,004,452	XXX	8,502,143	7,878,722	922,995	(47,492)	1,003,949	(128,446)	0	8,865,571	0	138,881	138,881	230,107	XXX	XXX	

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

QE05

Sch. DB - Pt. A - Sn. 1

NONE

Sch. DB - Pt. B - Sn. 1

NONE

Sch. DB - Pt. D - Sn. 1

NONE

Sch. DB - Pt. D - Sn. 2

NONE

Sch. DL - Pt. 1

NONE

Sch. DL - Pt. 2

NONE

American Commerce Insurance Company
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of Interest Accrued at Current Statement Date	First Month	Second Month	Third Month	*
Open Depositories								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(5,375,604)	(7,458,266)	(5,899,301)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.001	68		107,475	100,974	204,744	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				546,283	1,228,947	971,007	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				132,674	339,288	94,766	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	0.009	1		344	344	345	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	0.009	12		5,595	5,599	5,603	XXX
MM: Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	0.009	15,380		5,571,257	8,363,013	6,033,890	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....				(106,263)	173,911	(743,093)	XXX
0199999. Total Open Depositories.....	XXX	XXX	15,461	0	881,761	2,753,810	667,960	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	15,461	0	881,761	2,753,810	667,960	XXX
0599999. Total Cash.....	XXX	XXX	15,461	0	881,761	2,753,810	667,960	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

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

NONE