

QUARTERLY STATEMENT

As of September 30, 2018
of the Condition and Affairs of the

American Commerce Insurance Company

NAIC Group Code.....0411, 0411	NAIC Company Code..... 19941	Employer's ID Number..... 31-4361173
(Current Period) (Prior Period)		
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 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	
Main Administrative Office	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Mail Address	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)</i>	
Primary Location of Books and Records	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Internet Web Site Address		
Statutory Statement Contact	CHRISTINE A CONRAD <i>(Name)</i> cconrad@mapfreusa.com <i>(E-Mail Address)</i>	508-943-9000-14376 <i>(Area Code) (Telephone Number) (Extension)</i> 508-949-4246 <i>(Fax Number)</i>

OFFICERS




Name	Title	Name	Title
1. 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

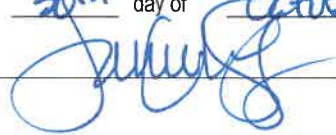
DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	ALFREDO CASTELO	DAVID HILL COCHRANE	TIMOTHY JOHN MORGAN
KIRK RICHARD NELSON	DANIEL PATRICK OLOHAN	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)	(Signature)	(Signature)
ALFREDO CASTELO	DANIEL PATRICK OLOHAN	ROBERT EDWARD MCKENNA
1. (Printed Name)	2. (Printed Name)	3. (Printed Name)
PRESIDENT & CEO	SECRETARY, GENERAL COUNSEL, & EVP	TREASURER, CAO, & SVP
(Title)	(Title)	(Title)

Subscribed and sworn to before me
This 30th day of October, 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 _____

 JANICE McGLYNN
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires Jan. 11, 2019

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.....	169,386,880		169,386,880	156,117,155
2. Stocks:				
2.1 Preferred stocks.....	2,572,140		2,572,140	
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).....	1,261,038		1,261,038	1,344,002
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 (\$.....9,624,721), cash equivalents (\$.....0) and short-term investments (\$.....0).....	9,624,721		9,624,721	(4,999,992)
6. Contract loans (including \$.....0 premium notes).....			0	
7. Derivatives.....			0	
8. Other invested assets.....			0	
9. Receivables for securities.....			0	
10. Securities lending reinvested collateral assets.....			0	
11. Aggregate write-ins for invested assets.....	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11).....	182,844,779	0	182,844,779	152,461,165
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,407,180		1,407,180	1,272,334
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	76,187,951		76,187,951	79,330,079
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.....	22,366,412		22,366,412	21,189,474
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	91,952
18.2 Net deferred tax asset.....	4,735,555	72,021	4,663,534	3,882,629
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	2,111,460		2,111,460	835,132
21. Furniture and equipment, including health care delivery assets (\$.....0).....	785,269	785,269	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....	4,075,220		4,075,220	4,276,124
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	84,555,418	1,233,800	83,321,618	77,383,433
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	379,069,244	2,091,090	376,978,154	340,722,323
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	379,069,244	2,091,090	376,978,154	340,722,323

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.....	1,233,800	1,233,800	0	
2502. Equity in pools and associations.....	78,507,316		78,507,316	76,581,382
2503. Premium Tax Accrual.....	3,068,302		3,068,302	802,051
2598. Summary of remaining write-ins for Line 25 from overflow page.....	1,746,000	0	1,746,000	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	84,555,418	1,233,800	83,321,618	77,383,433

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$....41,531,000).....	94,952,050	83,320,074
2. Reinsurance payable on paid losses and loss adjustment expenses.....	11,079,107	8,591,553
3. Loss adjustment expenses.....	18,789,158	16,002,091
4. Commissions payable, contingent commissions and other similar charges.....	5,075,991	7,723,473
5. Other expenses (excluding taxes, licenses and fees).....	1,154,352	1,017,167
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	38,379	96,095
7.1 Current federal and foreign income taxes (including \$....280,558 on realized capital gains (losses)).....	29,184	
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 \$....265,008,867 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).....	113,770,777	96,506,191
10. Advance premium.....	5,470,408	4,318,423
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	19,415,606	21,291,762
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.....		
20. Derivatives.....		
21. Payable for securities.....		
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	751,077	430,732
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	270,526,089	239,297,562
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	270,526,089	239,297,562
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.....	42,714,462	36,714,462
35. Unassigned funds (surplus).....	60,511,463	61,484,159
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....		
36.20.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36).....	106,452,065	101,424,761
38. Totals (Page 2, Line 28, Col. 3).....	376,978,154	340,722,323

DETAILS OF WRITE-INS

2501. Unclaimed property.....	751,077	430,732
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	751,077	430,732
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

American Commerce Insurance Company
STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$.....232,592,995).....	249,862,234	282,721,340	330,197,490
1.2 Assumed..... (written \$.....185,701,563).....	168,436,978	145,110,795	193,741,552
1.3 Ceded..... (written \$.....232,592,995).....	249,862,234	282,722,613	330,197,490
1.4 Net..... (written \$.....185,701,563).....	168,436,978	145,109,521	193,741,552
DEDUCTIONS:			
2. Losses incurred (current accident year \$.....103,418,000):			
2.1 Direct.....	180,072,660	170,013,106	226,906,858
2.2 Assumed.....	107,528,922	95,589,508	130,880,808
2.3 Ceded.....	180,072,660	170,013,106	226,906,858
2.4 Net.....	107,528,922	95,589,508	130,880,808
3. Loss adjustment expenses incurred.....	21,467,149	17,827,428	23,914,366
4. Other underwriting expenses incurred.....	50,710,776	37,141,954	49,520,033
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	179,706,847	150,558,890	204,315,207
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(11,269,869)	(5,449,369)	(10,573,655)
INVESTMENT INCOME			
9. Net investment income earned.....	4,182,518	3,512,647	5,320,865
10. Net realized capital gains (losses) less capital gains tax of \$.....488,780.....	2,067,735	(368,182)	(183,250)
11. Net investment gain (loss) (Lines 9 + 10).....	6,250,253	3,144,465	5,137,615
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$.....0 amount charged off \$.....0).....	0		
13. Finance and service charges not included in premiums.....	1,830,344	2,088,860	2,803,201
14. Aggregate write-ins for miscellaneous income.....	72,424	216,875	229,575
15. Total other income (Lines 12 through 14).....	1,902,768	2,305,735	3,032,776
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	(3,116,848)	831	(2,403,263)
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).....	(3,116,848)	831	(2,403,263)
19. Federal and foreign income taxes incurred.....	715,038	873,580	(375,689)
20. Net income (Line 18 minus Line 19) (to Line 22).....	(3,831,886)	(872,749)	(2,027,574)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	101,424,760	108,261,319	108,261,319
22. Net income (from Line 20).....	(3,831,886)	(872,749)	(2,027,574)
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$.....(29,879).....	(112,400)	595,331	596,262
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	764,405	335,361	(2,340,590)
27. Change in nonadmitted assets.....	(451,451)	112,160	1,117,783
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.....	6,000,000		
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....			(6,000,000)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	2,658,637	1,179,780	1,817,560
38. Change in surplus as regards policyholders (Lines 22 through 37).....	5,027,305	1,349,884	(6,836,559)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	106,452,065	109,611,203	101,424,760

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.....	1,810	20,676	26,160
1402. Gain on sale of fixed assets.....	38,136	86,306	93,522
1403. Other technical income (other reinsurer).....	56,615	109,893	109,893
1498. Summary of remaining write-ins for Line 14 from overflow page.....	(24,137)	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	72,424	216,875	229,575
3701. STATUTORY POOLING ADJUSTMENT.....	5,250,289	1,179,780	1,817,560
3702. Change in Pooling - Cash Settlement.....	(2,591,652)		
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).....	2,658,637	1,179,780	1,817,560

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.....	188,119,521	163,033,744	206,263,151
2. Net investment income.....	4,741,516	4,092,524	6,150,099
3. Miscellaneous income.....	1,902,768	2,305,735	3,032,776
4. Total (Lines 1 through 3).....	194,763,805	169,432,003	215,446,026
5. Benefit and loss related payments.....	94,586,330	88,226,130	121,143,912
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	69,300,237	53,489,526	70,155,187
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	393,762	534,828	385,369
10. Total (Lines 5 through 9).....	164,280,328	142,250,484	191,684,468
11. Net cash from operations (Line 4 minus Line 10).....	30,483,477	27,181,519	23,761,559
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	17,653,116	31,696,911	42,167,818
12.2 Stocks.....	8,132	17,248	899,748
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.....	800,000		
12.7 Miscellaneous proceeds.....		1,049,499	
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	18,461,248	32,763,658	43,067,566
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	31,507,293	56,094,507	61,188,376
13.2 Stocks.....	2,718,000		
13.3 Mortgage loans.....			
13.4 Real estate.....	15,464	207,480	207,480
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....		1,072,310	
13.7 Total investments acquired (Lines 13.1 to 13.6).....	34,240,757	57,374,297	61,395,856
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).....	(15,779,509)	(24,610,640)	(18,328,290)
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.....	6,000,000		
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			6,000,000
16.6 Other cash provided (applied).....	(6,079,255)	711,637	(1,818,704)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(79,255)	711,637	(7,818,704)
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).....	14,624,713	3,282,516	(2,385,436)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(4,999,992)	(2,614,557)	(2,614,557)
19.2 End of period (Line 18 plus Line 19.1).....	9,624,720	667,960	(4,999,992)

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

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

There are no differences between Ohio prescribed practices and NAIC SAP as noted below:

	SSAP #	F/S Page	F/S Line #	2018	2017
NET INCOME					
(1) The Company state basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$ (3,831,886)	\$ (2,027,574)
(2) State Prescribed Practice that are an increase/(decrease) from NAIC SAP				\$	\$
(3) State Permitted Practice that are an increase/(decrease) from NAIC SAP				\$	\$
(4) NAIC SAP (1 – 2 – 3 = 4)	XXX	XXX	XXX	\$ (3,831,886)	\$ (2,027,574)
SURPLUS					
(5) The Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 106,452,065	\$ 101,424,761
(6) State Prescribed Practice that are an increase/(decrease) from NAIC SAP				\$	\$
(7) State Permitted Practice that are an increase/(decrease) from NAIC SAP				\$	\$
(8) NAIC SAP (5 – 6 – 7 = 8)	XXX	XXX	XXX	\$ 106,452,065	\$ 101,424,761

C. Accounting Policy

(6) Basis for Loan-Backed Securities and Adjustment Methodology

No significant change

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 reporting period, no securities that have recognized an other-than-temporary impairment fit this criteria.
- (3) The Company did not recognize any other-than-temporary impairments on loan-backed securities during the reporting period.
- (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	\$ 93,965
	2. 12 Months or Longer	\$ 877,475
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$ 8,834,637
	2. 12 Months or Longer	\$ 16,529,376

NOTES TO FINANCIAL STATEMENTS

- E. Dollar Repurchase Agreements and/or Securities Lending Transactions
 - (3) Collateral Received
 - b. Not applicable
- F. Repurchase Agreements Transactions Accounted for as Secured Borrowing
 - Not applicable
- G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing
 - Not applicable
- H. Repurchase Agreements Transactions Accounted for as a Sale
 - Not applicable
- I. Reverse Repurchase Agreements Transactions Accounted for as a Sale
 - Not applicable
- M. Working Capital Finance Investments
 - (2) Not applicable
 - (3) Not applicable
- N. 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

The Company received a \$6,000,000 capital contribution from its parent company, American Commerce Holding Company.

Note 11 – Debt

- B. FHLB (Federal Home Loan Bank) Agreements
 - (1) Nature of the FHLB Agreement
 - Not applicable

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

- A. Defined Benefit Plan
 - (4) Components of Net Periodic Benefit Cost
 - Not applicable

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

No significant changes

Note 14 – Liabilities, Contingencies and Assessments

No significant changes

Note 15 – Leases

No significant changes

NOTES TO FINANCIAL STATEMENTS**Note 16 – Information about Financial Instruments with Off-Balance Sheet Risk and Financial Instruments with Concentrations of Credit Risk**

No significant changes

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

B. Transfer and Servicing of Financial Assets

(2) Servicing Assets and Servicing Liabilities

Not Applicable

(4) Securitizations, Asset-Based Financing Arrangements and Similar Transfers Accounted for as Sales

Not Applicable

C. Wash Sales

(2) The details by NAIC designation 3 or below, or unrated of securities sold during the year ended December 31, 2018 and reacquired within 30 days of the sale date are:

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. Fair Value Measurements

(1) Fair Value Measurements at Reporting Date

	Level 1	Level 2	Level 3	Total	Net Asset Value (NAV) Included in Level 2
Assets at Fair Value					
Bonds	\$	\$ 29,912	\$	\$ 29,912	\$
Preferred Stock	\$	\$ 2,572,140	\$	\$ 2,572,140	\$
Total	\$	\$ 2,602,052	\$	\$ 2,602,052	\$

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

	Beginning Balance at 1/1/2018	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	Settlements	Ending Balance at 12/31/2018
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. Fair Value Reporting under SSAP 100 and Other Accounting Pronouncements

Not applicable

C. Fair Value Level

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Not Practicable (Carrying Value)	Net Asset Value (NAV) Included in Level 2
Bonds	\$ 163,606,006	\$ 169,386,880	\$ 5,436,295	\$ 158,169,711	\$	\$	\$
Preferred Stock	\$ 2,572,140	\$ 2,572,140	\$	\$ 2,572,140	\$	\$	\$

D. Not Practicable to Estimate Fair Value

NOTES TO FINANCIAL STATEMENTS

Not applicable

Note 21 – Other Items

No significant changes

Note 22 – Events Subsequent

Not Applicable

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

A. Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$128,996,000 were higher by \$3,395,000 due to unfavorable development of prior year estimates. This deficiency was 3.0% of the unpaid losses and LAE of \$113,510,000 as of prior year-end.

B. Information about Significant Changes in Methodologies and Assumptions

Effective January 1, 2018 the Intercompany pooling agreement was amended to eliminate affiliate Company Verti Insurance Company. As described in Note 26, the prior year end balance of unpaid loss and LAE reserves has been restated in Part 3 of the statement to reflect the current pooling percentages.

Note 26 – Intercompany Pooling Arrangements

Effective January 1, 2018, the pooling agreement was amended to eliminate affiliate company Verti Insurance Company. The pooling percentages were revised to reflect the ratio of each subsidiary's policyholders' surplus to the aggregate policyholders' surplus at June 30, 2017. The resulting revised percentages are as follows:

Company	NAIC Code	Pooling Percentage
The lead company The Commerce Insurance Company	34754	65.2%
Affiliate company Citation Insurance Company	40274	7.7%
Affiliate company American Commerce Insurance Company	19941	11.2%
Affiliate company Commerce West Insurance Company	13161	5.6%
Affiliate company MAPFRE Insurance Company of New York	25275	4.8%
Affiliate company MAPFRE Insurance Company of Florida	34932	3.2%
Affiliate company MAPFRE Insurance Company	23876	2.3%
		100.0%

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

NOTES TO FINANCIAL STATEMENTS

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. Schedule of Insured Financial Obligations at the End of the Period:

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
- 1.2 If yes, has the report been filed with the domiciliary state? Yes No
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes No
- 2.2 If yes, date of change: _____
- 3.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes No
If yes, complete Schedule Y, Parts 1 and 1A.
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes No
- 3.3 If the response to 3.2 is yes, provide a brief description of those changes.
- 3.4 Is the reporting entity publicly traded or a member of a publicly traded group? Yes No
- 3.5 If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group.
- 4.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes No
- 4.2 If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

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

- 5. If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved? Yes No N/A
If yes, attach an explanation.
- 6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2013
- 6.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. 12/31/2013
- 6.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). 06/19/2015
- 6.4 By what department or departments?
State of Ohio Department of Insurance
- 6.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments? Yes No N/A
- 6.6 Have all of the recommendations within the latest financial examination report been complied with? Yes No N/A
- 7.1 Has this reporting entity had any Certificates of Authority, licenses or registrations (including corporate registration, if applicable) suspended or revoked by any governmental entity during the reporting period? Yes No
- 7.2 If yes, give full information:

- 8.1 Is the company a subsidiary of a bank holding company regulated with the Federal Reserve Board? Yes No
- 8.2 If response to 8.1 is yes, please identify the name of the bank holding company.

- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes No
- 8.4 If the response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator].

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

- 9.1 Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards? Yes No
 - (a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
 - (b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
 - (c) Compliance with applicable governmental laws, rules and regulations;
 - (d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
 - (e) Accountability for adherence to the code.

- 9.11 If the response to 9.1 is No, please explain:
- 9.2 Has the code of ethics for senior managers been amended? Yes No
- 9.21 If the response to 9.2 is Yes, provide information related to amendment(s).
- 9.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes No
- 9.31 If the response to 9.3 is Yes, provide the nature of any waiver(s).

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

FINANCIAL

- 10.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes No
- 10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 6,000,000

INVESTMENT

- 11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) Yes No
- 11.2 If yes, give full and complete information relating thereto:
12. Amount of real estate and mortgages held in other invested assets in Schedule BA: \$ 0
13. Amount of real estate and mortgages held in short-term investments: \$ 0
- 14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? Yes No
- 14.2 If yes, please complete the following:

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

- 15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? Yes No
- 15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes No
- If no, attach a description with this statement.

16. For the reporting entity's security lending program, state the amount of the following as of current statement date:
- 16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
- 16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0
- 16.3 Total payable for securities lending reported on the liability page: \$ 0
17. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes No

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

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

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

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

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes No
- 17.4 If yes, give full and complete information relating thereto:

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

17.5 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 No
- 18.2 If no, list exceptions:

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

19. By self-designating 5*GI securities, the reporting entity is certifying the following elements for each self-designated 5*GI security:
- a. Documentation necessary to permit a full credit analysis of the security does not exist.
 - b. Issuer or obligor is current on all contracted interest and principal payments.
 - c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.
- Has the reporting entity self-designated 5*GI securities?

Yes [] No [X]

GENERAL INTERROGATORIES (continued)

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

1. If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change? Yes [X] No [] N/A []
 If yes, attach an explanation.

Verti Insurance Company was removed from the pooling agreement as described in Note 26 of Notes to Financial Statements

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

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

3.2 If yes, give full and complete information thereto:

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

4.2 If yes, complete the following schedule:

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

5.1 Operating Percentages:

5.1 A&H loss percent 0.000%
 5.2 A&H cost containment percent 0.000%
 5.3 A&H expense percent excluding cost containment expenses 0.000%

6.1 Do you act as a custodian for health savings accounts? Yes [] No [X]

6.2 If yes, please provide the amount of custodial funds held as of the reporting date. \$ 0

6.3 Do you act as an administrator for health savings accounts? Yes [] No [X]

6.4 If yes, please provide the amount of funds administered as of the reporting date. \$ 0

7. Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states? Yes [X] No []

7.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes [] No []

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

1 NAIC Company Code	2 ID Number	3 Name of Reinsurer	4 Domiciliary Jurisdiction	5 Type of Reinsurer	6 Certified Reinsurer Rating (1 through 6)	7 Effective Date of Certified Reinsurer Rating
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NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.	1 Active Status (a)	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid		
		2 Current Year to Date	3 Prior Year to Date	4 Current Year to Date	5 Prior Year to Date	6 Current Year to Date	7 Prior Year to Date	
1. Alabama.....AL.....L.....	AL	L	155,081	159,602	7,838	30,335	36,974	27,949
2. Alaska.....AK.....L.....	AK	L	45,658	52,798		325	11,403	10,544
3. Arizona.....AZ.....L.....	AZ	L	1,583,200	2,726,635	1,617,209	2,380,921	2,041,997	1,582,734
4. Arkansas.....AR.....L.....	AR	L	186,646	173,155	33,364	22,983	60,941	45,132
5. California.....CA.....L.....	CA	L	3,423,367	5,123,023	2,481,153	1,904,100	4,543	4,818
6. Colorado.....CO.....L.....	CO	L	5,146,212	5,528,526	3,199,126	3,385,464	84,434	68,951
7. Connecticut.....CT.....L.....	CT	L	92,948,220	106,555,612	69,786,303	53,056,479	96,755,626	80,140,210
8. Delaware.....DE.....L.....	DE	L	62,170	106,662	12,088	11,883	91,564	387,828
9. District of Columbia.....DC.....L.....	DC	L	35,087	33,225		140	9,225	9,573
10. Florida.....FL.....L.....	FL	L	916,644	840,680	217,961	219,523	482,164	439,375
11. Georgia.....GA.....L.....	GA	L	367,906	383,854	88,251	77,120	165,297	176,947
12. Hawaii.....HI.....L.....	HI	L	18,921	13,416		6,235	23,506	4,339
13. Idaho.....ID.....L.....	ID	L	4,791,290	3,949,182	2,784,149	2,646,245	2,682,770	2,002,780
14. Illinois.....IL.....L.....	IL	L	962,215	764,267	311,416	252,160	708,236	613,445
15. Indiana.....IN.....L.....	IN	L	1,301,485	3,075,920	1,243,744	2,601,432	1,918,483	2,647,047
16. Iowa.....IA.....L.....	IA	L	270,080	210,502	178,435	132,636	25,899	26,454
17. Kansas.....KS.....L.....	KS	L	1,541,016	1,870,913	651,982	646,636	74,223	56,655
18. Kentucky.....KY.....L.....	KY	L	353,103	3,190,025	1,803,110	1,900,574	1,291,465	2,255,943
19. Louisiana.....LA.....L.....	LA	L	195,067	216,369	55,455	117,965	142,792	137,877
20. Maine.....ME.....L.....	ME	L	704,335	808,382	90,627	2,668	4,899	4,302
21. Maryland.....MD.....L.....	MD	L	112,020	95,510	5,237	(33,957)	37,869	63,379
22. Massachusetts.....MA.....L.....	MA	L	173,437	167,868	26,984	26,351	59,753	67,481
23. Michigan.....MI.....L.....	MI	L	191,024	258,529	58,697	85,071	89,229	90,601
24. Minnesota.....MN.....L.....	MN	L	434,220	290,463	22,963	32,865	78,755	82,326
25. Mississippi.....MS.....L.....	MS	L	51,698	41,141	3,968	3,640	12,039	8,437
26. Missouri.....MO.....L.....	MO	L	2,565,805	1,883,281	1,091,397	643,584	63,596	59,234
27. Montana.....MT.....L.....	MT	L	76,789	66,039	2,332	9,401	18,273	20,914
28. Nebraska.....NE.....L.....	NE	L	256,948	195,897	1,644,181	69,361	399,073	92,350
29. Nevada.....NV.....L.....	NV	L	549,507	276,493	159,544	220,718	35,018	48,531
30. New Hampshire.....NH.....L.....	NH	L	69,463	63,658	1,500		43,124	11,815
31. New Jersey.....NJ.....L.....	NJ	L	24,045,576	33,578,004	24,590,568	27,739,959	41,221,251	47,853,735
32. New Mexico.....NM.....L.....	NM	L	89,096	82,074	14,314	9,636	17,051	24,303
33. New York.....NY.....L.....	NY	L	647,417	689,471	1,131,837	1,416,517	1,924,066	3,191,477
34. North Carolina.....NC.....L.....	NC	L	457,115	436,955	74,283	68,807	240,880	167,339
35. North Dakota.....ND.....L.....	ND	L	19,652	17,009	2,977	288	21,336	15,603
36. Ohio.....OH.....L.....	OH	L	14,474,161	16,608,027	7,193,695	10,799,096	7,817,057	8,744,451
37. Oklahoma.....OK.....L.....	OK	L	247,063	165,448	33,144	38,314	(75,165)	326,384
38. Oregon.....OR.....L.....	OR	L	9,131,022	10,842,815	7,283,719	8,003,065	5,691,532	7,026,808
39. Pennsylvania.....PA.....L.....	PA	L	467,758	477,319	(71,229)	(244,731)	1,771,715	1,858,173
40. Rhode Island.....RI.....L.....	RI	L	46,088,752	44,043,773	25,646,684	22,139,521	30,528,211	24,309,123
41. South Carolina.....SC.....L.....	SC	L	277,447	264,005	63,146	(1,142)	89,931	107,959
42. South Dakota.....SD.....L.....	SD	L	115,934	15,744	11,161	6,662	4,899	92,417
43. Tennessee.....TN.....L.....	TN	L	1,915,032	11,579,259	6,289,069	8,787,760	5,075,426	4,491,229
44. Texas.....TX.....L.....	TX	L	901,367	814,093	167,995	165,549	419,290	326,410
45. Utah.....UT.....L.....	UT	L	73,717	80,587	33,813	60,626	42,842	45,191
46. Vermont.....VT.....L.....	VT	L	237,189	206,109	525	11,400	4,953	4,136
47. Virginia.....VA.....L.....	VA	L	245,726	221,983	48,472	11,054	58,327	51,406
48. Washington.....WA.....L.....	WA	L	13,395,106	15,426,048	8,216,164	11,174,647	12,317,655	10,431,340
49. West Virginia.....WV.....L.....	WV	L	12,285	8,285			3,220	2,660
50. Wisconsin.....WI.....L.....	WI	L	222,353	270,756	13,512	55,810	58,401	55,881
51. Wyoming.....WY.....L.....	WY	L	40,613	26,374	13,289	5,492	26,848	12,388
52. American Samoa.....AS.....N.....	AS	N						
53. Guam.....GU.....N.....	GU	N						
54. Puerto Rico.....PR.....N.....	PR	N						
55. US Virgin Islands.....VI.....N.....	VI	N						
56. Northern Mariana Islands.....MP.....N.....	MP	N						
57. Canada.....CAN.....N.....	CAN	N						
58. Aggregate Other Alien.....OT.....XXX.....	OT	XXX	0	0	0	0	0	0
59. Totals.....XXX.....	XXX		232,592,995	274,975,765	168,336,152	160,701,187	214,712,896	200,326,387

DETAILS OF WRITE-INS

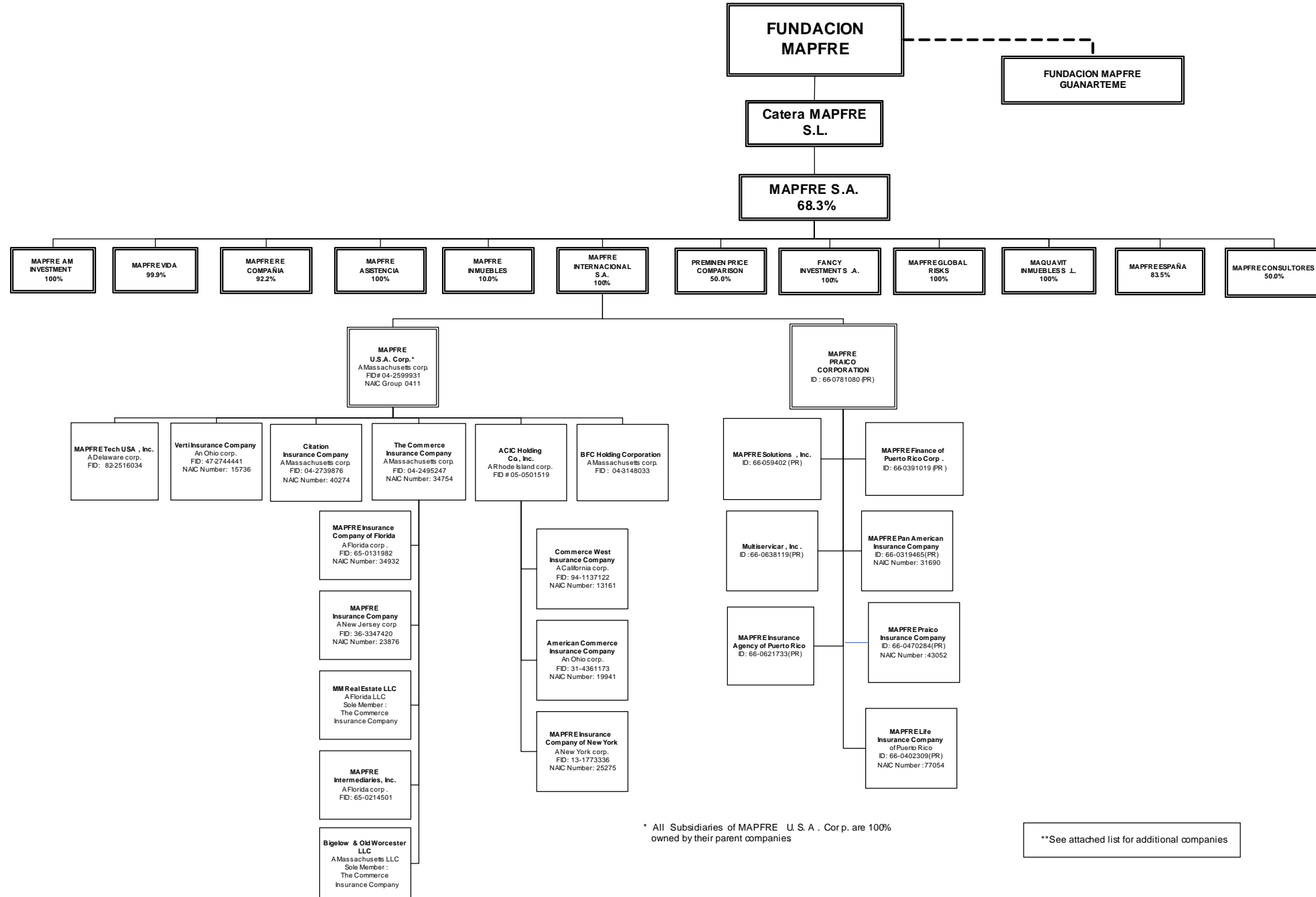
58001.....XXX.....	XXX							
58002.....XXX.....	XXX							
58003.....XXX.....	XXX							
58998. Summary of remaining write-ins for Line 58 from overflow page....XXX.....	XXX	0	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....XXX.....	XXX	0	0	0	0	0	0	0

(a) Active Status Count

L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....	51	R - Registered - Non-domiciled RRGs.....	0
E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - See DSLI).....	0	Q - Qualified - Qualified or accredited reinsurer.....	0
D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write surplus lines in the state of domicile.....	0	N - None of the above - Not allowed to write business in the state.....	6

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

PART 1 – ORGANIZATIONAL CHART



Q11

* All Subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies

**See attached list for additional companies

Statement for September 30, 2018 of the **American Commerce Insurance Company**

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE ESPAÑA COMPAÑIA 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		
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0		
MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	100.0		
AGROSEGURO, S.A.	20.6		
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		
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		
FONDMAPFRE BOLSA AMERICA	21.0		
FONDMAPFRE RENTA DOLAR	17.7		
FUNESPANA, S.A.	95.8		
TANATORIUM ZRT	100.0		
ALL FUNERAL SERVICES, S.L.	100.0		
SALZILLO SERVICIOS FUNERARIOS S.L.	45.0		
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		
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.	33.3		
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	11.7		
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		
MAPFRE GOOD GOVERNANCE	100.0		
MAPFRE IBERIAN EQUITY	100.0		
MAPFRE EUROPEAN EQUITY	100.0		
MAPFRE MULTI ASSET STRAT	100.0		
FONDEMAPFRE ELECCION DECIDIDA	38.4		
FONDEMAPFRE ELECCION MODERADA	48.2		
FONDEMAPFRE ELECCION PRUDENTE	65.9		
FONDEMAPFRE DIVERSIFICACION	66.9		
FONDEMAPFRE BOLSA AMERICA	31.7		
FONDEMAPFRE GLOBAL F.I.	35.0		
FONDEMAPFRE BOLSA F.I.	36.6		
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		
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 EURO BONDS FUND	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		
FONDMAPFRE BOLSA AMERICA	13.9		
FONDMAPFRE RENTA DOLAR	13.2		
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
MAPFRE PRAICO INSURANCE COMPANY	100.0		43052 66-0470284
MAPFRE LA SEGURIDAD S.A.	99.5		
CLUB MAPFRE S.A.	100.0		
CEFOPROSEG C.A.	100.0		
INVERSORA SEGURIDAD C.A.	100.0		
AUTOMOTRIZ MULTISERVICAR, C.A.	100.0		
UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	100.0		
MAPFRE CHILE SEGUROS S.A.	100.0		
MAPFRE CHILE ASESORIAS, S.A.	100.0		
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	12.7		
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	87.3		
MAPFRE CHILE VIDA S.A.	100.0		
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	100.0		
MAPFRE HOLDING DO BRASIL LTDA	98.8		
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.0		
PROTENSEG CORRETORA DE SEGUROS LTDA	100.0		
CESVI BRASIL S.A. CENTRO DE EXPERIMENTACAO E SEGURANCA VIARIA	100.0		
MAPFRE SAUDE LTDA	100.0		
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	100.0		
MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	100.0		

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MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	100.0	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	91.7	MAPFRE S.A.	
MAPFRE PREVIDENCIA S.A.	100.0	MAPFRE S.A.	
MAPFRE CAPITALIZACAO	100.0	MAPFRE S.A.	
MAPFRE BB SH2 PARTICIPACOES, S.A.	50.0	MAPFRE S.A.	
ALIANCA DO BRASIL SEGUROS S.A.	100.0	MAPFRE S.A.	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	100.0	MAPFRE S.A.	
MAPFRE ASSISTENCIA 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	100.0	MAPFRE S.A.	
MAPFRE SERVICIOS EXEQUIALES SAS	100.0	MAPFRE S.A.	
MAPFRE COLOMBIA VIDA S.A.	94.4	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 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.	
CESVI MEXICO, S.A.	16.7	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.	77.6	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
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
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.	100.0	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.	
MAPFRE MIDDLESEA P.L.C.	54.6	MAPFRE S.A.	
MIDDLESEA ASSIST LIMITED	49.0	MAPFRE S.A.	
MAPFRE 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.	
EUROMED RISK SOLUTIONS LIMITED	100.0	MAPFRE S.A.	
EURO GLOBE HOLDINGS LIMITED	100.0	MAPFRE S.A.	
PT ASURANSI BINA DANA ARTA TBK	62.3	MAPFRE S.A.	
PT MAPFRE ABDA ASSISTANCE	49.0	MAPFRE S.A.	
VERTI VERSICHERUNG AG	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.	
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.	
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.	
EUROSOS ASSISTANCE, S.A.	99.5	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.	
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.0	MAPFRE S.A.	
INSURE AND GO	100.0	MAPFRE S.A.	
TRAVEL CLAIMS SERVICES LIMITED	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.	

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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.
MAPFRE AM INVESTMENT HOLDING, S.A.	100.0	MAPFRE S.A.
LA FINANCIERE RESPONSIBLE	25.0	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)	*
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.....	...68.300	FUNDACION MAPFRE.....	...N.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	ESP.....	IA.....	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.....	IA.....	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.....	
							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.....	...20.600	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.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	...50.100	MAPFRE S.A.....	...N.....	
							RASTREATOR.COM LTD.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.....	OWNERSHIP.....	...25.000	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.....	

Q12

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)	*
							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	
							FONDMAPFRE BOLSA AMERICA	ESP	NIA	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP	21.000	MAPFRE S.A.	N	
							FONDMAPFRE RENTA DOLAR	ESP	NIA	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP	17.700	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	
							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	
							TANATORI LA DAMA D'ELX, S.L	ESP	NIA	FUNESPANA, S.A.	OWNERSHIP	97.100	MAPFRE S.A.	N	
							ZACARIAS NUNO, S.L	ESP	NIA	FUNESPANA, 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	
							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	
							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	

Q12.1

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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)	*
							TANATORIO DE ECIJA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP.....	33.300	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.....	IA.....	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.....	IA.....	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.....	11.700	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.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	100.000	MAPFRE S.A.....	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.....	

Q12.2

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 GOOD GOVERNANCE.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE IBERIAN EQUITY.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE EUROPEAN EQUITY.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE MULTI ASSET STRAT.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FONDEMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	38.400	MAPFRE S.A.....	N.....	
							FONDEMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	48.200	MAPFRE S.A.....	N.....	
							FONDEMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	65.900	MAPFRE S.A.....	N.....	
							FONDEMAPFRE DIVERSIFICACION.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	66.900	MAPFRE S.A.....	N.....	
							FONDEMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	31.700	MAPFRE S.A.....	N.....	
							FONDEMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	35.000	MAPFRE S.A.....	N.....	
							FONDEMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	36.600	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.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	

Q12.3

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)	*
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	IA.....	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.....	IA.....	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.....	IA.....	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.....	
							REINSURANCE MANAGEMENT INC.....	NJ.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE EURO BONDS FUND.....	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.....	IA.....	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.....	IA.....	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.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...13.900	MAPFRE S.A.....	...N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	...13.200	MAPFRE S.A.....	...N.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	

Q12.4

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 TECH.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	20.000	MAPFRE S.A.....	N.....	
							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.....	IA.....	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.....	IA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP.....	36.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.....	ARG.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	64.000	MAPFRE S.A.....	N.....	
			66-0781080..				MAPFRE PRAICO CORPORATION.....	PR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	MAPFRE INSURANCE GROUP	31690..	66-0319465..				MAPFRE PAN AMERICAN INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
			66-0391019..				MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
			66-0621733..				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
			66-0595402..				MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
			66-0638119..				MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	MAPFRE INSURANCE GROUP	77054..	66-0402309..				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
0411	MAPFRE INSURANCE GROUP	43052..	66-0470284..				MAPFRE PRAICO INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	IA.....	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.....	IA.....	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.....	IA.....	MAPFRE CHILE VIDA S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	

Q12.5

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 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.....	
							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....	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.....	
							CESVI COLOMBIA, S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP....	62.300	MAPFRE S.A.....	N.....	

Q12.6

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 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 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.....	IA.....	MAPFRE DOMINICANA S.A.....	OWNERSHIP.....	51.000	MAPFRE S.A.....	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.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP.....	16.700	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.....	IA.....	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.....	

Q12.7

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 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....	...77.600	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	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.....	
			04-3148033..				BFC HOLDING CORPORATION.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			82-2516034..				MAPFRE TECH USA, INC.....	DE.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754..	04-2495247..				THE COMMERCE INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			65-0214501..				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932..	65-0131982..				MAPFRE INSURANCE COMPANY OF FLORIDA	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	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....	...100.000	MAPFRE S.A.....	...N.....	*
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161..	94-1137122..				THE COMMERCE WEST INSURANCE COMPANY	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941..	31-4361173..				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	25275..	13-1773336..				MAPFRE INSURANCE COMPANY OF NEW YORK	NY.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...99.700	MAPFRE S.A.....	...N.....	

Q12.8

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 YASAM SIGORTA, A.S.	TUR	IA	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	
							MAPFRE MIDDLESEA 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	
							MAPFRE 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	
							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	62.300	MAPFRE S.A.	N	
							PT MAPFRE ABDA ASSISTANCE	IDN	NIA	PT ASURANSI BINA DANA ARTA TBK	OWNERSHIP	49.000	MAPFRE S.A.	N	
							VERTI VERSICHERUNG AG	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	IA	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	
							VEASISTENCIA, 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	
							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	

Q12.9

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)	*
							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.....	
							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.....	
							EUROSOS ASSISTANCE, S.A.....	GRC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...99.500	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.....	

Q12.10

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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 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.....	
							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.....	
							MAPFRE WARRANTY CORPORATION OF FLORIDA	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.....	
							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.....	

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SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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)	*
							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.....	
							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.....	

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SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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)	*
							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.....	
							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.....	IA.....	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.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	IA.....	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.....	
							BIOINGENIERIA 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.....	
							MAPFRE AM INVESTMENT HOLDING, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							LA FINANCIERE RESPONSIBLE.....	FRA.....	NIA.....	MAPFRE AM INVESTMENT HOLDING, S.A.....	OWNERSHIP.....	25.000	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.....	

Q12.13

Aster Explanation

* All subsidiaries of MAPFRE U.S.A. Corp. are 100% owned by their parent companies.

American Commerce Insurance Company 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.....	6,530,823	2,417,395	37.015	39.662
2. Allied lines.....	5,568,615	296,752	5.329	1.119
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	81,769,798	65,145,146	79.669	45.711
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	105,184	18,367	17.462	(12.027)
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.....			0.000	120.626
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1. Other liability-occurrence.....	14,423,279	9,334,502	64.718	52.217
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.....	83,243,964	66,588,955	79.993	84.330
19.3, 19.4. Commercial auto liability.....			0.000	
21. Auto physical damage.....	49,687,401	31,577,257	63.552	58.802
22. Aircraft (all perils).....	8,533,171	4,694,285	55.012	32.545
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.....	0	0	0.000	93.909
35. Totals.....	249,862,235	180,072,659	72.069	60.135
DETAILS OF WRITE-INS				
3401. TRAVEL.....			0.000	93.909
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).....	0	0	0.000	93.909

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1	2	3
	Current Quarter	Current Year to Date	Prior Year Year to Date
1. Fire.....	2,105,282	6,095,723	7,001,166
2. Allied lines.....	1,724,094	4,971,138	5,875,489
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	25,341,790	73,986,482	89,790,640
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	4,518	17,363	199,567
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
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	5,831,073	17,448,251	18,205,758
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.....	25,177,090	77,206,917	91,324,481
19.3 19.4. Commercial auto liability.....			
21. Auto physical damage.....	13,849,865	44,256,419	54,534,431
22. Aircraft (all perils).....	3,367,930	8,610,702	8,033,894
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	0	8,159
35. Totals.....	77,401,642	232,592,995	274,975,764
DETAILS OF WRITE-INS			
3401. TRAVEL.....			8,159
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	0	8,159

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

	1	2	3	4	5	6	7	8	9	10	11	12	13
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year-End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1 + 2)	2018 Loss and LAE Payments on Claims Reported as of Prior Year-End	2018 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2018 Loss and LAE Payments (Cols. 4 + 5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year-End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year-End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols. 7 + 8 + 9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 4 + 7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 5 + 8 + 9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/Deficiency (Cols. 11 + 12)
1. 2015 + Prior.....	31,324	(4,812)	26,512	12,311	172	12,483	19,209	184	(3,757)	15,636	196	1,411	1,607
2. 2016.....	25,086	2,435	27,521	10,237	386	10,623	17,709	101	230	18,040	2,860	(1,718)	1,142
3. Subtotals 2016 + Prior.....	56,410	(2,377)	54,033	22,548	558	23,106	36,918	285	(3,527)	33,676	3,056	(307)	2,749
4. 2017.....	38,041	21,436	59,477	22,701	6,224	28,925	26,680	622	3,896	31,198	11,340	(10,694)	646
5. Subtotals 2017 + Prior.....	94,451	19,059	113,510	45,249	6,782	52,031	63,598	907	369	64,874	14,396	(11,001)	3,395
6. 2018.....	XXX	XXX	XXX	XXX	76,736	76,736	XXX	27,393	21,475	48,868	XXX	XXX	XXX
7. Totals.....	94,451	19,059	113,510	45,249	83,518	128,767	63,598	28,300	21,844	113,742	14,396	(11,001)	3,395
8. Prior Year-End's Surplus As Regards Policyholders	101,425										Col. 11, Line 7 As % of Col. 1, Line 7	Col. 12, Line 7 As % of Col. 2, Line 7	Col. 13, Line 7 As % of Col. 3, Line 7
											1.15.2 %	2.(57.7)%	3.3.0 %
													Col. 13, Line 7 Line 8
													4.3.3 %

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SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

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

Explanation:

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

Bar Code:



American Commerce Insurance Company Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4 December 31, Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. Valuation Allowance.....	1,746,000		1,746,000	
2597. Summary of remaining write-ins for Line 25.....	1,746,000	0	1,746,000	0

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Loss on sale of fixed assets.....	(24,137)		
1497. Summary of remaining write-ins for Line 14.....	(24,137)	0	0

American Commerce Insurance Company
SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,344,002	1,262,841
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....	15,464	207,480
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.....	98,428	126,319
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,261,038	1,344,002
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,261,038	1,344,002

SCHEDULE B - VERIFICATION

Mortgage Loans

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

NONE

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

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

NONE

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	156,117,155	138,167,873
2. Cost of bonds and stocks acquired.....	34,225,293	61,188,376
3. Accrual of discount.....	64,142	125,711
4. Unrealized valuation increase (decrease).....	(142,279)	919,098
5. Total gain (loss) on disposals.....	15,515	615,408
6. Deduct consideration for bonds and stocks disposed of.....	17,662,448	43,067,566
7. Deduct amortization of premium.....	659,558	827,796
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other-than-temporary impairment recognized.....		1,003,949
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees.....	1,200	
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10).....	171,959,020	156,117,155
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	171,959,020	156,117,155

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

NAIC Designation	1 Book/Adjusted Carrying Value Beginning of Current Quarter	2 Acquisitions During Current Quarter	3 Dispositions During Current Quarter	4 Non-Trading Activity During Current Quarter	5 Book/Adjusted Carrying Value End of First Quarter	6 Book/Adjusted Carrying Value End of Second Quarter	7 Book/Adjusted Carrying Value End of Third Quarter	8 Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	144,668,415	503,185	2,789,141	(194,943)	143,650,664	144,668,415	142,187,516	130,937,581
2. NAIC 2 (a).....	27,204,225		1,190	(3,671)	29,278,058	27,204,225	27,199,364	24,147,735
3. NAIC 3 (a).....	31,177			(31,177)	1,002,291	31,177	0	995,860
4. NAIC 4 (a).....							0	35,979
5. NAIC 5 (a).....							0	
6. NAIC 6 (a).....							0	
7. Total Bonds.....	171,903,817	503,185	2,790,331	(229,791)	173,931,013	171,903,817	169,386,880	156,117,155
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....	2,689,500			(117,360)	2,715,930	2,689,500	2,572,140	
10. NAIC 3.....							0	
11. NAIC 4.....							0	
12. NAIC 5.....							0	
13. NAIC 6.....							0	
14. Total Preferred Stock.....	2,689,500	0	0	(117,360)	2,715,930	2,689,500	2,572,140	0
15. Total Bonds and Preferred Stock.....	174,593,317	503,185	2,790,331	(347,151)	176,646,943	174,593,317	171,959,020	156,117,155

QS102

(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.

**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 - Pt. 2 Verification
NONE**

**Sch. A - Pt. 2
NONE**

**Sch. A - Pt. 3
NONE**

**Sch. B - Pt. 2
NONE**

**Sch. B - Pt. 3
NONE**

**Sch. BA - Pt. 2
NONE**

**Sch. BA - Pt. 3
NONE**

SCHEDULE D - PART 3

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 - Industrial and Miscellaneous									
57636Q AB 0	MASTERCARD INC.....		08/08/2018.....	PIERPONT SECURITIES.....		503,185	500,000	6,047	1FE.....
3899999	Total - Bonds - Industrial and Miscellaneous.....					503,185	500,000	6,047	XXX.....
8399997	Total - Bonds - Part 3.....					503,185	500,000	6,047	XXX.....
8399999	Total - Bonds.....					503,185	500,000	6,047	XXX.....
Preferred Stocks - Industrial and Miscellaneous									
313586 82 8	FEDERAL NATL MTG ASSN.....		07/31/2018.....	CL ACT SETLMNT.....	0.010		50.00		P6UFE.....
8499999	Total - Preferred Stocks - Industrial and Miscellaneous.....					0	XXX	0	XXX.....
8999997	Total - Preferred Stocks - Part 3.....					0	XXX	0	XXX.....
8999999	Total - Preferred Stocks.....					0	XXX	0	XXX.....
9899999	Total - Preferred and Common Stocks.....					0	XXX	0	XXX.....
9999999	Total - Bonds, Preferred and Common Stocks.....					503,185	XXX	6,047	XXX.....

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

QE04

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		09/17/2018	PAYDOWN OF PRINCIPAL.....		2,852	2,852	2,957	2,920				(2)		2,917			(65)	(65)	122	11/15/2029	1.....
83162C	TA 1		07/02/2018	PRINCIPAL RECEIPT.....		168,212	168,212	185,637	177,362				(9,150)		168,212				0	8,044	01/01/2030	1.....
912828	QY 9		07/31/2018	MATURITY.....		600,000	600,000	625,797	603,125				(3,125)		600,000				0	13,500	07/31/2018	1.....
0599999	Total - Bonds - U.S. Government.....					771,064	771,064	814,391	783,407	0			(12,277)		771,129	0		(65)	(65)	21,666	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																						
23410B	AB 7		09/04/2018	CALLED @ 100.0000000.....		10,032	10,032	10,433	10,064				(28)		10,036			(4)	(4)	343	12/01/2038	1FE.....
254840	AP 6		07/02/2018	MATURITY.....		1,160,000	1,160,000	593,363	1,133,062				26,938		1,160,000				0		07/01/2018	1FE.....
31396P	GT 2		09/25/2018	PRINCIPAL RECEIPT.....		43,630	43,630	48,811	46,713				(3,083)		43,630				0	1,372	10/25/2032	1.....
3136A7	DJ 8		09/25/2018	PRINCIPAL RECEIPT.....		36,457	36,457	36,314	36,337				120		36,457				0	750	01/25/2042	1.....
3137B7	R7 6		09/17/2018	PRINCIPAL RECEIPT.....		21,206	21,206	21,498	21,296				(90)		21,206				0	503	02/15/2054	1.....
3138ER	2K 5		09/25/2018	PRINCIPAL RECEIPT.....		228,121	228,121	247,012	247,265				(19,144)		228,121				0	6,665	01/01/2047	1.....
3138WG	RK 2		09/25/2018	PRINCIPAL RECEIPT.....		39,973	39,973	42,471	42,398				(2,426)		39,973				0	912	03/01/2046	1.....
3138WJ	B3 1		09/25/2018	PRINCIPAL RECEIPT.....		456,592	456,592	491,907	491,555				(34,963)		456,592				0	13,807	10/01/2046	1.....
31418A	L5 5		09/25/2018	PRINCIPAL RECEIPT.....		21,997	21,997	23,166	23,015				(1,017)		21,997				0	440	11/01/2042	1.....
3199999	Total - Bonds - U.S. Special Revenue and Special Assessments.....					2,018,008	2,018,008	1,514,975	2,051,705	0			(33,693)		2,018,012	0		(4)	(4)	24,792	XXX	XXX
Bonds - Industrial and Miscellaneous																						
590218	AF 0		09/25/2018	VARIOUS.....		1,190	1,190	1,185	1,053	132	6		138		1,190				0	53	04/25/2036	2FM.....
3899999	Total - Bonds - Industrial and Miscellaneous.....					1,190	1,190	1,185	1,053	132	6		138		1,190				0	53	XXX	XXX
8399997	Total - Bonds - Part 4.....					2,790,262	2,790,262	2,330,551	2,836,165	132	(45,964)		(45,832)		2,790,331			(69)	(69)	46,511	XXX	XXX
8399999	Total - Bonds.....					2,790,262	2,790,262	2,330,551	2,836,165	132	(45,964)		(45,832)		2,790,331			(69)	(69)	46,511	XXX	XXX
Preferred Stocks - Industrial and Miscellaneous																						
313586	82 8		07/31/2018	VARIOUS.....		48	50.00						0					48	48		XXX	P6UFE.....
8499999	Total - Preferred Stocks - Industrial and Miscellaneous.....					48	XXX	0	0	0	0	0	0	0	0	0	0	48	48	0	XXX	XXX
8999997	Total - Preferred Stocks - Part 4.....					48	XXX	0	0	0	0	0	0	0	0	0	0	48	48	0	XXX	XXX
8999999	Total - Preferred Stocks.....					48	XXX	0	0	0	0	0	0	0	0	0	0	48	48	0	XXX	XXX
9899999	Total - Preferred and Common Stocks.....					48	XXX	0	0	0	0	0	0	0	0	0	0	48	48	0	XXX	XXX
9999999	Total - Bonds, Preferred and Common Stocks.....					2,790,310	XXX	2,330,551	2,836,165	132	(45,964)		(45,832)		2,790,331			(21)	(21)	46,511	XXX	XXX

QE05

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

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

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

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

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

Sch. DL - Pt. 1
NONE

Sch. DL - Pt. 2
NONE

American Commerce Insurance Company

SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *	
					6 First Month	7 Second Month	8 Third Month		
Open Depositories									
Bank of America.....	100 Federal Street, Boston, MA 02110.....					(9,048,244)	(7,036,072)	(6,167,556)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....		.007	.273		.742,327	.100,890	.106,209	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....					.673,370	.674,118	1,436,836	XXX
JPMorgan Chase.....	100 E. Broad St, Columbus, OH 43215.....					.508,073	.213,401	.52,950	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....		.019	.2		.348	.349	.350	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....		.019	.26		.5,665	.5,674	.5,682	XXX
MM: Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....		.019	.74,900		.18,706,809	.17,060,787	.14,099,716	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....					.180,724	.91,115	.90,534	XXX
0199999. Total Open Depositories.....	XXX	XXX	.75,201	.0		.11,769,072	.11,110,262	.9,624,721	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	.75,201	.0		.11,769,072	.11,110,262	.9,624,721	XXX
0599999. Total Cash.....	XXX	XXX	.75,201	.0		.11,769,072	.11,110,262	.9,624,721	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1 CUSIP	2 Description	3 Code	4 Date Acquired	5 Rate of Interest	6 Maturity Date	7 Book/Adjusted Carrying Value	8 Amount of Interest Due & Accrued	9 Amount Received During Year
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NONE

QE13