



QUARTERLY STATEMENT

As of March 31, 2019
of the Condition and Affairs of the

American Commerce Insurance Company

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

OFFICERS

Name	Title	Name	Title
1. ALFREDO CASTELO	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. ROBERT EDWARD MCKENNA	TREASURER, CAO, & SVP	4. FRANCOIS JEAN FACON	EXECUTIVE VICE PRESIDENT & CFO

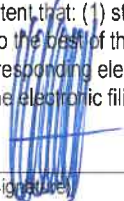
OTHER

DIRECTORS OR TRUSTEES

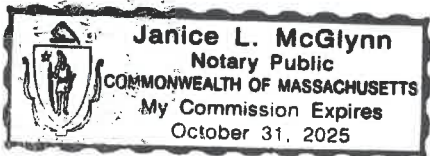
RANDALL VAUGHN BECKER	ALFREDO CASTELO	DAVID HILL COCHRANE	TIMOTHY JOHN MORGAN
KIRK RICHARD NELSON	DANIEL PATRICK OLOHAN	MARK HARRY SHAW	

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 14th day of May, 2019	a. Is this an original filing? b. If no: 1. State the amendment number 2. Date filed 3. Number of pages attached	Yes [X] No []
---	---	----------------



ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	179,325,394		179,325,394	183,932,766
2. Stocks:				
2.1 Preferred stocks.....	2,482,500		2,482,500	2,275,140
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).....	1,211,911		1,211,911	1,228,924
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			0	
4.3 Properties held for sale (less \$.....0 encumbrances).....			0	
5. Cash (\$.....(2,373,027)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(2,373,027)		(2,373,027)	17,265,871
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).....	180,646,778	0	180,646,778	204,702,701
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,500,395		1,500,395	1,535,190
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	60,932,521		60,932,521	67,807,011
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$.....0 earned but unbilled premiums).....			0	
15.3 Accrued retrospective premiums (\$.....0) and contracts subject to redetermination (\$.....0).....			0	
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers.....	19,550,787		19,550,787	15,193,854
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.....	546,591		546,591	636,499
18.2 Net deferred tax asset.....	3,229,801	83,124	3,146,677	3,800,403
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	2,263,690		2,263,690	1,980,107
21. Furniture and equipment, including health care delivery assets (\$.....0).....	590,693	590,693	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	80,944,462	956,833	79,987,629	79,662,918
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	350,205,718	1,630,650	348,575,068	375,318,683
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	350,205,718	1,630,650	348,575,068	375,318,683

DETAILS OF WRITE-INS

1101.			0	
1102.			0	
1103.			0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0	0
2501. Prepaid expenses.....	956,833	956,833	0	
2502. Evaluation allowance.....	1,741,000		1,741,000	1,741,000
2503. Equity in pools and associations.....	75,725,255		75,725,255	74,928,868
2598. Summary of remaining write-ins for Line 25 from overflow page.....	2,521,374	0	2,521,374	2,993,050
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	80,944,462	956,833	79,987,629	79,662,918

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....17,998,000).....	86,126,787	99,350,957
2. Reinsurance payable on paid losses and loss adjustment expenses.....	11,794,490	10,844,859
3. Loss adjustment expenses.....	16,776,101	18,616,887
4. Commissions payable, contingent commissions and other similar charges.....	1,978,910	3,865,920
5. Other expenses (excluding taxes, licenses and fees).....	2,203,017	1,097,525
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	49,187	57,134
7.1 Current federal and foreign income taxes (including \$.....0 on realized capital gains (losses)).....		
7.2 Net deferred tax liability.....		
8. Borrowed money \$.....0 and interest thereon \$.....0.....		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$....207,199,867 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).....	101,316,396	117,416,394
10. Advance premium.....	4,444,906	3,288,359
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	12,061,818	(8,222,836)
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.....	479,522	20,718,523
20. Derivatives.....		
21. Payable for securities.....		
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	1,316,104	1,282,437
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	238,547,238	268,316,159
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	238,547,238	268,316,159
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	42,714,462
35. Unassigned funds (surplus).....	64,087,228	61,061,921
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....		
36.20.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36).....	110,027,830	107,002,523
38. Totals (Page 2, Line 28, Col. 3).....	348,575,068	375,318,682

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,316,104	1,282,437
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).....	1,316,104	1,282,437
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$47,411,388).....	65,961,674	85,699,477	325,183,199
1.2 Assumed..... (written \$34,147,387).....	50,247,385	54,742,711	226,167,413
1.3 Ceded..... (written \$47,411,388).....	65,961,674	85,699,477	325,183,199
1.4 Net..... (written \$34,147,387).....	50,247,385	54,742,711	226,167,413
DEDUCTIONS:			
2. Losses incurred (current accident year \$....31,970,000):			
2.1 Direct.....	41,035,933	60,635,744	220,994,375
2.2 Assumed.....	31,238,204	36,180,410	147,489,216
2.3 Ceded.....	41,035,933	60,635,744	220,994,375
2.4 Net.....	31,238,204	36,180,410	147,489,216
3. Loss adjustment expenses incurred.....	5,890,633	7,396,106	27,852,093
4. Other underwriting expenses incurred.....	10,286,175	16,172,111	64,768,313
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	47,415,012	59,748,627	240,109,622
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	2,832,373	(5,005,916)	(13,942,209)
INVESTMENT INCOME			
9. Net investment income earned.....	1,502,179	1,387,024	6,178,794
10. Net realized capital gains (losses) less capital gains tax of \$17,099.....	64,323	40,975	2,222,586
11. Net investment gain (loss) (Lines 9 + 10).....	1,566,502	1,427,999	8,401,380
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.....	443,249	661,062	2,348,661
14. Aggregate write-ins for miscellaneous income.....	(3)	59,017	150,087
15. Total other income (Lines 12 through 14).....	443,246	720,079	2,498,748
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	4,842,121	(2,857,838)	(3,042,080)
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).....	4,842,121	(2,857,838)	(3,042,080)
19. Federal and foreign income taxes incurred.....	(145,835)	219,421	(29,607)
20. Net income (Line 18 minus Line 19) (to Line 22).....	4,987,956	(3,077,259)	(3,012,473)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	107,002,523	101,424,760	101,424,761
22. Net income (from Line 20).....	4,987,956	(3,077,259)	(3,012,473)
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$(43,563).....	163,884	(21,391)	(347,541)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	(650,601)	749,657	(109,690)
27. Change in nonadmitted assets.....	64,099	(998,434)	(55,111)
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.....			
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	(1,540,031)	(1,351,366)	3,102,577
38. Change in surplus as regards policyholders (Lines 22 through 37).....	3,025,307	(4,698,793)	5,577,762
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	110,027,830	96,725,967	107,002,523

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 (Expense) / Income.....	(3)	2,402	10,009
1402. Gain on sale of fixed assets.....			107,600
1403. Loss on sale of fixed assets.....		56,615	(24,137)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	56,615
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	(3)	59,017	150,087
3701. STATUTORY POOLING ADJUSTMENT.....	(2,362,550)	1,240,286	5,694,229
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....	822,519	(2,591,652)	(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).....	(1,540,031)	(1,351,366)	3,102,577

American Commerce Insurance Company
CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	62,463,078	71,600,789	228,056,021
2. Net investment income.....	1,802,544	1,458,140	6,792,300
3. Miscellaneous income.....	443,245	720,079	2,498,744
4. Total (Lines 1 through 3).....	64,708,867	73,779,008	237,347,065
5. Benefit and loss related payments.....	47,869,675	26,062,881	123,209,406
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	20,347,091	23,427,391	90,719,186
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....		688,920	345,270
10. Total (Lines 5 through 9).....	68,216,766	50,179,191	214,273,862
11. Net cash from operations (Line 4 minus Line 10).....	(3,507,898)	23,599,817	23,073,203
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	9,311,281	3,643,776	21,161,430
12.2 Stocks.....		2,572	8,132
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.....			
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	9,311,281	3,646,348	21,969,562
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	4,870,957	21,651,931	49,527,221
13.2 Stocks.....		2,718,000	2,718,000
13.3 Mortgage loans.....			
13.4 Real estate.....		15,464	15,464
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	4,870,957	24,385,395	52,260,685
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).....	4,440,324	(20,739,047)	(30,291,123)
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.....			
16.6 Other cash provided (applied).....	(20,571,324)	5,294,610	23,483,783
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(20,571,324)	5,294,610	29,483,783
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).....	(19,638,898)	8,155,380	22,265,863
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	17,265,871	(4,999,992)	(4,999,992)
19.2 End of period (Line 18 plus Line 19.1).....	(2,373,027)	3,155,387	17,265,871

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

20.0001			
---------	--	--	--

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 statutory accounting practices (NAIC SAP) as noted below:

	SSAP #	F/S Page	F/S Line #	Current Year to Date	2018
NET INCOME					
(1) American Commerce Insurance Company Company state basis (Page 4, Line 20, Columns 1 & 2)	XXX	XXX	XXX	\$ 4,987,955	\$ (3,012,473)
(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	\$ 4,987,955	\$ (3,012,473)
SURPLUS					
(5) American Commerce Insurance Company Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 110,027,830	\$ 107,002,523
(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	\$ 110,027,830	\$ 107,002,523

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

C. Accounting Policy

(2) Basis for Bonds and Amortization Schedule
Bonds, excluding Loan-Backed and Structured Securities, are accounted for in accordance with SAAP No. 26. Amortized cost is calculated using the scientific interest method. Bonds containing call provisions are amortized to either the call or maturity value and date, whichever produces the lowest asset value (yield to worst). Investment grade bonds are stated at amortized cost. Non-investment grade bonds are stated at the lower of amortized cost or fair value. Bonds whose decline has been determined to be other than temporary are written down to a new cost basis and the write-down amount is accounted for as a realized loss.

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

Loan-Backed and Structured Securities are accounted for in accordance with SSAP No. 43R. Amortized cost is calculated retrospectively using the scientific interest method. U.S. government agency loan-backed and structured securities are valued at amortized value. Other loan-backed and structured securities are valued at either amortized value or fair value, depending on many factors including: the type of underlying collateral, whether modeled by a NAIC vendor, whether rated (by either a NAIC approved rating organization or the NAIC Securities Valuation Office), and the relationship of amortized value to par value and amortized value to fair value. Bonds whose decline has been determined to be other than temporary are written down to a new cost basis and the write down amount is accounted for as a realized loss.

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) Description of Sources Used to Determine Prepayment Assumptions

Prepayment assumptions for Loan-Backed and Structured Securities were obtained from broker dealer survey values, internal estimates, or Bloomberg.

NOTES TO FINANCIAL STATEMENTS

- (2) Loan-Backed and Structured Securities Other-Than-Temporary Impairments recognized during the year based on the intent to sell or inability to retain the Investment for the period of time sufficient to recover the amortized cost

During the first quarter 2019 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities.

- (3) Loan-Backed and Structured Securities Other-Than-Temporary Impairments recognized during the year based on the present value of future cash flows expected to be less than the amortized cost of the security

During the first quarter 2019 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities.

- (4) All Loan-Backed and Structured Securities in an unrealized loss position as of quarter end.

a. The aggregate amount of unrealized losses:	1. Less than 12 Months	\$ 13,557
	2. 12 Months or Longer	\$ 539,975
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$ 1,815,259
	2. 12 Months or Longer	\$ 15,051,753

- (5) Information Investor Considered in Reaching Conclusion that Impairments are Not Other-Than-Temporary

All Loan-Backed and Structured Securities in an unrealized loss position were reviewed to determine whether other-than-temporary impairments should be recognized. The Company asserts that it has the intent and ability to hold these securities long enough to allow the cost basis of these securities to be recovered. These conclusions are supported by analysis of the underlying credit and cash flows of each security. Unrealized losses are primarily attributable to general changes in interest rates, credit spread widening, and increased liquidity discounts. It is possible that the Company could recognize other-than-temporary impairments in the future on some of the securities, if future events, information and the passage of time cause it to conclude that declines in the value are other-than-temporary.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions

None

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

None

M. Working Capital Finance Investments

None

N. Offsetting and Netting of Assets and Liabilities

None

Note 6 – Joint Ventures, Partnerships and Limited Liability Companies

No significant changes

Note 7 – Investment Income

No significant changes

Note 8 – Derivative Instruments

No significant changes

Note 9 – Income Taxes

No significant changes

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

No significant changes

Note 11 – Debt

B. FHLB (Federal Home Loan Bank) Agreements

- (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

NOTES TO FINANCIAL STATEMENTS

No significant changes

Note 14 – Liabilities, Contingencies and Assessments

No significant changes

Note 15 – Leases

No significant changes

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

No significant changes

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

- B. Transfer and Servicing of Financial Assets
- (2) 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 current period 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. Inputs Used for Assets and Liabilites Measured and Reported at Fair Value
- (1) Summary of Financial Assets Measured and Reported at Fair Value at 03/31/19

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds	\$	25,326	\$	\$	\$ 25,326
Preferred Stock	\$	2,482,500	\$	\$	\$ 2,482,500
Total	\$	2,507,826	\$	\$	\$ 2,507,826

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

The Company has no assets or liabilites measured at fair value in Level 3.
- (3) Policies when Transfers Between Levels are Recognized

At the end of each reporting period, the Company evaluates whether or not any event has occurred or circumstances have changed that would cause an instrument to be transferred into or out of a level.
- (4) Description of Valuation Techniques and Inputs Used in Fair Value Measurement

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) Fair Value Disclosures

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 for all Financial Instruments by Levels 1, 2, and 3

NOTES TO FINANCIAL STATEMENTS

The table below reflects the fair values and admitted values of all admitted assets and liabilities that are financial instruments excluding those accounted for under the equity method (subsidiaries, joint ventures, partnerships, and limited liability corporations). The fair values are also categorized into the three-level fair value hierarchy as described above in Note 20A(4).

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 178,463,470	\$ 179,325,394	\$ 5,872,454	\$ 172,591,016	\$	\$	\$
Preferred Stock	\$ 2,482,500	\$ 2,482,500	\$	\$ 2,482,500	\$	\$	\$

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

Note 21 – Other Items

No significant changes

Note 22 – Events Subsequent

Subsequent events have been considered through May 13, 2019 for these statutory financial statements which are to be issued on May 15, 2019. There were no events occurring subsequent to the end of the quarter that merited recognition or disclosure in these statements.

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 \$37,129,000 were lower by \$3,643,000 due to favorable development of prior year estimates. This redundancy was 3.40% of the unpaid losses and LAE of \$108,083,000 as of prior year-end.

B. Information about Significant Changes in Methodologies and Assumptions

Effective January 1, 2019, the pooling agreement was amended to eliminate affiliate company MAPFRE Insurance Company of New York. The prior year end balance utilized for unpaid loss in this computation and LAE reserves has been adjusted to the new pooling percentage for comparative purposes.

Note 26 – Intercompany Pooling Arrangements

Effective January 1, 2019, the pooling agreement was amended to eliminate affiliate company MAPFRE Insurance Company of New York. The pooling percentages were revised to reflect the ratio of each subsidiary's policyholders' surplus to the aggregate policyholders' surplus at March 31, 2019. The resulting revised percentages are as follows:

Company	NAIC Code	Pooling Percentage	
		2019	2018
The lead company The Commerce Insurance Company	34754	69.2%	65.2%
Affiliate company Citation Insurance Company	40274	8.0%	7.7%
Affiliate company American Commerce Insurance Company	19941	10.9%	11.2%
Affiliate company Commerce West Insurance Company	13161	6.1%	5.6%
Affiliate company MAPFRE Insurance Company of New York	25275	0.0%	4.8%
Affiliate company MAPFRE Insurance Company of Florida	34932	3.4%	3.2%
Affiliate company MAPFRE Insurance Company	23876	2.4%	2.3%
		100.0%	100.0%

Note 27 – Structured Settlements

No significant changes

Note 28 – Health Care Receivables

No significant changes

NOTES TO FINANCIAL STATEMENTS

Note 29 – Participating Policies

No significant changes

Note 30 – Premium Deficiency Reserves

No significant changes

Note 31 – High Deductibles

No significant changes

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

No significant changes

Note 33 – Asbestos/Environmental Reserves

No significant changes

Note 34 – Subscriber Savings Accounts

No significant changes

Note 35 – Multiple Peril Crop Insurance

No significant changes

Note 36 – Financial Guaranty Insurance

- B. 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 [X] No []

1.2

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

Yes [X] No []

2.1

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

Yes [] No [X]

2.2

If yes, date of change:

3.1

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

Yes [X] No []

3.2

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

Yes [X] No []

3.3

If the response to 3.2 is yes, provide a brief description of those changes.
Effective January 1, 2019, affiliate company MAPFRE Insurance Company of New York was sold to Plymouth Rock Assurance Corporation.

3.4

Is the reporting entity publicly traded or a member of a publicly traded group?

Yes [] No [X]

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?
If yes, complete and file the merger history data file with the NAIC for the annual filing corresponding to this period.

Yes [] No [X]

4.2

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

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

5.

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

Yes [] No [X] N/A []

6.1

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

12/31/2013

6.2

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

12/31/2013

6.3

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

06/19/2015

6.4

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

6.5

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

Yes [] No [] N/A [X]

6.6

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

Yes [] No [] N/A [X]

7.1

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

Yes [] No [X]

7.2

If yes, give full information:

8.1

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

Yes [] No [X]

8.2

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

8.3

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

Yes [] No [X]

8.4

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

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

9.1

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

Yes [X] No []

9.11

If the response to 9.1 is No, please explain:

9.2

Has the code of ethics for senior managers been amended?

Yes [] No [X]

9.21

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

9.3

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

Yes [] No [X]

9.31

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

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?

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

Yes [] No [X]

\$ 0

INVESTMENT

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

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

Yes [] No [X]

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

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

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

14.2 If yes, please complete the following:

\$ 0

\$ 0

Yes [] No [X]

	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?

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

If no, attach a description with this statement.

Yes [] No [X]

Yes [] No []

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:

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

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

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*?

\$ 0

\$ 0

\$ 0

Yes [X] No []

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

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

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

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

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

Yes [] No [X]

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

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

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

1 Name of Firm or Individual	2 Affiliation
Eric Trigilio	I

17.5097 For those firms/individuals listed in the table for Question 17.5, do any firms/individuals unaffiliated with the reporting entity (i.e., designated with a "U") manage more than 10% of the reporting entity's assets?

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 []

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?

18.2 If no, list exceptions:

Yes [X] No []

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

19.

By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designated 5GI security:

a.

Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.

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 5GI securities?

Yes [☐] No [☒]

20.

By self-designating PLGI securities, the reporting entity is certifying the following elements for each self-designated PLGI security:

a.

The security was purchased prior to January 1, 2018.

b.

The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.

c.

The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.

d.

The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities?

Yes [☐] No [☒]

Q07.2

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?

If yes, attach an explanation.

See Note 26

Yes [X] No [] N/A []

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?

If yes, attach an explanation.

Yes [] No [X]

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.

Operating Percentages:

5.1 A&H loss percent

5.2 A&H cost containment percent

5.3 A&H expense percent excluding cost containment expenses

0.000%

0.000%

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

NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.			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...	77,511	43,283	7,584	6,963	41,903	30,616
2.	Alaska.....	AK.....L...	50,096	19,687			16,670	9,950
3.	Arizona.....	AZ.....L...	137,312	682,545	245,035	333,926	1,602,460	2,676,290
4.	Arkansas.....	AR.....L...	43,941	31,513	19,579	17,890	88,302	60,490
5.	California.....	CA.....L...	363,517	1,031,917		821,516	4,543	4,543
6.	Colorado.....	CO.....L...	166,044	1,922,666	13,607	1,040,168	111,298	67,595
7.	Connecticut.....	CT.....L...	22,665,747	27,257,085	21,847,425	20,396,716	98,925,787	92,885,904
8.	Delaware.....	DE.....L...	16,854	9,076	9,521	11,789	137,393	79,452
9.	District of Columbia.....	DC.....L...	26,762	23,007			11,770	8,137
10.	Florida.....	FL.....L...	290,172	327,736	65,500	69,722	540,867	418,578
11.	Georgia.....	GA.....L...	176,422	124,051	25,249	33,000	192,222	141,236
12.	Hawaii.....	HI.....L...	6,351	8,647	17,590		6,156	22,688
13.	Idaho.....	ID.....L...	1,436,632	1,338,730	960,907	861,826	2,675,178	2,237,731
14.	Illinois.....	IL.....L...	164,075	159,883	(20,053)	96,486	506,865	665,187
15.	Indiana.....	IN.....L...	72,175	348,654	173,232	520,901	1,181,585	2,056,458
16.	Iowa.....	IA.....L...	49,327	82,877	(353)	42,624	62,706	23,173
17.	Kansas.....	KS.....L...	129,223	540,145	(8,924)	203,305	71,496	70,518
18.	Kentucky.....	KY.....L...	8,254	404,066	156,753	1,018,378	1,032,127	1,442,892
19.	Louisiana.....	LA.....L...	80,940	45,207	18,816	4,474	151,515	156,091
20.	Maine.....	ME.....L...	253,278	254,641	4,750	851	5,108	4,138
21.	Maryland.....	MD.....L...	29,357	42,350	28,127	1,677	36,667	45,777
22.	Massachusetts.....	MA.....L...	68,722	73,814	5,719	3,177	68,383	76,276
23.	Michigan.....	MI.....L...	134,716	100,273	46,710	87,047	103,367	86,119
24.	Minnesota.....	MN.....L...	176,343	169,665	24,290	6,829	267,379	71,814
25.	Mississippi.....	MS.....L...	20,865	17,366	(106)	3,506	10,800	7,560
26.	Missouri.....	MO.....L...	108,479	743,721	661	310,013	76,140	92,774
27.	Montana.....	MT.....L...	18,161	17,995	2,557	361	24,221	17,026
28.	Nebraska.....	NE.....L...	11,455	77,101	6,804	15,595	387,269	72,159
29.	Nevada.....	NV.....L...	63,049	146,935	5,402	34,257	68,827	45,471
30.	New Hampshire.....	NH.....L...	53,627	(3,781)	24,250		32,648	18,270
31.	New Jersey.....	NJ.....L...	(126,278)	7,744,716	8,273,797	8,525,391	32,468,976	44,599,473
32.	New Mexico.....	NM.....L...	55,319	28,637	2,420	12,376	239,923	10,739
33.	New York.....	NY.....L...	158,286	148,557	211,773	383,068	1,680,030	2,465,555
34.	North Carolina.....	NC.....L...	184,709	157,812	50,343	32,445	231,671	197,613
35.	North Dakota.....	ND.....L...	10,996	6,834	4,700	443	18,449	17,951
36.	Ohio.....	OH.....L...	3,831,504	4,418,294	2,624,677	2,954,654	7,138,706	7,584,461
37.	Oklahoma.....	OK.....L...	83,687	94,117	10,501	12,066	84,026	(1,050,031)
38.	Oregon.....	OR.....L...	2,399,758	2,925,967	1,729,979	2,557,394	4,929,305	5,659,312
39.	Pennsylvania.....	PA.....L...	175,681	189,073	28,002	(125,726)	161,517	1,757,552
40.	Rhode Island.....	RI.....L...	9,132,006	14,328,081	9,504,043	8,348,986	29,334,622	27,971,057
41.	South Carolina.....	SC.....L...	132,003	89,081	37,619	39,658	87,075	84,144
42.	South Dakota.....	SD.....L...	29,823	34,991	1,869	498	18,701	1,959
43.	Tennessee.....	TN.....L...	70,922	1,583,716	632,515	2,416,881	3,580,810	5,374,689
44.	Texas.....	TX.....L...	375,170	293,084	230,210	64,207	698,862	285,131
45.	Utah.....	UT.....L...	35,439	30,244	12,975	(1,819)	68,279	69,347
46.	Vermont.....	VT.....L...	57,865	113,643			5,352	5,590
47.	Virginia.....	VA.....L...	127,960	87,090	6,694	7,867	67,075	126,435
48.	Washington.....	WA.....L...	3,722,999	4,309,436	1,947,019	2,658,925	10,985,359	10,944,845
49.	West Virginia.....	WV.....L...	6,911	1,922			3,483	2,542
50.	Wisconsin.....	WI.....L...	44,493	71,509	1,556	4,602	56,356	55,895
51.	Wyoming.....	WY.....L...	2,728	12,118		908	20,852	17,136
52.	American Samoa.....	AS.....N...						
53.	Guam.....	GU.....N...						
54.	Puerto Rico.....	PR.....N...	-					
55.	US Virgin Islands.....	VI.....N...	-					
56.	Northern Mariana Islands.....	MP.....N...	-					
57.	Canada.....	CAN.....N...	-					
58.	Aggregate Other Alien.....	OT...XXX...	0	0	0	0	0	0
59.	Totals.....	...XXX...	47,411,388	72,709,777	48,991,324	53,835,821	200,321,081	209,776,308

DETAILS OF WRITE-INS

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

(a) Active Status Count

L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG..... 51

E - Eligible - Reporting entities eligible or approved to write surplus lines in the state
(other than their state of domicile - See DSLI)..... 0

D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write
surplus lines in the state of domicile..... 0

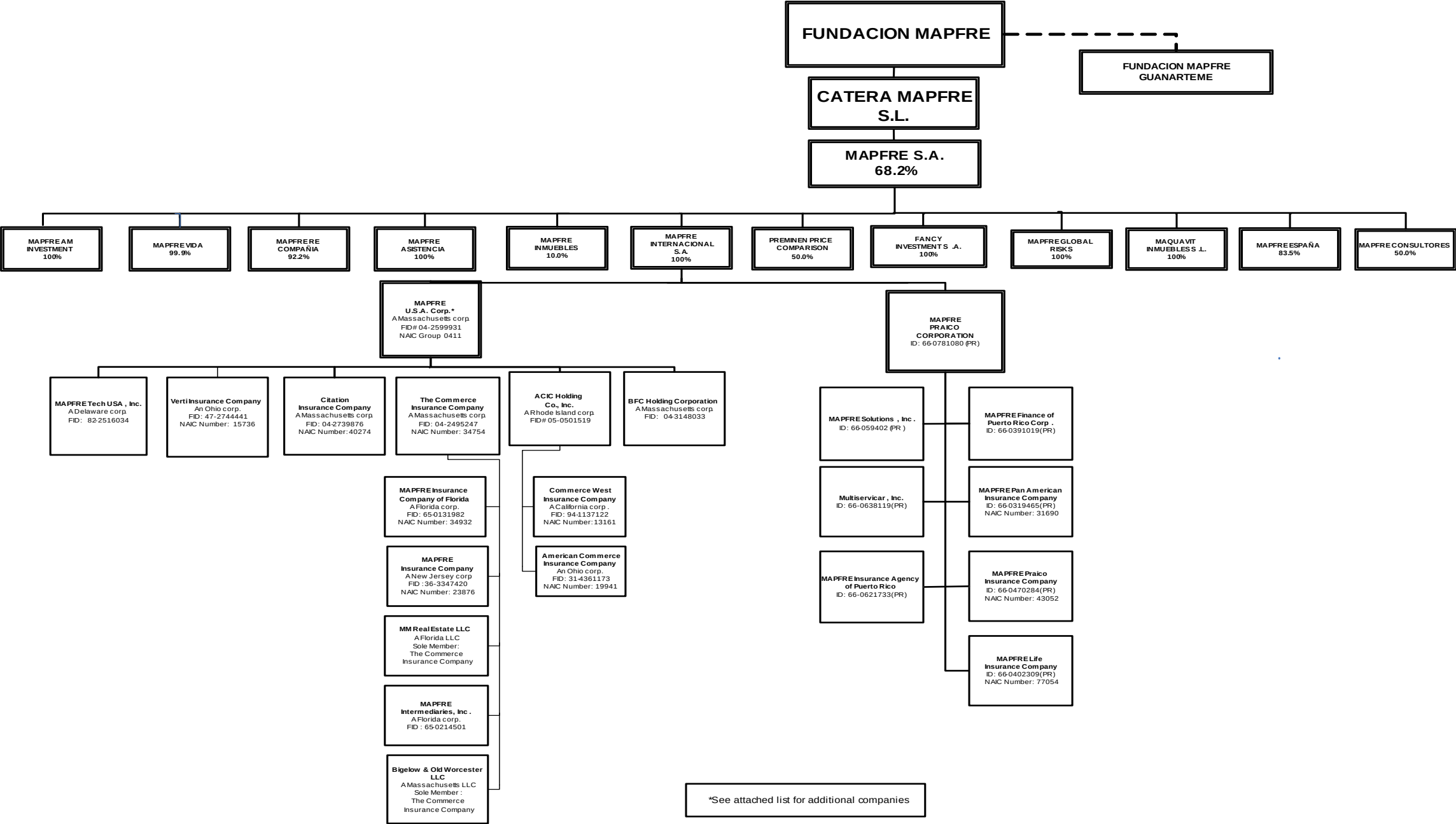
R - Registered - Non-domiciled RRGs..... 0

Q - Qualified - Qualified or accredited reinsurer..... 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



MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	83.5		
CENTROS MEDICOS MAPFRE, S.A.	100.0		
CLUB MAPFRE, S.A.	100.0		
MAPFRE AUTOMOCION S.A.U.	100.0		
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	100.0		
VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	100.0		
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5		
MAPFRE TECH	63.5		
MAPFRE VIDEO Y COMUNICACION, S.A.	75.0		
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 RE VERMONT CORPORATION	100.0	16475	83-2698500
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	MAPFRE S.A.	
MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	100.0	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	91.7	MAPFRE S.A.	
MAPFRE PREVIDENCIA S.A.	100.0	MAPFRE S.A.	
MAPFRE CAPITALIZACAO	100.0	MAPFRE S.A.	
MAPFRE BB SH2 PARTICIPACOES, S.A.	50.0	MAPFRE S.A.	
ALIANCA DO BRASIL SEGUROS S.A.	100.0	MAPFRE S.A.	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	100.0	MAPFRE S.A.	
MAPFRE ASISTENCIA S.A.	100.0	MAPFRE S.A.	
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0	MAPFRE S.A.	
MAPFRE VIDA S.A.	100.0	MAPFRE S.A.	
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.0	MAPFRE S.A.	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	94.3	MAPFRE S.A.	
CREDIMAPFRE	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
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
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 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 SOLUTIONIS 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.	

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.
BIOINGENERIA 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)	*
Q12	Members														
							FUNDACION MAPFRE.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	100.000	FUNDACION MAPFRE.....	.N.....	
							CARTERA MAPFRE, S.L.....	ESP.....	UIP.....	FUNDACION MAPFRE.....	OWNERSHIP....	100.000	FUNDACION MAPFRE.....	.N.....	
							MAPFRE, S.A.....	ESP.....	UIP.....	CARTERA MAPFRE, S.L.....	OWNERSHIP....	68.200	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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.1

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

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.2

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.3							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.4

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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.....	
		16475...	83-2698500...				MAPFRE RE VERMONT CORPORATION.....	VT.....	IA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.5

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
0411	MAPFRE INSURANCE GROUP	31690..	66-0781080..				MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...20.000	MAPFRE S.A.....	...N.....	
							MAPFRE 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.....	
							MAPFRE PRAICO CORPORATION.....	PR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE PAN AMERICAN INSURANCE COMPANY.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	MAPFRE INSURANCE GROUP	77054..	66-0391019..				MAPFRE FINANCE OF PUERTO RICO CORP.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO.....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	MAPFRE INSURANCE GROUP	43052..	66-0402309..				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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.6

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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....	
							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....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.7							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.....	
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.8

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE SEGUROS COSTA RICA, S.A.....	CRI.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS GUATEMALA, S.A.....	GTM.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS NICARAGUA, S.A.....	NIC.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	25.100	MAPFRE S.A.....	...N....	
							MAPFRE LA CENTRO AMERICANA, S.A.....	SLV.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	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..			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..			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....	
							MAPFRE SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...99.700	MAPFRE S.A.....	...N....	
							MAPFRE YASAM SIGORTA, A.S.....	TUR.....	IA.....	GENEL SIGORTA, A.S.....	OWNERSHIP....	...99.500	MAPFRE S.A.....	...N....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.9

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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.....	
							ENEASISTENCIA, 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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.11							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.....	

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.....	
							ROADSIDE ASSIST ALGERIE SPA.....	DZA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	60.300	MAPFRE S.A.....	N.....	

Q12.12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.13							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.....	
							BIOINGIENERIA ARAGONESA, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							PROVITAE CENTROS ASISTENCIALES, S.L.....	ESP.....	NIA.....	MAQUAVIT INMUEBLES, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							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.....	

PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	1,927,444	177,854	9.227	38.275
2. Allied lines.....	1,762,799	379,812	21.546	2.939
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	22,293,631	14,797,202	66.374	74.140
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	5,838		0.000	19.625
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	
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1. Other liability-occurrence.....	1,063,635	286,411	26.928	79.723
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.....	22,739,829	16,006,676	70.390	78.464
19.3, 19.4. Commercial auto liability.....			0.000	
21. Auto physical damage.....	13,025,633	7,755,960	59.544	70.493
22. Aircraft (all perils).....	3,142,865	1,431,335	45.542	19.018
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	200,683	0.000	
35. Totals.....	65,961,674	41,035,933	62.212	70.754
DETAILS OF WRITE-INS				
3401. Travel.....		200,683	0.000	
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	200,683	0.000	

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	1,524,115	1,524,115	1,895,545
2. Allied lines.....	1,482,074	1,482,074	1,565,325
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	14,175,348	14,175,348	21,960,716
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	4,747	4,747	4,783
10. Financial guaranty.....			
11.1. Medical professional liability - occurrence.....			
11.2. Medical professional liability - claims made.....			
12. Earthquake.....			
13. Group accident and health.....			
14. Credit accident and health.....			
15. Other accident and health.....			
16. Workers' compensation.....			
17.1. Other liability-occurrence.....	1,750,850	1,750,850	5,487,518
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.....	16,256,998	16,256,998	24,783,038
19.3 19.4. Commercial auto liability.....			
21. Auto physical damage.....	9,501,153	9,501,153	14,555,638
22. Aircraft (all perils).....	2,716,103	2,716,103	2,457,217
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	0
35. Totals.....	47,411,388	47,411,388	72,709,780
DETAILS OF WRITE-INS			
3401. Travel.....			
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	0

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. Premium Tax Accrual.....	2,510,720		2,510,720	2,990,707
2505. Miscellaneous Assets.....	10,654		10,654	2,343
2597. Summary of remaining write-ins for Line 25.....	2,521,374	0	2,521,374	2,993,050

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Global Service Fees.....			56,615
1497. Summary of remaining write-ins for Line 14.....	0	0	56,615

American Commerce Insurance Company
SCHEDULE A - VERIFICATION
Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,228,924	1,344,002
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		15,464
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.....	17,013	130,542
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,211,911	1,228,924
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,211,911	1,228,924

SCHEDULE B - VERIFICATION
Mortgage Loans

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

SCHEDULE BA - VERIFICATION
Other Long-Term Invested Assets

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

SCHEDULE D - VERIFICATION
Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	186,207,906	156,117,155
2. Cost of bonds and stocks acquired.....	4,870,957	52,245,221
3. Accrual of discount.....	25,651	79,150
4. Unrealized valuation increase (decrease).....	207,447	(439,924)
5. Total gain (loss) on disposals.....	81,422	200,836
6. Deduct consideration for bonds and stocks disposed of.....	9,311,281	21,170,762
7. Deduct amortization of premium.....	274,208	824,970
8. Total foreign exchange change in book/adjusted carrying value.....		
9. Deduct current year's other-than-temporary impairment recognized.....		
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).....	181,807,894	186,207,906
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	181,807,894	186,207,906

SCHEDULE D - PART 1B

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

	1	2	3	4	5	6	7	8
NAIC Designation	Book/Adjusted Carrying Value Beginning of Current Quarter	Acquisitions During Current Quarter	Dispositions During Current Quarter	Non-Trading Activity During Current Quarter	Book/Adjusted Carrying Value End of First Quarter	Book/Adjusted Carrying Value End of Second Quarter	Book/Adjusted Carrying Value End of Third Quarter	Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	152,006,466	4,870,957	9,228,112	809,016	148,458,327			152,006,466
2. NAIC 2 (a).....	31,926,300		1,747	(1,057,486)	30,867,067			31,926,300
3. NAIC 3 (a).....					0			
4. NAIC 4 (a).....					0			
5. NAIC 5 (a).....					0			
6. NAIC 6 (a).....					0			
7. Total Bonds.....	183,932,766	4,870,957	9,229,859	(248,470)	179,325,394	0	0	183,932,766
PREFERRED STOCK								
8. NAIC 1.....					0			
9. NAIC 2.....	2,275,140			207,360	2,482,500			2,275,140
10. NAIC 3.....					0			
11. NAIC 4.....					0			
12. NAIC 5.....					0			
13. NAIC 6.....					0			
14. Total Preferred Stock.....	2,275,140	0	0	207,360	2,482,500	0	0	2,275,140
15. Total Bonds and Preferred Stock.....	186,207,906	4,870,957	9,229,859	(41,110)	181,807,894	0	0	186,207,906

(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 and Administrative Symbol/Market Indicator (a)
Bonds - U.S. Government									
912828 5Z 9	U.S. TREASURY NOTE.....		02/25/2019.....	RW PRESSPRICH & CO.....		325,280	325,000	584	1.....
0599999	Total - Bonds - U.S. Government.....					325,280	325,000	584	XXX.....
Bonds - Industrial and Miscellaneous									
78012K KU 0	ROYAL BANK OF CANADA.....	A.....	02/01/2019.....	PIERPONT SECURITIES.....		992,420	1,000,000	1,111	1FE.....
89114Q BL 1	TORONTO-DOMINION BANK.....	A.....	01/29/2019.....	RAYMOND JAMES.....		1,581,577	1,627,000	1,464	1FE.....
06051G GR 4	BANK OF AMERICA CORP.....		02/13/2019.....	J.P. MORGAN.....		979,290	1,000,000	2,395	1FE.....
86787E AU 1	SUNTRUST BANK.....		01/16/2019.....	BAIRD, ROBERT W. & CO.....		992,390	1,000,000	12,159	1FE.....
3899999	Total - Bonds - Industrial and Miscellaneous.....					4,545,677	4,627,000	17,129	XXX.....
8399997	Total - Bonds - Part 3.....					4,870,957	4,952,000	17,713	XXX.....
8399999	Total - Bonds.....					4,870,957	4,952,000	17,713	XXX.....
9999999	Total - Bonds, Preferred and Common Stocks.....					4,870,957	XXX	17,713	XXX.....

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

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

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

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

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

Sch. DL - Pt. 1
NONE

Sch. DL - Pt. 2
NONE

American Commerce Insurance Company
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of Interest Accrued at Current Statement Date	First Month	Second Month	Third Month	*
Open Depositories								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(7,852,733)	(9,118,190)	(9,597,134)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.850	402		100,780	96,955	160,259	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				562,053	783,103	861,881	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				357,227	128,684	125,007	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	2.290	2		352	353	353	XXX
MM: BlackRock 30.....	One Financial Center, Boston, MA 02111.....	2.320					2,024,000	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000.....	2.280	32		5,723	5,733	5,744	XXX
MM: Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	2.340	87,250		23,682,450	3,320,347	4,046,863	XXX
The Northern Trust Company.....	50 South LaSalle Street, Chicago, IL 60675.....				(129,654)	(4,608)		XXX
0199999. Total Open Depositories.....	XXX	XXX	87,686	0	16,726,198	(4,787,623)	(2,373,027)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	87,686	0	16,726,198	(4,787,623)	(2,373,027)	XXX
0599999. Total Cash.....	XXX	XXX	87,686	0	16,726,198	(4,787,623)	(2,373,027)	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1	2	3	4	5	6	7	8	9
CUSIP	Description	Code	Date Acquired	Rate of Interest	Maturity Date	Book/Adjusted Carrying Value	Amount of Interest Due & Accrued	Amount Received During Year

NONE