



QUARTERLY STATEMENT

As of September 30, 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
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(Name)
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508-943-9000-14376
(Area Code) (Telephone Number) (Extension)

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(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 29th day of October 2019

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

YARISSA GOMEZ
Notary Public
Commonwealth of Massachusetts
My Commission Expires
9-6-2024

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.....	190,953,010		190,953,010	183,932,766
2. Stocks:				
2.1 Preferred stocks.....	2,655,000		2,655,000	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).....	1,214,599		1,214,599	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 (\$.....(2,152,527)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(2,152,527)		(2,152,527)	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).....	192,670,082	0	192,670,082	204,702,701
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,432,837		1,432,837	1,535,190
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	48,643,850		48,643,850	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.....	15,680,290		15,680,290	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.....			0	636,499
18.2 Net deferred tax asset.....	2,797,675	90,279	2,707,396	3,800,403
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	1,941,617		1,941,617	1,980,107
21. Furniture and equipment, including health care delivery assets (\$.....0).....	583,412	583,412	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....	796,396		796,396	
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	83,066,577	1,013,502	82,053,075	79,662,917
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	347,612,736	1,687,193	345,925,543	375,318,682
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	347,612,736	1,687,193	345,925,543	375,318,682

DETAILS OF WRITE-INS

1101.			0	
1102.			0	
1103.			0	
1198. Summary of remaining write-ins for Line 11 from overflow page.....	0	0	0	0
1199. Totals (Lines 1101 thru 1103 plus 1198) (Line 11 above).....	0	0	0	0
2501. Prepaid expenses.....	1,013,502	1,013,502	0	
2502. Evaluation Allowance.....	1,741,000		1,741,000	1,741,000
2503. Equity in pools and associations.....	77,683,590		77,683,590	74,928,868
2598. Summary of remaining write-ins for Line 25 from overflow page.....	2,628,485	0	2,628,485	2,993,049
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	83,066,577	1,013,502	82,053,075	79,662,917

LIABILITIES, SURPLUS AND OTHER FUNDS

		1 Current Statement Date	2 December 31 Prior Year
1.	Losses (current accident year \$.....35,055,000).....	83,084,525	99,350,957
2.	Reinsurance payable on paid losses and loss adjustment expenses.....	12,027,823	10,844,859
3.	Loss adjustment expenses.....	16,101,671	18,616,887
4.	Commissions payable, contingent commissions and other similar charges.....	2,785,291	3,865,920
5.	Other expenses (excluding taxes, licenses and fees).....	2,264,944	1,097,525
6.	Taxes, licenses and fees (excluding federal and foreign income taxes).....	13,019	57,134
7.1	Current federal and foreign income taxes (including \$.....(39,474) on realized capital gains (losses)).....	325,393	
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 \$.....194,778,066 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).....	101,253,300	117,416,394
10.	Advance premium.....	3,268,563	3,288,359
11.	Dividends declared and unpaid:		
11.1	Stockholders.....		
11.2	Policyholders.....		
12.	Ceded reinsurance premiums payable (net of ceding commissions).....	11,420,949	(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.....		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.....	792,216	1,282,437
26.	Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	233,337,694	268,316,159
27.	Protected cell liabilities.....		
28.	Total liabilities (Lines 26 and 27).....	233,337,694	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).....	66,647,247	61,061,921
36.	Less treasury stock, at cost:		
36.1	0.000 shares common (value included in Line 30 \$.....0).....		
36.2	0.000 shares preferred (value included in Line 31 \$.....0).....		
37.	Surplus as regards policyholders (Lines 29 to 35, less 36).....	112,587,849	107,002,523
38.	Totals (Page 2, Line 28, Col. 3).....	345,925,543	375,318,682

DETAILS OF WRITE-INS

2501.	Unclaimed property.....	792,216	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).....	792,216	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 \$146,137,970).....	177,110,056	249,862,234	325,183,199
1.2 Assumed..... (written \$131,264,664).....	147,427,758	168,436,978	226,167,413
1.3 Ceded..... (written \$146,137,970).....	177,110,056	249,862,234	325,183,199
1.4 Net..... (written \$131,264,664).....	147,427,758	168,436,978	226,167,413
DEDUCTIONS:			
2. Losses incurred (current accident year \$....89,019,000):			
2.1 Direct.....	107,379,718	180,072,660	220,994,375
2.2 Assumed.....	91,058,998	107,528,922	147,489,216
2.3 Ceded.....	107,379,718	180,072,660	220,994,375
2.4 Net.....	91,058,998	107,528,922	147,489,216
3. Loss adjustment expenses incurred.....	13,391,611	21,467,149	27,852,093
4. Other underwriting expenses incurred.....	33,528,065	50,710,776	64,768,313
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	137,978,674	179,706,847	240,109,622
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	9,449,084	(11,269,869)	(13,942,209)
INVESTMENT INCOME			
9. Net investment income earned.....	4,322,980	4,182,518	6,178,794
10. Net realized capital gains (losses) less capital gains tax of \$39,474.....	496,609	2,067,735	2,222,586
11. Net investment gain (loss) (Lines 9 + 10).....	4,819,589	6,250,253	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.....	1,207,549	1,830,344	2,348,661
14. Aggregate write-ins for miscellaneous income.....	74,575	72,424	150,087
15. Total other income (Lines 12 through 14).....	1,282,124	1,902,768	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).....	15,550,797	(3,116,848)	(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).....	15,550,797	(3,116,848)	(3,042,080)
19. Federal and foreign income taxes incurred.....	67,275	715,038	(29,607)
20. Net income (Line 18 minus Line 19) (to Line 22).....	15,483,522	(3,831,886)	(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).....	15,483,522	(3,831,886)	(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 \$(79,829).....	300,312	(112,400)	(347,541)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	(1,046,461)	764,405	(109,690)
27. Change in nonadmitted assets.....	7,555	(451,451)	(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	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.....	(9,159,602)	2,658,637	3,102,577
38. Change in surplus as regards policyholders (Lines 22 through 37).....	5,585,326	5,027,305	5,577,762
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	112,587,849	106,452,065	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 income.....		1,810	10,009
1402. Gain on sale of fixed assets.....	15,040	38,136	107,600
1403. Loss on sale of fixed assets.....		(24,137)	(24,137)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	59,535	56,615	56,615
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	74,575	72,424	150,087
3701. STATUTORY POOLING ADJUSTMENT.....	(9,982,121)	5,250,289	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).....	(9,159,602)	2,658,637	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.....	170,051,814	188,119,521	228,056,021
2. Net investment income.....	5,373,077	4,741,516	6,792,300
3. Miscellaneous income.....	1,282,124	1,902,768	2,498,744
4. Total (Lines 1 through 3).....	176,707,015	194,763,805	237,347,065
5. Benefit and loss related payments.....	106,628,901	94,586,330	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.....	58,551,820	69,300,237	90,719,186
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	(636,499)	393,762	345,270
10. Total (Lines 5 through 9).....	164,544,222	164,280,328	214,273,862
11. Net cash from operations (Line 4 minus Line 10).....	12,162,794	30,483,477	23,073,203
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	34,509,557	17,653,116	21,161,430
12.2 Stocks.....		8,132	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	800,000
12.7 Miscellaneous proceeds.....			
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	34,509,557	18,461,248	21,969,562
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	41,889,369	31,507,293	49,527,221
13.2 Stocks.....		2,718,000	2,718,000
13.3 Mortgage loans.....			
13.4 Real estate.....	37,487	15,464	15,464
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	41,926,856	34,240,757	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).....	(7,417,299)	(15,779,509)	(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	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).....	(24,163,893)	(6,079,255)	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).....	(24,163,893)	(79,255)	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).....	(19,418,399)	14,624,713	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).....	(2,152,528)	9,624,720	17,265,871

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

20.0001			
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NOTES TO FINANCIAL STATEMENTS

Note 1 – Summary of Significant Accounting Policies and Going Concern

A. Accounting Practices

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

There are no differences between Ohio prescribed practices and NAIC 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	\$ 15,483,522	\$ (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	\$ 15,483,522	\$ (3,012,473)
SURPLUS					
(5) American Commerce Insurance Company Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 112,587,849	\$ 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	\$ 112,587,849	\$ 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

NOTES TO FINANCIAL STATEMENTS

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

- (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 third 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 third 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	\$ 97,454
	2. 12 Months or Longer	\$ 73,045
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$ 11,484,943
	2. 12 Months or Longer	\$ 11,293,653

- (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

- (3) Collateral Received

b. Not applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing

Not applicable

H. Repurchase Agreements Transactions Accounted for as a Sale

Not applicalbe

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

Not applicable

M. Working Capital Finance Investments

- (2) Not applicable

- (3) Not applicable

N. Offsetting and Netting of Assets and Liabilities

Not applicable

Note 6 – Joint Ventures, Partnerships and Limited Liability Companies

No significant changes

Note 7 – Investment Income

No significant changes

Note 8 – Derivative Instruments

No significant changes

Note 9 – Income Taxes

No significant changes

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

No significant changes

NOTES TO FINANCIAL STATEMENTS

Note 11 – Debt

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

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

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

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

No significant changes

Note 14 – Liabilities, Contingencies and Assessments

No significant changes

Note 15 – Leases

No significant changes

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
- (a) Not applicable
- (b) Not applicable
- C. Wash Sales
- (1) Description of the Objectives Regarding These Transactions
- Not applicable
- (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 09/30/19

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds	\$	21,197	\$	\$	\$ 21,197
Preferred Stock	\$	2,655,000	\$	\$	\$ 2,655,000
Total	\$	2,676,197	\$	\$	\$ 2,676,197

- (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.

NOTES TO FINANCIAL STATEMENTS

(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

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	\$ 195,370,869	\$ 190,953,010	\$ 5,531,470	\$ 189,839,399	\$	\$	\$
Preferred Stock	\$ 2,655,000	\$ 2,655,000	\$	\$ 2,655,000	\$	\$	\$
Totals	\$ 198,025,869	\$ 193,608,010	\$ 5,531,470	\$ 192,494,399	\$	\$	\$

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 November 13, 2019 for these statutory financial statements which are to be issued on November 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 incurred losses and LAE reflected on the Statement of Income of \$104,451,000 were higher by \$171,000 due to unfavorable development of prior year estimates. This deficiency was .2% 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 of unpaid loss and LAE reserves has been restated in Part 3 of the statement to reflect the current pooling percentages.

Note 26 – Intercompany Pooling Arrangements

Effective January 1, 2019, the pooling agreement was amended to eliminate affiliate company MAPFRE Insurance Company of New York. The pooling percentages

NOTES TO FINANCIAL STATEMENTS

were revised to reflect the ratio of each subsidiary's policyholders' surplus to the aggregate policyholders' surplus at March 31, 2018. 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

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 ☒ No ☐

1.2

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

Yes ☒ No ☐

2.1

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

Yes ☐ No ☒

2.2

If yes, date of change:

3.1

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

Yes ☒ No ☐

3.2

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

Yes ☒ No ☐

3.3

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

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 ☒

4.2

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

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

5.

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

Yes ☐ No ☒ N/A ☐

6.1

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

12/31/2018

6.2

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

12/31/2013

6.3

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

06/19/2015

6.4

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

6.5

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

Yes ☐ No ☐ N/A ☒

6.6

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

Yes ☐ No ☐ N/A ☒

7.1

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

Yes ☐ No ☒

7.2

If yes, give full information:

8.1

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

Yes ☐ No ☒

8.2

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

8.3

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

Yes ☐ No ☒

8.4

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

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

9.1

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

9.21

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

9.3

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

Yes ☐ No ☒

9.31

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

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

FINANCIAL

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

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

Yes ☒ No ☐

\$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 ☒

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 ☒

14.21 Bonds

14.22 Preferred Stock

14.23 Common Stock

14.24 Short-Term Investments

14.25 Mortgage Loans on Real Estate

14.26 All Other

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

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

1	2
Prior Year End Book/Adjusted Carrying Value	Current Quarter Book/Adjusted Carrying Value
\$0	\$0
0	0
0	0
0	0
0	0
0	0
0	0
\$0	\$0
\$0	\$0

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

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 ☒

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 ☒ No ☐

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

1	2
Name of Custodian(s)	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	2	3
Name(s)	Location(s)	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?

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

Yes ☐ No ☒

1	2	3	4
Old Custodian	New Custodian	Date of Change	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	2
Name of Firm or Individual	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	2	3	4	5
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	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 ☒ 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 [☒]

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

			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
States, Etc.			1 Active Status (a)					
1.	Alabama.....	AL.....L.....	204,522	155,081	25,367	7,838	65,858	36,974
2.	Alaska.....	AK.....L.....	70,253	45,658	8,808		16,698	11,403
3.	Arizona.....	AZ.....L.....	749,769	1,583,200	720,250	1,617,209	1,148,389	2,041,997
4.	Arkansas.....	AR.....L.....	228,563	186,646	40,354	33,364	500,503	60,941
5.	California.....	CA.....L.....	1,162,315	3,423,367	358	2,481,153	4,669	4,543
6.	Colorado.....	CO.....L.....	545,865	5,146,212	86,478	3,199,126	75,313	84,434
7.	Connecticut.....	CT.....L.....	72,383,960	92,948,220	62,726,279	69,786,303	93,483,805	96,755,626
8.	Delaware.....	DE.....L.....	93,253	62,170	106,048	12,088	66,574	91,564
9.	District of Columbia.....	DC.....L.....	48,377	35,087	448		11,313	9,225
10.	Florida.....	FL.....L.....	987,416	916,644	310,659	217,961	516,602	482,164
11.	Georgia.....	GA.....L.....	441,032	367,906	128,370	88,251	193,413	165,297
12.	Hawaii.....	HI.....L.....	15,704	18,921	19,531		9,138	23,506
13.	Idaho.....	ID.....L.....	4,575,169	4,791,290	2,520,989	2,784,149	3,262,980	2,682,770
14.	Illinois.....	IL.....L.....	935,560	962,215	118,856	311,416	557,219	708,236
15.	Indiana.....	IN.....L.....	281,478	1,301,485	428,824	1,243,744	698,693	1,918,483
16.	Iowa.....	IA.....L.....	150,845	270,080	12,444	178,435	50,656	25,899
17.	Kansas.....	KS.....L.....	344,947	1,541,016	10,603	651,982	75,943	74,223
18.	Kentucky.....	KY.....L.....	35,881	353,103	240,901	1,803,110	633,277	1,291,465
19.	Louisiana.....	LA.....L.....	273,526	195,067	48,825	55,455	345,215	142,792
20.	Maine.....	ME.....L.....	713,419	704,335	7,251	90,627	12,700	4,899
21.	Maryland.....	MD.....L.....	108,223	112,020	30,892	5,237	53,204	37,869
22.	Massachusetts.....	MA.....L.....	216,904	173,437	16,157	26,984	63,062	59,753
23.	Michigan.....	MI.....L.....	327,275	191,024	92,682	58,697	165,377	89,229
24.	Minnesota.....	MN.....L.....	458,400	434,220	95,243	22,963	321,220	78,755
25.	Mississippi.....	MS.....L.....	61,995	51,698	1,456	3,968	32,880	12,039
26.	Missouri.....	MO.....L.....	324,341	2,565,805	21,206	1,091,397	81,166	63,596
27.	Montana.....	MT.....L.....	114,985	76,789	24,776	2,332	69,935	18,273
28.	Nebraska.....	NE.....L.....	237,781	256,948	78,487	1,644,181	131,952	399,073
29.	Nevada.....	NV.....L.....	331,203	549,507	42,395	159,544	73,497	35,018
30.	New Hampshire.....	NH.....L.....	132,539	69,463	68,006	1,500	16,412	43,124
31.	New Jersey.....	NJ.....L.....	(913,991)	24,045,576	19,146,454	24,590,568	25,139,638	41,221,251
32.	New Mexico.....	NM.....L.....	177,223	89,096	27,478	14,314	322,463	17,051
33.	New York.....	NY.....L.....	535,455	647,417	766,288	1,131,837	1,310,579	1,924,066
34.	North Carolina.....	NC.....L.....	499,606	457,115	149,461	74,283	152,884	240,880
35.	North Dakota.....	ND.....L.....	32,514	19,652	5,942	2,977	22,449	21,336
36.	Ohio.....	OH.....L.....	12,148,760	14,474,161	8,604,665	7,193,695	6,446,102	7,817,057
37.	Oklahoma.....	OK.....L.....	208,694	247,063	42,141	33,144	85,812	(75,165)
38.	Oregon.....	OR.....L.....	7,132,557	9,131,022	4,889,197	7,283,719	4,197,110	5,691,532
39.	Pennsylvania.....	PA.....L.....	463,194	467,758	132,836	(71,229)	114,953	1,771,715
40.	Rhode Island.....	RI.....L.....	26,162,431	46,088,752	25,987,996	25,646,684	25,523,052	30,528,211
41.	South Carolina.....	SC.....L.....	347,159	277,447	58,766	63,146	63,206	89,931
42.	South Dakota.....	SD.....L.....	111,977	115,934	20,891	11,161	19,754	4,899
43.	Tennessee.....	TN.....L.....	133,867	1,915,032	1,208,449	6,289,069	1,580,870	5,075,426
44.	Texas.....	TX.....L.....	1,076,961	901,367	663,796	167,995	446,950	419,290
45.	Utah.....	UT.....L.....	68,887	73,717	50,974	33,813	36,481	42,842
46.	Vermont.....	VT.....L.....	164,186	237,189		525	10,978	4,953
47.	Virginia.....	VA.....L.....	304,936	245,726	26,218	48,472	52,549	58,327
48.	Washington.....	WA.....L.....	10,717,549	13,395,106	6,634,000	8,216,164	10,717,724	12,317,655
49.	West Virginia.....	WV.....L.....	15,251	12,285			4,221	3,220
50.	Wisconsin.....	WI.....L.....	165,205	222,353	81,982	13,512	119,661	58,401
51.	Wyoming.....	WY.....L.....	30,049	40,613	655	13,289	19,960	26,848
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.....	146,137,970	232,592,995	136,531,132	168,336,152	179,125,059	214,712,896

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

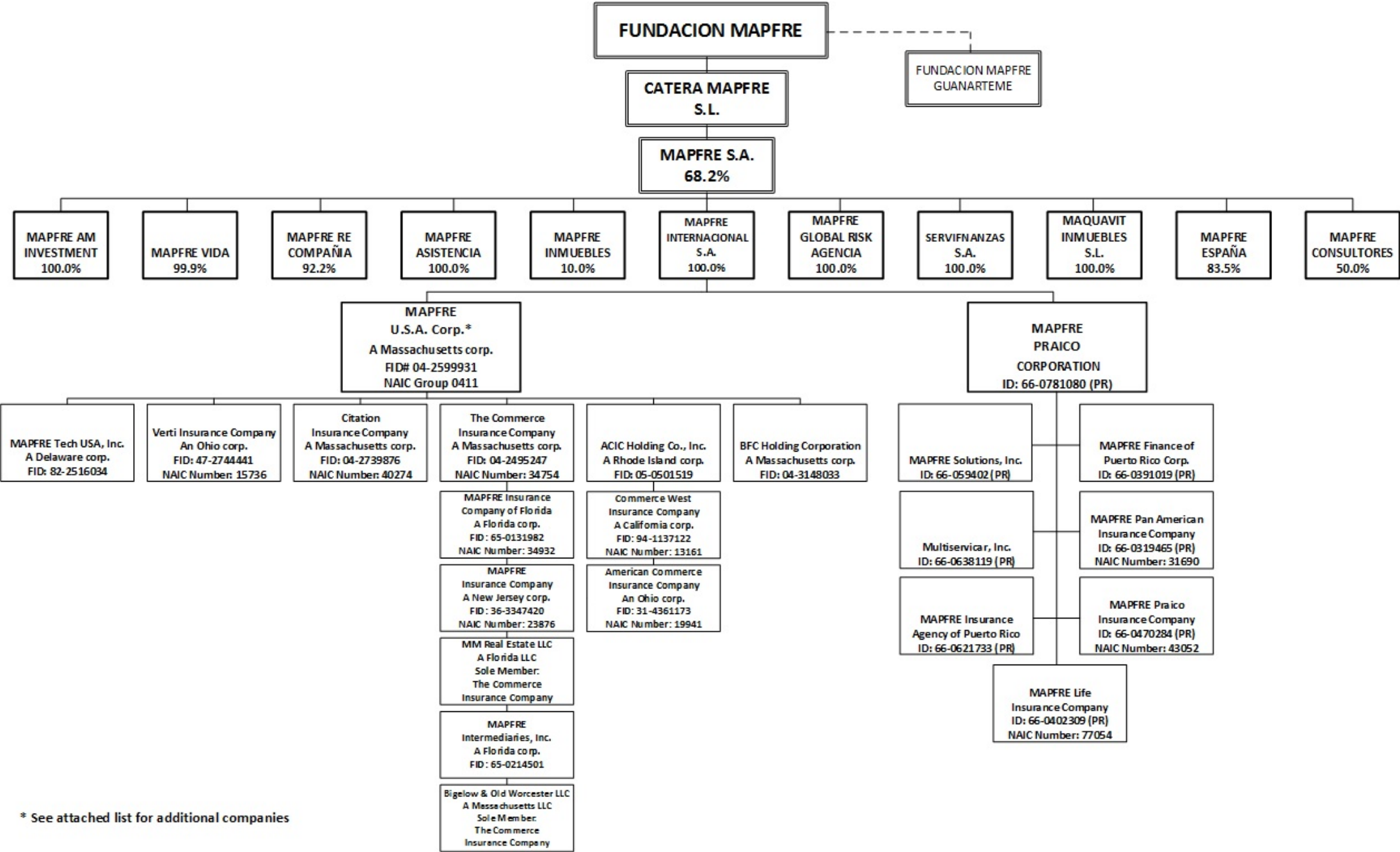
R - Registered - Non-domiciled RRGs..... 0

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



* See attached list for additional companies

Statement for September 30, 2019 of the

American Commerce Insurance Company

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	83.5168	MAPFRE S.A.	
MAPFRE RE COMANIA DE REASEGUROS, S.A.	0.0003	MAPFRE S.A.	
IBEROASISTENCIA, S.A.	0.0700	MAPFRE S.A.	
MAPFRE ASISTENCIA COMANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	0.0030	MAPFRE S.A.	
CENTROS MEDICOS MAPFRE, S.A.	100.0000	MAPFRE S.A.	
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	2.5000	MAPFRE S.A.	
SALUD DIGITAL MAPFRE S.A.	2.5000	MAPFRE S.A.	
CLUB MAPFRE, S.A.	99.9875	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	0.1808	MAPFRE S.A.	
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	99.9982	MAPFRE S.A.	
MAPFRE AUTOMOCION S.A.U.	100.0000	MAPFRE S.A.	
CLUB MAPFRE, S.A.	0.0125	MAPFRE S.A.	
VERTI ASEGURADORA, COMANIA DE SEGUROS Y REASEGUROS, S.A.	0.0009	MAPFRE S.A.	
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	0.0018	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.1199	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.0534	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	0.2182	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	1.1001	MAPFRE S.A.	
VERTI ASEGURADORA, COMANIA DE SEGUROS Y REASEGUROS, S.A.	99.9991	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	0.6665	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.2266	MAPFRE S.A.	
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.5000	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	0.2345	MAPFRE S.A.	
MAPFRE TECH	63.4693	MAPFRE S.A.	
MAPFRE VIDEO Y COMUNICACION, S.A.	75.0000	MAPFRE S.A.	
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0000	MAPFRE S.A.	
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.0000	MAPFRE S.A.	
MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	100.0000	MAPFRE S.A.	
AGROSEGURO	20.1700	MAPFRE S.A.	
SALVADOR CAETANO AUTO (SGPS), S.A.	24.6100	MAPFRE S.A.	
ONLINE SHOPPING CLUB EUROPE, S.L.	49.9000	MAPFRE S.A.	
BANKINTER SEGUROS GENERALES, S.A.	50.1000	MAPFRE S.A.	
RASTREATOR.COM LTD	25.0000	MAPFRE S.A.	
AUDATEX ESPANA, S.A.	12.5000	MAPFRE S.A.	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0000	MAPFRE S.A.	
TECNOLOGIAS DE LA INFOMRACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	22.9506	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	23.4213	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	21.7469	MAPFRE S.A.	
SALUD DIGITAL MAPFRE S.A.	97.5000	MAPFRE S.A.	
PUY DU FOU ESPANA,S.A.	19.3810	MAPFRE S.A.	
FUNESPANA, S.A.	99.5567	MAPFRE S.A.	
TANATORIUM ZRT	100.0000	MAPFRE S.A.	
ALL FUNERAL SERVICES, S.L.	100.0000	MAPFRE S.A.	
SALZILLO SERVICIOS FUNERARIOS S.L.	45.0000	MAPFRE S.A.	
TANATORI LA DAMA D'ELX, S.L.	97.1400	MAPFRE S.A.	
ZACARIAS NUNO, S.L.	50.0000	MAPFRE S.A.	
SERVICIOS FUNERARIOS FUNEMADRID, S.A.	100.0000	MAPFRE S.A.	
CEMENTERIO JARDIN DE ALCALA DE HENARES, S.A.	49.0000	MAPFRE S.A.	
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.0000	MAPFRE S.A.	
INICIATIVAS ALCAESAR, S.L.	40.0000	MAPFRE S.A.	
NUEVO TANATORIO, S.L.	50.0000	MAPFRE S.A.	
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.0000	MAPFRE S.A.	
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.0000	MAPFRE S.A.	
GAB MANAGEMENT & CONSULTING, S.R.L.	77.6000	MAPFRE S.A.	
POMPES FUNEBRES DOMINGO, S.L.	75.0000	MAPFRE S.A.	
DE MENA SERVICIOS FUNERARIOS S.L.	70.0000	MAPFRE S.A.	
CEMENTERIO PARQUE ANDUJAR, S.L.	68.6200	MAPFRE S.A.	
ISABELO ALVAREZ MAYORGA, S.A.	50.0000	MAPFRE S.A.	
SERVICIOS FUNERARIOS DEL NERVION, S.L.	50.0000	MAPFRE S.A.	
TANATORIO DE ECJJA, S.L.	33.3300	MAPFRE S.A.	
TANATORIO SE-30 SEVILLA, S.L.	10.0000	MAPFRE S.A.	
FUNESPANA CHILE, S.A.	50.0000	MAPFRE S.A.	
FUNEUROPEA CHILE, S.A.	50.0000	MAPFRE S.A.	
FUNERARIAS REUNIDAS EL BIERZO, S.A.	85.8200	MAPFRE S.A.	
SERVICIOS FUNERARIOS LUCEM S.L.	50.0000	MAPFRE S.A.	
FUNERARIA SAN VICENTE, S.L.	50.0000	MAPFRE S.A.	
MAPFRE INMUEBLES, S.G.A.	76.8430	MAPFRE S.A.	
DESARROLLOS URBANOS CIC, S.A.	99.9216	MAPFRE S.A.	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.0100	MAPFRE S.A.	
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.9000	MAPFRE S.A.	
DESARROLLOS URBANOS CIC, S.A.	0.0784	MAPFRE S.A.	
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.6667	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	99.9994	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.5682	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	0.3434	MAPFRE S.A.	
MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	100.0000	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.7377	MAPFRE S.A.	
FONDMAPFRE ELECCION DECIDIDA	4.5014	MAPFRE S.A.	
FONDMAPFRE ELECCION MODERADA	0.9139	MAPFRE S.A.	
FONDMAPFRE ELECCION PRUDENTE	1.8322	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.1298	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	1.6441	MAPFRE S.A.	
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.9121	MAPFRE S.A.	
MAPFRE TECH	11.6834	MAPFRE S.A.	
MAPFRE VIDEO Y COMUNICACION, S.A.	25.0000	MAPFRE S.A.	
MIRACETI S.A.	99.9991	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.9306	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.9906	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	1.7442	MAPFRE S.A.	
MIRACETI S.A.	0.0009	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	8.5608	MAPFRE S.A.	
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	99.9991	MAPFRE S.A.	
FONDMAPFRE ELECCION DECIDIDA	7.8071	MAPFRE S.A.	
FONDMAPFRE ELECCION MODERADA	2.6213	MAPFRE S.A.	
FONDMAPFRE ELECCION PRUDENTE	0.9912	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	2.4066	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	8.5286	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	2.6262	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	0.8619	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	0.5431	MAPFRE S.A.	
MAPFRE GOOD GOVERNANCE	100.0000	MAPFRE S.A.	
MAPFRE IBERIAN EQUITY	100.0000	MAPFRE S.A.	
MAPFRE EUROPEAN EQUITY	100.0000	MAPFRE S.A.	
MAPFRE TECH	0.7746	MAPFRE S.A.	
MAPFRE MULTI ASSET STRAT	100.0000	MAPFRE S.A.	
MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	99.9853	MAPFRE S.A.	
FONDMAPFRE ELECCION DECIDIDA	0.7807	MAPFRE S.A.	
FONDMAPFRE ELECCION MODERADA	0.2580	MAPFRE S.A.	
FONDMAPFRE ELECCION PRUDENTE	0.2357	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	1.4944	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.8786	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	0.9335	MAPFRE S.A.	
MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	0.0147	MAPFRE S.A.	
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	0.0009	MAPFRE S.A.	
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	99.9971	MAPFRE S.A.	
FONDMAPFRE ELECCION DECIDIDA	0.7807	MAPFRE S.A.	
FONDMAPFRE ELECCION MODERADA	0.2580	MAPFRE S.A.	
FONDMAPFRE ELECCION PRUDENTE	0.2357	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.9626	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	4.3667	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	0.2721	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	2.2114	MAPFRE S.A.	
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	0.0029	MAPFRE S.A.	
FONDMAPFRE ELECCION DECIDIDA	40.0701	MAPFRE S.A.	
FONDMAPFRE ELECCION MODERADA	47.5247	MAPFRE S.A.	
FONDMAPFRE ELECCION PRUDENTE	61.6890	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	28.5234	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	35.6864	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	49.3213	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	26.8234	MAPFRE S.A.	
FONDMAPFRE BLUE CHIPS,F.I.	100.0000	MAPFRE S.A.	

SHORT TERM I	100.0000	MAPFRE S.A.	
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.9339	MAPFRE S.A.	
GESTION MODA SHOPPING S.A.	99.8215	MAPFRE S.A.	
BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	51.0000	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	1.9903	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	0.7992	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	2.2117	MAPFRE S.A.	
FONDMAPFRE BOLSA F.I.	1.6712	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	2.9864	MAPFRE S.A.	
BANKINTER SEGUROS DE VIDA, S.A.	50.0000	MAPFRE S.A.	
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.0000	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	1.8513	MAPFRE S.A.	
FONDMAPFRE GLOBAL F.I.	1.3451	MAPFRE S.A.	
FONDMAPFRE BOLSA EUROPA F.I	1.6441	MAPFRE S.A.	
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.3333	MAPFRE S.A.	
MAPFRE INMUEBLES, S.G.A.	7.0279	MAPFRE S.A.	
MAPFRE TECH	0.7746	MAPFRE S.A.	
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	0.0661	MAPFRE S.A.	
GESTION MODA SHOPPING S.A.	0.1785	MAPFRE S.A.	
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	92.2454	MAPFRE S.A.	
SERVICIOS GENERALES VENEASISTENCIA, S.A.	0.0020	MAPFRE S.A.	
CIAR INVESTMENT	99.9900	MAPFRE S.A.	
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	99.9985	MAPFRE S.A.	
REINSURANCE MANAGEMENT INC.	100.0000	MAPFRE S.A.	
MAPFRE EURO BONDS FUND	100.0000	MAPFRE S.A.	
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	99.9999	MAPFRE S.A.	
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	99.9999	MAPFRE S.A.	
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	0.0001	MAPFRE S.A.	
MAPFRE CHILE REASEGUROS, S.A.	100.0000	MAPFRE S.A.	
C R ARGENTINA, S.A.	99.9960	MAPFRE S.A.	
CAJA REASEGURADORA DE CHILE, S.A.	99.8467	MAPFRE S.A.	
INMOBILIARIA COSTA DE MONTEMAR, S.A.	31.4400	MAPFRE S.A.	
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.0000	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	11.5695	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	16.2513	MAPFRE S.A.	
MAPFRE RE VERMONT CORPORATION	100.0000	MAPFRE S.A.	16475 83-2698500
MAPFRE TECH	0.8002	MAPFRE S.A.	
MAPFRE INTERNACIONAL S.A.	100.0000	MAPFRE S.A.	
CIAR INVESTMENT	0.0100	MAPFRE S.A.	
MAPFRE TECH	20.0000	MAPFRE S.A.	
MAPFRE ARGENTINA HOLDING S.A.	99.9997	MAPFRE S.A.	
MAPFRE MANDATOS Y SERVICIOS, S.A.	5.0000	MAPFRE S.A.	
CLUB MAPFRE ARGENTINA	97.0000	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS S.A.	99.9988	MAPFRE S.A.	
CESVI ARGENTINA, S.A.	60.6400	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.0000	MAPFRE S.A.	
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.0000	MAPFRE S.A.	
CLUB MAPFRE ARGENTINA	3.0000	MAPFRE S.A.	
MAPFRE PRAICO CORPORATION	100.0000	MAPFRE S.A.	66-0781080
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.0000	MAPFRE S.A.	31690 66-0319465
MAPFRE FINANCE OF PUERTO RICO CORP	100.0000	MAPFRE S.A.	66-0391019
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.0000	MAPFRE S.A.	66-0621733
MAPFRE SOLUTIONS, INC.	100.0000	MAPFRE S.A.	66-0595402
MULTISERVICAR INC.	100.0000	MAPFRE S.A.	66-0638119
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.0000	MAPFRE S.A.	77054 66-0402309
MAPFRE PRAICO INSURANCE COMPANY	100.0000	MAPFRE S.A.	43052 66-0470284
MAPFRE LA SEGURIDAD S.A.	99.5159	MAPFRE S.A.	
CLUB MAPFRE S.A.	100.0000	MAPFRE S.A.	
CEFOPROSEG C.A.	100.0000	MAPFRE S.A.	
INVERSORA SEGURIDAD C.A.	100.0000	MAPFRE S.A.	
AUTOMOTRIZ MULTISERVICAR, C.A.	97.0000	MAPFRE S.A.	
UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	99.7000	MAPFRE S.A.	
AMA-ASISTENCIA MEDICA ADMISTRADA, C.A.	99.7000	MAPFRE S.A.	
MAPFRE CHILE ASESORIAS, S.A.	0.0001	MAPFRE S.A.	
MAPFRE CHILE SEGUROS S.A.	100.0000	MAPFRE S.A.	
MAPFRE CHILE ASESORIAS, S.A.	99.9999	MAPFRE S.A.	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	12.7100	MAPFRE S.A.	
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	87.2900	MAPFRE S.A.	
MAPFRE CHILE VIDA S.A.	100.0000	MAPFRE S.A.	
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE S.A.	99.9968	MAPFRE S.A.	
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE S.A.	0.0032	MAPFRE S.A.	
MAPFRE HOLDING DO BRASIL LTDA	0.3314	MAPFRE S.A.	
MAPFRE HOLDING DO BRASIL LTDA	98.7993	MAPFRE S.A.	
MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA	100.0000	MAPFRE S.A.	
MAPFRE SAUDE LTDA	99.9900	MAPFRE S.A.	
PROTENSEG CORRETORA DE SEGUROS LTDA	100.0000	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	5.7651	MAPFRE S.A.	
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	100.0000	MAPFRE S.A.	
MAPFRE ADMINISTRACOES DE CONSORCIO S.A.	100.0000	MAPFRE S.A.	
MAPFRE DISTRIBUIDORA DE TITULOS E VALORES MOBILIARIOS, S.A.	99.9000	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	93.3797	MAPFRE S.A.	
MAPFRE PREVIDENCIA S.A.	100.0000	MAPFRE S.A.	
MAPFRE CAPITALIZACAO	100.0000	MAPFRE S.A.	
MAPFRE BB SH2 PARTICIPACOES, S.A.	100.0000	MAPFRE S.A.	
BRASIL VEICULOS COMPANHIA DE SEGUROS S.A.	100.0000	MAPFRE S.A.	
MAPFRE VIDA S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	100.0000	MAPFRE S.A.	
MAPFRE ASISTENCIA S.A.	100.0000	MAPFRE S.A.	
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.0100	MAPFRE S.A.	
ALIANCA DO BRASIL SEGUROS S.A.	100.0000	MAPFRE S.A.	
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.7178	MAPFRE S.A.	
CESVI COLOMBIA, S.A.	5.4434	MAPFRE S.A.	
CREDIMAPFRE S.A.	100.0000	MAPFRE S.A.	
MAPFRE SERVICIOS EXEQUIALES SAS	100.0000	MAPFRE S.A.	
MAPFRE COLOMBIA VIDA S.A.	94.3541	MAPFRE S.A.	
CESVI COLOMBIA, S.A.	62.3309	MAPFRE S.A.	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	0.0021	MAPFRE S.A.	
MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	67.4071	MAPFRE S.A.	
CORPORACION FINISTERRE, S.A.	100.0000	MAPFRE S.A.	
MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	99.2900	MAPFRE S.A.	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	1.4100	MAPFRE S.A.	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.5900	MAPFRE S.A.	
MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	60.0000	MAPFRE S.A.	
MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	89.5400	MAPFRE S.A.	
APOINT S.A.	100.0000	MAPFRE S.A.	
MAPFRE ARGENTINA HOLDING S.A.	0.0003	MAPFRE S.A.	
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	6.2768	MAPFRE S.A.	
MAPFRE COLOMBIA VIDA S.A.	5.6459	MAPFRE S.A.	
MAPFRE LA URUGUAYA S.A.	100.0000	MAPFRE S.A.	
MAPFRE DOMINICANA S.A.	99.9999	MAPFRE S.A.	
MAPFRE BHD COMPANIA DE SECUROS, S.A.	51.0000	MAPFRE S.A.	
CREDI PRIMAS, S.A.	100.0000	MAPFRE S.A.	
MAPFRE DOMINICANA S.A.	0.0001	MAPFRE S.A.	
GRUPO CORPORATIVO LML S.A. DE C.V.	100.0000	MAPFRE S.A.	
MAPFRE TEPEYAC S.A.	55.6602	MAPFRE S.A.	
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	99.9982	MAPFRE S.A.	
MAPFRE TEPEYAC INC.	100.0000	MAPFRE S.A.	
MAPFRE SERVICIOS MEXICANOS S.A.	99.9900	MAPFRE S.A.	
MAPFRE FIANZAS S.A.	100.0000	MAPFRE S.A.	
MAPFRE ASSET DEFENSA LEGAL MEXICANA S.A. DE C.V.	100.0000	MAPFRE S.A.	
CESVI MEXICO, S.A.	16.6700	MAPFRE S.A.	
MAPFRE AMERICA CENTRAL, S.A.	99.9000	MAPFRE S.A.	
MAPFRE PANAMA S.A.	99.3772	MAPFRE S.A.	
INMOBILIARIA AMERICANA S.A.	78.9000	MAPFRE S.A.	
MAPFRE TENEDORA DE ACC, S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS HONDURAS S.A.	73.2569	MAPFRE S.A.	
MAPFRE SEGUROS COSTA RICA, S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS GUATEMALA, S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS NICARAGUA, S.A.	100.0000	MAPFRE S.A.	
MAPFRE SEGUROS HONDURAS S.A.	25.1031	MAPFRE S.A.	
MAPFRE SEGUROS EL SALVADOR, S.A.	78.1065	MAPFRE S.A.	

Statement for September 30, 2019 of the

American Commerce Insurance Company

MAPFRE USA CORPORATION INC.	100.0000	MAPFRE S.A.	04-2599993
VERTI INSURANCE COMPANY	100.0000	MAPFRE S.A.	15736 47-2744441
CITATION INSURANCE COMPANY	100.0000	MAPFRE S.A.	40274 04-2739876
BFC HOLDING CORPORATION	100.0000	MAPFRE S.A.	04-3148033
MAPFRE TECH USA, INC	100.0000	MAPFRE S.A.	82-2516034
THE COMMERCE INSURANCE COMPANY	100.0000	MAPFRE S.A.	34754 04-2495247
MAPFRE INTERMEDIARIES	100.0000	MAPFRE S.A.	65-0214501
MAPFRE INSURANCE COMPANY OF FLORIDA	100.0000	MAPFRE S.A.	34932 65-0131982
MAPFRE INSURANCE COMPANY	100.0000	MAPFRE S.A.	23876 36-3347420
MM REAL ESTATE, LLC	100.0000	MAPFRE S.A.	
BIGELOW & OLD WORCESTER, LLC	100.0000	MAPFRE S.A.	04-2495247
ACIC HOLDINGS COMPANY, INC.	100.0000	MAPFRE S.A.	05-0501519
COMMERCE WEST INSURANCE COMPANY	100.0000	MAPFRE S.A.	13161 94-1137122
AMERICAN COMMERCE INSURANCE COMPANY	100.0000	MAPFRE S.A.	19941 31-4361173
MAPFRE SIGORTA, A.S.	99.7450	MAPFRE S.A.	
MAPFRE YASAM SIGORTA, A.S.	99.5000	MAPFRE S.A.	
GENEL SERVIS A.S.	51.0000	MAPFRE S.A.	
MAPFRE INSULAR INSURANCE CORPORATION	74.9384	MAPFRE S.A.	
MAPFRE MIDDLESEA P.L.C.	54.5627	MAPFRE S.A.	
MIDDLESEA ASSIST LIMITED	49.0000	MAPFRE S.A.	
MAPFRE M.S.V. LIFE P.L.C.	50.0000	MAPFRE S.A.	
GROWTH INVESTMENTS LIMITED	100.0000	MAPFRE S.A.	
CHURCH WARF PROPERTIES	50.0000	MAPFRE S.A.	
CHURCH WARF PROPERTIES	50.0000	MAPFRE S.A.	
BEE INSURANCE MANAGEMENT LTD	100.0000	MAPFRE S.A.	
EUROMED RISK SOLUTIONIS LIMITED	100.0000	MAPFRE S.A.	
EURO GLOBE HOLDINGS LIMITED	100.0000	MAPFRE S.A.	
PT ASURANSI BINA DANA ARTA TBK	62.3267	MAPFRE S.A.	
PT MAPFRE ABDA ASSISTANCE	49.0000	MAPFRE S.A.	
VERTI VERSICHERUNG AG	100.0000	MAPFRE S.A.	
VERTI ASSICURIZIONI S.P.A.	100.0000	MAPFRE S.A.	
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	99.9970	MAPFRE S.A.	
IBEROASISTENCIA, ARGENTINA S.A.	98.4200	MAPFRE S.A.	
SERVICIOS GENERALES VENEASISTENCIA, S.A.	99.9980	MAPFRE S.A.	
IRELAND ASSIST, LTD	100.0000	MAPFRE S.A.	
MEXICO ASISTENCIA, S.A.	99.9998	MAPFRE S.A.	
ALLMAP ASSIST GESELLSCHAFT FUR BEISTANDSLEISTUNGEN MBH	99.9500	MAPFRE S.A.	
ARABA ASSIST FOR LOGISTIC SERVICES	100.0000	MAPFRE S.A.	
LLC MAPFRE WARRANTY	100.0000	MAPFRE S.A.	
MAPFRE ASISTENCIA LIMITED	100.0000	MAPFRE S.A.	
MAPFRE ASISTENCIA COMPANY LIMITED	100.0000	MAPFRE S.A.	
INSURE & GO INSURANCE SERVICES USA CORP.	100.0000	MAPFRE S.A.	
QUETZAL ASISTENCIA, S.A.	99.9920	MAPFRE S.A.	
NICASSIT, S.A.	100.0000	MAPFRE S.A.	
EL SALVADOR ASISTENCIA, S.A.	99.9900	MAPFRE S.A.	
NORASIST, INC D/B/A ROAD CANADA	100.0000	MAPFRE S.A.	
D/B/A ROAD AMERICAN MOTOR CLUB	100.0000	MAPFRE S.A.	
INSURE AND GO AUSTRALIA	100.0000	MAPFRE S.A.	
EUROSOS ASSISTANCE, S.A.	99.5000	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	0.1118	MAPFRE S.A.	
MAPFRE ASISTENCIA LTDA	99.9990	MAPFRE S.A.	
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	0.0001	MAPFRE S.A.	
MAPFRE SOLUTIONS DO BRASIL LTDA	99.9900	MAPFRE S.A.	
MAPFRE ABRAXAS SOFTWARE, LTD	100.0000	MAPFRE S.A.	
ABRAXAS INSURANCE	100.0000	MAPFRE S.A.	
MAPFRE WARRANTY UK LIMITED	100.0000	MAPFRE S.A.	
HOME 3	100.0000	MAPFRE S.A.	
MAPFRE WARRANTY S.P.A.	100.0000	MAPFRE S.A.	
MAPFRE WARRANTIES	100.0000	MAPFRE S.A.	
FRANCE ASSIST	100.0000	MAPFRE S.A.	
MAPFRE ASSISTANCE USA INC.	100.0000	MAPFRE S.A.	
CENTURY AUTOMOTIVE SERVICES COMPANY	100.0000	MAPFRE S.A.	
FEDERAL ASSIST COMPANY	100.0000	MAPFRE S.A.	
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.0000	MAPFRE S.A.	
INSURE & GO INSURANCE SERVICES USA CORP.	100.0000	MAPFRE S.A.	
INSURE AND GO	100.0000	MAPFRE S.A.	
TRAVEL CLAIMS SERVICES LIMITED	100.0000	MAPFRE S.A.	
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	98.0900	MAPFRE S.A.	
ECUASISTENCIA S.A.	99.2600	MAPFRE S.A.	
PERU ASISTENCIA, S.A.	99.9856	MAPFRE S.A.	
CONSULTING DE SOLUCIONES Y TECNOLOGIAS SIAM, S.A.	99.9259	MAPFRE S.A.	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.6300	MAPFRE S.A.	
URUGUAY ASISTENCIA, S.A.	97.9000	MAPFRE S.A.	
SUR ASISTENCIA, S.A.	99.0000	MAPFRE S.A.	
IBEROASISTENCIA, S.A.	99.9300	MAPFRE S.A.	
MAPFRE SOLUTIONS DO BRASIL LTDA	0.0010	MAPFRE S.A.	
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	1.9100	MAPFRE S.A.	
IBEROASISTENCIA, ARGENTINA S.A.	1.5800	MAPFRE S.A.	
SUR ASISTENCIA, S.A.	1.0000	MAPFRE S.A.	
EUROSOS ASSISTANCE, S.A.	0.5000	MAPFRE S.A.	
CONSULTING DE SOLUCIONES Y TECNOLOGIAS SIAM, S.A.	0.0741	MAPFRE S.A.	
PERU ASISTENCIA, S.A.	0.0144	MAPFRE S.A.	
ALLMAP ASSIST GESELLSCHAFT FUR BEISTANDSLEISTUNGEN MBH	0.0500	MAPFRE S.A.	
URUGUAY ASISTENCIA, S.A.	2.1000	MAPFRE S.A.	
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	0.3700	MAPFRE S.A.	
ROADSIDE ASSIST ALGERIE SPA	0.4000	MAPFRE S.A.	
NILE ASSIT	1.0000	MAPFRE S.A.	
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	1.0500	MAPFRE S.A.	
NILE ASSIT	98.0000	MAPFRE S.A.	
TUR ASSIST, LTD.	99.6500	MAPFRE S.A.	
ROAD CHINA ASSISTANCE CO., LTD.	100.0000	MAPFRE S.A.	
IBERO ASISTENCIA, S.A.	100.0000	MAPFRE S.A.	
MIDDLESEA ASSIST LIMITED	51.0000	MAPFRE S.A.	
GULF ASSIST, B.S.C.	74.6250	MAPFRE S.A.	
CARIBE ASISTENCIA, S.A.	83.5823	MAPFRE S.A.	
BENELUX ASSIST, S.A.	100.0000	MAPFRE S.A.	
PANAMA ASISTENCIA, S.A.	82.0700	MAPFRE S.A.	
ROADSIDE ASSIST ALGERIE SPA	60.3000	MAPFRE S.A.	
PT MAPFRE ABDA ASSISTANCE	51.0000	MAPFRE S.A.	
AFRIQUE ASSISTANCE, S.A.	49.0000	MAPFRE S.A.	
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	98.9500	MAPFRE S.A.	
MAPFRE TECH	1.5864	MAPFRE S.A.	
MAPFRE INMUEBLES, S.G.A.	9.9977	MAPFRE S.A.	
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.0000	MAPFRE S.A.	
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	10.0000	MAPFRE S.A.	
MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	16.4825	MAPFRE S.A.	
INDUSTRIAL RE S.A.	100.0000	MAPFRE S.A.	
FONDMAPFRE BOLSA AMERICA	0.3637	MAPFRE S.A.	
FONDMAPFRE RENTA DOLAR	5.9169	MAPFRE S.A.	
SOLUNION SEGUROS DE CREDITO S.A.	50.0000	MAPFRE S.A.	
MAPFRE INMUEBLES, S.G.A.	6.1302	MAPFRE S.A.	
MAPFRE TECH	1.6881	MAPFRE S.A.	
MAPFRE SEGUROS GERAIS S.A.	0.0006	MAPFRE S.A.	
SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	100.0000	MAPFRE S.A.	
MAQUAVIT INMUEBLES, S.L.	100.0000	MAPFRE S.A.	
BIOINGENIERIA ARAGONESA, S.L.	100.0000	MAPFRE S.A.	
PROVITAE CENTROS ASISTENCIALES, S.L.	50.0000	MAPFRE S.A.	
MAPFRE AM INVESTMENT HOLDING, S.A.	100.0000	MAPFRE S.A.	
LA FINANCIERE RESPONSABLE	24.9500	MAPFRE S.A.	
STABLE INCOME REAL ESTATE FUN GP S.A.R.I.	100.0000	MAPFRE S.A.	
MAPFRE BRASIL PARTICIPACOES, S.A.	0.8552	MAPFRE S.A.	
MAPFRE HOLDING DO BRASIL LTDA	0.8693	MAPFRE S.A.	
MAPFRE ASISTENCIA LTDA	0.0010	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....	83.517	MAPFRE S.A.....	..N.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	0.000	MAPFRE S.A.....	..N.....	
							IBEROASISTENCIA, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	0.070	MAPFRE S.A.....	..N.....	
							MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	0.003	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.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A..	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	2.500	MAPFRE S.A.....	..N.....	
							SALUD DIGITAL MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	2.500	MAPFRE S.A.....	..N.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.988	MAPFRE S.A.....	..N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	CLUB MAPFRE.....	OWNERSHIP....	0.181	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....	99.998	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.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE AUTOMOCION S.A.U.....	OWNERSHIP....	0.013	MAPFRE S.A.....	..N.....	
							VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	CLUB MAPFRE, S.A.....	OWNERSHIP....	0.001	MAPFRE S.A.....	..N.....	
							CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	0.002	MAPFRE S.A.....	..N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	CESVIMAP.....	OWNERSHIP....	0.120	MAPFRE S.A.....	..N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	CESVIMAP.....	OWNERSHIP....	0.053	MAPFRE S.A.....	..N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	CESVIMAP.....	OWNERSHIP....	0.218	MAPFRE S.A.....	..N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	1.100	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....	99.999	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)	*
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	VERTI.....	OWNERSHIP....	0.667	MAPFRE S.A.....	N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	VERTI.....	OWNERSHIP....	0.227	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.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MULTIMAP.....	OWNERSHIP....	0.235	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	63.469	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 CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	CHN.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							AGROSEGURO.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	20.170	MAPFRE S.A.....	N.....	
							SALVADOR CAETANO AUTO (SGPS), S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	24.610	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.....	
							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....	22.951	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	23.421	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	21.747	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)	*
							SALUD DIGITAL MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.500	MAPFRE S.A.....	N.....	
							PUY DU FOU ESPANA,S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	19.381	MAPFRE S.A.....	N.....	
							FUNESPANA, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.557	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....	97.140	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.....	FUNESPANA, 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....	68.620	MAPFRE S.A.....	N.....	
							ISABELO ALVAREZ MAYORGA, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS DEL NERVION, S.L.	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							TANATORIO DE ECIJA, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	33.330	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.....	CHL.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNEUROPEA CHILE, S.A.....	CHL.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNERARIAS REUNIDAS EL BIERZO, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	85.820	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS LUCEM S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNERARIA SAN VICENTE, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.3

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	76.843	MAPFRE S.A.....	N.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP....	99.922	MAPFRE S.A.....	N.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	DESARROLLOS URBANOS CIC, S.A.....	OWNERSHIP....	0.010	MAPFRE S.A.....	N.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	0.078	MAPFRE S.A.....	N.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	66.667	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.999	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP....	0.568	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP....	0.343	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.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	0.738	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	4.501	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	0.914	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	1.832	MAPFRE S.A.....	N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	0.130	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	OWNERSHIP....	1.644	MAPFRE S.A.....	N.....	
							MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA.....	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP....	99.912	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	11.683	MAPFRE S.A.....	N.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	25.000	MAPFRE S.A.....	N.....	
							MIRACETI S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.999	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)	*
Q12.4							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MIRACETI	OWNERSHIP....	0.931	MAPFRE S.A.....	N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MIRACETI	OWNERSHIP....	0.991	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MIRACETI	OWNERSHIP....	1.744	MAPFRE S.A.....	N.....	
							MIRACETI S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	0.001	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	8.561	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....	99.999	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	7.807	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	2.621	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	0.991	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	2.407	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	8.529	MAPFRE S.A.....	N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	2.626	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	0.862	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	0.543	MAPFRE S.A.....	N.....	
							MAPFRE GOOD GOVERNANCE.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE IBERIAN EQUITY.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE EUROPEAN EQUITY.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	0.775	MAPFRE S.A.....	N.....	
							MAPFRE MULTI ASSET STRAT.....	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

Q12.5

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	...99.985	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	0.781	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	0.258	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	0.236	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	1.494	MAPFRE S.A.....	...N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	0.879	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	OWNERSHIP....	0.934	MAPFRE S.A.....	...N.....	
							MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...0.015	MAPFRE S.A.....	...N.....	
							MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	0.001	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....	...99.997	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	0.781	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...0.258	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...0.236	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...0.963	MAPFRE S.A.....	...N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...4.367	MAPFRE S.A.....	...N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...0.272	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE VIDA PENSIONES.....	OWNERSHIP....	...2.211	MAPFRE S.A.....	...N.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...0.003	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...40.070	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...47.525	MAPFRE S.A.....	...N.....	
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	...61.689	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)	*
Q12.6							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	28.523	MAPFRE S.A.....	...N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	35.686	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	49.321	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	26.823	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BLUE CHIPS,F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							SHORT TERM I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.934	MAPFRE S.A.....	...N.....	
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.822	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.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	BANKIA MAPFRE VIDA.....	OWNERSHIP....	1.990	MAPFRE S.A.....	...N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	BANKIA MAPFRE VIDA.....	OWNERSHIP....	0.799	MAPFRE S.A.....	...N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	BANKIA MAPFRE VIDA.....	OWNERSHIP....	2.212	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	BANKIA MAPFRE VIDA.....	OWNERSHIP....	1.671	MAPFRE S.A.....	...N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	BANKIA MAPFRE VIDA.....	OWNERSHIP....	2.986	MAPFRE S.A.....	...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.....	

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							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.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	CCM VIDA.....	OWNERSHIP.....	1.851	MAPFRE S.A.....	..N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	CCM VIDA.....	OWNERSHIP.....	1.345	MAPFRE S.A.....	..N.....	
							FONDMAPFRE BOLSA EUROPA F.I.....	ESP.....	NIA.....	CCM VIDA.....	OWNERSHIP.....	1.644	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.....	33.333	MAPFRE S.A.....	..N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP.....	7.028	MAPFRE S.A.....	..N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	0.775	MAPFRE S.A.....	..N.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	0.066	MAPFRE S.A.....	..N.....	
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP.....	0.179	MAPFRE S.A.....	..N.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP.....	92.245	MAPFRE S.A.....	..N.....	
							SERVICIOS GENERALES VENEASISTENCIA, S.A.	VEN.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	0.002	MAPFRE S.A.....	..N.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	99.990	MAPFRE S.A.....	..N.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP.....	99.999	MAPFRE S.A.....	..N.....	
							REINSURANCE MANAGEMENT INC.....	USA.....	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 RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	OWNERSHIP.....	0.000	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.....	

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)	*
							C R ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	99.996	MAPFRE S.A.....	N.....	
							CAJA REASEGURADORA DE CHILE, S.A.....	CHL.....	IA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	99.847	MAPFRE S.A.....	N.....	
							INMOBILIARIA COSTA DE MONTEMAR, S.A.....	CHL.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	31.440	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....	11.570	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	16.251	MAPFRE S.A.....	N.....	
							MAPFRE RE VERMONT CORPORATION.....	VT.....	IA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	0.800	MAPFRE S.A.....	N.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CIAR INVESTMENT.....	BEL.....	NIA.....	MAPFRE INTERNACIONAL	OWNERSHIP....	0.010	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL	OWNERSHIP....	20.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA HOLDING S.A.....	ARG.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE MANDATOS Y SERVICIOS, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	5.000	MAPFRE S.A.....	N.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP....	97.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS S.A.....	ARG.....	IA.....	MAPFRE ARGENTINA HOLDING.....	OWNERSHIP....	99.999	MAPFRE S.A.....	N.....	
							CESVI ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP....	60.640	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.....	IA.....	MAPFRE ARGENTINA HOLDING.....	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.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA VIDA.....	OWNERSHIP....	3.000	MAPFRE S.A.....	N.....	
			66-0781080..				MAPFRE PRAICO CORPORATION.....	PR.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
		31690..	66-0319465..				MAPFRE PAN AMERICAN INSURANCE COMPANY	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
			66-0391019..				MAPFRE FINANCE OF PUERTO RICO CORP	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
			66-0621733..				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
			66-0595402..				MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
			66-0638119..				MULTISERVICAR INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
		77054..	66-0402309..				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.9

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
		43052...	66-0470284..				MAPFRE PRAICO INSURANCE COMPANY....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE LA SEGURIDAD S.A.....	VEN.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...99.516	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....	...97.000	MAPFRE S.A.....	...N.....	
							UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	VEN.....	NIA.....	MAPFRE LA SEGURIDAD S.A.....	OWNERSHIP....	...99.700	MAPFRE S.A.....	...N.....	
							AMA-ASISTENCIA MEDICA ADMISTRADA, C.A.	VEN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...99.700	MAPFRE S.A.....	...N.....	
							MAPFRE CHILE ASESORIAS, S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...0.000	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.....	NIA.....	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....	...12.710	MAPFRE S.A.....	...N.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP....	...87.290	MAPFRE S.A.....	...N.....	
							MAPFRE CHILE VIDA S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE VIDA S.A.....	OWNERSHIP....	...99.997	MAPFRE S.A.....	...N.....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE S.A.	CHL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...0.003	MAPFRE S.A.....	...N.....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...0.331	MAPFRE S.A.....	...N.....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...98.799	MAPFRE S.A.....	...N.....	
							MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA	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....	...99.990	MAPFRE S.A.....	...N.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	...5.765	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....	...99.900	MAPFRE S.A.....	...N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	93.380	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....	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 VIDA 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....	25.010	MAPFRE S.A.....	N.....	
							ALIANCA DO BRASIL SEGUROS 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....	93.718	MAPFRE S.A.....	N.....	
							CESVI COLOMBIA, S.A.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP....	5.443	MAPFRE S.A.....	N.....	
							CREDIMAPFRE S.A.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SERVICIOS EXEQUIALES SAS.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE COLOMBIA VIDA S.A.....	COL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	94.354	MAPFRE S.A.....	N.....	
							CESVI COLOMBIA, S.A.....	COL.....	NIA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP....	62.331	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	COL.....	IA.....	MAPFRE COLOMBIA VIDA S.A.....	OWNERSHIP....	0.002	MAPFRE S.A.....	N.....	
							MAPFRE PERU VIDA, COMPANIA DE SEGUROS, S.A.	PER.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	67.407	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....	99.290	MAPFRE S.A.....	N.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	PER.....	NIA.....	MAPFRE PERU CAMPANIA DE SEGUROS Y REASEGUROS	OWNERSHIP....	1.410	MAPFRE S.A.....	N.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	PER.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	98.590	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....	89.540	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.11

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736...	47-2744441..				APOINT S.A.....	URY.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE ARGENTINA HOLDING S.A.....	ARG.....	NIA.....	APOINT S.A.....	OWNERSHIP....	0.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.....	COL.....	IA.....	APOINT S.A.....	OWNERSHIP....	6.277	MAPFRE S.A.....	...N....	
							MAPFRE COLOMBIA VIDA S.A.....	COL.....	IA.....	APOINT S.A.....	OWNERSHIP....	5.646	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....	
							MAPFRE DOMINICANA S.A.....	DOM.....	NIA.....	CREDI PRIMAS, S.A.....	OWNERSHIP....	0.000	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.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	55.660	MAPFRE S.A.....	...N....	
							MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP....	99.998	MAPFRE S.A.....	...N....	
							MAPFRE TEPEYAC INC.....	CA.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SERVICIOS MEXICANOS S.A.....	MEX.....	NIA.....	MAPFRE TEPEYAC S.A.....	OWNERSHIP....	99.990	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....	16.670	MAPFRE S.A.....	...N....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	...N....	
							MAPFRE PANAMA S.A.....	PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	99.377	MAPFRE S.A.....	...N....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	78.900	MAPFRE S.A.....	...N....	
							MAPFRE TENEDORA DE ACC, S.A.....	PAN.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	73.257	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS COSTA RICA, S.A.....	CRI.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS GUATEMALA, S.A.....	GTM.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS NICARAGUA, S.A.....	NIC.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	25.103	MAPFRE S.A.....	...N....	
							MAPFRE SEGUROS EL SALVADOR, S.A.....	SLV.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	78.107	MAPFRE S.A.....	...N....	
							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....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.13

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	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							EUROMED RISK SOLUTIONIS LIMITED.....	MLT.....	NIA.....	BEE INSURANCE MANAGEMENT LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							EURO GLOBE HOLDINGS LIMITED.....	MLT.....	NIA.....	MAPFRE MIDDLESEA P.L.C.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							PT ASURANSI BINA DANA ARTA TBK.....	IDN.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	62.327	MAPFRE S.A.....	N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	IA.....	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.....	
							VERTI ASSICURIZIONI 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....	99.997	MAPFRE S.A.....	N.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.420	MAPFRE S.A.....	N.....	
							SERVICIOS GENERALES VENEASISTENCIA, S.A.	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.998	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....	99.950	MAPFRE S.A.....	N.....	
							ARABA ASSIST FOR LOGISTIC SERVICES....	JOR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							LLC MAPFRE WARRANTY.....	RUS.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA LIMITED.....	HKG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA COMPANY LIMITED....	TWN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INSURE & GO INSURANCE SERVICES USA CORP.	FL.....	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

Q12.14

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)	*
							QUETZAL ASISTENCIA, S.A.....	GTM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.992	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.....	99.990	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.....	
							D/B/A ROAD AMERICAN MOTOR CLUB	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.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	0.112	MAPFRE S.A.....	...N.....	
							MAPFRE ASSISTENCIA LTDA.....	BRA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.999	MAPFRE S.A.....	...N.....	
							MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	BRA.....	IA.....	MAPFRE ASSISTENCIA LTDA.....	OWNERSHIP.....	0.000	MAPFRE S.A.....	...N.....	
							MAPFRE SOLUTIONS DO BRASIL LTDA	BRA.....	NIA.....	MAPFRE ASSISTENCIA LTDA.....	OWNERSHIP.....	99.990	MAPFRE S.A.....	...N.....	
							MAPFRE ABRAXAS SOFTWARE, LTD.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	...N.....	
							ABRAXAS INSURANCE	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE WARRANTY UK LIMITED.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	...N.....	
							HOME 3.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE WARRANTY S.P.A.....	ITA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	...N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.15

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE WARRANTIES.....	LUX.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FRANCE ASSIST.....	FRA.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE 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 COMPANY.....	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 & GO INSURANCE SERVICES USA CORP.	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....	98.090	MAPFRE S.A.....	N.....	
							ECUASISTENCIA S.A.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.260	MAPFRE S.A.....	N.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.986	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....	99.926	MAPFRE S.A.....	N.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.630	MAPFRE S.A.....	N.....	
							URUGUAY ASISTENCIA, S.A.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.900	MAPFRE S.A.....	N.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.16

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							IBEROASISTENCIA, S.A.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.930	MAPFRE S.A.....	...N.....	
							MAPFRE SOLUTIONS DO BRASIL LTDA	BRA.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.001	MAPFRE S.A.....	...N.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	COL.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	1.910	MAPFRE S.A.....	...N.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	1.580	MAPFRE S.A.....	...N.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	1.000	MAPFRE S.A.....	...N.....	
							EUROSOS ASSISTANCE, S.A.....	GRC.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.500	MAPFRE S.A.....	...N.....	
							CONSULTING DE SOLUCIONES Y TECNOLOGIAS SIAM, S.A.	ESP.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.074	MAPFRE S.A.....	...N.....	
							PERU ASISTENCIA, S.A.....	PER.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.014	MAPFRE S.A.....	...N.....	
							ALLMAP ASSIST GESELLSCHAFT FUR BEISTANDSLEISTUNGEN MBH	DEU.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.050	MAPFRE S.A.....	...N.....	
							URUGUAY ASISTENCIA, S.A.....	URY.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	2.100	MAPFRE S.A.....	...N.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.370	MAPFRE S.A.....	...N.....	
							ROADSIDE ASSIST ALGERIE SPA.....	DZA.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	0.400	MAPFRE S.A.....	...N.....	
							NILE ASSIT.....	EGY.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	1.000	MAPFRE S.A.....	...N.....	
							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	PRY.....	NIA.....	IBEROASISTENCIA.....	OWNERSHIP....	1.050	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....	99.650	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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.17

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)	*
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	74.625	MAPFRE S.A.....	N.....	
							CARIBE ASISTENCIA, S.A.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	83.582	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....	82.070	MAPFRE S.A.....	N.....	
							ROADSIDE ASSIST ALGERIE SPA.....	DZA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	60.300	MAPFRE S.A.....	N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	IA.....	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....	98.950	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	1.586	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	9.998	MAPFRE S.A.....	N.....	
							MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	10.000	MAPFRE S.A.....	N.....	
							MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	16.483	MAPFRE S.A.....	N.....	
							INDUSTRIAL RE S.A.....	LUX.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	INDUSTRIAL RE S.A.....	OWNERSHIP....	0.364	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	INDUSTRIAL RE S.A.....	OWNERSHIP....	5.917	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)	*
Q12.18							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	6.130	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	1.688	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	0.001	MAPFRE S.A.....	N.....	
							SERVIFINANZAS S.A. SOCIEDAD UNIPERSONAL	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	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 RESPONSABLE.....	FRA.....	NIA.....	MAPFRE AM INVESTMENT HOLDING, S.A...	OWNERSHIP....	24.950	MAPFRE S.A.....	N.....	
							STABLE INCOME REAL ESTATE FUN GP S.A.R.I.	LUX.....	NIA.....	MAPFRE AM INVESTMENT HOLDING, S.A...	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	NIA.....	FANCY INVESTMENT S.A.....	OWNERSHIP....	0.855	MAPFRE S.A.....	N.....	
							MAPFRE HOLDING DO BRASIL LTDA.....	BRA.....	NIA.....	FANCY INVESTMENT S.A.....	OWNERSHIP....	0.869	MAPFRE S.A.....	N.....	
							MAPFRE ASSISTENCIA LTDA.....	BRA.....	NIA.....	MAPFRE HOLDING DO BRASIL LTDA.....	OWNERSHIP....	0.001	MAPFRE S.A.....	N.....	

PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	5,531,168	895,377	16.188	37.015
2. Allied lines.....	4,857,238	605,832	12.473	5.329
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	59,957,692	34,172,081	56.994	79.669
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	16,090	484	3.008	17.462
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.....	3,242,463	1,597,028	49.254	64.718
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.....	58,647,552	45,189,214	77.052	79.993
19.3, 19.4 Commercial auto liability.....			0.000	
21. Auto physical damage.....	34,884,502	20,497,456	58.758	63.552
22. Aircraft (all perils).....	9,973,351	4,117,212	41.282	55.012
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	305,034	0.000	
35. Totals.....	177,110,056	107,379,718	60.629	72.069
DETAILS OF WRITE-INS				
3401. TRAVEL.....		305,034	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	305,034	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.....	1,818,242	4,970,048	6,095,723
2. Allied lines.....	1,405,735	4,358,945	4,971,138
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	16,042,897	46,620,112	73,986,482
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	4,444	15,941	17,363
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.....	1,865,457	5,461,957	17,448,251
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.....	14,134,867	46,088,192	77,206,917
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	9,511,331	28,376,995	44,256,419
22. Aircraft (all perils).....	4,269,819	10,245,780	8,610,702
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.....	49,052,792	146,137,970	232,592,995
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.....	2,626,554		2,626,554	2,990,706
2505. Miscellaneous Assets.....	1,931		1,931	2,343
2597. Summary of remaining write-ins for Line 25.....	2,628,485	0	2,628,485	2,993,049

Additional Write-ins for Statement of Income:

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Other technical income (other reinsurer).....	59,535	56,615	56,615
1497. Summary of remaining write-ins for Line 14.....	59,535	56,615	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.....	37,487	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.....	51,812	130,542
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,214,599	1,228,924
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,214,599	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.....	41,889,369	52,245,221
3. Accrual of discount.....	93,960	79,150
4. Unrealized valuation increase (decrease).....	380,141	(439,924)
5. Total gain (loss) on disposals.....	536,083	200,836
6. Deduct consideration for bonds and stocks disposed of.....	34,537,870	21,170,762
7. Deduct amortization of premium.....	989,892	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.....	28,313	1,200
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10).....	193,608,010	186,207,906
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	193,608,010	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).....	148,333,977	13,433,708	9,611,568	(292,013)	148,458,327	148,333,977	151,864,104	152,006,466
2. NAIC 2 (a).....	34,709,037	7,456,208	3,027,956	(48,383)	30,867,067	34,709,037	39,088,906	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.....	183,043,014	20,889,916	12,639,524	(340,396)	179,325,394	183,043,014	190,953,010	183,932,766
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....	2,572,500			82,500	2,482,500	2,572,500	2,655,000	2,275,140
10. NAIC 3.....							0	
11. NAIC 4.....							0	
12. NAIC 5.....							0	
13. NAIC 6.....							0	
14. Total Preferred Stock.....	2,572,500	0	0	82,500	2,482,500	2,572,500	2,655,000	2,275,140
15. Total Bonds and Preferred Stock.....	185,615,514	20,889,916	12,639,524	(257,896)	181,807,894	185,615,514	193,608,010	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

SCHEDULE A - PART 2

Showing all Real Estate ACQUIRED AND ADDITIONS MADE During the Current Quarter

1	Location		4	5	6	7	8	9
	2	3						
Description of Property	City	State	Date Acquired	Name of Vendor	Actual Cost at Time of Acquisition	Amount of Encumbrances	Book/Adjusted Carrying Value Less Encumbrances	Additional Investment Made After Acquisition
Acquired by Purchase								
ADDITIONS TO: THREE STORY BUILDING, 37,077 SQUARE FEET, LOCATED ON 6.002 ACRES OF LAND ON FOUR SEPARATE PARCELS	COLUMBUS.....	OH..	09/30/2019....	VARIOUS.....			1,214,599	26,241
0199999. Totals.....					0	0	1,214,599	26,241
0399999. Totals.....					0	0	1,214,599	26,241

QE01

SCHEDULE A - PART 3

Showing all Real Estate DISPOSED During the Quarter, Including Payments During the Final Year on "Sales Under Contract "

1	Location		4	5	6	7	8	Change in Book/Adjusted Carrying Value Less Encumbrances					14	15	16	17	18	19	20
	2	3						9	10	11	12	13							
Description of Property	City	State	Disposal Date	Name of Purchaser	Actual Cost	Expended for Additions, Permanent Improvements and Changes in Encumbrances	Book/Adjusted Carrying Value Less Encumbrances Prior Year	Current Year's Depreciation	Current Year's Other-Than-Temporary Impairment Recognized	Current Year's Change in Encumbrances	Total Change in B./A.C.V. (11 - 9 - 10)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value Less Encumbrances on Disposal	Amounts Received During Year	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Gross Income Earned Less Interest Incurred on Encumbrances	Taxes, Repairs, and Expenses Incurred

NONE

Sch. B - Pt. 2
NONE

Sch. B - Pt. 3
NONE

Sch. BA - Pt. 2
NONE

Sch. BA - Pt. 3
NONE

SCHEDULE D - PART 3

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. Special Revenue and Special Assessment											
3140J9 VX 6	FN PL#BM5129.....				07/01/2019.....	BAIRD, ROBERT W. & CO.....		1,464,796	1,378,834	2,145	1.....
31334X GB 9	FNCL PL#QA1094.....				08/07/2019.....	BAIRD, ROBERT W. & CO.....		5,173,818	4,992,828	5,825	1.....
31334X ZZ 5	FNCL PL#QA1660.....				09/03/2019.....	BAIRD, ROBERT W. & CO.....		5,091,058	4,962,348	4,549	1.....
880558 MX 6	TENNESSEE STATE SCHOOL BOND AUTH.....				09/23/2019.....	BAIRD, ROBERT W. & CO.....		1,167,486	1,185,000	461	1FE.....
3199999	Total - Bonds - U.S. Special Revenue and Special Assessments.....							12,897,158	12,519,009	12,980	XXX.....
Bonds - Industrial and Miscellaneous											
015271 AK 5	ALEXANDRIA REAL ESTATE EQUITIE INC.....				07/18/2019.....	WELLS FARGO SECURITIES, LLC.....		2,118,680	2,000,000	1,536	2FE.....
20030N CH 2	COMCAST CORP.....				09/11/2019.....	GOLDMAN SACHS.....		536,550	500,000	6,508	1FE.....
25466A AP 6	DISCOVER BANK.....				07/30/2019.....	GOLDMAN SACHS.....		2,196,900	2,000,000	35,650	2FE.....
30292R AJ 3	FREM F MORTAGE TRUST 2015-K46.....				07/24/2019.....	BAIRD, ROBERT W. & CO.....		1,044,922	1,000,000	2,566	2FE.....
674599 DA 0	OCCIDENTAL PETROLEUM CORP.....				09/18/2019.....	Exchg from 032511BJ5.....		999,686	1,000,000		2FE.....
907818 EY 0	UNION PACIFIC CORP.....				09/13/2019.....	J.P. MORGAN.....		1,096,020	1,000,000	768	2FE.....
3899999	Total - Bonds - Industrial and Miscellaneous.....							7,992,758	7,500,000	47,028	XXX.....
8399997	Total - Bonds - Part 3.....							20,889,916	20,019,009	60,008	XXX.....
8399999	Total - Bonds.....							20,889,916	20,019,009	60,008	XXX.....
9999999	Total - Bonds, Preferred and Common Stocks.....							20,889,916	XXX	60,008	XXX.....

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

SCHEDULE D - PART 4

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

1	2			3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22
												11	12	13	14	15							
CUSIP Identification	Description			F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase (Decrease)	Current Year's (Amortization) / Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest / Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation and Administrative Symbol/Market Indicator (a)
Bonds - U.S. Government																							
36225B	GW	2	GNMA POOL #0781113.....	..	09/16/2019.	VARIOUS.....		2,314	2,314	2,399	2,366		(2)		(2)		2,363		(49)	(49)	109	11/15/2029.	1.....
38377V	T8	9	GNMA REMIC TRUST 2011-68.....	..	09/20/2019.	PRINCIPAL RECEIPT.....		416,488	416,488	425,701	423,088		(6,600)		(6,600)		416,488			0	10,908	07/20/2039.	1.....
83162C	TA	1	SMALL BUS ADMIN GTD DEV PTC.....	..	07/01/2019.	PRINCIPAL RECEIPT.....		188,147	188,147	207,637	197,802		(9,656)		(9,656)		188,147			0	8,397	01/01/2030.	1.....
0599999.	Total - Bonds - U.S. Government.....							606,949	606,948	635,737	623,256	0	(16,258)	0	(16,258)	0	606,998	0	(49)	(49)	19,414	XXX	XXX
Bonds - U.S. States, Territories and Possessions																							
13063D	AD	0	CALIFORNIA ST.....	..	09/23/2019.	WELLS FARGO SECURITIES, LLC.....		1,009,640	1,000,000	1,012,180	1,008,348		(1,821)		(1,821)		1,006,527		3,113	3,113	23,276	04/01/2022.	1FE.....
1799999.	Total - Bonds - U.S. States, Territories & Possessions.....							1,009,640	1,000,000	1,012,180	1,008,348	0	(1,821)	0	(1,821)	0	1,006,527	0	3,113	3,113	23,276	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																							
01026C	AC	5	ALABAMA ECONOMIC SETTLEMENT.....	..	09/16/2019.	Sink PMT @ 100.0000000.....		150,000	150,000	148,119	148,136		1,864		1,864		150,000			0	4,745	09/15/2025.	1FE.....
31396P	GT	2	FANNIE MAE - ACES.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		15,654	15,654	17,513	16,697		(1,043)		(1,043)		15,654			0	640	10/25/2032.	1.....
3136A7	DJ	8	FEDERAL NATL MTG ASSN REMIC TR.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		22,325	22,325	22,238	22,256		69		69		22,325			0	502	01/25/2042.	1.....
34160P	DD	8	AM FLA ST DPT MGMT SVCS COP-BUILD	..	08/01/2019.	CALLED @ 100.0000000.....		1,000,000	1,000,000	1,091,000	1,021,430		(21,430)		(21,430)		1,000,000			0	59,860	08/01/2022.	1FE.....
3140J9	VX	6	FN PL#BM5129.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		45,702	45,702	48,551		(2,849)		(2,849)		45,702			0	223	07/01/2047.	1.....	
3138ER	2K	5	FNCL PL#AL9777.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		148,338	148,338	160,623	161,493		(13,155)		(13,155)		148,338			0	4,318	01/01/2047.	1.....
3138WG	RK	2	FNCL PL#AS6789.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		38,435	38,435	40,838	40,794		(2,359)		(2,359)		38,435			0	925	03/01/2046.	1.....
3138WJ	B3	1	FNCL PL#AS8157.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		462,058	462,058	497,795	501,569		(39,511)		(39,511)		462,058			0	14,247	10/01/2046.	1.....
31334X	GB	9	FNCL PL#QA1094.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		56,038	56,038	58,069		(2,031)		(2,031)		56,038			0	163	07/01/2049.	1.....	
31418A	L5	5	FNMA PASS-THRU PL#MA1247.....	..	09/25/2019.	PRINCIPAL RECEIPT.....		10,082	10,082	10,617	10,559		(478)		(478)		10,082			0	202	11/01/2042.	1.....
928109	XE	2	VIRGINIA ST.....	..	08/14/2019.	CALLED @ 100.0000000.....		3,525,000	3,525,000	3,626,344	3,558,831		(33,831)		(33,831)		3,525,000			0	116,433	06/01/2029.	1FE.....
3199999.	Total - Bonds - U.S. Special Revenue and Special Assessments.....							5,473,632	5,473,632	5,721,707	5,481,765	0	(114,754)	0	(114,754)	0	5,473,632	0	0	0	202,258	XXX	XXX
Bonds - Industrial and Miscellaneous																							
251526	BY	4	DEUTSCHE BANK NY.....	D	09/04/2019.	J.P. MORGAN.....		997,380	1,000,000	1,031,157	1,028,377		(3,281)		(3,281)		1,025,096		(27,716)	(27,716)	28,367	05/30/2024.	2FE.....
63253W	AG	6	NATIONAL AUSTRALIA BANK.....	D	08/05/2019.	GOLDMAN SACHS.....		1,999,520	2,000,000	2,014,800	2,004,401		(3,792)		(3,792)		2,000,608		(1,088)	(1,088)	38,722	09/09/2019.	1FE.....
032511	BJ	5	ANADARKO PETROLEUM CORP.....	..	09/18/2019.	Exchg to 674599DA0.....		999,686	1,000,000	999,400	999,644		42		42		999,686			0	35,500	07/15/2024.	2FE.....
20030N	BS	9	COMCAST CORP.....	..	09/11/2019.	GOLDMAN SACHS.....		521,395	500,000	530,320	523,260		(2,166)		(2,166)		521,094		301	301	16,275	03/01/2026.	1FE.....
494550	BM	7	KINDER MORGAN ENERGY PARTNERS.....	..	09/12/2019.	PIERPONT SECURITIES.....		1,028,060	1,000,000	1,008,790	1,003,827		(653)		(653)		1,003,174		24,886	24,886	37,471	02/15/2023.	2FE.....
590218	AF	0	ML MTG INV TR 2006-F1.....	..	09/25/2019.	VARIOUS.....		2,709	2,697	2,687	2,245	440	24		464		2,709			0	111	04/25/2036.	1FM.....
3899999.	Total - Bonds - Industrial and Miscellaneous.....							5,548,750	5,502,697	5,587,154	5,561,754	440	(9,826)	0	(9,386)	0	5,552,367	0	(3,617)	(3,617)	156,446	XXX	XXX
8399997.	Total - Bonds - Part 4.....							12,638,971	12,583,277	12,956,778	12,675,123	440	(142,659)	0	(142,219)	0	12,639,524	0	(553)	(553)	401,394	XXX	XXX
8399999.	Total - Bonds.....							12,638,971	12,583,277	12,956,778	12,675,123	440	(142,659)	0	(142,219)	0	12,639,524	0	(553)	(553)	401,394	XXX	XXX
9999999.	Total - Bonds, Preferred and Common Stocks.....							12,638,971	XXX	12,956,778	12,675,123	440	(142,659)	0	(142,219)	0	12,639,524	0	(553)	(553)	401,394	XXX	XXX

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

Sch. DB - Pt. A - Sn. 1

NONE

Sch. DB - Pt. B - Sn. 1

NONE

Sch. DB - Pt. D - Sn. 1

NONE

Sch. DB - Pt. D - Sn. 2

NONE

Sch. DL - Pt. 1

NONE

Sch. DL - Pt. 2

NONE

American Commerce Insurance Company
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount or interest Accrued at Current Statement Date	First Month	Second Month	Third Month	*
Open Depositories								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(8,578,989)	(9,683,952)	(9,492,215)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....	0.450	412		100,212	100,170	100,001	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				1,002,814	411,072	928,777	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				207,331	123,606	29,847	XXX
MM: BlackRock 11.....	One Financial Center, Boston, MA 02111.....	1.930	2		356	356	357	XXX
MM: BlackRock 30.....	One Financial Center, Boston, MA 02111.....	2.000	1,448		262,156	262,659	263,114	XXX
MM: Fed Govn't Oblig.....	5800 Corporate Drive, Pittsburgh, PA 15237-7000...	1.990	30		5,788	5,798	5,807	XXX
MM: Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	2.030	42,589		7,691,654	11,308,993	6,011,785	XXX
0199999. Total Open Depositories.....	XXX	XXX	44,481	0	691,322	2,528,702	(2,152,527)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	44,481	0	691,322	2,528,702	(2,152,527)	XXX
0599999. Total Cash.....	XXX	XXX	44,481	0	691,322	2,528,702	(2,152,527)	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