

AMENDED FILING EXPLANATION



QUARTERLY STATEMENT

As of March 31, 2020
of the Condition and Affairs of the

American Commerce Insurance Company

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

OFFICERS

Name	Title	Name	Title
1. ALFREDO CASTELO	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. SHERRI DAWN KRISTAL #	TREASURER & AVP	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) ALFREDO CASTELO 1. (Printed Name) PRESIDENT & CEO (Title)	(Signature) DANIEL PATRICK OLOHAN 2. (Printed Name) SECRETARY, GENERAL COUNSEL, & EVP (Title)	(Signature) SHERRI DAWN KRISTAL 3. (Printed Name) TREASURER & AVP (Title)
Subscribed and sworn to before me This _____ day of _____	a. Is this an original filing? b. If no: 1. State the amendment number 2. Date filed 3. Number of pages attached	Yes [] No [X] 2 05/14/2020 53

Yarissa Gomez
Public Notary
Commonwealth of Massachusetts
My Commission Expires: September 6, 2024

ASSETS

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31 Prior Year Net Admitted Assets
1. Bonds.....	201,068,564		201,068,564	189,697,395
2. Stocks:				
2.1 Preferred stocks.....	2,718,000		2,718,000	2,718,000
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).....			0	
4.2 Properties held for the production of income (less \$.....0 encumbrances).....			0	
4.3 Properties held for sale (less \$.....0 encumbrances).....	1,178,801		1,178,801	1,196,578
5. Cash (\$.....17,284,387), cash equivalents (\$.....0) and short-term investments (\$.....0).....	17,284,387		17,284,387	(1,813,634)
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).....	222,249,752	0	222,249,752	191,798,339
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,461,958		1,461,958	1,540,062
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	44,100,769		44,100,769	45,371,125
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.....	14,289,848		14,289,848	14,163,235
16.2 Funds held by or deposited with reinsured companies.....			0	
16.3 Other amounts receivable under reinsurance contracts.....			0	
17. Amounts receivable relating to uninsured plans.....			0	
18.1 Current federal and foreign income tax recoverable and interest thereon.....			0	
18.2 Net deferred tax asset.....	3,165,124	101,655	3,063,469	2,644,309
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	2,151,303		2,151,303	1,717,205
21. Furniture and equipment, including health care delivery assets (\$.....0).....	494,486	494,486	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....			0	3,782,438
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	79,879,425	1,096,312	78,783,113	78,198,491
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	367,792,665	1,692,453	366,100,212	339,215,204
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	367,792,665	1,692,453	366,100,212	339,215,204

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.....	1,096,312	1,096,312	0	
2502. Evaluation allowance.....	1,741,000		1,741,000	1,741,000
2503. Equity in pools and associations.....	74,863,027		74,863,027	74,225,411
2598. Summary of remaining write-ins for Line 25 from overflow page.....	2,179,086	0	2,179,086	2,232,080
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	79,879,425	1,096,312	78,783,113	78,198,491

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....14,992,000).....	91,932,104	87,704,544
2. Reinsurance payable on paid losses and loss adjustment expenses.....	13,133,970	9,340,078
3. Loss adjustment expenses.....	15,472,454	14,634,016
4. Commissions payable, contingent commissions and other similar charges.....	1,421,750	2,453,005
5. Other expenses (excluding taxes, licenses and fees).....	2,433,025	2,000,508
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	37,265	34,917
7.1 Current federal and foreign income taxes (including \$.....15,461 on realized capital gains (losses)).....	414,395	838,126
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 \$.....168,294,025 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).....	102,967,520	95,305,303
10. Advance premium.....	3,539,711	2,190,635
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	10,750,695	9,615,023
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.....	5,690,609	
20. Derivatives.....		
21. Payable for securities.....	2,965,590	
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$.....0 and interest thereon \$.....0.....		
25. Aggregate write-ins for liabilities.....	1,056,486	1,235,207
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	251,815,574	225,351,362
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	251,815,574	225,351,362
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).....	68,344,036	67,923,240
36. Less treasury stock, at cost:		
36.10.000 shares common (value included in Line 30 \$.....0).....		
36.20.000 shares preferred (value included in Line 31 \$.....0).....		
37. Surplus as regards policyholders (Lines 29 to 35, less 36).....	114,284,638	113,863,842
38. Totals (Page 2, Line 28, Col. 3).....	366,100,212	339,215,204

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,056,486	1,235,207
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	1,056,486	1,235,207
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

American Commerce Insurance Company
STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$26,617,205).....	46,355,380	65,961,674	226,927,167
1.2 Assumed..... (written \$58,956,544).....	51,294,327	50,247,385	195,362,289
1.3 Ceded..... (written \$26,617,205).....	46,355,380	65,961,674	226,927,167
1.4 Net..... (written \$58,956,544).....	51,294,327	50,247,385	195,362,289
DEDUCTIONS:			
2. Losses incurred (current accident year \$27,038,000):			
2.1 Direct.....	20,759,133	41,035,933	138,838,523
2.2 Assumed.....	28,809,867	31,238,204	123,423,635
2.3 Ceded.....	20,759,133	41,035,933	138,838,523
2.4 Net.....	28,809,867	31,238,204	123,423,635
3. Loss adjustment expenses incurred.....	6,192,132	5,890,633	17,948,753
4. Other underwriting expenses incurred.....	15,321,331	10,286,175	45,713,282
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	50,323,330	47,415,012	187,085,670
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	970,997	2,832,373	8,276,619
INVESTMENT INCOME			
9. Net investment income earned.....	1,332,535	1,502,179	6,413,810
10. Net realized capital gains (losses) less capital gains tax of \$(15,461).....	19,211	64,323	538,892
11. Net investment gain (loss) (Lines 9 + 10).....	1,351,746	1,566,502	6,952,702
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.....	303,528	443,249	1,540,992
14. Aggregate write-ins for miscellaneous income.....	5,651	(3)	77,598
15. Total other income (Lines 12 through 14).....	309,179	443,246	1,618,590
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	2,631,922	4,842,121	16,847,911
17. Dividends to policyholders.....			
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17).....	2,631,922	4,842,121	16,847,911
19. Federal and foreign income taxes incurred.....	906,200	(145,835)	592,268
20. Net income (Line 18 minus Line 19) (to Line 22).....	1,725,722	4,987,956	16,255,643
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	113,863,842	107,002,523	107,002,523
22. Net income (from Line 20).....	1,725,722	4,987,956	16,255,643
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$137,463.....	(517,121)	163,884	349,990
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	196,458	(650,601)	(999,727)
27. Change in nonadmitted assets.....	(207,779)	7,779	210,074
28. Change in provision for reinsurance.....			
29. Change in surplus notes.....			
30. Surplus (contributed to) withdrawn from protected cells.....			
31. Cumulative effect of changes in accounting principles.....			
32. Capital changes:			
32.1 Paid in.....			
32.2 Transferred from surplus (Stock Dividend).....			
32.3 Transferred to surplus.....			
33. Surplus adjustments:			
33.1 Paid in.....			
33.2 Transferred to capital (Stock Dividend).....			
33.3 Transferred from capital.....			
34. Net remittances from or (to) Home Office.....			
35. Dividends to stockholders.....			
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	(776,484)	(1,540,031)	(8,954,661)
38. Change in surplus as regards policyholders (Lines 22 through 37).....	420,796	2,968,987	6,861,319
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	114,284,638	109,971,510	113,863,842
DETAILS OF WRITE-INS			
0501.			
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	0	0	0
1401. Miscellaneous expense/income.....		(3)	(2)
1402. Gain on sale of fixed assets.....	5,651		19,432
1403. Loss on sale of fixed assets.....			(1,367)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	0	59,535
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	5,651	(3)	77,598
3701. STATUTORY ADJUSTMENT INTERCO EXPENSE POOLING.....	1,015,469	(2,362,550)	(9,777,180)
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....	(1,791,953)	822,519	822,519
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).....	(776,484)	(1,540,031)	(8,954,661)

American Commerce Insurance Company
CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	62,711,648	62,463,078	212,427,220
2. Net investment income.....	1,797,319	1,802,544	7,460,044
3. Miscellaneous income.....	309,178	443,245	1,618,587
4. Total (Lines 1 through 3).....	64,818,145	64,708,867	221,505,851
5. Benefit and loss related payments.....	20,915,028	47,869,675	135,544,210
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	22,047,899	20,347,091	77,131,714
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.....0 tax on capital gains (losses).....	838,128		(636,500)
10. Total (Lines 5 through 9).....	43,801,055	68,216,766	212,039,424
11. Net cash from operations (Line 4 minus Line 10).....	21,017,090	(3,507,898)	9,466,428
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	3,259,403	9,311,281	41,160,286
12.2 Stocks.....			
12.3 Mortgage loans.....			
12.4 Real estate.....			
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			
12.7 Miscellaneous proceeds.....	2,965,590		
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	6,224,993	9,311,281	41,160,286
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	15,650,310	4,870,957	47,339,918
13.2 Stocks.....			
13.3 Mortgage loans.....			
13.4 Real estate.....			37,487
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	15,650,310	4,870,957	47,377,405
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).....	(9,425,317)	4,440,324	(6,217,119)
CASH FROM FINANCING AND MISCELLANEOUS SOURCES			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes.....			
16.2 Capital and paid in surplus, less treasury stock.....			
16.3 Borrowed funds.....			
16.4 Net deposits on deposit-type contracts and other insurance liabilities.....			
16.5 Dividends to stockholders.....			
16.6 Other cash provided (applied).....	7,506,249	(20,571,324)	(22,328,814)
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	7,506,249	(20,571,324)	(22,328,814)
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).....	19,098,022	(19,638,898)	(19,079,505)
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(1,813,635)	17,265,871	17,265,871
19.2 End of period (Line 18 plus Line 19.1).....	17,284,387	(2,373,027)	(1,813,635)

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	2019
NET INCOME					
(1) The Company state basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$ 1,725,722	\$ 16,255,643
(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	\$ 1,725,722	\$ 16,255,643
SURPLUS					
(5) The Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 114,284,638	\$ 113,863,842
(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	\$ 114,284,638	\$ 113,863,842

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. 26R. Amortized cost is calculated using the scientific interest method. Bonds containing call provisions are amortized to either the call or maturity value and date, whichever produces the lowest asset value (yield to worst). Investment grade bonds are stated at amortized cost. Non-investment grade bonds are stated at the lower of amortized cost or fair value. Bonds whose decline has been determined to be Other-Than-Temporary are written down to a new cost basis and the write-down amount is accounted for as a realized loss.

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

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

D. Going Concern

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

Note 2 – Accounting Changes and Corrections of Errors

No significant changes

Note 3 – Business Combinations and Goodwill

No significant changes

Note 4 – Discontinued Operations

No significant changes

Note 5 – Investments

D. Loan-Backed Securities

(1) Description of Sources Used to Determine Prepayment Assumptions

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

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

During the first quarter 2020 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities.

NOTES TO FINANCIAL STATEMENTS

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

During the first quarter 2020 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	\$	84,228
	2. 12 Months or Longer	\$	7,135
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$	1,458,975
	2. 12 Months or Longer	\$	17,262

- (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

A. Derivatives Under SSAP No. 86 – Derivatives

- (8) Not applicable

B. Derivatives under SSAP No. 108 – Derivatives Hedging Variable Annuity Guarantees

- (2) Recognition of Gains/Losses and Deferred Assets and Liabilities

- a. Not applicable
- b. Not applicable
- c. Not applicable

Note 9 – Income Taxes

No significant changes

NOTES TO FINANCIAL STATEMENTS

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

No significant changes

Note 11 – Debt

B. FHLB (Federal Home Loan Bank) Agreements

(1) Nature of the FHLB Agreement

Not applicable

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

A. Defined Benefit Plan

(4) Components of Net Periodic Benefit Cost

Not applicable

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

No significant changes

Note 14 – Liabilities, Contingencies and Assessments

No significant changes

Note 15 – Leases

No significant changes

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

No significant changes

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

B. Transfer and Servicing of Financial Assets

(2) Servicing Assets and Servicing Liabilities

Not applicable

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

Not applicable

C. Wash Sales

(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 03/31/2020

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds	\$	1,373,112	\$	\$	\$ 1,373,112
Total	\$	1,373,112	\$	\$	\$ 1,373,112

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

The Company has no assets or liabilites measured at fair value in Level 3.

(3) Policies when Transfers Between Levels are Recognized

NOTES TO FINANCIAL STATEMENTS

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	\$ 204,769,029	\$ 201,068,564	\$ 5,660,275	\$ 199,108,754	\$	\$	\$
Redeemable Preferred Stocks	\$ 2,542,500	\$ 2,718,000	\$	\$ 2,542,500	\$	\$	\$
Totals	\$ 207,311,529	\$ 203,786,564	\$ 5,660,275	\$ 201,651,254	\$	\$	\$

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

Note 21 – Other Items

No significant changes

Note 22 – Events Subsequent

Subsequent events have been considered through May 13, 2020 for these statutory financial statements which are to be issued on May 15, 2020 .

MAPFRE Insurance Company of Florida for sale

When MAPFRE USA finalized its long term strategy in December of 2019 for the years 2020-2022 the decision was made to focus efforts and resources in selected states. At that time it was decided that business in the state of Florida would not be part of the strategy for the company. In March of 2020 a working group was formed and a broker was contracted to work towards the plan to sell MAPFRE Insurance Company of Florida. At the current time there are no binding offers.

Covid 19

As a result of the COVID-19 pandemic, economic uncertainties have arisen which are likely to impact the Company's net income and surplus. The extent to which the COVID-19 pandemic impacts our business, net income, and surplus, as well as our capital and liquidity position, will depend on future developments, which are highly uncertain and cannot be estimated, including the scope and duration of the pandemic and actions taken by governmental authorities and other third parties in response to the pandemic.

Note 23 – Reinsurance

No significant changes

Note 24 – Retrospectively Rated Contracts and Contracts Subject to Redetermination

F. Risk Sharing Provisions of the Affordable Care Act

Not applicable

Note 25 – Change in Incurred Losses and Loss Adjustment Expenses

A. Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$35,002,000 were higher by \$5,082,000 due to unfavorable development of prior year estimates. This deficiency was 4.50% of the unpaid losses and LAE of \$112,900,000 as of prior year-end.

NOTES TO FINANCIAL STATEMENTS

B. Information about Significant Changes in Methodologies and Assumptions

Effective January 1, 2020, the pooling agreement was expanded to include affiliate company Verti Insurance Company. The prior year end balance utilized in this computation for unpaid loss and LAE reserves has been adjusted to the new pooling percentage for comparative purposes.

Note 26 – Intercompany Pooling Arrangements

Effective January 1, 2020, the pooling agreement was expanded to include affiliate company Verti Insurance Company. The pooling percentages were revised to reflect the ratio of each subsidiary's policyholders' surplus to the aggregate policyholders' surplus at June 30, 2019. The resulting revised percentages are as follows:

Company	NAIC Code	Pooling Percentage	
		2020	2019
The lead company The Commerce Insurance Company	34754	66.2%	69.2%
Affiliate company Citation Insurance Company	40274	7.0%	8.0%
Affiliate company American Commerce Insurance Company	19941	12.0%	10.9%
Affiliate company Commerce West Insurance Company	13161	6.2%	6.1%
Affiliate company MAPFRE Insurance Company of Florida	34932	3.4%	3.4%
Affiliate company MAPFRE Insurance Company	23876	2.4%	2.4%
Affiliate company Verti Insurance Company	15736	2.8%	0.0%
		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.

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?

Yes ☐ No ☒

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

\$

0

INVESTMENT

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

Yes ☐ No ☒

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

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

\$

0

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

\$

0

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

Yes ☐ No ☒

14.2 If yes, please complete the following:

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

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

Yes ☐ No ☒

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

Yes ☐ No ☐ N/A ☒

If no, attach a description with this statement.

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

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

\$

0

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

\$

0

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

\$

0

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

Yes ☒ No ☐

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

1	2
Name of Custodian(s)	Custodian Address
The 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?

Yes ☐ No ☒

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

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 invested assets?

Yes ☐ No ☐

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

Yes ☐ No ☐

17.6 For those firms or individuals listed in the table for 17.5 with an affiliation code of "A" (affiliated) or "U" (unaffiliated), provide the information for the table below.

1	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?

Yes ☒ No ☐

18.2 If no, list exceptions:

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

American Commerce Insurance Company

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

- | | |
|--|---|
| <p>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.</p> <p>b. Issuer or obligor is current on all contracted interest and principal payments.</p> <p>c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.</p> | <p>Yes [☐] No [☒]</p> |
| <p>Has the reporting entity self-designated 5GI securities?</p> | |
| <p>20. By self-designating PLGI securities, the reporting entity is certifying the following elements for each self-designated PLGI security:</p> | |
| <p>a. The security was purchased prior to January 1, 2018.</p> <p>b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.</p> <p>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.</p> <p>d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.</p> | <p>Yes [☐] No [☒]</p> |
| <p>Has the reporting entity self-designated PLGI securities?</p> | |
| <p>21. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:</p> | |
| <p>a. The security was purchased prior to January 1, 2019.</p> <p>b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.</p> <p>c. The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.</p> <p>d. The fund only or predominantly holds bonds in its portfolio.</p> <p>e. The current reporting NAIC designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.</p> <p>f. The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.</p> | <p>Yes [☐] No [☒]</p> |
| <p>Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria?</p> | |

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

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

NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.		1 Active Status (a)	Direct Premiums Written		Direct Losses Paid (Deducting Salvage)		Direct Losses Unpaid	
			2 Current Year to Date	3 Prior Year to Date	4 Current Year to Date	5 Prior Year to Date	6 Current Year to Date	7 Prior Year to Date
1.	Alabama.....AL	L	82,689	77,511	10,903	7,584	63,400	41,903
2.	Alaska.....AK	L	45,572	50,096	500		17,188	16,670
3.	Arizona.....AZ	L	(593,599)	137,312	598,525	245,035	928,359	1,602,460
4.	Arkansas.....AR	L	47,707	43,941	124,404	19,579	82,309	88,302
5.	California.....CA	L	(4,048,735)	363,517			4,310	4,543
6.	Colorado.....CO	L	(3,242,221)	166,044	19,307	13,607	84,164	111,298
7.	Connecticut.....CT	L	16,838,103	22,665,747	13,585,966	21,847,425	87,757,830	98,925,787
8.	Delaware.....DE	L	30,276	16,854	19,183	9,521	57,507	137,393
9.	District of Columbia.....DC	L	53,205	26,762			11,196	11,770
10.	Florida.....FL	L	499,110	290,172	101,874	65,500	682,123	540,867
11.	Georgia.....GA	L	211,044	176,422	24,442	25,249	228,566	192,222
12.	Hawaii.....HI	L	9,313	6,351	893	17,590	7,865	6,156
13.	Idaho.....ID	L	1,143,672	1,436,632	1,053,826	960,907	3,060,132	2,675,178
14.	Illinois.....IL	L	233,285	164,075	125,020	(20,053)	515,760	506,865
15.	Indiana.....IN	L	(1,486,425)	72,175	29,077	173,232	377,109	1,181,585
16.	Iowa.....IA	L	(114,231)	49,327	358	(353)	55,396	62,706
17.	Kansas.....KS	L	(535,501)	129,223	31,548	(8,924)	58,255	71,496
18.	Kentucky.....KY	L	15,858	8,254	52,568	156,753	425,118	1,032,127
19.	Louisiana.....LA	L	46,675	80,940	52,784	18,816	364,271	151,515
20.	Maine.....ME	L	185,957	253,278	6,774	4,750	67,301	5,108
21.	Maryland.....MD	L	47,417	29,357	21,164	28,127	96,726	36,667
22.	Massachusetts.....MA	L	81,939	68,722	16,604	5,719	81,204	68,383
23.	Michigan.....MI	L	120,482	134,716	18,767	46,710	113,765	103,367
24.	Minnesota.....MN	L	234,606	176,343	54,335	24,290	307,535	267,379
25.	Mississippi.....MS	L	13,954	20,865	8,397	(106)	12,074	10,800
26.	Missouri.....MO	L	(1,136,526)	108,479	9,757	661	51,968	76,140
27.	Montana.....MT	L	72,870	18,161	9,890	2,557	64,847	24,221
28.	Nebraska.....NE	L	35,308	11,455	21,362	6,804	101,642	387,269
29.	Nevada.....NV	L	(167,802)	63,049	29,617	5,402	79,962	68,827
30.	New Hampshire.....NH	L	74,391	53,627	1,280	24,250	19,343	32,648
31.	New Jersey.....NJ	L	141,843	(126,278)	2,956,801	8,273,797	18,218,551	32,468,976
32.	New Mexico.....NM	L	51,611	55,319	12,945	2,420	16,061	239,923
33.	New York.....NY	L	166,742	158,286	179,537	211,773	990,259	1,680,030
34.	North Carolina.....NC	L	167,361	184,709	28,846	50,343	155,955	231,671
35.	North Dakota.....ND	L	8,456	10,996		4,700	22,811	18,449
36.	Ohio.....OH	L	2,894,066	3,831,504	2,341,217	2,624,677	5,360,751	7,138,706
37.	Oklahoma.....OK	L	58,553	83,687	288	10,501	77,464	84,026
38.	Oregon.....OR	L	1,845,974	2,399,758	1,084,295	1,729,979	3,675,534	4,929,305
39.	Pennsylvania.....PA	L	222,815	175,681	13,329	28,002	131,119	161,517
40.	Rhode Island.....RI	L	8,307,496	9,132,006	5,969,455	9,504,043	23,733,923	29,334,622
41.	South Carolina.....SC	L	147,415	132,003	10,333	37,619	66,655	87,075
42.	South Dakota.....SD	L	42,411	29,823	3,707	1,869	32,190	18,701
43.	Tennessee.....TN	L	95,425	70,922	390,944	632,515	1,012,095	3,580,810
44.	Texas.....TX	L	459,344	375,170	180,765	230,210	466,213	698,862
45.	Utah.....UT	L	52,205	35,439	5,247	12,975	34,080	68,279
46.	Vermont.....VT	L	51,444	57,865	26,480		16,759	5,352
47.	Virginia.....VA	L	206,569	127,960	3,378	6,694	56,726	67,075
48.	Washington.....WA	L	2,831,070	3,722,999	2,485,082	1,947,019	10,528,989	10,985,359
49.	West Virginia.....WV	L	4,291	6,911	11,500		16,479	3,483
50.	Wisconsin.....WI	L	59,068	44,493	16,575	1,556	87,324	56,356
51.	Wyoming.....WY	L	4,653	2,728	21,400		50,723	20,852
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	26,617,205	47,411,388	31,771,249	48,991,324	160,527,886	200,321,081

DETAILS OF WRITE-INS

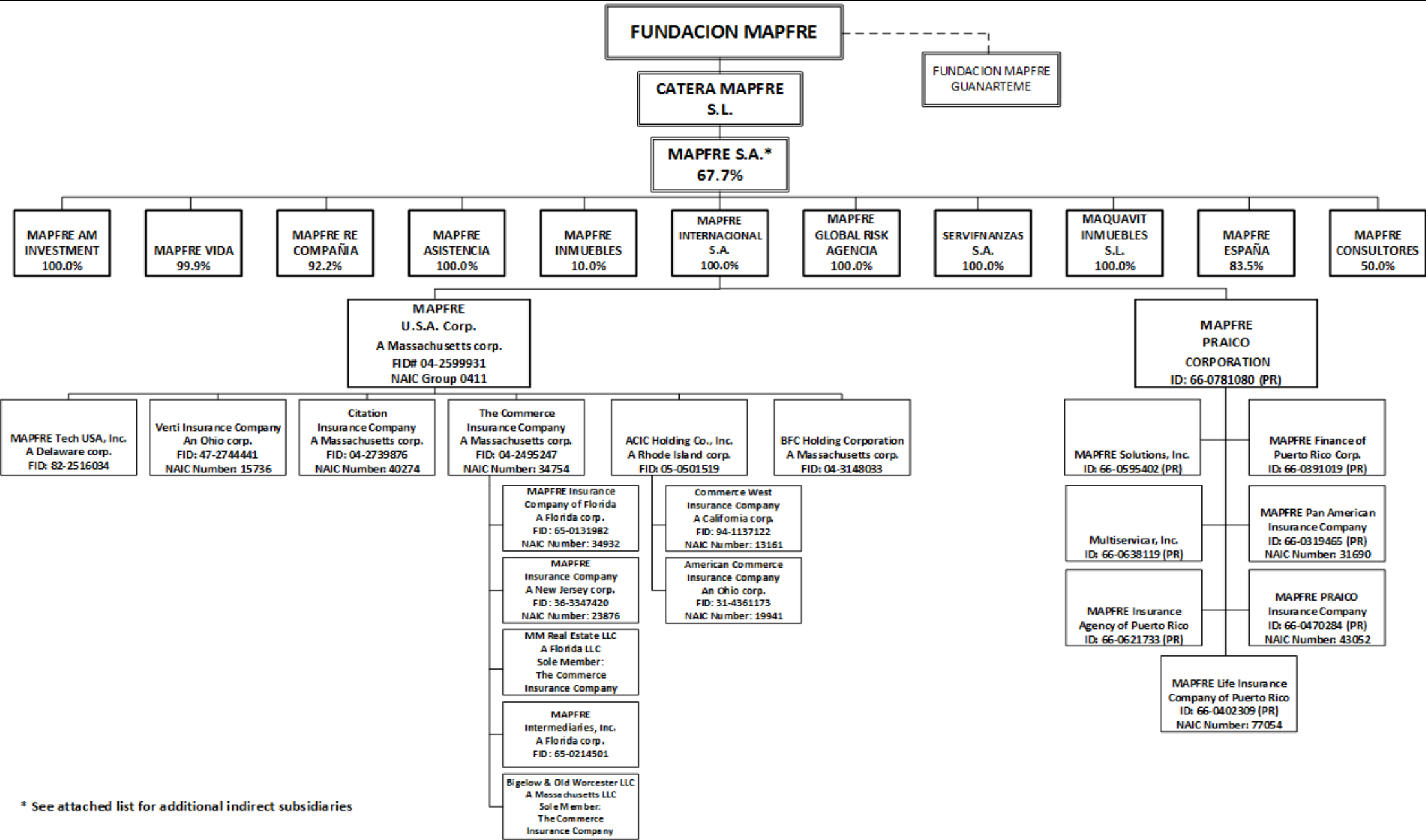
58001.	XXX						
58002.	XXX						
58003.	XXX						
58998. Summary of remaining write-ins for Line 58 from overflow page.....	XXX	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	XXX	0	0	0	0	0	0

(a) Active Status Count

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

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

PART 1 – ORGANIZATIONAL CHART



* See attached list for additional indirect subsidiaries

MAPFRE, S.A.	% OWNED	NAIC	FED ID
MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	83.5168	MAPFRE S.A.	
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	0.0003	MAPFRE S.A.	
IBEROASISTENCIA, S.A.	0.0700	MAPFRE S.A.	
MAPFRE ASISTENCIA COMPANIA 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, COMPANIA 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, COMPANIA 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 QINGDAO 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 ESPAÑA, 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 ECIJA, 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 ADMINISTRADA, 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.	
MAPFRE USA CORPORATION INC.	100.0000	MAPFRE S.A.	04-2599931
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 COMPAÑÍA 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.	
BIOINGIENERIA 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....	...67.700	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

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

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)	*
Q12.2							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

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

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

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)	*
Q12.5							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
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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

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

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)	*
Q12.10							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

Q12.12

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274...	04-2739876..				CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			04-3148033..				BFC HOLDING CORPORATION.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE TECH USA, INC.....	DE.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754...	04-2495247..				THE COMMERCE INSURANCE COMPANY....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			65-0214501..				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932...	65-0131982..				MAPFRE INSURANCE COMPANY OF FLORIDA	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876...	36-3347420..				MAPFRE INSURANCE COMPANY.....	NJ.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MM REAL ESTATE, LLC.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			04-2495247..				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			05-0501519..				ACIC HOLDINGS COMPANY, INC.....	RI.....	UDP.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161...	94-1137122..				COMMERCE WEST INSURANCE COMPANY.	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941...	31-4361173..				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...99.745	MAPFRE S.A.....	...N.....	
							MAPFRE YASAM SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE SIGORTA.....	OWNERSHIP....	...99.500	MAPFRE S.A.....	...N.....	
							GENEL SERVIS A.S.....	TUR.....	NIA.....	MAPFRE SIGORTA.....	OWNERSHIP....	...51.000	MAPFRE S.A.....	...N.....	
							MAPFRE INSULAR INSURANCE CORPORATION	PHL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...74.938	MAPFRE S.A.....	...N.....	
							MAPFRE MIDDLESEA P.L.C.....	MLT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	...54.563	MAPFRE S.A.....	...N.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE MIDDLESEA P.L.C.....	OWNERSHIP....	...49.000	MAPFRE S.A.....	...N.....	
							MAPFRE M.S.V. LIFE P.L.C.....	MLT.....	IA.....	MAPFRE MIDDLESEA P.L.C.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							GROWTH INVESTMENTS LIMITED.....	MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	MAPFRE MIDDLESEA P.L.C.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							BEE INSURANCE MANAGEMENT LTD.....	MLT.....	NIA.....	MAPFRE MIDDLESEA P.L.C.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

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)	*
Q12.14							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

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)	*
Q12.15							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 ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE ASSISTANCE USA INC.....	FL.....	NIA.....						
							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.....	
										MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							INSURE AND GO.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....		OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
										MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.090	MAPFRE S.A.....	...N.....	
										MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.260	MAPFRE S.A.....	...N.....	
										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.....		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.....	
										MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	97.900	MAPFRE S.A.....	...N.....	
							URUGUAY ASISTENCIA, S.A.....	URY.....	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

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)	*
Q12.16							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
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							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 COMPAÑÍA 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			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	1,553,997	202,968	13.061	9.227
2. Allied lines.....	1,599,083	64,564	4.038	21.546
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	14,792,387	6,760,854	45.705	66.374
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	4,406		0.000	
10. Financial guaranty.....			0.000	
11.1. Medical professional liability - occurrence.....			0.000	
11.2. Medical professional liability - claims-made.....			0.000	
12. Earthquake.....			0.000	
13. Group accident and health.....			0.000	
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1 Other liability-occurrence.....	1,118,018	(210,415)	(18.820)	26.928
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.....	14,796,838	8,911,806	60.228	70.390
19.3, 19.4 Commercial auto liability.....			0.000	
21. Auto physical damage.....	8,790,383	4,409,444	50.162	59.544
22. Aircraft (all perils).....	3,700,268	619,912	16.753	45.542
23. Fidelity.....			0.000	
24. Surety.....			0.000	
26. Burglary and theft.....			0.000	
27. Boiler and machinery.....			0.000	
28. Credit.....			0.000	
29. International.....			0.000	
30. Warranty.....			0.000	
31. Reinsurance-nonproportional assumed property.....	XXX	XXX	XXX	XXX
32. Reinsurance-nonproportional assumed liability.....	XXX	XXX	XXX	XXX
33. Reinsurance-nonproportional assumed financial lines.....	XXX	XXX	XXX	XXX
34. Aggregate write-ins for other lines of business.....	0	0	0.000	
35. Totals.....	46,355,380	20,759,133	44.783	62.212
DETAILS OF WRITE-INS				
3401. Travel.....			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	0	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.....	1,194,582	1,194,582	1,524,115
2. Allied lines.....	1,233,624	1,233,624	1,482,074
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	11,034,691	11,034,691	14,175,348
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	3,933	3,933	4,747
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.....	(11,012,125)	(11,012,125)	1,750,850
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.....	12,762,249	12,762,249	16,256,998
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	7,540,583	7,540,583	9,501,153
22. Aircraft (all perils).....	3,859,668	3,859,668	2,716,103
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.....	26,617,205	26,617,205	47,411,388
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

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

Q14

	1	2	3	4	5	6	7	8	9	10	11	12	13
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year-End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1 + 2)	2020 Loss and LAE Payments on Claims Reported as of Prior Year-End	2020 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2020 Loss and LAE Payments (Cols. 4 + 5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year-End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year-End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols. 7 + 8 + 9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 4 + 7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/Deficiency (Cols. 5 + 8 + 9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/Deficiency (Cols. 11 + 12)
1. 2017 + Prior.....	32,546	(2,832)	29,714	5,258	75	5,333	28,220	166	(2,191)	26,195	932	882	1,814
2. 2018.....	21,718	6,132	27,850	4,565	207	4,772	20,920	151	4,048	25,119	3,767	(1,726)	2,041
3. Subtotals 2018 + Prior.....	54,264	3,300	57,564	9,823	282	10,105	49,140	317	1,857	51,314	4,699	(844)	3,855
4. 2019.....	35,830	19,506	55,336	14,240	2,851	17,091	28,013	712	10,747	39,472	6,423	(5,196)	1,227
5. Subtotals 2019 + Prior.....	90,094	22,806	112,900	24,063	3,133	27,196	77,153	1,029	12,604	90,786	11,122	(6,040)	5,082
6. 2020.....	XXX.....	XXX.....	XXX.....	XXX.....	13,302	13,302	XXX.....	7,061	9,557	16,618	XXX.....	XXX.....	XXX.....
7. Totals.....	90,094	22,806	112,900	24,063	16,435	40,498	77,153	8,090	22,161	107,404	11,122	(6,040)	5,082
8. Prior Year-End's Surplus As Regards Policyholders	113,864										Col. 11, Line 7 As % of Col. 1, Line 7	Col. 12, Line 7 As % of Col. 2, Line 7	Col. 13, Line 7 As % of Col. 3, Line 7
											1.12.3 %	2.(26.5)%	3.4.5 %
											Col. 13, Line 7 Line 8		
											4.4.5 %		

SUPPLEMENTAL EXHIBITS AND SCHEDULES INTERROGATORIES

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

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

Explanation:

1.

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

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

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

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

Bar Code:



American Commerce Insurance Company

Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31, Prior Year Net Admitted Assets
2504. Premium tax accrual.....	2,179,073		2,179,073	2,230,068
2505. Miscellaneous assets.....	13		13	2,012
2597. Summary of remaining write-ins for Line 25.....	2,179,086	0	2,179,086	2,232,080

Additional Write-ins for Statement of Income:

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
1404. Other technical income (other reinsurer).....			59,535
1497. Summary of remaining write-ins for Line 14.....	0	0	59,535

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.....	1,196,578	1,228,924
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		37,487
3. Current year change in encumbrances.....		
4. Total gain (loss) on disposals.....		
5. Deduct amounts received on disposals.....		
6. Total foreign exchange change in book/adjusted carrying value.....		
7. Deduct current year's other-than-temporary impairment recognized.....		
8. Deduct current year's depreciation.....	17,776	69,833
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,178,802	1,196,578
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,178,802	1,196,578

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.....	192,415,395	186,207,906
2. Cost of bonds and stocks acquired.....	15,650,310	47,339,918
3. Accrual of discount.....	38,055	131,484
4. Unrealized valuation increase (decrease).....	(654,584)	443,025
5. Total gain (loss) on disposals.....	3,750	566,105
6. Deduct consideration for bonds and stocks disposed of.....	3,259,403	41,188,599
7. Deduct amortization of premium.....	406,959	1,112,757
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
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10).....	203,786,564	192,415,395
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	203,786,564	192,415,395

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).....	150,947,669	17,734,615	5,855,653	(5,346,093)	157,480,538			150,947,669
2. NAIC 2 (a).....	38,749,726	517,515		2,964,935	42,232,176			38,749,726
3. NAIC 3 (a).....				1,355,850	1,355,850			
4. NAIC 4 (a).....					.0			
5. NAIC 5 (a).....					.0			
6. NAIC 6 (a).....					.0			
7. Total Bonds.....	189,697,395	18,252,130	5,855,653	(1,025,308)	201,068,564	.0	.0	189,697,395
PREFERRED STOCK								
8. NAIC 1.....					.0			
9. NAIC 2.....	2,718,000				2,718,000			2,718,000
10. NAIC 3.....					.0			
11. NAIC 4.....					.0			
12. NAIC 5.....					.0			
13. NAIC 6.....					.0			
14. Total Preferred Stock.....	2,718,000	.0	.0	.0	2,718,000	.0	.0	2,718,000
15. Total Bonds and Preferred Stock.....	192,415,395	18,252,130	5,855,653	(1,025,308)	203,786,564	.0	.0	192,415,395

(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

SCHEDULE E - PART 2 - VERIFICATION

Cash Equivalents

	1	2
	Year To Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	0	
2. Cost of cash equivalents acquired.....	2,601,820	
3. Accrual of discount.....		
4. Unrealized valuation increase (decrease).....		
5. Total gain (loss) on disposals.....		
6. Deduct consideration received on disposals.....	2,600,000	
7. Deduct amortization of premium.....	1,820	
8. Total foreign exchange change in book/ adjusted carrying value.....		
9. Deduct current year's other-than-temporary impairment recognized.....		
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9).....	0	0
11. Deduct total nonadmitted amounts.....		
12. Statement value at end of current period (Line 10 minus Line 11).....	0	0

Sch. A Pt. 2

NONE

Sch. A Pt. 3

NONE

Sch. B - Pt. 2

NONE

Sch. B - Pt. 3

NONE

Sch. BA - Pt. 2

NONE

Sch. BA - Pt. 3

NONE

SCHEDULE D - PART 3

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

1	2				3	4	5		6	7		8	9		10
CUSIP Identification	Description				Foreign	Date Acquired	Name of Vendor		Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends		NAIC Designation and Administrative Symbol	
Bonds - U.S. States, Territories and Possessions															
373384	RX	6	GEORGIA ST GO.....			03/05/2020.....	RAYMOND JAMES.....			1,131,000	1,000,000	17,556		1FE.....	
1799999. Total - Bonds - U.S. States, Territories & Possessions.....										1,131,000	1,000,000	17,556		XXX.....	
Bonds - U.S. Political Subdivisions of States															
113745	6J	7	BROOKLINE MA.....			03/12/2020.....	BAIRD, ROBERT W. & CO.....			2,966,070	3,000,000			1FE.....	
517845	JN	4	LAS VEGAS VALLEY WATER DISTRICT.....			03/12/2020.....	BAIRD, ROBERT W. & CO.....			2,965,590	3,000,000			1FE.....	
2499999. Total - Bonds - U.S. Political Subdivisions of States.....										5,931,660	6,000,000	0		XXX.....	
Bonds - U.S. Special Revenue and Special Assessment															
3140X5	M4	2	FN #FM2178.....			01/17/2020.....	BAIRD, ROBERT W. & CO.....			2,076,342	1,991,099	2,128		1.....	
31339U	3M	0	FNCL PL#QA4404.....			02/04/2020.....	BAIRD, ROBERT W. & CO.....			1,893,848	1,836,597	1,684		1.....	
3133N3	VW	1	FNCL PL#RE6029.....			01/17/2020.....	BAIRD, ROBERT W. & CO.....			2,020,005	1,996,916	1,831		1.....	
3199999. Total - Bonds - U.S. Special Revenue and Special Assessments.....										5,990,195	5,824,612	5,643		XXX.....	
Bonds - Industrial and Miscellaneous															
09247X	AQ	4	BLACKROCK INC.....			01/16/2020.....	J.P. MORGAN.....			999,200	1,000,000			1FE.....	
459200	KA	8	IBM CORP.....			01/14/2020.....	WELLS FARGO SECURITIES, LLC.....			1,080,740	1,000,000	5,931		1FE.....	
94106L	BD	0	WASTE MANAGEMENT INC.....			03/05/2020.....	RAYMOND JAMES.....			517,515	500,000	3,800		2FE.....	
3899999. Total - Bonds - Industrial and Miscellaneous.....										2,597,455	2,500,000	9,731		XXX.....	
8399997. Total - Bonds - Part 3.....										15,650,310	15,324,612	32,930		XXX.....	
8399999. Total - Bonds.....										15,650,310	15,324,612	32,930		XXX.....	
9999999. Total - Bonds, Preferred and Common Stocks.....										15,650,310	XXX	32,930		XXX.....	

QE04

SCHEDULE D - PART 4

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

1	2		3	4	5	6	7	8	9	10	Change in Book/Adjusted Carrying Value					16	17	18	19	20	21	22		
		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	11	12	13	14	15	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		
CUSIP Identification	Description										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.									
Bonds - U.S. Government																								
36225B	GW	2		03/16/2020.	PAYDOWN OF PRINCIPAL.....			2,123	2,123	2,201	2,168				0		2,167		(44)	(44)	23	11/15/2029.	1.....	
38377V	T8	9		03/20/2020.	PRINCIPAL RECEIPT.....			246,153	246,153	251,598	248,514		(2,362)		(2,362)		246,153			0	1,604	07/20/2039.	1.....	
83162C	TA	1		01/02/2020.	PRINCIPAL RECEIPT.....			233,843	233,843	258,068	245,232		(11,389)		(11,389)		233,843			0	5,232	01/01/2030.	1.....	
0599999.	Total - Bonds - U.S. Government.....							482,119	482,119	511,867	495,914		0	(13,751)	0	(13,751)	0	482,163	0	(44)	(44)	6,859	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																								
31396P	GT	2		03/25/2020.	PRINCIPAL RECEIPT.....			112,688	112,688	126,070	119,713		(7,024)		(7,024)		112,688			0	1,707	10/25/2032.	1.....	
3136A7	DJ	8		03/25/2020.	PRINCIPAL RECEIPT.....			9,353	9,353	9,317	9,327		27		27		9,353			0	34	01/25/2042.	1.....	
3137B7	R7	6		03/16/2020.	PRINCIPAL RECEIPT.....			41,392	41,392	41,961	42,471		(1,079)		(1,079)		41,392			0	329	02/15/2054.	1.....	
3140X5	M4	2		03/25/2020.	PRINCIPAL RECEIPT.....			9,353	9,353	9,753			(400)		(400)		9,353			0	27	01/01/2050.	1.....	
3140J9	VX	6		03/25/2020.	PRINCIPAL RECEIPT.....			45,015	45,015	47,821	47,821		(2,807)		(2,807)		45,015			0	280	07/01/2047.	1.....	
3138ER	2K	5		03/25/2020.	PRINCIPAL RECEIPT.....			193,113	193,113	209,106	210,221		(17,107)		(17,107)		193,113			0	1,326	01/01/2047.	1.....	
3138WG	RK	2		03/25/2020.	PRINCIPAL RECEIPT.....			24,303	24,303	25,821	25,640		(1,337)		(1,337)		24,303			0	133	03/01/2046.	1.....	
3138WJ	B3	1		03/25/2020.	PRINCIPAL RECEIPT.....			305,637	305,637	329,276	329,251		(23,614)		(23,614)		305,637			0	2,089	10/01/2046.	1.....	
31334X	GB	9		03/25/2020.	PRINCIPAL RECEIPT.....			166,133	166,133	172,156	172,084		(5,951)		(5,951)		166,133			0	1,156	07/01/2049.	1.....	
31334X	ZZ	5		03/25/2020.	PRINCIPAL RECEIPT.....			278,397	278,397	285,617	285,561		(7,164)		(7,164)		278,397			0	1,252	08/01/2049.	1.....	
31339U	CN	8		03/25/2020.	PRINCIPAL RECEIPT.....			12,717	12,717	12,554	12,554		163		163		12,717			0	53	10/01/2049.	1.....	
31339U	3M	0		03/25/2020.	PRINCIPAL RECEIPT.....			14,529	14,529	14,982			(453)		(453)		14,529			0	36	11/01/2049.	1.....	
3133N3	VW	1		03/25/2020.	PRINCIPAL RECEIPT.....			10,449	10,449	10,570			(121)		(121)		10,449			0	26	02/01/2050.	1.....	
31418A	L5	5		03/25/2020.	PRINCIPAL RECEIPT.....			53,944	53,945	56,811	56,198		(2,253)		(2,253)		53,944			0	235	11/01/2042.	1.....	
3199999.	Total - Bonds - U.S. Special Revenue and Special Assessments.....							1,277,023	1,277,023	1,351,815	1,310,841		0	(69,120)	0	(69,120)	0	1,277,023	0	0	0	8,683	XXX	XXX
Bonds - Industrial and Miscellaneous																								
90261X	HK	1	D	03/26/2020.	MATURITY.....			500,000	500,000	500,665	500,039			(39)		(39)		500,000			0	5,875	03/26/2020.	1FE.....
590218	AF	0		03/25/2020.	VARIOUS.....			261	261	260	206	54	1		55		261			0	3	04/25/2036.	1FM.....	
86787E	AU	1		01/29/2020.	CALLED @ 100.0000000.....			1,000,000	1,000,000	992,390	995,913		292		292		996,206		3,794	3,794	12,950	01/29/2021.	1FE.....	
3899999.	Total - Bonds - Industrial and Miscellaneous.....							1,500,261	1,500,261	1,493,315	1,496,158	54	254	0	308	0	1,496,467	0	3,794	3,794	18,828	XXX	XXX	
8399997.	Total - Bonds - Part 4.....							3,259,403	3,259,404	3,356,997	3,302,913	54	(82,617)	0	(82,563)	0	3,255,653	0	3,750	3,750	34,370	XXX	XXX	
8399999.	Total - Bonds.....							3,259,403	3,259,404	3,356,997	3,302,913	54	(82,617)	0	(82,563)	0	3,255,653	0	3,750	3,750	34,370	XXX	XXX	
9999999.	Total - Bonds, Preferred and Common Stocks.....							3,259,403	XXX	3,356,997	3,302,913	54	(82,617)	0	(82,563)	0	3,255,653	0	3,750	3,750	34,370	XXX	XXX	

QE05

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

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

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

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

Sch. DB - Pt. E
NONE

Sch. DL - Pt. 1
NONE

Sch. DL - Pt. 2
NONE

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.....				(6,031,703)	(7,107,537)	(5,469,337)	XXX
The Bank of New York Mellon.....	One Wall Street, NY, New York 10286.....		105		104,285	100,736	197,369	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				177,829	548,923	731,602	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				81,846	144,907	23,733	XXX
BlackRock 30.....	One Financial Center, Boston, MA 02111.....	0.810	996		264,624	264,962	265,277	XXX
Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	0.850	22,121		9,515,496	3,557,461	21,535,743	XXX
0199999. Total Open Depositories.....	XXX	XXX	23,222	0	4,112,377	(2,490,548)	17,284,387	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	23,222	0	4,112,377	(2,490,548)	17,284,387	XXX
0599999. Total Cash.....	XXX	XXX	23,222	0	4,112,377	(2,490,548)	17,284,387	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