



QUARTERLY STATEMENT

As of June 30, 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 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	
Main Administrative Office	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Mail Address	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)</i>	
Primary Location of Books and Records	211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758 <i>(Street and Number) (City or Town, State, Country and Zip Code)</i>	508-943-9000 <i>(Area Code) (Telephone Number)</i>
Internet Web Site Address	www.mapfreinsurance.com	
Statutory Statement Contact	CHRISTINE A CONRAD <i>(Name)</i> cconrad@mapfreusa.com <i>(E-Mail Address)</i>	508-943-9000-14376 <i>(Area Code) (Telephone Number) (Extension)</i> 508-949-4246 <i>(Fax Number)</i>

OFFICERS

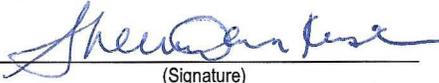
Name	Title	Name	Title
1. ALFREDO CASTELO	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. SHERRI DAWN KRISTAL #	TREASURER & AVP	4. FRANCOIS JEAN FACON	EXECUTIVE VICE PRESIDENT & CFO

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	ALFREDO CASTELO	DAVID HILL COCHRANE	TIMOTHY JOHN MORGAN
KIRK RICHARD NELSON	DANIEL PATRICK OLOHAN	DAVID MCMULLEN #	

State of..... MASSACHUSETTS
County of..... WORCESTER

The officers of this reporting entity being duly sworn, each depose and say that they are the described officers of said reporting entity, and that on the reporting period stated above, all of the herein described assets were the absolute property of the said reporting entity, free and clear from any liens or claims thereon, except as herein stated, and that this statement, together with related exhibits, schedules and explanations therein contained, annexed or referred to, is a full and true statement of all the assets and liabilities and of the condition and affairs of the said reporting entity as of the reporting period stated above, and of its income and deductions therefrom for the period ended, and have been completed in accordance with the NAIC *Annual Statement Instructions and Accounting Practices and Procedures* manual except to the extent that: (1) state law may differ; or, (2) that state rules or regulations require differences in reporting not related to accounting practices and procedures, according to the best of their information, knowledge and belief, respectively. Furthermore, the scope of this attestation by the described officers also includes the related corresponding electronic filing with the NAIC, when required, that is an exact copy (except for formatting differences due to electronic filing) of the enclosed statement. The electronic filing may be requested by various regulators in lieu of or in addition to the enclosed statement.

 _____ (Signature)	 _____ (Signature)	 _____ (Signature)
ALFREDO CASTELO 1. (Printed Name)	DANIEL PATRICK OLOHAN 2. (Printed Name)	SHERRI DAWN KRISTAL 3. (Printed Name)
PRESIDENT & CEO (Title)	SECRETARY, GENERAL COUNSEL, & EVP (Title)	TREASURER & AVP (Title)

Subscribed and sworn to before me
This 27th day of July, 2020


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


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

ASSETS

	Current Statement Date			4
	1	2	3	December 31 Prior Year Net Admitted Assets
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	
1. Bonds.....	214,859,893		214,859,893	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).....	1,161,024		1,161,024	1,196,578
5. Cash (\$.....(218,161)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(218,161)		(218,161)	(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).....	218,520,756	0	218,520,756	191,798,339
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,647,512		1,647,512	1,540,062
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	43,183,449		43,183,449	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.....	12,151,981		12,151,981	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.....	3,175,995	66,029	3,109,966	2,644,309
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	2,018,163		2,018,163	1,717,205
21. Furniture and equipment, including health care delivery assets (\$.....0).....	426,714	426,714	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.....	80,733,715	1,185,336	79,548,380	78,198,491
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	361,858,286	1,678,079	360,180,207	339,215,204
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	361,858,286	1,678,079	360,180,207	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.....	1,185,336	1,185,336	0	
2502. Evaluation Allowance.....	1,741,000		1,741,000	1,741,000
2503. Equity in pools and associations.....	75,718,392		75,718,392	74,225,411
2598. Summary of remaining write-ins for Line 25 from overflow page.....	2,088,988	0	2,088,988	2,232,080
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	80,733,715	1,185,336	79,548,380	78,198,491

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$.....25,514,000).....	90,607,518	87,704,544
2. Reinsurance payable on paid losses and loss adjustment expenses.....	11,021,831	9,340,078
3. Loss adjustment expenses.....	15,048,067	14,634,016
4. Commissions payable, contingent commissions and other similar charges.....	2,167,272	2,453,005
5. Other expenses (excluding taxes, licenses and fees).....	1,715,397	2,000,508
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	30,763	34,917
7.1 Current federal and foreign income taxes (including \$.....78,473 on realized capital gains (losses)).....	1,214,000	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 \$.....168,543,063 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).....	103,391,500	95,305,303
10. Advance premium.....	3,524,001	2,190,635
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	11,539,961	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.....	36,565	
20. Derivatives.....		
21. Payable for securities.....	1,500,000	
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.....	1,037,198	1,235,207
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	242,834,072	225,351,362
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	242,834,072	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).....	71,405,534	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).....	117,346,136	113,863,842
38. Totals (Page 2, Line 28, Col. 3).....	360,180,207	339,215,204

DETAILS OF WRITE-INS

2501. Unclaimed property.....	1,037,198	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).....	1,037,198	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

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 \$....68,963,647).....	88,452,783	123,143,351	226,927,167
1.2 Assumed..... (written \$....104,324,014).....	96,137,817	99,253,513	195,362,289
1.3 Ceded..... (written \$....68,963,647).....	88,452,783	123,143,351	226,927,167
1.4 Net..... (written \$....104,324,014).....	96,137,817	99,253,513	195,362,289
DEDUCTIONS:			
2. Losses incurred (current accident year \$....49,756,000):			
2.1 Direct.....	39,290,434	75,172,141	138,838,523
2.2 Assumed.....	51,409,245	61,637,664	123,423,635
2.3 Ceded.....	39,290,434	75,172,141	138,838,523
2.4 Net.....	51,409,245	61,637,664	123,423,635
3. Loss adjustment expenses incurred.....	11,950,787	7,871,022	17,948,753
4. Other underwriting expenses incurred.....	30,088,336	20,451,745	45,713,282
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	93,448,368	89,960,431	187,085,670
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	2,689,449	9,293,082	8,276,619
INVESTMENT INCOME			
9. Net investment income earned.....	2,849,371	2,956,274	6,413,810
10. Net realized capital gains (losses) less capital gains tax of \$....(78,473).....	82,698	456,684	538,892
11. Net investment gain (loss) (Lines 9 + 10).....	2,932,069	3,412,958	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.....	579,839	831,043	1,540,992
14. Aggregate write-ins for miscellaneous income.....	(1,486)	59,533	77,598
15. Total other income (Lines 12 through 14).....	578,353	890,576	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).....	6,199,871	13,596,615	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).....	6,199,871	13,596,615	16,847,911
19. Federal and foreign income taxes incurred.....	1,768,817	660,067	592,268
20. Net income (Line 18 minus Line 19) (to Line 22).....	4,431,054	12,936,548	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).....	4,431,054	12,936,548	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 \$....49,535.....	(186,337)	235,169	349,990
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	295,257	29,738	(999,727)
27. Change in nonadmitted assets.....	(193,405)	(483,837)	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.....	(864,275)	(8,955,327)	(8,954,661)
38. Change in surplus as regards policyholders (Lines 22 through 37).....	3,482,294	3,762,291	6,861,319
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	117,346,136	110,764,814	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.....		(3)	(2)
1402. Gain on sale of fixed assets.....	5,650		19,432
1403. Loss on sale of fixed assets.....	(7,136)		(1,367)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	0	59,535	59,535
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	(1,486)	59,533	77,598
3701. STATUTORY POOLING ADJUSTMENT.....	927,677	(9,777,846)	(9,777,180)
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....	(1,791,952)	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).....	(864,275)	(8,955,327)	(8,954,661)

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.....	109,669,993	116,213,562	212,427,220
2. Net investment income.....	3,396,542	3,568,457	7,460,044
3. Miscellaneous income.....	578,353	890,575	1,618,587
4. Total (Lines 1 through 3).....	113,644,888	120,672,593	221,505,851
5. Benefit and loss related payments.....	44,813,264	78,880,664	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.....	43,064,347	38,906,159	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	(636,499)	(636,500)
10. Total (Lines 5 through 9).....	88,715,738	117,150,324	212,039,424
11. Net cash from operations (Line 4 minus Line 10).....	24,929,150	3,522,270	9,466,428
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	11,799,575	21,870,586	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.....	1,500,000	2,018,800	
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	13,299,575	23,889,386	41,160,286
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	37,812,788	20,999,453	47,339,918
13.2 Stocks.....			
13.3 Mortgage loans.....			
13.4 Real estate.....		11,246	37,487
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	37,812,788	21,010,699	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).....	(24,513,213)	2,878,687	(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).....	1,179,536	(22,470,126)	(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).....	1,179,536	(22,470,126)	(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).....	1,595,473	(16,069,170)	(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).....	(218,162)	1,196,701	(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	\$ 4,431,054	\$ 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	\$ 4,431,054	\$ 16,255,643
SURPLUS					
(5) The Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 117,346,136	\$ 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	\$ 117,346,136	\$ 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 second 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 second 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	\$	
	2. 12 Months or Longer	\$	5,723
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$	
	2. 12 Months or Longer	\$	17,597

- (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 applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

Not applicable

M. Working Capital Finance Investments

- (2) Not applicable

- (3) Not applicable

N. Offsetting and Netting of Assets and Liabilities

Not applicable

Note 6 – Joint Ventures, Partnerships and Limited Liability Companies

No significant changes

Note 7 – Investment Income

No significant changes

Note 8 – Derivative Instruments

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 Liabilities Measured and Reported at Fair Value

(1) Summary of Financial Assets Measured and Reported at Fair Value at 06/30/2020

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds	\$	\$ 1,790,307	\$	\$	\$ 1,790,307
Total	\$	\$ 1,790,307	\$	\$	\$ 1,790,307

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

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

NOTES TO FINANCIAL STATEMENTS

(3) Policies when Transfers Between Levels are Recognized

At the end of each reporting period, the Company evaluates whether or not any event has occurred or circumstances have changed that would cause an instrument to be transferred into or out of a level.

(4) Description of Valuation Techniques and Inputs Used in Fair Value Measurement

Financial Assets included in Level 1 of the Fair Value Hierarchy include US Treasury securities and exchange traded common stock where prices are obtained directly from active markets.

Financial Assets included in Level 2 of the Fair Value Hierarchy are securities priced by the company's custodial bank and based on observable market data.

Financial Assets included in Level 3 of the Fair Value Hierarchy are securities priced utilizing broker quotes or internal pricing determined by insurer.

(5) Fair Value Disclosures

The Company does not hold Derivative assets or liabilities.

B. Fair Value Reporting under SSAP 100 and Other Accounting Pronouncements

Not applicable

C. Fair Value for all Financial Instruments by Levels 1, 2, and 3

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

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 226,959,581	\$ 214,859,893	\$ 5,734,284	\$ 221,225,297	\$	\$	\$
Perpetual Preferred Stock	\$ 2,731,470	\$ 2,718,000	\$	\$ 2,731,470	\$	\$	\$
Totals	\$ 229,691,051	\$ 217,577,893	\$ 5,734,284	\$ 223,956,767	\$	\$	\$

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 August 12, 2020 for these statutory financial statements which are to be issued on August 14, 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

NOTES TO FINANCIAL STATEMENTS

Current year losses and LAE reflected on the Statement of Income of \$63,360,000 were lower by \$215,000 due to favorable development of prior year estimates. This redundancy was .2% of the unpaid losses and LAE of \$112,900,000 as of prior year-end.

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 [X]
- 1.2 If yes, has the report been filed with the domiciliary state? Yes [] No []
- 2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes [] No [X]
- 2.2 If yes, date of change: _____
- 3.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes [X] No []
If yes, complete Schedule Y, Parts 1 and 1A.
- 3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes [] No [X]
- 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 [X]
- 3.5 If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. _____

- 4.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes [] No [X]
If yes, complete and file the merger history data file with the NAIC for the annual filing corresponding to this period.
- 4.2 If yes, provide name of entity, NAIC Company Code, and state of domicile (use two letter state abbreviation) for any entity that has ceased to exist as a result of the merger or consolidation.

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

5. If the reporting entity is subject to a management agreement, including third-party administrator(s), managing general agent(s), attorney-in-fact, or similar agreement, have there been any significant changes regarding the terms of the agreement or principals involved? Yes [] No [X] N/A []
If yes, attach an explanation.

- 6.1 State as of what date the latest financial examination of the reporting entity was made or is being made. 12/31/2018
- 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. 12/31/2018
- 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). 06/30/2020

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

- 6.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments? Yes [] No [] N/A [X]
- 6.6 Have all of the recommendations within the latest financial examination report been complied with? Yes [X] 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 [X]
- 7.2 If yes, give full information:

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

- 8.3 Is the company affiliated with one or more banks, thrifts or securities firms? Yes [] No [X]

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

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

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

- 9.11 If the response to 9.1 is No, please explain:

- 9.2 Has the code of ethics for senior managers been amended? Yes [X] No []

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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

The Code of Ethics was amended on June 25, 2020. The main changes were as follows:

- 1- Whistleblower Provision – requires reporting to the ethics committee in Madrid and does not allow for anonymous reporting.
- 2- Scope of Application – applies to third parties.
- 3- Compliant with U.S. law.
- 4- Specific monetary threshold for acceptance of gifts.

9.3 Have any provisions of the code of ethics been waived for any of the specified officers? Yes [] No [X]

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

FINANCIAL

10.1 Does the reporting entity report any amounts due from parent, subsidiaries or affiliates on Page 2 of this statement? Yes [] No [X]

10.2 If yes, indicate any amounts receivable from parent included in the Page 2 amount: \$ 0

INVESTMENT

11.1 Were any of the stocks, bonds, or other assets of the reporting entity loaned, placed under option agreement, or otherwise made available for use by another person? (Exclude securities under securities lending agreements.) Yes [] No [X]

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

12. Amount of real estate and mortgages held in other invested assets in Schedule BA: \$ 0

13. Amount of real estate and mortgages held in short-term investments: \$ 0

14.1 Does the reporting entity have any investments in parent, subsidiaries and affiliates? Yes [] No [X]

14.2 If yes, please complete the following:

- 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 Prior Year End Book/Adjusted Carrying Value	2 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 [X]

15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A [X]

If no, attach a description with this statement.

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

16.1 Total fair value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0

16.2 Total book adjusted/carrying value of reinvested collateral assets reported on Schedule DL, Parts 1 and 2: \$ 0

16.3 Total payable for securities lending reported on the liability page: \$ 0

17. Excluding items in Schedule E-Part 3-Special Deposits, real estate, mortgage loans and investments held physically in the reporting entity's offices, vaults or safety deposit boxes, were all stocks, bonds and other securities, owned throughout the current year held pursuant to a custodial agreement with a qualified bank or trust company in accordance with Section 1, III - General Examination Considerations, F. Outsourcing of Critical Functions, Custodial or Safekeeping Agreements of the NAIC *Financial Condition Examiners Handbook*? Yes [X] No []

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

1 Name of Custodian(s)	2 Custodian Address
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 Name(s)	2 Location(s)	3 Complete Explanation(s)

17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]

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

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

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

1 Name of Firm or Individual	2 Affiliation
Eric Trigilio	I

17.5097 For those firms/individuals listed in the table for Question 17.5, do any firms/individuals unaffiliated with the reporting entity (i.e., designated with a "U") manage more than 10% of the reporting entity's invested assets? Yes [] No [X]

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 [X]

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

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 [X] 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:

- 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.
- Issuer or obligor is current on all contracted interest and principal payments.
- The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities?

Yes [] No [X]

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

- The security was purchased prior to January 1, 2018.
- The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
- 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.
- The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities?

Yes [] No [X]

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:

- The security was purchased prior to January 1, 2019.
- The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
- 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.
- The fund only or predominantly holds bonds in its portfolio.
- 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.
- The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.

Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria?

Yes [] No [X]

GENERAL INTERROGATORIES (continued)

PART 2 – PROPERTY & CASUALTY INTERROGATORIES

1. If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change? Yes No N/A
 If yes, attach an explanation.
See Note 26

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

3.1 Have any of the reporting entity's primary reinsurance contracts been canceled? Yes No
 3.2 If yes, give full and complete information thereto:

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

4.2 If yes, complete the following schedule:

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

5. Operating Percentages:

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

6.1 Do you act as a custodian for health savings accounts? Yes No
 6.2 If yes, please provide the amount of custodial funds held as of the reporting date. \$ 0

6.3 Do you act as an administrator for health savings accounts? Yes No
 6.4 If yes, please provide the amount of funds administered as of the reporting date. \$ 0

7. Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states? Yes No
 7.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes No

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

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

NONE

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

States, Etc.	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	144,903	147,075	19,086	14,531	60,269	73,030
2. Alaska.....AK	L	81,455	65,931	500	228	19,346	16,037
3. Arizona.....AZ	L	(353,996)	578,036	765,822	575,124	748,568	1,146,086
4. Arkansas.....AR	L	171,444	191,507	134,804	25,087	82,502	79,567
5. California.....CA	L	(3,753,758)	762,145		358	4,310	4,669
6. Colorado.....CO	L	(3,084,426)	351,449	32,018	61,675	79,470	79,833
7. Connecticut.....CT	L	36,342,533	48,655,373	25,907,513	44,963,351	84,714,778	93,813,762
8. Delaware.....DE	L	81,830	63,408	33,648	80,275	105,967	66,971
9. District of Columbia.....DC	L	63,132	38,517		448	11,332	9,938
10. Florida.....FL	L	867,539	699,614	199,490	196,888	694,313	471,369
11. Georgia.....GA	L	386,222	315,005	53,605	46,096	291,270	239,996
12. Hawaii.....HI	L	13,403	13,216	1,490	18,235	8,601	5,038
13. Idaho.....ID	L	2,434,354	3,053,717	1,782,573	1,830,219	2,952,303	3,043,415
14. Illinois.....IL	L	601,797	488,676	298,102	(2,969)	334,418	491,061
15. Indiana.....IN	L	(1,399,905)	128,412	88,456	271,491	358,057	915,982
16. Iowa.....IA	L	(77,852)	89,112	2,268	(352)	52,437	60,950
17. Kansas.....KS	L	(427,317)	194,572	39,631	(2,037)	54,976	58,869
18. Kentucky.....KY	L	36,276	(11,823)	82,675	213,079	348,426	761,979
19. Louisiana.....LA	L	92,327	124,840	305,649	27,347	223,721	167,102
20. Maine.....ME	L	350,081	468,421	6,918	6,750	11,735	5,806
21. Maryland.....MD	L	98,300	66,472	30,973	28,102	86,775	31,780
22. Massachusetts.....MA	L	125,850	128,570	17,716	11,775	131,248	57,554
23. Michigan.....MI	L	203,185	204,158	36,980	66,432	115,672	123,241
24. Minnesota.....MN	L	375,804	331,619	72,460	50,492	289,120	304,861
25. Mississippi.....MS	L	30,603	37,025	18,213	(106)	9,370	10,210
26. Missouri.....MO	L	(1,101,578)	235,412	9,766	20,647	49,963	63,928
27. Montana.....MT	L	159,396	93,275	25,580	6,449	54,531	26,756
28. Nebraska.....NE	L	41,269	31,541	28,626	56,056	107,930	253,352
29. Nevada.....NV	L	(49,677)	250,489	29,842	26,973	86,215	57,276
30. New Hampshire.....NH	L	133,620	93,818	1,280	38,170	19,981	43,613
31. New Jersey.....NJ	L	265,566	(509,232)	5,153,212	13,481,896	15,485,518	29,084,657
32. New Mexico.....NM	L	118,330	111,085	12,945	25,813	16,747	352,566
33. New York.....NY	L	378,148	410,848	268,930	610,930	988,244	1,496,892
34. North Carolina.....NC	L	335,982	284,385	59,403	144,943	153,671	149,834
35. North Dakota.....ND	L	18,982	19,380	96	5,942	30,734	15,668
36. Ohio.....OH	L	5,994,294	7,735,042	4,458,053	5,737,554	5,407,300	7,400,432
37. Oklahoma.....OK	L	123,915	116,795	5,552	21,235	56,090	70,370
38. Oregon.....OR	L	3,786,466	4,862,424	1,807,492	3,389,313	3,773,794	4,631,725
39. Pennsylvania.....PA	L	353,688	333,229	21,637	68,268	133,713	149,002
40. Rhode Island.....RI	L	17,238,848	17,124,002	9,623,301	18,475,765	23,235,003	27,110,693
41. South Carolina.....SC	L	258,422	234,826	18,536	43,759	60,567	65,672
42. South Dakota.....SD	L	83,348	70,708	8,938	11,466	28,344	15,098
43. Tennessee.....TN	L	199,077	9,199	535,709	882,267	1,786,739	2,537,438
44. Texas.....TX	L	866,769	718,441	328,779	443,297	441,110	561,765
45. Utah.....UT	L	77,314	44,826	22,455	47,054	81,486	24,573
46. Vermont.....VT	L	104,493	113,021	44,783		11,709	3,913
47. Virginia.....VA	L	292,884	204,131	5,348	18,717	80,372	48,590
48. Washington.....WA	L	5,676,837	7,158,946	4,678,679	4,900,775	9,674,818	10,229,387
49. West Virginia.....WV	L	18,959	9,158	10,332		17,548	3,315
50. Wisconsin.....WI	L	153,637	128,700	20,137	1,120	93,298	51,884
51. Wyoming.....WY	L	30,874	15,681	30,616	29	25,409	20,152
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	68,963,647	97,085,177	57,140,617	96,940,957	153,689,818	186,507,657

DETAILS OF WRITE-INS

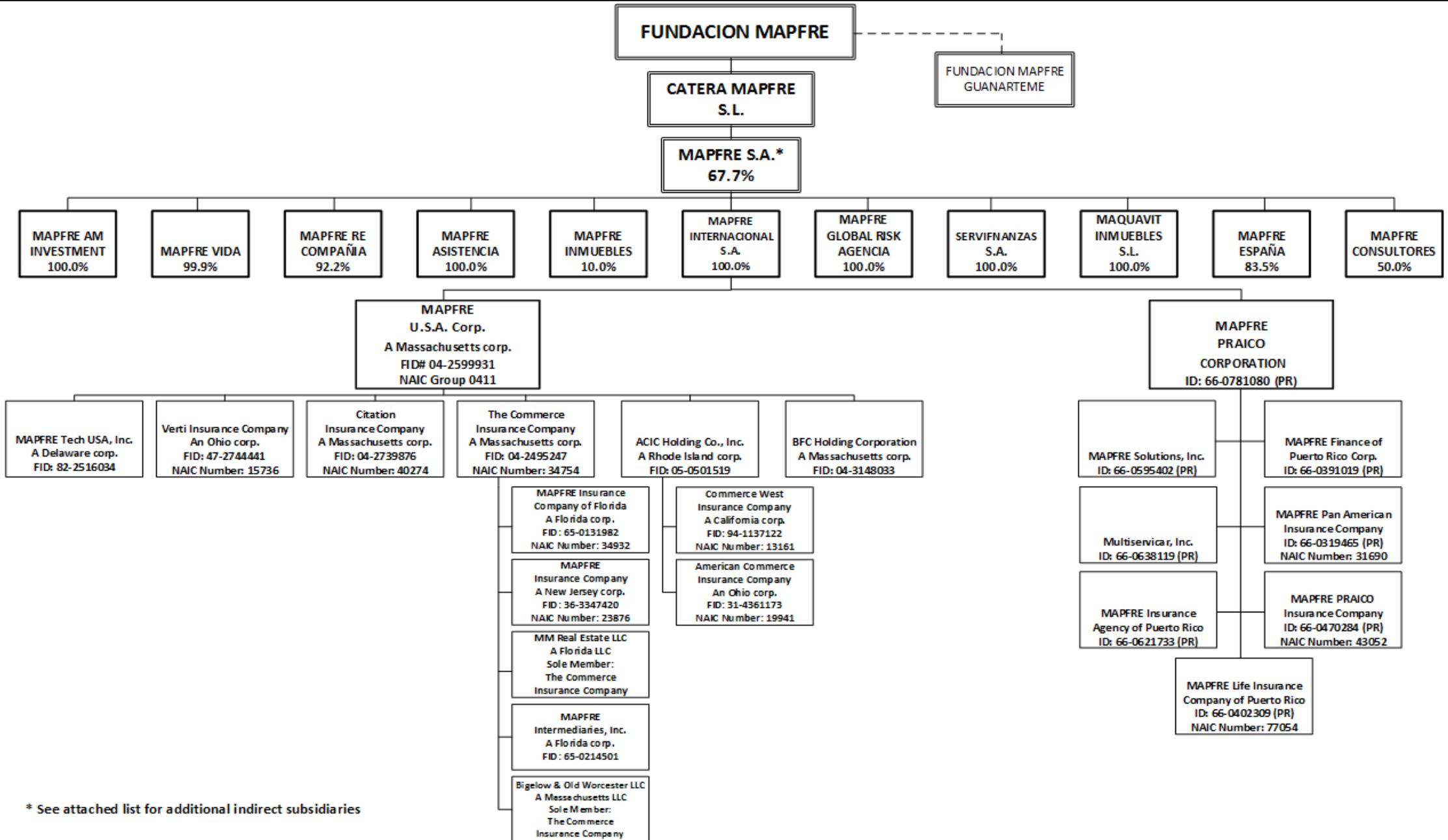
58001.....	XXX						
58002.....	XXX						
58003.....	XXX						
58998. Summary of remaining write-ins for Line 58 from overflow page.....	XXX	0	0	0	0	0	0
58999. Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	XXX	0	0	0	0	0	0

(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 (DSLII) - 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

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.2

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.4

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.5

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.6

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.7

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.9

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.10

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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.....	
			04-2599931..				MAPFRE USA CORPORATION INC.....	MA.....	UDP.....	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.....	

Q12.11

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)	*
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.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754...	04-2495247..				THE COMMERCE INSURANCE COMPANY...	MA.....	RE.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			65-0214501..				MAPFRE INTERMEDIARIES.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932...	65-0131982..				MAPFRE INSURANCE COMPANY OF FLORIDA	FL.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876...	36-3347420..				MAPFRE INSURANCE COMPANY.....	NJ.....	IA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MM REAL ESTATE, LLC.....	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			04-2495247..				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
			05-0501519..				ACIC HOLDINGS COMPANY, INC.....	RI.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161...	94-1137122..				COMMERCE WEST INSURANCE COMPANY.	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941...	31-4361173..				AMERICAN COMMERCE INSURANCE COMPANY	OH.....	IA.....	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.....	

Q12.12

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.13

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)	*
							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.....	

Q12.14

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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

Q12.15

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)	*
							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	

Q12.16

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)	*
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	74.625	MAPFRE S.A.....	N.....	
							CARIBE ASISTENCIA, S.A.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	83.582	MAPFRE S.A.....	N.....	
							BENELUX ASSIST, S.A.....	BEL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							PANAMA ASISTENCIA, S.A.....	PAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	82.070	MAPFRE S.A.....	N.....	
							ROADSIDE ASSIST ALGERIE SPA.....	DZA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	60.300	MAPFRE S.A.....	N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	IA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							AFRIQUE ASSISTANCE, S.A.....	TUN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	
							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	PRY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.950	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	1.586	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	9.998	MAPFRE S.A.....	N.....	
							MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	ESP.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	10.000	MAPFRE S.A.....	N.....	
							MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	16.483	MAPFRE S.A.....	N.....	
							INDUSTRIAL RE S.A.....	LUX.....	IA.....	MAPFRE GLOBAL RISKS.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	INDUSTRIAL RE S.A.....	OWNERSHIP....	0.364	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	INDUSTRIAL RE S.A.....	OWNERSHIP....	5.917	MAPFRE S.A.....	N.....	

Q12.17

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)	*
							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.....	

Q12.18

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.....	3,033,155	735,776	24.258	11.904
2. Allied lines.....	3,147,345	160,805	5.109	16.480
3. Farmowners multiple peril.....	-	-	0.000	-
4. Homeowners multiple peril.....	28,903,921	13,183,041	45.610	62.349
5. Commercial multiple peril.....	-	-	0.000	-
6. Mortgage guaranty.....	-	-	0.000	-
8. Ocean marine.....	-	-	0.000	-
9. Inland marine.....	8,263	-	0.000	4.431
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.....	2,126,102	(308,397)	(14.505)	(8.986)
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.....	27,454,573	15,226,365	55.460	75.378
19.3, 19.4 Commercial auto liability.....	-	-	0.000	-
21. Auto physical damage.....	16,309,476	7,671,980	47.040	60.160
22. Aircraft (all perils).....	7,469,948	2,620,864	35.085	33.293
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.....	88,452,783	39,290,434	44.420	61.044

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	2	3
	Current Quarter	Current Year to Date	Prior Year Year to Date
1. Fire.....	1,454,198	2,648,780	3,151,806
2. Allied lines.....	1,222,929	2,456,553	2,953,210
3. Farmowners multiple peril.....	-	-	-
4. Homeowners multiple peril.....	14,583,506	25,618,196	30,577,215
5. Commercial multiple peril.....	-	-	-
6. Mortgage guaranty.....	-	-	-
8. Ocean marine.....	-	-	-
9. Inland marine.....	4,848	8,781	11,496
10. Financial guaranty.....	-	-	-
11.1. Medical professional liability - occurrence.....	-	-	-
11.2. Medical professional liability - claims made.....	-	-	-
12. Earthquake.....	-	-	-
13. Group accident and health.....	-	-	-
14. Credit accident and health.....	-	-	-
15. Other accident and health.....	-	-	-
16. Workers' compensation.....	-	-	-
17.1. Other liability-occurrence.....	1,603,978	(9,408,148)	3,596,501
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.....	12,524,197	25,286,446	31,953,324
19.3, 19.4 Commercial auto liability.....	-	-	-
21. Auto physical damage.....	7,536,547	15,077,130	18,865,664
22. Aircraft (all perils).....	3,416,239	7,275,908	5,975,961
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.....	42,346,442	68,963,647	97,085,177

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

	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	9,226	166	9,392	24,106	225	(2,554)	21,777	786	669	1,455
2. 2018.....	21,718	6,132	27,850	6,587	318	6,905	18,915	225	2,753	21,893	3,784	(2,836)	948
3. Subtotals 2018 + Prior.....	54,264	3,300	57,564	15,813	484	16,297	43,021	450	199	43,670	4,570	(2,167)	2,403
4. 2019.....	35,830	19,506	55,336	16,833	4,362	21,195	25,118	667	5,738	31,523	6,121	(8,739)	(2,618)
5. Subtotals 2019 + Prior.....	90,094	22,806	112,900	32,646	4,846	37,492	68,139	1,117	5,937	75,193	10,691	(10,906)	(215)
6. 2020.....	XXX	XXX	XXX	XXX	33,112	33,112	XXX	12,335	18,127	30,462	XXX	XXX	XXX
7. Totals.....	90,094	22,806	112,900	32,646	37,958	70,604	68,139	13,452	24,064	105,655	10,691	(10,906)	(215)
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
											1.11.9%	2.(47.8)%	3.(0.2)%
													Col. 13, Line 7 Line 8
													4.(0.2)%

Q14

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:



Statement for June 30, 2020 of the **American Commerce Insurance Company**
Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4 December 31, Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. Premium Tax Accrual.....	2,088,988		2,088,988	2,230,068
2505. Miscellaneous Assets.....			0	2,012
2597. Summary of remaining write-ins for Line 25.....	2,088,988	0	2,088,988	2,232,080

Additional Write-ins for Statement of Income:

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

American Commerce Insurance Company
SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	1,196,578	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.....	35,553	69,833
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	1,161,025	1,196,578
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	1,161,025	1,196,578

SCHEDULE B - VERIFICATION

Mortgage Loans

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

NONE

SCHEDULE BA - VERIFICATION

Other Long-Term Invested Assets

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

NONE

SCHEDULE D - VERIFICATION

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	192,415,395	186,207,906
2. Cost of bonds and stocks acquired.....	37,812,788	47,339,918
3. Accrual of discount.....	78,917	131,484
4. Unrealized valuation increase (decrease).....	(235,872)	443,025
5. Total gain (loss) on disposals.....	4,144	566,105
6. Deduct consideration for bonds and stocks disposed of.....	11,799,575	41,188,599
7. Deduct amortization of premium.....	697,904	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).....	217,577,893	192,415,395
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	217,577,893	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

NAIC Designation	1 Book/Adjusted Carrying Value Beginning of Current Quarter	2 Acquisitions During Current Quarter	3 Dispositions During Current Quarter	4 Non-Trading Activity During Current Quarter	5 Book/Adjusted Carrying Value End of First Quarter	6 Book/Adjusted Carrying Value End of Second Quarter	7 Book/Adjusted Carrying Value End of Third Quarter	8 Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	157,480,538	16,418,308	8,539,778	(2,205,255)	157,480,538	163,153,813		150,947,669
2. NAIC 2 (a).....	42,232,176	5,744,170		1,957,024	42,232,176	49,933,370		38,749,726
3. NAIC 3 (a).....	1,355,850			416,860	1,355,850	1,772,710		
4. NAIC 4 (a).....						.0		
5. NAIC 5 (a).....						.0		
6. NAIC 6 (a).....						.0		
7. Total Bonds.....	201,068,564	22,162,478	8,539,778	168,629	201,068,564	214,859,893	.0	189,697,395
PREFERRED STOCK								
8. NAIC 1.....						.0		
9. NAIC 2.....	2,718,000				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	2,718,000	.0	2,718,000
15. Total Bonds and Preferred Stock.....	203,786,564	22,162,478	8,539,778	168,629	203,786,564	217,577,893	.0	192,415,395

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(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 Year To Date	2 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. Government										
912828	4M	9		05/12/2020	RW PRESSPRICH & CO		562,344	500,000	508	1
912828	4F	4		05/12/2020	RW PRESSPRICH & CO		277,656	250,000	771	1
912828	3Z	1		05/12/2020	RW PRESSPRICH & CO		39,030	35,000	194	1
0599999. Total - Bonds - U.S. Government							879,030	785,000	1,473	XXX
Bonds - U.S. Political Subdivisions of States										
375280	LR	3		05/07/2020	BAIRD, ROBERT W. & CO		1,333,584	1,350,000		1FE
392658	HC	7		05/07/2020	BAIRD, ROBERT W. & CO		583,834	580,000		1FE
741751	2Q	3		05/28/2020	WELLS FARGO SECURITIES, LLC		1,275,000	1,275,000		1FE
2499999. Total - Bonds - U.S. Political Subdivisions of States							3,192,418	3,205,000	0	XXX
Bonds - U.S. Special Revenue and Special Assessment										
160429	YK	6		06/23/2020	WELLS FARGO SECURITIES, LLC		1,007,830	1,000,000		1FE
479354	ER	9		06/18/2020	BAIRD, ROBERT W. & CO		1,500,000	1,500,000		1FE
685869	FT	1		04/06/2020	RAYMOND JAMES		2,002,000	2,000,000	16,834	1FE
3199999. Total - Bonds - U.S. Special Revenue and Special Assessments							4,509,830	4,500,000	16,834	XXX
Bonds - Industrial and Miscellaneous										
539439	AR	0	D	04/06/2020	RAYMOND JAMES		2,092,000	2,000,000	3,889	1FE
00287Y	AQ	2		04/06/2020	RAYMOND JAMES		2,082,000	2,000,000	28,800	2FE
20030N	CH	2		06/24/2020	RAYMOND JAMES		569,750	500,000	2,663	1FE
23338V	AK	2		05/27/2020	PIERPONT SECURITIES		2,064,660	2,000,000	11,625	1FE
61761J	VL	0		04/06/2020	RAYMOND JAMES		2,092,000	2,000,000	33,917	2FE
670346	AS	4		06/23/2020	FIFTH THIRD CAPITAL		1,570,170	1,500,000	3,713	2FE
69349L	AS	7		06/04/2020	J.P. MORGAN		1,075,140	1,000,000	3,450	1FE
747525	BK	8		05/21/2020	WELLS FARGO SECURITIES, LLC		2,035,480	2,000,000	2,150	1FE
3899999. Total - Bonds - Industrial and Miscellaneous							13,581,200	13,000,000	90,207	XXX
8399997. Total - Bonds - Part 3							22,162,478	21,490,000	108,514	XXX
8399999. Total - Bonds							22,162,478	21,490,000	108,514	XXX
9999999. Total - Bonds, Preferred and Common Stocks							22,162,478	XXX	108,514	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
										11	12	13	14	15							
CUSIP Identification	Description	F o r e i g n	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consideration	Par Value	Actual Cost	Prior Year Book/Adjusted Carrying Value	Unrealized Valuation Increase (Decrease)	Current Year's (Amortization) / Accretion	Current Year's Other-Than-Temporary Impairment Recognized	Total Change in B./A.C.V. (11+12-13)	Total Foreign Exchange Change in B./A.C.V.	Book/Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest / Stock Dividends Received During Year	Stated Contractual Maturity Date	NAIC Designation and Administrative Symbol
Bonds - U.S. Government																					
36225B	GW 2		06/15/2020	PAYDOWN OF PRINCIPAL		2,168	2,168	2,248	2,214		(1)		(1)		2,212		(44)	(44)	65	11/15/2029	1
38377V	T8 9		06/22/2020	PRINCIPAL RECEIPT		395,895	395,895	404,653	399,693		(3,798)		(3,798)		395,895			0	6,773	07/20/2039	1
912828	VJ 6		06/30/2020	MATURITY		785,000	785,000	792,666	785,800		(800)		(800)		785,000			0	7,359	06/30/2020	1
0599999	Total - Bonds - U.S. Government					1,183,063	1,183,063	1,199,567	1,187,707	0	(4,599)	0	(4,599)	0	1,183,107	0	(44)	(44)	14,197	XXX	XXX
Bonds - U.S. Political Subdivisions of States																					
447025	JM 0		05/20/2020	WELLS FARGO SECURITIES, LLC		1,005,000	1,000,000	1,046,000	1,010,775		(6,214)		(6,214)		1,004,562		438	438	28,536	09/01/2022	1FE
751120	AJ 5		06/18/2020	RALEIGH N C LTD OBLIG		1,000,000	1,000,000	1,090,400	1,008,651		(8,651)		(8,651)		1,000,000			0	30,491	06/01/2035	1FE
2499999	Total - Bonds - U.S. Political Subdivisions of States					2,005,000	2,000,000	2,136,400	2,019,426	0	(14,865)	0	(14,865)	0	2,004,562	0	438	438	59,027	XXX	XXX
Bonds - U.S. Special Revenue and Special Assessment																					
31396P	GT 2		06/25/2020	PRINCIPAL RECEIPT		52,077	52,077	58,261	55,323		(3,246)		(3,246)		52,077			0	1,348	10/25/2032	1
3136A7	DJ 8		06/25/2020	PRINCIPAL RECEIPT		23,595	23,595	23,503	23,528		67		67		23,595			0	349	01/25/2042	1
3137B7	R7 6		06/15/2020	PRINCIPAL RECEIPT		76,328	76,328	77,377	78,318		(1,990)		(1,990)		76,328			0	1,229	02/15/2054	1
3140X5	M4 2		06/25/2020	PRINCIPAL RECEIPT		113,824	113,824	118,697			(4,873)		(4,873)		113,824			0	1,062	01/01/2050	1
3140J9	VX 6		06/25/2020	PRINCIPAL RECEIPT		51,290	51,290	54,488	54,488		(3,198)		(3,198)		51,290			0	842	07/01/2047	1
3138ER	2K 5		06/25/2020	PRINCIPAL RECEIPT		90,385	90,385	97,870	98,392		(8,007)		(8,007)		90,385			0	1,677	01/01/2047	1
3138WG	RK 2		06/25/2020	PRINCIPAL RECEIPT		33,326	33,326	35,409	35,160		(1,833)		(1,833)		33,326			0	513	03/01/2046	1
3138WJ	B3 1		06/25/2020	PRINCIPAL RECEIPT		270,761	270,761	291,702	291,680		(20,919)		(20,919)		270,761			0	5,412	10/01/2046	1
31334X	GB 9		06/25/2020	PRINCIPAL RECEIPT		310,316	310,316	321,565	321,431		(11,115)		(11,115)		310,316			0	4,971	07/01/2049	1
31334X	ZZ 5		06/25/2020	PRINCIPAL RECEIPT		374,081	374,081	383,784	383,708		(9,627)		(9,627)		374,081			0	4,445	08/01/2049	1
31339U	CN 8		06/25/2020	PRINCIPAL RECEIPT		107,936	107,936	106,553	106,551		1,385		1,385		107,936			0	1,291	10/01/2049	1
31339U	3M 0		06/25/2020	PRINCIPAL RECEIPT		41,476	41,476	42,769			(1,293)		(1,293)		41,476			0	304	11/01/2049	1
3133N3	VW 1		06/25/2020	PRINCIPAL RECEIPT		44,489	44,489	45,003			(514)		(514)		44,489			0	328	02/01/2050	1
31418A	L5 5		06/25/2020	PRINCIPAL RECEIPT		42,655	42,655	44,921	44,437		(1,782)		(1,782)		42,655			0	533	11/01/2042	1
31397S	KW 3		06/25/2020	PRINCIPAL RECEIPT		218,448	218,448	228,209	220,210		(1,763)		(1,763)		218,448			0	3,287	01/25/2039	1
575175	HF 4		06/01/2020	CALLLED @ 100.0000000		1,000,000	1,000,000	1,146,020	1,013,086		(13,086)		(13,086)		1,000,000			0	31,735	12/01/2040	1FE
598113	AQ 1		05/01/2020	CALLLED @ 100.0000000		1,500,000	1,500,000	1,527,645	1,501,219		(1,219)		(1,219)		1,500,000			0	46,125	05/01/2030	1FE
3199999	Total - Bonds - U.S. Special Revenue and Special Assessments					4,350,987	4,350,987	4,603,776	4,227,531	0	(83,013)	0	(83,013)	0	4,350,987	0	0	0	105,451	XXX	XXX
Bonds - Industrial and Miscellaneous																					
341099	CM 9		04/01/2020	MATURITY		1,000,000	1,000,000	1,028,600	1,003,848		(3,848)		(3,848)		1,000,000			0	22,750	04/01/2020	1FE
590218	AF 0		06/25/2020	PRINCIPAL RECEIPT		1,122	1,099	1,095	869	228	25		253		1,122			0	27	04/25/2036	1FM
3899999	Total - Bonds - Industrial and Miscellaneous					1,001,122	1,001,099	1,029,695	1,004,717	228	(3,823)	0	(3,595)	0	1,001,122	0	0	0	22,777	XXX	XXX
8399997	Total - Bonds - Part 4					8,540,172	8,535,149	8,969,438	8,439,381	228	(106,300)	0	(106,072)	0	8,539,778	0	394	394	201,452	XXX	XXX
8399999	Total - Bonds					8,540,172	8,535,149	8,969,438	8,439,381	228	(106,300)	0	(106,072)	0	8,539,778	0	394	394	201,452	XXX	XXX
9999999	Total - Bonds, Preferred and Common Stocks					8,540,172	XXX	8,969,438	8,439,381	228	(106,300)	0	(106,072)	0	8,539,778	0	394	394	201,452	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 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *	
					6 First Month	7 Second Month	8 Third Month		
Open Depositories									
Bank of America.....	100 Federal Street, Boston, MA 02110.....					(5,872,174)	(6,032,490)	(6,071,740)	XXX
The Bank of New York Mellon.....	One Wall Street, New York, NY 10286.....			7		211,303	100,511	100,032	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....					1,328,834	1,064,902	739,980	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....					58,533	92,149	11,992	XXX
BlackRock 30.....	One Financial Center, Boston, MA 02111.....	0.100	275			265,460	265,519	265,552	XXX
Fidelity Gov'n't 2642.....	500 Salem Street, Smithfield, RI 02917.....	0.110	4,152			6,640,845	6,016,106	4,736,023	XXX
0199999. Total Open Depositories.....	XXX	XXX	4,434	0		2,632,802	1,506,697	(218,161)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	4,434	0		2,632,802	1,506,697	(218,161)	XXX
0599999. Total Cash.....	XXX	XXX	4,434	0		2,632,802	1,506,697	(218,161)	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

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

QE14