



QUARTERLY STATEMENT

As of September 30, 2021
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

4400 EASTON COMMONS WAY, SUITE 125 .. COLUMBUS .. OH .. US ..
43219
(Street and Number) (City or Town, State, Country and Zip Code)

Main Administrative Office

211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758
(Street and Number) (City or Town, State, Country and Zip Code)

508-943-9000
(Area Code) (Telephone Number)

Mail Address

211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758
(Street and Number or P. O. Box) (City or Town, State, Country and Zip Code)

Primary Location of Books and Records

211 MAIN STREET .. WEBSTER .. MA .. US .. 01570-0758
(Street and Number) (City or Town, State, Country and Zip Code)

508-943-9000
(Area Code) (Telephone Number)

Internet Web Site Address

www.mapfreinsurance.com

Statutory Statement Contact

CHRISTINE A CONRAD
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(Fax Number)

OFFICERS

Name	Title	Name	Title
1. JAIME TAMAYO #	PRESIDENT & CEO	2. DANIEL PATRICK OLOHAN	SECRETARY, GENERAL COUNSEL, & EVP
3. SHERRI DAWN KRISTAL	TREASURER & AVP	4. JESUS AMADORI	CHIEF FINANCIAL OFFICER & EVP

DIRECTORS OR TRUSTEES

RANDALL VAUGHN BECKER	JAIME TAMAYO #	DAVID HILL COCHRANE	TIMOTHY JOHN MORGAN
DANIEL PATRICK OLOHAN	DAVID MCMULLEN	HEATHER SNAVELY #	

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

Subscribed and sworn to before me
This 15th day of November, 2021

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

American Commerce Insurance Company
ASSETS

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31 Prior Year Net Admitted Assets
1. Bonds.....	212,978,170		212,978,170	207,862,463
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).....			0	
5. Cash (\$.....(1,241,212)), cash equivalents (\$.....0) and short-term investments (\$.....0).....	(1,241,212)		(1,241,212)	(402,133)
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).....	214,454,958	0	214,454,958	210,178,330
13. Title plants less \$.....0 charged off (for Title insurers only).....			0	
14. Investment income due and accrued.....	1,477,030		1,477,030	1,476,412
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection.....	37,428,745		37,428,745	38,501,328
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.....	11,896,569		11,896,569	11,987,846
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.....	2,966,830	136,793	2,830,037	2,667,525
19. Guaranty funds receivable or on deposit.....			0	
20. Electronic data processing equipment and software.....	1,237,218		1,237,218	2,041,689
21. Furniture and equipment, including health care delivery assets (\$.....0).....	242,257	242,257	0	
22. Net adjustment in assets and liabilities due to foreign exchange rates.....			0	
23. Receivables from parent, subsidiaries and affiliates.....	4,327,929		4,327,929	3,637,005
24. Health care (\$.....0) and other amounts receivable.....			0	
25. Aggregate write-ins for other than invested assets.....	76,477,685	617,300	75,860,385	75,350,313
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 through 25).....	350,509,222	996,350	349,512,872	345,840,447
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			0	
28. Total (Lines 26 and 27).....	350,509,222	996,350	349,512,872	345,840,447

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.....	617,300	617,300	0	
2502. Equity in pools and associations.....	75,544,126		75,544,126	73,693,834
2503. Premium Tax Accrual.....	316,260		316,260	1,071,450
2598. Summary of remaining write-ins for Line 25 from overflow page.....	0	0	0	585,029
2599. Totals (Lines 2501 thru 2503 plus 2598) (Line 25 above).....	76,477,685	617,300	75,860,385	75,350,313

LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31 Prior Year
1. Losses (current accident year \$32,793,000).....	89,935,572	91,148,248
2. Reinsurance payable on paid losses and loss adjustment expenses.....	9,551,168	10,977,436
3. Loss adjustment expenses.....	11,984,660	12,869,224
4. Commissions payable, contingent commissions and other similar charges.....	2,543,937	3,476,675
5. Other expenses (excluding taxes, licenses and fees).....	3,002,388	1,268,275
6. Taxes, licenses and fees (excluding federal and foreign income taxes).....	14,598	46,342
7.1 Current federal and foreign income taxes (including \$.....(8,895) on realized capital gains (losses)).....	1,523,225	2,358,356
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 \$166,066,740 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).....	97,575,881	97,241,264
10. Advance premium.....	2,978,483	2,009,809
11. Dividends declared and unpaid:		
11.1 Stockholders.....		
11.2 Policyholders.....		
12. Ceded reinsurance premiums payable (net of ceding commissions).....	12,590,052	9,666,711
13. Funds held by company under reinsurance treaties.....		
14. Amounts withheld or retained by company for account of others.....		
15. Remittances and items not allocated.....		
16. Provision for reinsurance (including \$0 certified).....		
17. Net adjustments in assets and liabilities due to foreign exchange rates.....		
18. Drafts outstanding.....		
19. Payable to parent, subsidiaries and affiliates.....		
20. Derivatives.....		
21. Payable for securities.....		
22. Payable for securities lending.....		
23. Liability for amounts held under uninsured plans.....		
24. Capital notes \$0 and interest thereon \$0.....		
25. Aggregate write-ins for liabilities.....	731,319	1,281,023
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25).....	232,431,283	232,343,363
27. Protected cell liabilities.....		
28. Total liabilities (Lines 26 and 27).....	232,431,283	232,343,363
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).....	71,140,987	67,556,482
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).....	117,081,589	113,497,084
38. Totals (Page 2, Line 28, Col. 3).....	349,512,872	345,840,447

DETAILS OF WRITE-INS

2501. Unclaimed property.....	731,319	1,281,023
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).....	731,319	1,281,023
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page.....	0	0
2999. Totals (Lines 2901 thru 2903 plus 2998) (Line 29 above).....	0	0
3201.		
3202.		
3203.		
3298. Summary of remaining write-ins for Line 32 from overflow page.....	0	0
3299. Totals (Lines 3201 thru 3203 plus 3298) (Line 32 above).....	0	0

American Commerce Insurance Company
STATEMENT OF INCOME

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct..... (written \$ 123,833,306).....	124,549,619	132,469,885	176,385,657
1.2 Assumed..... (written \$ 138,951,027).....	138,616,411	144,724,347	192,947,597
1.3 Ceded..... (written \$ 123,833,306).....	124,549,619	132,469,885	176,385,657
1.4 Net..... (written \$ 138,951,027).....	138,616,411	144,724,347	192,947,597
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 78,189,000):			
2.1 Direct.....	60,697,166	62,479,903	87,719,663
2.2 Assumed.....	78,308,936	75,784,948	102,776,541
2.3 Ceded.....	60,697,166	62,479,903	87,719,663
2.4 Net.....	78,308,936	75,784,948	102,776,541
3. Loss adjustment expenses incurred.....	18,163,108	17,819,549	22,810,254
4. Other underwriting expenses incurred.....	42,825,467	46,584,698	62,069,537
5. Aggregate write-ins for underwriting deductions.....	0	0	0
6. Total underwriting deductions (Lines 2 through 5).....	139,297,511	140,189,195	187,656,332
7. Net income of protected cells.....			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7).....	(681,101)	4,535,152	5,291,265
INVESTMENT INCOME			
9. Net investment income earned.....	4,127,004	4,376,150	6,335,762
10. Net realized capital gains (losses) less capital gains tax of \$ 8,895.....	338,385	(44,529)	311,076
11. Net investment gain (loss) (Lines 9 + 10).....	4,465,388	4,331,621	6,646,838
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.....	735,183	843,866	1,114,923
14. Aggregate write-ins for miscellaneous income.....	1,158,561	(147,041)	(175,420)
15. Total other income (Lines 12 through 14).....	1,893,744	696,825	939,503
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15).....	5,678,031	9,563,598	12,877,606
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).....	5,678,031	9,563,598	12,877,606
19. Federal and foreign income taxes incurred.....	1,514,331	2,652,267	3,027,815
20. Net income (Line 18 minus Line 19) (to Line 22).....	4,163,700	6,911,331	9,849,791
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year.....	113,497,084	113,863,842	113,863,842
22. Net income (from Line 20).....	4,163,700	6,911,331	9,849,791
23. Net transfers (to) from Protected Cell accounts.....			
24. Change in net unrealized capital gains or (losses) less capital gains tax of \$ 7,009.....	(26,364)	(137,778)	(237)
25. Change in net unrealized foreign exchange capital gain (loss).....			
26. Change in net deferred income tax.....	255,722	436,257	(127,167)
27. Change in nonadmitted assets.....	(254,472)	(81,141)	742,797
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.....	(1,300,000)		(10,000,000)
36. Change in treasury stock.....			
37. Aggregate write-ins for gains and losses in surplus.....	745,919	(1,110,379)	(831,943)
38. Change in surplus as regards policyholders (Lines 22 through 37).....	3,584,505	6,018,290	(366,759)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38).....	117,081,589	119,882,132	113,497,084
DETAILS OF WRITE-INS			
0501.			
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page.....	0	0	0
0599. Totals (Lines 0501 thru 0503 plus 0598) (Line 5 above).....	0	0	0
1401. Miscellaneous income/(expense).....	975,400	1,400	(8,545)
1402. Gain on sale of fixed assets.....	21,430	9,381	9,380
1403. Loss on sale of fixed assets.....		(157,822)	(176,254)
1498. Summary of remaining write-ins for Line 14 from overflow page.....	161,731	0	0
1499. Totals (Lines 1401 thru 1403 plus 1498) (Line 14 above).....	1,158,561	(147,041)	(175,420)
3701. STATUTORY POOLING ADJUSTMENT.....	745,919	681,574	960,010
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT.....		(1,791,953)	(1,791,953)
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).....	745,919	(1,110,379)	(831,943)

American Commerce Insurance Company
CASH FLOW

	1 Current Year to Date	2 Prior Year To Date	3 Prior Year Ended December 31
CASH FROM OPERATIONS			
1. Premiums collected net of reinsurance.....	143,915,625	162,119,023	201,624,218
2. Net investment income.....	4,664,327	5,227,995	7,592,820
3. Miscellaneous income.....	1,893,744	696,825	939,503
4. Total (Lines 1 through 3).....	150,473,695	168,043,842	210,156,541
5. Benefit and loss related payments.....	80,856,603	71,227,386	95,520,090
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts.....			
7. Commissions, expenses paid and aggregate write-ins for deductions.....	60,357,589	64,498,899	87,173,664
8. Dividends paid to policyholders.....			
9. Federal and foreign income taxes paid (recovered) net of \$.0 tax on capital gains (losses).....	2,358,357	838,127	838,127
10. Total (Lines 5 through 9).....	143,572,550	136,564,412	183,531,881
11. Net cash from operations (Line 4 minus Line 10).....	6,901,146	31,479,430	26,624,660
CASH FROM INVESTMENTS			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds.....	24,781,807	28,601,375	46,252,265
12.2 Stocks.....			
12.3 Mortgage loans.....			
12.4 Real estate.....		878,837	878,837
12.5 Other invested assets.....			
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments.....			193,376
12.7 Miscellaneous proceeds.....		963,136	
12.8 Total investment proceeds (Lines 12.1 to 12.7).....	24,781,807	30,443,348	47,324,478
13. Cost of investments acquired (long-term only):			
13.1 Bonds.....	30,121,549	57,710,730	65,368,716
13.2 Stocks.....			
13.3 Mortgage loans.....			
13.4 Real estate.....			
13.5 Other invested assets.....			
13.6 Miscellaneous applications.....			
13.7 Total investments acquired (Lines 13.1 to 13.6).....	30,121,549	57,710,730	65,368,716
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).....	(5,339,742)	(27,267,382)	(18,044,238)
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.....	1,300,000		10,000,000
16.6 Other cash provided (applied).....	(1,100,482)	(2,337,731)	2,831,079
17. Net cash from financing and miscellaneous sources (Lines 16.1 through 16.4 minus Line 16.5 plus Line 16.6).....	(2,400,482)	(2,337,731)	(7,168,921)
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).....	(839,079)	1,874,317	1,411,502
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year.....	(402,133)	(1,813,635)	(1,813,635)
19.2 End of period (Line 18 plus Line 19.1).....	(1,241,212)	60,682	(402,133)

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	2020
NET INCOME					
(1) The Company state basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$ 4,163,700	\$ 9,849,791
(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	\$ 4,163,700	\$ 9,849,791
SURPLUS					
(5) The Company state basis (Page 3, line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 117,081,589	\$ 113,497,084
(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	\$ 117,081,589	\$ 113,497,084

C. Accounting Policy

(2) Basis for Bonds, Mandatory Convertible Securities, SVO-Identified Investments and Amortization Method

Bonds, excluding Loan-Backed and Structured Securities, are accounted for in accordance with SSAP 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 third quarter 2021 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities.

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

During the third quarter 2021 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities.

NOTES TO FINANCIAL STATEMENTS

(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	\$ 115,004
	2. 12 Months or Longer	\$ 5,515
b. The aggregate related fair value of securities with unrealized losses:	1. Less than 12 Months	\$ 4,666,338
	2. 12 Months or Longer	\$ 11,904

(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
Repurchase Transaction – Cash Taker – Overview of Secured Borrowing Transactions

Not applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing
Repurchase Transactions – Cash Provider – Overview of Secured Borrowing Transactions

Not applicable

H. Repurchase Agreements Transactions Accounted for as a Sale
Repurchase Transaction – Cash Taker – Overview of Sale Transactions

Not applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale
Repurchase Transaction – Cash Provider – Overview of Sale Transactions

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

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

The Company declared an ordinary dividend of \$1,300,000 to its parent company on June 29, 2021.

NOTES TO FINANCIAL STATEMENTS

Note 11 – Debt

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

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

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

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

- D. Dates and Amounts of Dividends Paid
- Ordinary dividends in the amount of \$1,300,000 on July 13, 2021.

Note 14 – Liabilities, Contingencies and Assessments

- G. All Other Contingencies
- No significant changes

Note 15 – Leases

No significant changes

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

No significant changes

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

- B. Transfer and Servicing of Financial Assets
- (2) Servicing Assets and Servicing Liabilities
- Not applicable
- (4) Securitizations, Asset-Based Financing Arrangements and Similar Transfers Accounted for as Sales
- (a) Not applicable
- (b) Not applicable
- C. Wash Sales
- (1) Description of the Objectives Regarding These Transactions
- Not applicable
- (2) The details by NAIC designation 3 or below, or unrated of securities sold during the current period and reacquired within 30 days of the sale date are:
- Not applicable

Note 18 – Gain or Loss to the Reporting Entity from Uninsured Plans and the Portion of Partially Insured Plans

No significant changes

Note 19 – Direct Premium Written/Produced by Managing General Agents/Third Party Administrators

No significant changes

Note 20 – Fair Value Measurements

- A. Fair Value Measurements
- (1) Summary of Financial Assets Measured and Reported at Fair Value at 09/30/2021

Description for Each Type of Asset or Liability	Level 1	Level 2	Level 3	Net Asset Value (NAV)	Total
Assets at Fair Value					
Bonds	\$	2,152,904	\$	\$	\$ 2,152,904
Total	\$	2,152,904	\$	\$	\$ 2,152,904

- (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	\$ 220,283,488	\$ 212,978,170	\$ 5,586,457	\$ 214,697,031	\$	\$	\$
Preferred Stock	\$ 3,000,090	\$ 2,718,000	\$	\$ 3,000,090	\$	\$	\$
Total	\$ 223,283,578	\$ 215,696,170	\$ 5,586,457	\$ 217,697,121	\$	\$	\$

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

Note 21 – Other Items

No significant changes

Note 22 – Events Subsequent

Subsequent events have been considered through November 12, 2021 for these statutory financial statements which are to be issued on November 12, 2021. There were no events occurring subsequent to the end of the quarter that merited recognition or disclosure in these statements.

Note 23 – Reinsurance

No significant changes

Note 24 – Retrospectively Rated Contracts and Contracts Subject to Redetermination

F. Risk Sharing Provisions of the Affordable Care Act

Not applicable

Note 25 – Change in Incurred Losses and Loss Adjustment Expenses

A. Change in Incurred Losses and Loss Adjustment Expenses

Current year losses and LAE reflected on the Statement of Income of \$96,472,000 were higher by \$1,079,000 due to unfavorable development of prior year estimates. This deficiency was 1.0% of the unpaid losses and LAE of \$104,019,000 as of prior year-end.

B. Information about Significant Changes in Methodologies and Assumptions

None

Note 26 – Intercompany Pooling Arrangements

No significant changes

Note 27 – Structured Settlements

No significant changes

NOTES TO FINANCIAL STATEMENTS

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?
If yes, complete Schedule Y, Parts 1 and 1A.

Yes [☒ X] No [☐]

3.2

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

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

Yes [☐] No [☒ X]

4.2

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

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

5.

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

Yes [☐] No [☒ X] N/A [☐]

6.1

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

12/31/2018

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 [☐] No [☐] N/A [☒ X]

7.1

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

Yes [☐] No [☒ X]

7.2

If yes, give full information:

8.1

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

Yes [☐] No [☒ X]

8.2

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

8.3

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

Yes [☐] No [☒ X]

8.4

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

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

9.1

Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?
(a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
(b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
(c) Compliance with applicable governmental laws, rules and regulations;
(d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
(e) Accountability for adherence to the code.

Yes [☒ X] No [☐]

9.11

If the response to 9.1 is No, please explain:

9.2

Has the code of ethics for senior managers been amended?

Yes [☐] No [☒ X]

9.21

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

9.3

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

Yes [☐] No [☒ X]

9.31

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

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

FINANCIAL

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

Yes [X] No []

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

\$

0

INVESTMENT

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

Yes [] No [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
\$ 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
Bank of New York Mellon	One Wall Street, New York, NY 10286

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 []

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

Yes [] No []

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

1 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed

18.1 Have all the filing requirements of the *Purposes and Procedures Manual of the NAIC Investment Analysis Office* been followed?

Yes [X] No []

18.2 If no, list exceptions:

GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

19.

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

a.

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

b.

Issuer or obligor is current on all contracted interest and principal payments.

c.

The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities?

Yes

[]

No

[X]

20.

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

a.

The security was purchased prior to January 1, 2018.

b.

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

c.

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

d.

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

Has the reporting entity self-designated PLGI securities?

Yes

[]

No

[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:

a.

The security was purchased prior to January 1, 2019.

b.

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

c.

The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.

d.

The fund only or predominantly holds bonds in its portfolio.

e.

The current reporting NAIC designation was derived from the public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO.

f.

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]

Q07.2

American Commerce Insurance Company
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...	184,374	208,510	24,618	22,626	59,471	58,208
2.	Alaska.....AK	...L...	118,233	104,460	44,019	973	107,375	20,700
3.	Arizona.....AZ	...L...	1,099,310	398,652	542,350	779,477	828,005	925,367
4.	Arkansas.....AR	...L...	238,311	256,023	15,622	176,912	77,115	115,559
5.	California.....CA	...L...	1,204,779	(3,362,056)			4,310	4,310
6.	Colorado.....CO	...L...	762,297	(2,852,748)	18,975	50,499	106,818	99,579
7.	Connecticut.....CT	...L...	51,257,522	55,479,583	32,743,483	39,985,262	79,026,406	83,401,187
8.	Delaware.....DE	...L...	165,078	138,434	39,618	35,536	67,529	100,925
9.	District of Columbia.....DC	...L...	69,851	63,910		101	14,039	11,973
10.	Florida.....FL	...L...	1,498,721	1,296,750	275,269	300,114	607,823	720,762
11.	Georgia.....GA	...L...	499,108	521,857	71,080	169,061	217,321	229,004
12.	Hawaii.....HI	...L...	31,689	21,144	5,225	1,490	13,119	9,021
13.	Idaho.....ID	...L...	3,510,534	3,729,935	2,112,575	2,386,288	2,770,045	2,886,006
14.	Illinois.....IL	...L...	1,374,969	1,307,498	143,940	367,286	396,116	317,846
15.	Indiana.....IN	...L...	398,355	(1,234,534)	228,815	92,473	205,428	357,351
16.	Iowa.....IA	...L...	141,574	(19,664)	62,422	3,803	32,965	50,771
17.	Kansas.....KS	...L...	412,417	(294,891)	33,002	46,719	87,714	65,592
18.	Kentucky.....KY	...L...	57,644	50,511	22,991	217,281	182,027	208,956
19.	Louisiana.....LA	...L...	172,533	205,120	263,793	343,586	322,293	275,246
20.	Maine.....ME	...L...	600,051	581,324	33,405	7,375	23,053	12,117
21.	Maryland.....MD	...L...	196,191	155,931	46,348	48,910	100,040	78,685
22.	Massachusetts.....MA	...L...	218,860	202,769	19,846	66,375	103,426	100,932
23.	Michigan.....MI	...L...	447,750	455,683	162,538	48,313	138,914	204,012
24.	Minnesota.....MN	...L...	469,681	505,454	19,980	234,673	106,096	148,404
25.	Mississippi.....MS	...L...	45,858	46,909	20,990	21,668	16,626	25,572
26.	Missouri.....MO	...L...	181,411	(1,055,713)	4,822	18,763	13,025	38,489
27.	Montana.....MT	...L...	238,995	195,439	7,453	25,776	106,008	56,373
28.	Nebraska.....NE	...L...	385,725	281,650	226,991	26,882	236,489	98,508
29.	Nevada.....NV	...L...	418,617	47,129	667,064	39,565	94,640	94,350
30.	New Hampshire.....NH	...L...	181,945	180,874	4,222	1,857	68,470	21,982
31.	New Jersey.....NJ	...L...	446,476	366,090	3,261,602	5,889,876	8,692,011	14,398,320
32.	New Mexico.....NM	...L...	150,754	184,958	17,149	11,970	21,905	18,304
33.	New York.....NY	...L...	780,265	813,936	201,676	370,459	1,008,292	932,435
34.	North Carolina.....NC	...L...	674,481	576,468	90,349	78,333	150,712	161,535
35.	North Dakota.....ND	...L...	28,561	27,585	12,338	7,189	19,543	38,291
36.	Ohio.....OH	...L...	10,322,226	11,274,075	4,489,805	6,493,557	6,132,199	5,357,836
37.	Oklahoma.....OK	...L...	216,729	187,330	26,598	56,201	76,286	72,737
38.	Oregon.....OR	...L...	4,581,386	5,580,511	3,151,141	2,840,927	3,388,616	3,891,223
39.	Pennsylvania.....PA	...L...	519,732	460,535	48,495	30,084	146,507	146,419
40.	Rhode Island.....RI	...L...	28,979,041	26,880,523	16,105,779	13,688,693	24,319,482	24,021,223
41.	South Carolina.....SC	...L...	316,074	385,017	20,892	31,881	57,929	77,674
42.	South Dakota.....SD	...L...	147,415	141,035	7,159	8,251	18,827	29,195
43.	Tennessee.....TN	...L...	370,000	348,063	117,427	1,756,441	295,679	574,276
44.	Texas.....TX	...L...	1,356,377	1,297,632	442,543	413,072	562,107	466,222
45.	Utah.....UT	...L...	96,567	114,236	14,313	48,871	52,480	52,237
46.	Vermont.....VT	...L...	189,244	151,841	1,636	45,572	14,008	15,659
47.	Virginia.....VA	...L...	360,850	419,964	29,342	25,715	96,617	71,742
48.	Washington.....WA	...L...	7,333,401	8,498,029	4,884,286	5,995,191	8,899,955	9,373,605
49.	West Virginia.....WV	...L...	35,951	28,084		60,332	7,285	5,696
50.	Wisconsin.....WI	...L...	287,495	234,633	(315)	22,687	90,262	114,016
51.	Wyoming.....WY	...L...	57,896	44,818	8,262	37,838	54,576	30,690
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...	123,833,304	115,631,306	70,791,933	83,432,784	140,237,984	150,587,122

DETAILS OF WRITE-INS

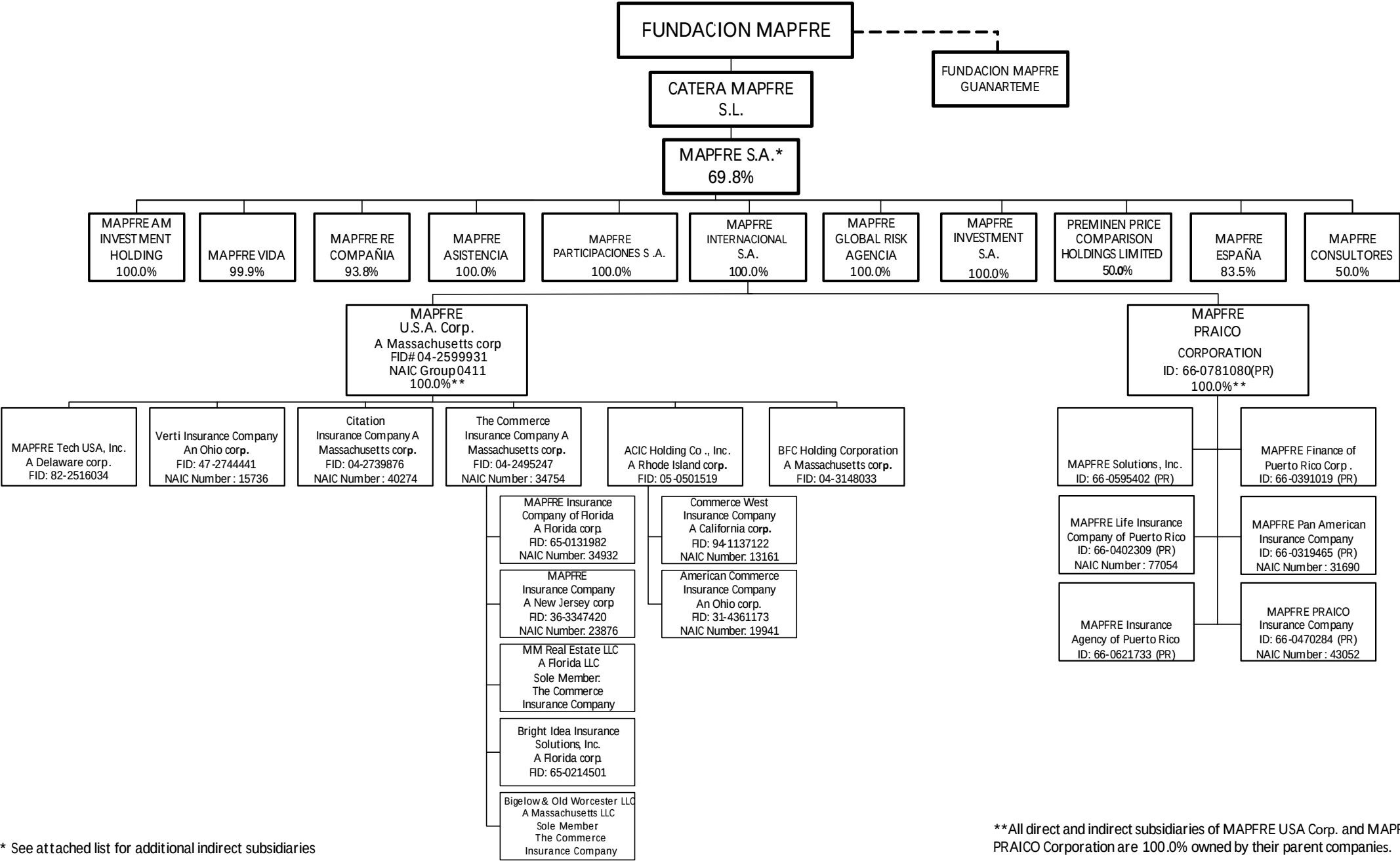
58001.	XXX...						
58002.	XXX...						
58003.	XXX...						
58998.	Summary of remaining write-ins for Line 58 from overflow page....	...XXX...	0	0	0	0	0
58999.	Totals (Lines 58001 thru 58003+ Line 58998) (Line 58 above).....	...XXX...	0	0	0	0	0

(a) Active Status Count

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

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

PART 1 – ORGANIZATIONAL CHART



* See attached list for additional indirect subsidiaries

**All direct and indirect subsidiaries of MAPFRE USA Corp. and MAPFRE PRAICO Corporation are 100.0% owned by their parent companies.

American Commerce Insurance Company

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY	NAIC #	FED ID
MAPFRE INTERNACIONAL S.A.	100.00	MAPFRE, S.A.		
MAPFRE TECH	20.00	MAPFRE, S.A.		
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.00	MAPFRE, S.A.		
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.50	MAPFRE, S.A.		
MAPFRE ARGENTINA HOLDING S.A.	100.00	MAPFRE, S.A.		
CLUB MAPFRE ARGENTINA	97.00	MAPFRE, S.A.		
MAPFRE ARGENTINA SEGUROS S.A.	100.00	MAPFRE, S.A.		
CESVI ARGENTINA, S.A.	60.60	MAPFRE, S.A.		
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.00	MAPFRE, S.A.		
MAPFRE CHILE SEGUROS S.A.	100.00	MAPFRE, S.A.		
MAPFRE CHILE VIDA S.A.	100.00	MAPFRE, S.A.		
MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.70	MAPFRE, S.A.		
CREDIMAPFRE S.A.	100.00	MAPFRE, S.A.		
MAPFRE SERVICIOS EXEQUIALES SAS	100.00	MAPFRE, S.A.		
CESVI COLOMBIA, S.A.	62.30	MAPFRE, S.A.		
MAPFRE COLOMBIA VIDA SEGUROS S.A.	94.40	MAPFRE, S.A.		
MAPFRE PERU VIDA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	67.40	MAPFRE, S.A.		
CORPORACION FUNERARIA, S.A.	100.00	MAPFRE, S.A.		
MAPFRE PERU COMPANIA DE SEGUROS Y REASEGUROS	99.30	MAPFRE, S.A.		
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.60	MAPFRE, S.A.		
MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	60.00	MAPFRE, S.A.		
MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	89.50	MAPFRE, S.A.		
APOINT S.A.	100.00	MAPFRE, S.A.		
MAPFRE URUGUAY SEGUROS S.A.	100.00	MAPFRE, S.A.		
MAPFRE DOMINICANA S.A.	100.00	MAPFRE, S.A.		
MAPFRE BHD COMPANIA DE SECUROS, S.A.	51.00	MAPFRE, S.A.		
CREDI PRIMAS, S.A.	100.00	MAPFRE, S.A.		
GRUPO CORPORATIVO LML S.A. DE C.V.	100.00	MAPFRE, S.A.		
MAPFRE MEXICO S.A.	44.30	MAPFRE, S.A.		
MAPFRE MEXICO S.A.	55.70	MAPFRE, S.A.		
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	100.00	MAPFRE, S.A.		
MAPFRE TEPEYAC INC.	100.00	MAPFRE, S.A.		
MAPFRE SERVICIOS MEXICANOS	100.00	MAPFRE, S.A.		
MAPFRE FIANZAS S.A.	100.00	MAPFRE, S.A.		
MAPFRE DEFENSA LEGAL S.A. DE C.V.	100.00	MAPFRE, S.A.		
CESVI MEXICO, S.A.	16.70	MAPFRE, S.A.		
MAPFRE AMERICA CENTRAL, S.A.	99.90	MAPFRE, S.A.		
MAPFRE PANAMA S.A.	99.40	MAPFRE, S.A.		
INMOBILIARIA AMERICANA S.A.	78.90	MAPFRE, S.A.		
MAPFRE TENEDORA DE ACC, S.A.	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS HONDURAS S.A.	73.30	MAPFRE, S.A.		
MAPFRE SEGUROS COSTA RICA, S.A.	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS GUATEMALA, S.A.	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS NICARAGUA, S.A.	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS HONDURAS S.A.	25.10	MAPFRE, S.A.		
AMA-ASISTENCIA MEDICA ADMISTRADA, C.A.	99.70	MAPFRE, S.A.		
MAPFRE SIGORTA, A.S.	99.70	MAPFRE, S.A.		
MAPFRE YASAM SIGORTA, A.S.	99.50	MAPFRE, S.A.		
GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	51.00	MAPFRE, S.A.		
MAPFRE INSULAR INSURANCE CORPORATION	74.90	MAPFRE, S.A.		
MAPFRE MIDDLESEA P.L.C.	54.60	MAPFRE, S.A.		
MIDDLESEA ASSIST LIMITED	49.00	MAPFRE, S.A.		
MAPFRE M.S.V. LIFE P.L.C.	50.00	MAPFRE, S.A.		
GROWTH INVESTMENTS LIMITED	100.00	MAPFRE, S.A.		
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.		
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.		
BEE INSURANCE MANAGEMENT LTD	100.00	MAPFRE, S.A.		
EUROMED RISK SOLUTIONS LIMITED	100.00	MAPFRE, S.A.		
EURO GLOBE HOLDINGS LIMITED	100.00	MAPFRE, S.A.		
PT ASURANSI BINA DANA ARTA TBK	62.30	MAPFRE, S.A.		
PT MAPFRE ABDA ASSISTANCE	49.00	MAPFRE, S.A.		
VERTI VERSICHERUNG AG	100.00	MAPFRE, S.A.		
VERTI ASSICURIZIONI S.P.A.	100.00	MAPFRE, S.A.		
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.50	MAPFRE, S.A.		
CLUB MAPFRE S.A.	100.00	MAPFRE, S.A.		
CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	100.00	MAPFRE, S.A.		
INVERSORA SEGURIDAD-FINACIADORA DE PRIMAS, C.A.	100.00	MAPFRE, S.A.		
AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	97.00	MAPFRE, S.A.		
UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	99.70	MAPFRE, S.A.		
MAPFRE CHILE SEGUROS, S.A.	100.00	MAPFRE, S.A.		
MAPFRE CHILE ASESORIAS, S.A.	100.00	MAPFRE, S.A.		
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	12.70	MAPFRE, S.A.		
MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	87.30	MAPFRE, S.A.		
MAPFRE BRASIL PARTICIPACOES, S.A.	99.20	MAPFRE, S.A.		
MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	100.00	MAPFRE, S.A.		
PROTENSEG CORRETORA DE SEGUROS LTDA	100.00	MAPFRE, S.A.		
MAPFRE SAUDE LTDA	100.00	MAPFRE, S.A.		
MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	100.00	MAPFRE, S.A.		
MAC INVESTIMENTOS S.A.	100.00	MAPFRE, S.A.		
MAPFRE INVESTIMENTOS LTDS	100.00	MAPFRE, S.A.		
MAPFRE PARTICIPACOES, S.A.	100.00	MAPFRE, S.A.		
MAPFRE PREVIDENCIA S.A.	100.00	MAPFRE, S.A.		
MAPFRE CAPITALIZACAO, S.A.	100.00	MAPFRE, S.A.		
MAPFRE SEGUROS GERAIS S.A.	100.00	MAPFRE, S.A.		
MAPFRE SERVICOS S.A.	100.00	MAPFRE, S.A.		
MAPFRE VIDA, S.A.	100.00	MAPFRE, S.A.		
BB MAPFRE SH1 PARTICIPACOES, S.A.	25.00	MAPFRE, S.A.		
ALIANCA DO BRASIL SEGUROS S.A.	100.00	MAPFRE, S.A.		
COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	100.00	MAPFRE, S.A.		
MAPFRE AM INVESTMENT HOLDING, S.A.	100.00	MAPFRE, S.A.		
LA FINANCIERE RESPONSIBLE	25.00	MAPFRE, S.A.		
MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.90	MAPFRE, S.A.		
MAPFRE TECH	11.70	MAPFRE, S.A.		
MAPFRE VIDEO Y COMUNICACION, S.A.	25.00	MAPFRE, S.A.		
MIRACETI S.A.	100.00	MAPFRE, S.A.		
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	100.00	MAPFRE, S.A.		
MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	100.00	MAPFRE, S.A.		
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	100.00	MAPFRE, S.A.		

American Commerce Insurance Company

MAPFRE AM-GOOD GOVERNANCE	7.90	MAPFRE, S.A.
MAPFRE AM-IBERIAN EQUITIES	9.80	MAPFRE, S.A.
MAPFRE AM-EUROPEAN EQUITIES	4.00	MAPFRE, S.A.
FONDMAPFRE ELECCION DECIDIDA	40.00	MAPFRE, S.A.
FONDMAPFRE ELECCION MODERADA	47.20	MAPFRE, S.A.
FONDMAPFRE ELECCION PRUDENTE	53.30	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	25.20	MAPFRE, S.A.
FONDMAPFRE GLOBAL F.I.	36.90	MAPFRE, S.A.
FONDMAPFRE BOLSA F.I.	54.90	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.90	MAPFRE, S.A.
GESTION MODA SHOPPING S.A.	99.80	MAPFRE, S.A.
BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	51.00	MAPFRE, S.A.
BANKINTER SEGUROS DE VIDA, S.A.	50.00	MAPFRE, S.A.
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.00	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.30	MAPFRE, S.A.
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	93.80	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.00	MAPFRE, S.A.
REINSURANCE MANAGEMENT INC.	100.00	MAPFRE, S.A.
MAPFRE EURO BONDS FUND	100.00	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	100.00	MAPFRE, S.A.
C R ARGENTINA, S.A.	100.00	MAPFRE, S.A.
CAJA REASEGURADORA DE CHILE, S.A.	99.80	MAPFRE, S.A.
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.00	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	13.50	MAPFRE, S.A.
FONDMAPFRE RENTA DOLAR	19.70	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.00	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	98.40	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	100.00	MAPFRE, S.A.
IRELAND ASSIST, LTD	100.00	MAPFRE, S.A.
MEXICO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
ARABA ASSIST FOR LOGISTIC SERVICES	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPANY LIMITED	100.00	MAPFRE, S.A.
INSURE AND GO INSURANCE SERVICES USA CORP.	100.00	MAPFRE, S.A.
QUETZAL ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
NICASSIT, S.A.	100.00	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
NORASIST, INC D/B/A ROAD CANADA	100.00	MAPFRE, S.A.
D/B/A ROAD AMERICA MOTOR CLUB	100.00	MAPFRE, S.A.
INSURE AND GO AUSTRALIA	100.00	MAPFRE, S.A.
EUROSOS ASSISTANCE, S.A.	99.50	MAPFRE, S.A.
BRASIL ASISTENCIA S.A.	100.00	MAPFRE, S.A.
MAPFRE ABRAXAS SOFTWARE, LTD	100.00	MAPFRE, S.A.
ABRAXAS INSURANCE	100.00	MAPFRE, S.A.
MAPFRE WARRANTY UK LIMITED	100.00	MAPFRE, S.A.
HOME 3	100.00	MAPFRE, S.A.
MAPFRE WARRANTY S.P.A.	100.00	MAPFRE, S.A.
MAPFRE WARRANTIES	100.00	MAPFRE, S.A.
MAPFRE ASSISTANCE USA INC.	100.00	MAPFRE, S.A.
CENTURY AUTOMOTIVE SERVICES COMPANY	100.00	MAPFRE, S.A.
FEDERAL ASSIST Co.	100.00	MAPFRE, S.A.
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.00	MAPFRE, S.A.
INSURE AND GO	100.00	MAPFRE, S.A.
TRAVEL CLAIMS SERVICES LIMITED	100.00	MAPFRE, S.A.
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	98.10	MAPFRE, S.A.
ECUASISTENCIA S.A.	99.30	MAPFRE, S.A.
PERÚ ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
CONSULTING DE SOLUCIONES Y TECNOLOGÍAS SIAM, S.A.	99.90	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.60	MAPFRE, S.A.
URUGUAY ASISTENCIA, S.A.	97.90	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.00	MAPFRE, S.A.
IBEROASISTENCIA, S.A.	99.90	MAPFRE, S.A.
NILE ASSIST	98.00	MAPFRE, S.A.
TUR ASSIST, LTD.	99.70	MAPFRE, S.A.
ROAD CHINA ASSISTANCE CO., LTD.	100.00	MAPFRE, S.A.
IBERO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	51.00	MAPFRE, S.A.
GULF ASSIST, B.S.C.	74.60	MAPFRE, S.A.
CARIBE ASISTENCIA	83.60	MAPFRE, S.A.
PANAMÁ ASISTENCIA, S.A.	84.00	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	60.30	MAPFRE, S.A.
PT MAPFRE ABDA ASSISTANCE	51.00	MAPFRE, S.A.
AFRIQUE ASSISTANCE, S.A.	49.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	99.00	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	10.00	MAPFRE, S.A.
DESARROLLOS URBANOS CIC, S.A.	99.90	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.90	MAPFRE, S.A.
MAPFRE PARTICIPACIONES, S.A.	100.00	MAPFRE, S.A.
INDUSTRIAL RE S.A.	100.00	MAPFRE, S.A.
SOLUNION SEGUROS DE CREDITO S.A.	50.00	MAPFRE, S.A.
MAPFRE INVESTMENT, S.A.	100.00	MAPFRE, S.A.
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.00	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	83.50	MAPFRE, S.A.
CENTRO MEDICOS MAPFRE, S.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE, S.A.	100.00	MAPFRE, S.A.
MAPFRE AUTOMOCION S.A.U.	100.00	MAPFRE, S.A.
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE S.A.	100.00	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	100.00	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.50	MAPFRE, S.A.
MAPFRE TECH	65.20	MAPFRE, S.A.
MAPFRE VIDEO Y COMUNICACION, S.A.	75.00	MAPFRE, S.A.
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.00	MAPFRE, S.A.
MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	100.00	MAPFRE, S.A.
AGROSEGURO, S.A.	19.90	MAPFRE, S.A.
SALVADOR CAETANO AUTO (SGPS), S.A.	24.60	MAPFRE, S.A.
BANKINTER SEGUROS GENERALES, CIA DE SEGUROS Y REASEGUROS S.A.	50.10	MAPFRE, S.A.
RASTREATOR.COM LTD	25.00	MAPFRE, S.A.
AUDATEX ESPANA, S.A.	12.50	MAPFRE, S.A.
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	20.00	MAPFRE, S.A.
TECNOLOGÍAS DE LA INFORMACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	22.95	MAPFRE, S.A.

FONDMAPFRE BOLSA AMERICA	21.70	MAPFRE, S.A.
FONDMAPFRE RENTA DOLAR	19.70	MAPFRE, S.A.
FUNESPANA, S.A.	99.80	MAPFRE, S.A.
TANATORIUM ZRT	100.00	MAPFRE, S.A.
ALL FUNERAL SERVICES, S.L.	100.00	MAPFRE, S.A.
FUNESPANA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNEUROPEA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNESPANA DOS, S.L.	100.00	MAPFRE, S.A.
SALZILLO SERVICIOS FUNERARIOS S.L.	45.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	100.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.00	MAPFRE, S.A.
INICIATIVAS ALCAESAR, S.L.	40.00	MAPFRE, S.A.
NUEVO TANATORIO, S.L.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.00	MAPFRE, S.A.
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.00	MAPFRE, S.A.
POMPES FUNEBRES DOMINGO, S.L.	100.00	MAPFRE, S.A.
DE MENA SERVICIOS FUNERARIOS S.L.	70.00	MAPFRE, S.A.
CEMENTERIO PARQUE ANDUJAR, S.L.	72.80	MAPFRE, S.A.
ISABELO ALVAREZ MAYORGA, S.A.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DEL NERVION, S.L.	50.00	MAPFRE, S.A.
TANATORIO DE ECIJA, S.L.	33.30	MAPFRE, S.A.
TANATORIO SE-30 SEVILLA, S.L.	10.00	MAPFRE, S.A.
FUNERARIAS REUNIDAS EL BIERZO, S.A.	85.80	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	83.00	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.70	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS S.A.	100.00	MAPFRE, S.A.
MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	100.00	MAPFRE, S.A.
MAPFRE MULTI ASSET STRAT	41.60	MAPFRE, S.A.
PREMINEN PRICE COMPARISON HOLDINGS LIMITED	50.00	MAPFRE, S.A.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.00	MAPFRE, S.A.

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
012	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....	69.800	FUNDACION MAPFRE.....	..N.....	
							MAPFRE INTERNACIONAL S.A.....	ESP.....	UIP.....	MAPFRE, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
			04-2599931..				MAPFRE USA CORPORATION INC.....	MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	**
			82-2516034..				MAPFRE TECH USA, INC.....	DE.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736..	47-2744441..			VERTI INSURANCE COMPANY.....	OH.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274..	04-2739876..			CITATION INSURANCE COMPANY.....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754..	04-2495247..			THE COMMERCE INSURANCE COMPANY....	MA.....	IA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	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.....	
			65-0214501..				BRIGHT IDEA INSURANCE SOLUTIONS, INC.	FL.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
			04-2495247..				BIGELOW & OLD WORCESTER, LLC.....	MA.....	NIA.....	THE COMMERCE INSURANCE COMPANY..	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
			05-0501519..				ACIC HOLDINGS COMPANY, INC.....	RI.....	UDP.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161..	94-1137122..			COMMERCE WEST INSURANCE COMPANY..	CA.....	IA.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941..	31-4361173..			AMERICAN COMMERCE INSURANCE COMPANY	OH.....	RE.....	ACIC HOLDINGS COMPANY, INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
				04-3148033..			BFC HOLDING CORPORATION.....	MA.....	NIA.....	MAPFRE USA CORPORATION INC.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
				66-0781080..			MAPFRE PRAICO CORPORATION.....	PR.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	**
				66-0595402..			MAPFRE SOLUTIONS, INC.....	PR.....	NIA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	
	0411	MAPFRE INSURANCE GROUP	77054..	66-0402309..			MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	..N.....	

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	0411	MAPFRE INSURANCE GROUP	66-0621733..				MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	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.....	
	0411	MAPFRE INSURANCE GROUP	31690..	66-0319465..			MAPFRE PAN AMERICAN INSURANCE COMPANY	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
	0411	MAPFRE INSURANCE GROUP	43052..	66-0470284..			MAPFRE PRAICO INSURANCE COMPANY....	PR.....	IA.....	MAPFRE PRAICO CORPORATION.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	20.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	64.000	MAPFRE S.A.....	N.....	
							MAPFRE LA SEGURIDAD C.A. DE SEGUROS	VEN.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.500	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA HOLDING S.A.....	ARG.....	NIA.....	MAPFRE INTERNACIONAL S.A.....		100.000	MAPFRE S.A.....	N.....	
							CLUB MAPFRE ARGENTINA.....	ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	97.000	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS S.A.....	ARG.....	IA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CESVI ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.....	OWNERSHIP....	60.600	MAPFRE S.A.....	N.....	
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.....	IA.....	MAPFRE ARGENTINA HOLDING S.A.....	OWNERSHIP....	36.000	MAPFRE S.A.....	N.....	
							MAPFRE CHILE SEGUROS S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE CHILE VIDA S.A.....	CHL.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	CHL.....	IA.....	MAPFRE CHILE VIDA S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PERU COMPANIA DE SEGUROS Y REASEGUROS	PER.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.300	MAPFRE S.A.....	N.....	
							MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	PER.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	98.600	MAPFRE S.A.....	N.....	
							MAPFRE ATLAS COMPANIA DE SEGUROS, S.A.	ECU.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	60.000	MAPFRE S.A.....	N.....	
							MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	PRY.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	89.500	MAPFRE S.A.....	N.....	
							APOINT S.A.....	URY.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE URUGUAY SEGUROS S.A.....	URY.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							GRUPO CORPORATIVO LML S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE MEXICO S.A.....	MEX.....	IA.....	GRUPO CORPORATIVO LML S.A. DE C.V....	OWNERSHIP....	44.300	MAPFRE S.A.....	N.....	
							MAPFRE MEXICO S.A.....	MEX.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	55.700	MAPFRE S.A.....	N.....	
							MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	MEX.....	NIA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.2

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE TEPEYAC INC.....	CA.....	NIA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SERVICIOS MEXICANOS.....	MEX.....	NIA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE FIANZAS S.A.....	MEX.....	IA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE DEFENSA LEGAL S.A. DE C.V.....	MEX.....	NIA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							CESVI MEXICO, S.A.....	MEX.....	NIA.....	MAPFRE MEXICO S.A.....	OWNERSHIP....	16.700	MAPFRE S.A.....	...N.....	
							MAPFRE AMERICA CENTRAL, S.A.....	PAN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	...N.....	
							MAPFRE PANAMA S.A.....	PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	99.400	MAPFRE S.A.....	...N.....	
							INMOBILIARIA AMERICANA S.A.....	SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	78.900	MAPFRE S.A.....	...N.....	
							MAPFRE TENEDORA DE ACC, S.A.....	PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	73.300	MAPFRE S.A.....	...N.....	
							MAPFRE SEGUROS COSTA RICA, S.A.....	CRI.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SEGUROS GUATEMALA, S.A.....	GTM.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SEGUROS NICARAGUA, S.A.....	NIC.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							MAPFRE SEGUROS HONDURAS S.A.....	HND.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.....	OWNERSHIP....	25.100	MAPFRE S.A.....	...N.....	
							AMA-ASISTENCIA MEDICA ADMISTRADA, C.A.	VEN.....	NIA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.700	MAPFRE S.A.....	...N.....	
							MAPFRE SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	99.700	MAPFRE S.A.....	...N.....	
							MAPFRE YASAM SIGORTA, A.S.....	TUR.....	IA.....	MAPFRE SIGORTA, A.S.....	OWNERSHIP....	99.500	MAPFRE S.A.....	...N.....	
							GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	TUR.....	NIA.....	MAPFRE SIGORTA, A.S.....	OWNERSHIP....	51.000	MAPFRE S.A.....	...N.....	
							MAPFRE INSULAR INSURANCE CORPORATION	PHL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	74.900	MAPFRE S.A.....	...N.....	
							MAPFRE MIDDLESEA P.L.C.....	MLT.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	54.600	MAPFRE S.A.....	...N.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	49.000	MAPFRE S.A.....	...N.....	
							MAPFRE M.S.V. LIFE P.L.C.....	MLT.....	IA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							GROWTH INVESTMENTS LIMITED.....	MLT.....	NIA.....	M.S.V. LIFE P.L.C.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	M.S.V. LIFE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							CHURCH WARF PROPERTIES.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	50.000	MAPFRE S.A.....	...N.....	
							BEE INSURANCE MANAGEMENT LTD.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							EUROMED RISK SOLUTIONS LIMITED.....	MLT.....	NIA.....	BEE INSURANCE MANAGEMENT LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							EURO GLOBE HOLDINGS LIMITED.....	MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							PT ASURANSI BINA DANA ARTA TBK.....	IDN.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	62.300	MAPFRE S.A.....	...N.....	
							PT MAPFRE ABDA ASSISTANCE.....	IDN.....	NIA.....	PT ASURANSI BINA DANA ARTA TBK.....	OWNERSHIP....	49.000	MAPFRE S.A.....	...N.....	
							VERTI VERSICHERUNG AG.....	DEU.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	
							VERTI ASSICURIZIONI S.P.A.....	ITA.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	...N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.3

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE LA SEGURIDAD C.A. DE SEGUROS	VEN.....	NIA.....	MAPFRE INTERNACIONAL, S.A.....		99.500	MAPFRE S.A.....	N.....	
							CLUB MAPFRE S.A.....	VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							INVERSORA SEGURIDAD-FINACIADORA DE PRIMAS, C.A.	VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	OWNERSHIP....	97.000	MAPFRE S.A.....	N.....	
							UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA	VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	OWNERSHIP....	99.700	MAPFRE S.A.....	N.....	
							MAPFRE CHILE SEGUROS, S.A.....	CHL.....	IA.....	MAPFRE INTERNACIONAL, S.A.....		100.000	MAPFRE S.A.....	N.....	
							MAPFRE CHILE ASESORIAS, S.A.....	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE ASESORIAS, S.A.....	OWNERSHIP....	12.700	MAPFRE S.A.....	N.....	
							MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.....	OWNERSHIP....	87.300	MAPFRE S.A.....	N.....	
							MAPFRE BRASIL PARTICIPACOES, S.A.....	BRA.....	IA.....	MAPFRE INTERNACIONAL, S.A.....		99.200	MAPFRE S.A.....	N.....	
							MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	BRA.....	IA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							PROTENSEG CORRETORA DE SEGUROS LTDA	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SAUDE LTDA.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAC INVESTIMENTOS S.A.....	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE INVESTIMENTOS LTDS.....	BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PREVIDENCIA S.A.....	BRA.....	IA.....	MAPFRE PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE CAPITALIZACAO, S.A.....	BRA.....	NIA.....	MAPFRE PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	BRA.....	IA.....	MAPFRE PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SERVICOS S.A.....	BRA.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA S.A.....	BRA.....	IA.....	MAPFRE PARTICIPACOES, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.4							BB MAPFRE SH1 PARTICIPACOES, S.A.....	BRA.....	NIA.....	MAPFRE BRASIL PARTICIPACOES, S.A.....	OWNERSHIP....	25.000	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 AM INVESTMENT HOLDING, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							LA FINANCIERE RESPONSIBLE.....	FRA.....	NIA.....	MAPFRE AM INVESTMENT HOLDING, S.A...	OWNERSHIP....	25.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP.....	IA.....	MAPFRE, S.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	11.700	MAPFRE S.A.....	N.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	25.000	MAPFRE S.A.....	N.....	
							MIRACETI S.A.....	ESP.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE AM-GOOD GOVERNANCE.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	7.900	MAPFRE S.A.....	N.....	
							MAPFRE AM-IBERIAN EQUITIES.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	9.800	MAPFRE S.A.....	N.....	
							MAPFRE AM-EUROPEAN EQUITIES.....	ESP.....	NIA.....	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	OWNERSHIP....	4.000	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION DECIDIDA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	40.000	MAPFRE S.A.....	N.....	
							FONDMAPFRE ELECCION MODERADA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	47.200	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.5

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							FONDMAPFRE ELECCION PRUDENTE.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	53.300	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	25.200	MAPFRE S.A.....	N.....	
							FONDMAPFRE GLOBAL F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	36.900	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA F.I.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	54.900	MAPFRE S.A.....	N.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							GESTION MODA SHOPPING S.A.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	99.800	MAPFRE S.A.....	N.....	
							BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	ESP.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							BANKINTER SEGUROS DE VIDA, S.A.....	ESP.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	ESP.....	IA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	OWNERSHIP....	33.300	MAPFRE S.A.....	N.....	
							MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE, S.A.....	OWNERSHIP....	93.800	MAPFRE S.A.....	N.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							REINSURANCE MANAGEMENT INC.....	NJ.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE EURO BONDS FUND.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.6

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	BRA.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	BRA.....	IA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE CHILE REASEGUROS, S.A.....	CHL.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							C R ARGENTINA, S.A.....	ARG.....	NIA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CAJA REASEGURADORA DE CHILE, S.A.....	CHL.....	IA.....	MAPFRE CHILE REASEGUROS, S.A.....	OWNERSHIP....	99.800	MAPFRE S.A.....	N.....	
							MAPFRE MANDATOS Y SERVICIOS, S.A.....	ARG.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	95.000	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	13.500	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	19.700	MAPFRE S.A.....	N.....	
		16475...	83-2698500..				MAPFRE RE VERMONT CORPORATION.....	VT.....	IA.....	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							IBEROASISTENCIA, ARGENTINA S.A.....	ARG.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	98.400	MAPFRE S.A.....	N.....	
							SERVICIOS GENERALES VENEASISTENCIA, S.A.	VEN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							IRELAND ASSIST, LTD.....	IRL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MEXICO ASISTENCIA, S.A.....	MEX.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ARABA ASSIST FOR LOGISTIC SERVICES....	JOR.....	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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.7

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)	*
							INSURE AND GO INSURANCE SERVICES USA CORP.	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							QUETZAL ASISTENCIA, S.A.....	GTM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							NICASSIT, S.A.....	NIC.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							EL SALVADOR ASISTENCIA, S.A.....	SLV.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							NORASIST, INC D/B/A ROAD CANADA.....	CAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							D/B/A ROAD AMERICA 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.....	
							BRASIL ASISTENCIA S.A.....	BRA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ABRAXAS SOFTWARE, LTD.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ABRAXAS INSURANCE	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE WARRANTY UK LIMITED.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							HOME 3.....	GBR.....	NIA.....	MAPFRE ABRAXAS SOFTWARE, LTD.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE WARRANTY S.P.A.....	ITA.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.8

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE WARRANTIES.....	LUX.....	NIA.....	MAPFRE WARRANTY S.P.A.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE ASSISTANCE USA INC.....	FL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							CENTURY AUTOMOTIVE SERVICES COMPANY	NM.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							FEDERAL ASSIST Co.....	FL.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE WARRANTY CORPORATION OF FLORIDA	FL.....	NIA.....	MAPFRE ASSISTANCE USA INC.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							INSURE AND GO.....	GBR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							TRAVEL CLAIMS SERVICES LIMITED.....	GBR.....	NIA.....	INSURE AND GO.....	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	COL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	98.100	MAPFRE S.A.....	N.....	
							ECUASISTENCIA S.A.....	ECU.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.300	MAPFRE S.A.....	N.....	
							PERÚ ASISTENCIA, S.A.....	PER.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	100.000	MAPFRE S.A.....	N.....	
							CONSULTING DE SOLUCIONES Y TECNOLOGÍAS SIAM, S.A.	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.600	MAPFRE S.A.....	N.....	
							URUGUAY ASISTENCIA, S.A.....	URY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	97.900	MAPFRE S.A.....	N.....	
							SUR ASISTENCIA, S.A.....	CHL.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.000	MAPFRE S.A.....	N.....	
							IBEROASISTENCIA, S.A.....	ESP.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	99.900	MAPFRE S.A.....	N.....	
							NILE ASSIST.....	EGY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP.....	98.000	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.9

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							TUR ASSIST, LTD.....	TUR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.700	MAPFRE S.A.....	N.....	
							ROAD CHINA ASSISTANCE CO., LTD.....	CHN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							IBERO ASISTENCIA, S.A.....	PRT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MIDDLESEA ASSIST LIMITED.....	MLT.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							GULF ASSIST, B.S.C.....	BHR.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	74.600	MAPFRE S.A.....	N.....	
							CARIBE ASISTENCIA.....	DOM.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	83.600	MAPFRE S.A.....	N.....	
							PANAMÁ ASISTENCIA, S.A.....	PAN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	84.000	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.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	51.000	MAPFRE S.A.....	N.....	
							AFRIQUE ASSISTANCE, S.A.....	TUN.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	
							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	PRY.....	NIA.....	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.000	MAPFRE S.A.....	N.....	
							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	10.000	MAPFRE S.A.....	N.....	
							DESARROLLOS URBANOS CIC, S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	
							SERVICIOS INMOBILIARIOS MAPFRE S.A.....	ESP.....	NIA.....	MAPFRE INMUEBLES, S.G.A.....	OWNERSHIP....	99.900	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							MAPFRE PARTICIPACIONES, S.A.....	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							INDUSTRIAL RE S.A.....	LUX.....	IA.....	MAPFRE PARTICIPACIONES, S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							SOLUNION SEGUROS DE CREDITO S.A.....	ESP.....	IA.....	MAPFRE PARTICIPACIONES, S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							MAPFRE INVESTMENT S.A.....	URY.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP....	...83.500	MAPFRE S.A.....	...N.....	
							CENTROS MEDICOS MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							CLUB MAPFRE, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MAPFRE AUTOMOCION S.A.U.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							VERTI ASEGURADORA, COMPANIA DE SEGUROS Y REASEGUROS, S.A.	ESP.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A..	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...97.500	MAPFRE S.A.....	...N.....	
							MAPFRE TECH.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...65.200	MAPFRE S.A.....	...N.....	
							MAPFRE VIDEO Y COMUNICACION, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...75.000	MAPFRE S.A.....	...N.....	
							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...50.000	MAPFRE S.A.....	...N.....	
							MAPFRE QUINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...100.000	MAPFRE S.A.....	...N.....	
							AGROSEGURO, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...19.900	MAPFRE S.A.....	...N.....	
							SALVADOR CAETANO AUTO (SGPS), S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	...24.600	MAPFRE S.A.....	...N.....	
							BANKINTER SEGUROS GENERALES, CIA DE SEGUROS Y REASEGUROS 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.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

Q12.11

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
							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....	20.000	MAPFRE S.A.....	N.....	
							TECNOLOGIAS DE LA INFORMACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	22.950	MAPFRE S.A.....	N.....	
							FONDMAPFRE BOLSA AMERICA.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	21.700	MAPFRE S.A.....	N.....	
							FONDMAPFRE RENTA DOLAR.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	19.700	MAPFRE S.A.....	N.....	
							FUNESPANA, S.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	99.800	MAPFRE S.A.....	N.....	
							TANATORIUM ZRT.....	HUN.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							ALL FUNERAL SERVICES, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							FUNESPANA CHILE, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNEUROPEA CHILE, S.A.....	ESP.....	NIA.....	FUNESPANA, S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							FUNESPANA DOS, S.L.....	ESP.....	NIA.....	FUNESPANA, S.A.....		100.000	MAPFRE S.A.....	N.....	
							SALZILLO SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	45.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	70.000	MAPFRE S.A.....	N.....	
							INICIATIVAS ALCAESAR, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	40.000	MAPFRE S.A.....	N.....	
							NUEVO TANATORIO, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	49.000	MAPFRE S.A.....	N.....	
							POMPES FUNEBRES DOMINGO, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							DE MENA SERVICIOS FUNERARIOS S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	70.000	MAPFRE S.A.....	N.....	
							CEMENTERIO PARQUE ANDUJAR, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	72.800	MAPFRE S.A.....	N.....	
							ISABELO ALVAREZ MAYORGA, S.A.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							SERVICIOS FUNERARIOS DEL NERVION, S.L.	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							TANATORIO DE ECIJA, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	33.300	MAPFRE S.A.....	N.....	
							TANATORIO SE-30 SEVILLA, S.L.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	10.000	MAPFRE S.A.....	N.....	
							FUNERARIAS REUNIDAS EL BIERZO, S.A.....	ESP.....	NIA.....	FUNESPANA DOS, S.L.....	OWNERSHIP....	85.800	MAPFRE S.A.....	N.....	

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries or Affiliates	Domiciliary Location	Relationship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Ownership Provide Percentage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Required? (Y/N)	*
Q12.12							MAPFRE INMUEBLES, S.G.A.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	83.000	MAPFRE S.A.....	N.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	66.700	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GERAIS S.A.....	PRT.....	IA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE MULTI ASSET STRAT.....	ESP.....	NIA.....	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	41.600	MAPFRE S.A.....	N.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	COL.....	NIA.....	MAPFRE INTERNACIONAL, S.A.....		93.700	MAPFRE S.A.....	N.....	
							CREDIMAPFRE.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE SERVICIOS EXEQUIALES SAS.....	COL.....	NIA.....	CREDIMAPFRE.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							CESVI COLOMBIA, S.A.....	COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	OWNERSHIP....	62.300	MAPFRE S.A.....	N.....	
							MAPFRE COLOMBIA VIDA SEGUROS S.A.....	COL.....	IA.....	MAPFRE INTERNACIONAL S.A.....	OWNERSHIP....	94.400	MAPFRE S.A.....	N.....	
							MAPFRE PERÚ VIDA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	PER.....	NIA.....	MAPFRE INTERNACIONAL, S.A.....		67.400	MAPFRE S.A.....	N.....	
							CORPORACION FUNERARIA, S.A.....	PER.....	NIA.....	MAPFRE PERÚ VIDA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	
							MAPFRE DOMINICANA.....	DOM.....	NIA.....	MAPFRE INTERNACIONAL, S.A.....		100.000	MAPFRE S.A.....	N.....	
							MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	DOM.....	NIA.....	MAPFRE DOMINICANA.....		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.....	
							PREMINEN PRICE COMPARISON HOLDINGS LIMITED	GBR.....	NIA.....	MAPFRE S.A.....	OWNERSHIP....	50.000	MAPFRE S.A.....	N.....	
							MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	ESP.....	IA.....	MAPFRE S.A.....	OWNERSHIP....	100.000	MAPFRE S.A.....	N.....	

American Commerce Insurance Company
PART 1 - LOSS EXPERIENCE

Lines of Business	Current Year to Date			4 Prior Year to Date Direct Loss Percentage
	1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1. Fire.....	3,504,424	2,086,075	59.527	31.540
2. Allied lines.....	4,150,245	(26,254)	(0.633)	3.877
3. Farmowners multiple peril.....			0.000	
4. Homeowners multiple peril.....	37,296,780	20,883,181	55.992	55.327
5. Commercial multiple peril.....			0.000	
6. Mortgage guaranty.....			0.000	
8. Ocean marine.....			0.000	
9. Inland marine.....	6,597		0.000	
10. Financial guaranty.....			0.000	
11.1. Medical professional liability - occurrence.....			0.000	
11.2. Medical professional liability - claims-made.....			0.000	
12. Earthquake.....			0.000	
13. Group accident and health.....			0.000	
14. Credit accident and health.....			0.000	
15. Other accident and health.....			0.000	
16. Workers' compensation.....			0.000	
17.1 Other liability-occurrence.....	2,963,411	1,166,259	39.355	(23.440)
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.....	37,854,458	21,273,112	56.197	55.019
19.3, 19.4 Commercial auto liability.....			0.000	
21. Auto physical damage.....	22,993,402	11,487,823	49.961	46.619
22. Aircraft (all perils).....	15,780,302	3,826,971	24.252	34.597
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.....	124,549,619	60,697,167	48.733	47.165
DETAILS OF WRITE-INS				
3401.			0.000	
3402.			0.000	
3403.			0.000	
3498. Sum. of remaining write-ins for Line 34 from overflow page.....	0	0	0.000	XXX
3499. Totals (Lines 3401 thru 3403 plus 3498) (Line 34).....	0	0	0.000	

PART 2 - DIRECT PREMIUMS WRITTEN

Lines of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire.....	1,089,015	3,191,754	3,945,198
2. Allied lines.....	1,379,275	3,628,012	3,885,178
3. Farmowners multiple peril.....			
4. Homeowners multiple peril.....	12,967,831	36,054,421	38,981,815
5. Commercial multiple peril.....			
6. Mortgage guaranty.....			
8. Ocean marine.....			
9. Inland marine.....	1,665	6,929	11,214
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.....	1,599,239	4,543,744	(7,543,814)
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.....	12,384,515	37,005,817	38,424,349
19.3 19.4 Commercial auto liability.....			
21. Auto physical damage.....	7,593,867	22,596,026	23,174,944
22. Aircraft (all perils).....	8,537,182	16,806,603	14,752,420
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.....	45,552,589	123,833,306	115,631,304
DETAILS OF WRITE-INS			
3401.			
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)	2021 Loss and LAE Payments on Claims Reported as of Prior Year-End	2021 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2021 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. 2018 + Prior.....	37,176	(2,376)	34,800	13,417	273	13,690	23,687	561	(2,061)	22,187	(72)	1,149	1,077
2. 2019.....	23,901	2,224	26,125	8,115	399	8,514	17,724	283	618	18,625	1,938	(924)	1,014
3. Subtotals 2019 + Prior.....	61,077	(152)	60,925	21,532	672	22,204	41,411	844	(1,443)	40,812	1,866	225	2,091
4. 2020.....	22,843	20,251	43,094	14,303	3,826	18,129	16,326	560	7,067	23,953	7,786	(8,798)	(1,012)
5. Subtotals 2020 + Prior.....	83,920	20,099	104,019	35,835	4,498	40,333	57,737	1,404	5,624	64,765	9,652	(8,573)	1,079
6. 2021.....	XXX.....	XXX.....	XXX.....	XXX.....	58,236	58,236	XXX.....	24,375	12,780	37,155	XXX.....	XXX.....	XXX.....
7. Totals.....	83,920	20,099	104,019	35,835	62,734	98,569	57,737	25,779	18,404	101,920	9,652	(8,573)	1,079
8. Prior Year- End's Surplus As Regards Policyholders	113,497										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
											1.11.5 %	2.(42.7)%	3.1.0 %
											Col. 13, Line 7 Line 8		
											4.1.0 %		

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:

* 1 9 9 4 1 2 0 2 1 4 9 0 0 0 0 0 3 *

* 1 9 9 4 1 2 0 2 1 4 5 5 0 0 0 0 3 *

* 1 9 9 4 1 2 0 2 1 3 6 5 0 0 0 0 3 *

* 1 9 9 4 1 2 0 2 1 5 0 5 0 0 0 0 3 *

American Commerce Insurance Company

Overflow Page for Write-Ins

Additional Write-ins for Assets:

	Current Statement Date			4
	1	2	3	
	Assets	Nonadmitted Assets	Net Admitted Assets (Cols. 1 - 2)	December 31, Prior Year Net Admitted Assets
2504. Miscellaneous Assets.....			0	585,029
2597. Summary of remaining write-ins for Line 25.....	0	0	0	585,029

Additional Write-ins for Statement of Income:

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
1404. Other technical income (other reinsurer).....	161,731		
1497. Summary of remaining write-ins for Line 14.....	161,731	0	0

American Commerce Insurance Company
SCHEDULE A - VERIFICATION
Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year.....	0	1,196,578
2. Cost of acquired:		
2.1 Actual cost at time of acquisition.....		
2.2 Additional investment made after acquisition.....		
3. Current year change in encumbrances.....		(81,503)
4. Total gain (loss) on disposals.....		(275,722)
5. Deduct amounts received on disposals.....		797,334
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.....		42,019
9. Book/adjusted carrying value at end of current period (Lines 1+2+3+4-5+6-7-8).....	0	0
10. Deduct total nonadmitted amounts.....		
11. Statement value at end of current period (Line 9 minus Line 10).....	0	0

SCHEDULE B - VERIFICATION
Mortgage Loans

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

SCHEDULE BA - VERIFICATION
Other Long-Term Invested Assets

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

SCHEDULE D - VERIFICATION
Bonds and Stocks

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year.....	210,580,463	192,415,395
2. Cost of bonds and stocks acquired.....	30,121,549	65,368,716
3. Accrual of discount.....	120,564	162,796
4. Unrealized valuation increase (decrease).....	(33,374)	(300)
5. Total gain (loss) on disposals.....	347,280	200,306
6. Deduct consideration for bonds and stocks disposed of.....	24,781,807	46,381,830
7. Deduct amortization of premium.....	739,265	1,314,185
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.....	80,760	129,565
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10).....	215,696,170	210,580,463
12. Deduct total nonadmitted amounts.....		
13. Statement value at end of current period (Line 11 minus Line 12).....	215,696,170	210,580,463

SCHEDULE D - PART 1B

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

	1	2	3	4	5	6	7	8
NAIC Designation	Book/Adjusted Carrying Value Beginning of Current Quarter	Acquisitions During Current Quarter	Dispositions During Current Quarter	Non-Trading Activity During Current Quarter	Book/Adjusted Carrying Value End of First Quarter	Book/Adjusted Carrying Value End of Second Quarter	Book/Adjusted Carrying Value End of Third Quarter	Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a).....	166,282,990	4,748,414	5,434,059	2,864,243	164,614,410	166,282,990	168,461,588	156,519,406
2. NAIC 2 (a).....	42,482,883	3,111,180		(3,111,638)	46,211,590	42,482,883	42,482,425	50,335,734
3. NAIC 3 (a).....	2,036,594			(2,437)	2,039,009	2,036,594	2,034,157	1,007,323
4. NAIC 4 (a).....							0	
5. NAIC 5 (a).....							0	
6. NAIC 6 (a).....							0	
7. Total Bonds.....	210,802,467	7,859,594	5,434,059	(249,832)	212,865,009	210,802,467	212,978,170	207,862,463
PREFERRED STOCK								
8. NAIC 1.....							0	
9. NAIC 2.....	2,718,000				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	2,718,000	2,718,000
15. Total Bonds and Preferred Stock.....	213,520,467	7,859,594	5,434,059	(249,832)	215,583,009	213,520,467	215,696,170	210,580,463

(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.

QSI02

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

American Commerce Insurance Company

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, NAIC Designation Modifier and SVO Administrative Symbol
Bonds - U.S. Special Revenue and Special Assessment											
299461 SX 2	EVANSVILLE IN SEWAGE WKS.....				07/19/2021.....	BAIRD, ROBERT W. & CO.....		1,500,000	1,500,000		1.C FE.....
3199999. Total - Bonds - U.S. Special Revenue and Special Assessments.....								1,500,000	1,500,000	0	XXX
Bonds - Industrial and Miscellaneous											
031162 CW 8	AMGEN INC.....				07/22/2021.....	FIFTH THIRD CAPITAL.....		2,062,400	2,000,000	19,294	2.A FE.....
036752 AP 8	ANTHEM INC.....				07/22/2021.....	FIFTH THIRD CAPITAL.....		1,048,780	1,000,000	9,138	2.B FE.....
314353 AA 1	FEDEX 2020-1 CLASS AA.....				07/26/2021.....	RAYMOND JAMES.....		1,070,414	1,067,670	8,786	1.D FE.....
67066G AF 1	NVIDIA CORPORATION.....				07/23/2021.....	RAYMOND JAMES.....		2,178,000	2,000,000	18,367	1.G FE.....
3899999. Total - Bonds - Industrial and Miscellaneous.....								6,359,594	6,067,670	55,585	XXX
8399997. Total - Bonds - Part 3.....								7,859,594	7,567,670	55,585	XXX
8399999. Total - Bonds.....								7,859,594	7,567,670	55,585	XXX
9999999. Total - Bonds, Preferred and Common Stocks.....								7,859,594	XXX	55,585	XXX

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

American Commerce Insurance Company
SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of interest Accrued at Current Statement Date	First Month	Second Month	Third Month	*
Open Depositories								
Bank of America.....	100 Federal Street, Boston, MA 02110.....				(2,914,281)	(5,168,265)	(3,845,716)	XXX
The Bank of New York Mellon.....	One Wall Street, New York, NY 10286.....	0.010	6		100,700	1,226,783	100,501	XXX
Deutsche Bank.....	60 Wall Street, New York, NY 10005.....				(14,886)	(9,224)	(10,054)	XXX
JPMorgan Chase.....	100 E.Broad St, Columbus, OH 43215.....				98,730	6,371	72,865	XXX
BlackRock 30.....	One Financial Center, Boston, MA 02111.....	0.030	140		1,545,904	145,974	145,989	XXX
Fidelity Govn't 2642.....	500 Salem Street, Smithfield, RI 02917.....	0.010	96		4,023,479	5,353,580	2,295,203	XXX
0199999. Total Open Depositories.....	XXX	XXX	242	0	2,839,647	1,555,218	(1,241,212)	XXX
0399999. Total Cash on Deposit.....	XXX	XXX	242	0	2,839,647	1,555,218	(1,241,212)	XXX
0599999. Total Cash.....	XXX	XXX	242	0	2,839,647	1,555,218	(1,241,212)	XXX

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

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

NONE