



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF JUNE 30, 2022
OF THE CONDITION AND AFFAIRS OF THE

American Commerce Insurance Company

NAIC Group Code 0411 0411 NAIC Company Code 19941 Employer's ID Number 31-4361173

Organized under the Laws of Ohio, State of Domicile or Port of Entry OH

Country of Domicile United States of America

Incorporated/Organized 09/18/1946 Commenced Business 03/19/1947

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 508-943-9000
(Street and Number) (City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)

Mail Address 211 MAIN STREET WEBSTER, MA, US 01570-0758 508-943-9000
(Street and Number or P.O. Box) (City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)

Primary Location of Books and Records 211 MAIN STREET
WEBSTER, MA, US 01570-0758 508-943-9000
(Street and Number) (City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)

Internet Website Address www.mapfreinsurance.com

Statutory Statement Contact CHRISTINE A CONRAD 508-943-9000-14376
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(E-mail Address) JESUS AMADORI (FAX Number)

OFFICERS

PRESIDENT & CEO	<u>JAIME TAMAYO</u>	TREASURER, CHIEF ACCOUNTING OFFICER & SVP	<u>JOHN MARTIN MECIAK JR. #</u>
SECRETARY, GENERAL COUNSEL, & EVP	<u>DANIEL PATRICK OLOHAN</u>	CHIEF FINANCIAL OFFICER & EVP	<u>JESUS AMADORI</u>

OTHER

DIRECTORS OR TRUSTEES		
<u>RANDALL VAUGHN BECKER</u>	<u>JAIME TAMAYO</u>	<u>DAVID HILL COCHRANE</u>
<u>TIMOTHY JOHN MORGAN</u>	<u>DANIEL PATRICK OLOHAN</u>	<u>DAVID McMULLEN</u>
<u>HEATHER SNAVELY</u>	<u>JOSE CORRAL #</u>	

State of Massachusetts SS: _____
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.

JAIME TAMAYO
PRESIDENT & CEODANIEL PATRICK OLOHAN
SECRETARY, GENERAL COUNSEL, & EVPJOHN MARTIN MECIAK, JR.
TREASURER, CHIEF ACCOUNTING OFFICER &
SVPSubscribed and sworn to before me this
25 day of July, 2022

a. Is this an original filing? _____
b. If no,
1. State the amendment number _____
2. Date filed _____
3. Number of pages attached _____

Yes [X] No []

Yarissa Gomez
Public Notary
September 6, 2024

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

ASSETS

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
1. Bonds	196,958,881		196,958,881	198,751,648
2. Stocks:				
2.1 Preferred stocks	2,718,000		2,718,000	2,718,000
2.2 Common stocks			0	0
3. Mortgage loans on real estate:				
3.1 First liens			0	0
3.2 Other than first liens			0	0
4. Real estate:				
4.1 Properties occupied by the company (less \$ encumbrances)			0	0
4.2 Properties held for the production of income (less \$ encumbrances)			0	0
4.3 Properties held for sale (less \$ encumbrances)			0	0
5. Cash (\$(1,830,666)), cash equivalents (\$0) and short-term investments (\$0)	(1,830,666)		(1,830,666)	(369,478)
6. Contract loans (including \$ premium notes)			0	0
7. Derivatives			0	0
8. Other invested assets			0	0
9. Receivables for securities			0	0
10. Securities lending reinvested collateral assets			0	0
11. Aggregate write-ins for invested assets	0	0	0	0
12. Subtotals, cash and invested assets (Lines 1 to 11)	197,846,215	0	197,846,215	201,100,170
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,353,361		1,353,361	1,426,514
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	39,526,437		39,526,437	35,747,421
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ earned but unbilled premiums)			0	0
15.3 Accrued retrospective premiums (\$) and contracts subject to redetermination (\$)			0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	10,232,385		10,232,385	10,734,749
16.2 Funds held by or deposited with reinsured companies			0	0
16.3 Other amounts receivable under reinsurance contracts			0	0
17. Amounts receivable relating to uninsured plans			0	0
18.1 Current federal and foreign income tax recoverable and interest thereon	311,087		311,087	0
18.2 Net deferred tax asset	3,226,442	289,874	2,936,568	2,602,049
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	784,823		784,823	1,121,178
21. Furniture and equipment, including health care delivery assets (\$)	214,591	214,591	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	806,098		806,098	4,438,947
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	74,213,684	872,034	73,341,650	76,978,905
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	328,515,123	1,376,499	327,138,624	334,149,933
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	328,515,123	1,376,499	327,138,624	334,149,933
DETAILS OF WRITE-INS				
1101.				
1102.				
1103.				
1198. Summary of remaining write-ins for Line 11 from overflow page	0	0	0	0
1199. Totals (Lines 1101 through 1103 plus 1198)(Line 11 above)	0	0	0	0
2501. Prepaid expenses	872,034	872,034	0	0
2502. Equity in pools and associations	72,095,361		72,095,361	75,745,315
2503. Premium Tax Recoverable	1,237,486		1,237,486	1,231,998
2598. Summary of remaining write-ins for Line 25 from overflow page	8,803	0	8,803	1,592
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	74,213,684	872,034	73,341,650	76,978,905

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
LIABILITIES, SURPLUS AND OTHER FUNDS

	1 Current Statement Date	2 December 31, Prior Year
1. Losses (current accident year \$ 28,763,000)	85,246,594	90,924,311
2. Reinsurance payable on paid losses and loss adjustment expenses	9,566,114	7,953,650
3. Loss adjustment expenses	9,929,932	11,818,043
4. Commissions payable, contingent commissions and other similar charges	1,761,110	2,695,657
5. Other expenses (excluding taxes, licenses and fees)	371,778	1,730,129
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	29,205	37,716
7.1 Current federal and foreign income taxes (including \$ on realized capital gains (losses))	0	1,535,918
7.2 Net deferred tax liability	0	0
8. Borrowed money \$ and interest thereon \$	0	0
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$ 163,195,834 and including warranty reserves of \$ and accrued accident and health experience rating refunds including \$ for medical loss ratio rebate per the Public Health Service Act)	100,857,872	93,072,724
10. Advance premium	2,644,608	1,900,468
11. Dividends declared and unpaid:		
11.1 Stockholders	0	0
11.2 Policyholders	0	0
12. Ceded reinsurance premiums payable (net of ceding commissions)	10,465,126	10,083,535
13. Funds held by company under reinsurance treaties	0	0
14. Amounts withheld or retained by company for account of others	0	0
15. Remittances and items not allocated	0	0
16. Provision for reinsurance (including \$ certified)	0	0
17. Net adjustments in assets and liabilities due to foreign exchange rates	0	0
18. Drafts outstanding	0	0
19. Payable to parent, subsidiaries and affiliates	0	0
20. Derivatives	0	0
21. Payable for securities	0	0
22. Payable for securities lending	0	0
23. Liability for amounts held under uninsured plans	0	0
24. Capital notes \$ and interest thereon \$	0	0
25. Aggregate write-ins for liabilities	824,290	1,129,339
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	221,696,629	222,881,490
27. Protected cell liabilities	0	0
28. Total liabilities (Lines 26 and 27)	221,696,629	222,881,490
29. Aggregate write-ins for special surplus funds	0	0
30. Common capital stock	3,226,140	3,226,140
31. Preferred capital stock	0	0
32. Aggregate write-ins for other than special surplus funds	0	0
33. Surplus notes	0	0
34. Gross paid in and contributed surplus	42,714,462	42,714,462
35. Unassigned funds (surplus)	59,501,393	65,327,840
36. Less treasury stock, at cost:		
36.1 shares common (value included in Line 30 \$)	0	0
36.2 shares preferred (value included in Line 31 \$)	0	0
37. Surplus as regards policyholders (Lines 29 to 35, less 36)	105,441,995	111,268,442
38. Totals (Page 2, Line 28, Col. 3)	327,138,624	334,149,932
DETAILS OF WRITE-INS		
2501. Unclaimed property	824,290	1,129,339
2502.		
2503.		
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	824,290	1,129,339
2901.		
2902.		
2903.		
2998. Summary of remaining write-ins for Line 29 from overflow page	0	0
2999. Totals (Lines 2901 through 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 through 3203 plus 3298)(Line 32 above)	0	0

STATEMENT AS OF JUNE 30, 2022 OF THE 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 \$ 80,051,839)	81,485,908	82,881,173	166,399,611
1.2 Assumed (written \$ 100,032,261)	92,247,113	92,774,870	184,134,701
1.3 Ceded (written \$ 80,051,839)	81,485,908	82,881,173	166,399,611
1.4 Net (written \$ 100,032,261)	92,247,113	92,774,870	184,134,701
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 61,322,000):			
2.1 Direct	39,209,186	40,067,859	84,461,912
2.2 Assumed	59,229,619	50,770,774	107,680,095
2.3 Ceded	39,209,186	40,067,859	84,461,912
2.4 Net	59,229,619	50,770,774	107,680,095
3. Loss adjustment expenses incurred	11,001,098	12,368,622	24,192,329
4. Other underwriting expenses incurred	27,941,433	29,411,553	56,425,726
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	98,172,150	92,550,949	188,298,150
7. Net income of protected cells			0
8. Net underwriting gain or (loss) (Line 1 minus Line 6 + Line 7)	(5,925,037)	223,921	(4,163,449)
INVESTMENT INCOME			
9. Net investment income earned	2,778,502	2,841,780	5,974,601
10. Net realized capital gains (losses) less capital gains tax of \$ (8,769)	35,733	246,313	641,542
11. Net investment gain (loss) (Lines 9 + 10)	2,814,235	3,088,093	6,616,143
OTHER INCOME			
12. Net gain or (loss) from agents' or premium balances charged off (amount recovered \$ amount charged off \$)	0	0	0
13. Finance and service charges not included in premiums	439,055	503,244	963,949
14. Aggregate write-ins for miscellaneous income	124,024	1,150,270	1,523,262
15. Total other income (Lines 12 through 14)	563,079	1,653,514	2,487,211
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	(2,547,723)	4,965,528	4,939,905
17. Dividends to policyholders			0
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17)	(2,547,723)	4,965,528	4,939,905
19. Federal and foreign income taxes incurred	(161,758)	1,202,742	1,502,360
20. Net income (Line 18 minus Line 19)(to Line 22)	(2,385,965)	3,762,786	3,437,545
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year	111,268,442	113,497,084	113,497,084
22. Net income (from Line 20)	(2,385,965)	3,762,786	3,437,545
23. Net transfers (to) from Protected Cell accounts			0
24. Change in net unrealized capital gains (losses) less capital gains tax of \$ 254	(955)	(35)	(79)
25. Change in net unrealized foreign exchange capital gain (loss)			0
26. Change in net deferred income tax	411,032	84,243	111,036
27. Change in nonadmitted assets	(635,008)	(414,191)	387
28. Change in provision for reinsurance			0
29. Change in surplus notes			0
30. Surplus (contributed to) withdrawn from protected cells			0
31. Cumulative effect of changes in accounting principles			0
32. Capital changes:			
32.1 Paid in			0
32.2 Transferred from surplus (Stock Dividend)			0
32.3 Transferred to surplus			0
33. Surplus adjustments:			
33.1 Paid in	0	0	0
33.2 Transferred to capital (Stock Dividend)			0
33.3 Transferred from capital			0
34. Net remittances from or (to) Home Office			0
35. Dividends to stockholders	(3,200,000)	(1,300,000)	(7,900,000)
36. Change in treasury stock			0
37. Aggregate write-ins for gains and losses in surplus	(15,551)	928,247	2,122,469
38. Change in surplus as regards policyholders (Lines 22 through 37)	(5,826,447)	3,061,050	(2,228,642)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	105,441,995	116,558,134	111,268,442
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 through 0503 plus 0598)(Line 5 above)	0	0	0
1401. Miscellaneous income		975,400	1,328,816
1402. Gain on sale of fixed assets	0	13,139	32,715
1403. Loss on sale of fixed assets	(14,964)		
1498. Summary of remaining write-ins for Line 14 from overflow page	138,988	161,731	161,731
1499. Totals (Lines 1401 through 1403 plus 1498)(Line 14 above)	124,024	1,150,270	1,523,262
3701. STATUTORY POOLING ADJUSTMENT	513,226	928,247	2,122,469
3702. DAC CHANGE IN POOLING - CASH SETTLEMENT	(528,777)	0	0
3703.			
3798. Summary of remaining write-ins for Line 37 from overflow page	0	0	0
3799. Totals (Lines 3701 through 3703 plus 3798)(Line 37 above)	(15,551)	928,247	2,122,469

STATEMENT AS OF JUNE 30, 2022 OF THE 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	97,378,976	93,357,852	183,103,576
2. Net investment income	2,856,803	3,090,181	6,833,724
3. Miscellaneous income	563,079	1,653,514	2,487,211
4. Total (Lines 1 to 3)	100,798,858	98,101,547	192,424,511
5. Benefit and loss related payments	62,792,508	52,850,005	109,664,590
6. Net transfers to Separate Accounts, Segregated Accounts and Protected Cell Accounts	0	0	0
7. Commissions, expenses paid and aggregate write-ins for deductions	43,147,602	40,259,376	79,960,715
8. Dividends paid to policyholders	0	0	0
9. Federal and foreign income taxes paid (recovered) net of \$ tax on capital gains (losses)	1,535,915	2,358,357	2,419,771
10. Total (Lines 5 through 9)	107,476,025	95,467,738	192,045,076
11. Net cash from operations (Line 4 minus Line 10)	(6,677,167)	2,633,809	379,435
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	13,257,743	19,249,818	46,297,643
12.2 Stocks	0	0	0
12.3 Mortgage loans	0	0	0
12.4 Real estate	0	0	0
12.5 Other invested assets	0	0	0
12.6 Net gains or (losses) on cash, cash equivalents and short-term investments	40	0	(249)
12.7 Miscellaneous proceeds	0	0	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	13,257,783	19,249,818	46,297,394
13. Cost of investments acquired (long-term only):			
13.1 Bonds	11,444,410	22,261,955	37,259,389
13.2 Stocks	0	0	0
13.3 Mortgage loans	0	0	0
13.4 Real estate	0	0	0
13.5 Other invested assets	0	0	0
13.6 Miscellaneous applications	0	0	0
13.7 Total investments acquired (Lines 13.1 to 13.6)	11,444,410	22,261,955	37,259,389
14. Net increase (or decrease) in contract loans and premium notes	0	0	0
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14)	1,813,373	(3,012,137)	9,038,005
Cash from Financing and Miscellaneous Sources			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes	0	0	0
16.2 Capital and paid in surplus, less treasury stock	0	0	0
16.3 Borrowed funds	0	0	0
16.4 Net deposits on deposit-type contracts and other insurance liabilities	0	0	0
16.5 Dividends to stockholders	3,200,000	0	7,900,000
16.6 Other cash provided (applied)	6,602,607	1,856,264	(1,484,786)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	3,402,607	1,856,264	(9,384,786)
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17)	(1,461,187)	1,477,936	32,654
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year	(369,479)	(402,133)	(402,133)
19.2 End of period (Line 18 plus Line 19.1)	(1,830,666)	1,075,803	(369,479)

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

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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 #	2022	2021
NET INCOME					
(1) State basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$ (2,385,965)	\$ 3,437,545
(2) State Prescribed Practices that are an increase/(decrease) from NAIC SAP:					
(3) State Permitted Practices that are an increase/(decrease) from NAIC SAP:					
(4) NAIC SAP (1-2-3=4)	XXX	XXX	XXX	\$ (2,385,965)	\$ 3,437,545
SURPLUS					
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 105,441,995	\$ 111,268,442
(6) State Prescribed Practices that are an increase/(decrease) from NAIC SAP:					
(7) State Permitted Practices that are an increase/(decrease) from NAIC SAP:					
(8) NAIC SAP (5-6-7=8)	XXX	XXX	XXX	\$ 105,441,995	\$ 111,268,442

C. Accounting Policy
(2) Basis for Bonds and Amortization Schedule

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

(2) During second quarter 2022 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities based on the intent to sell or inability to retain.

(3) During second quarter 2022 the Company did not recognize Other-Than-Temporary Impairments on Loan-Backed and Structured Securities based on the present value of future cash flows expected to be less than the amortized cost of the security.

(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	\$ 1,145,039
2. 12 Months or Longer	\$ 684,679

b) The aggregate related fair value of securities with unrealized losses:

1. Less than 12 Months	\$ 14,162,855
2. 12 Months or Longer	\$ 3,784,759

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

NOTES TO FINANCIAL STATEMENTS

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 TRANSACTION – 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

R. Reporting Entity's Share of Cash Pool by Asset Type

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—Derivative 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

No significant changes

NOTE 11 Debt

B. FHLB (Federal Home Loan Bank) Agreements

(1) Nature of the FHLB Agreement

Not Applicable

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

A. Defined Benefit Plan

(4) Components of net periodic benefit cost

NOTES TO FINANCIAL STATEMENTS

Not applicable

NOTE 13 Capital and Surplus, Dividend Restrictions and Quasi-Reorganizations

D. Ordinary dividends in the amount of \$3,200,000 on April 25, 2022.

NOTE 14 Liabilities, Contingencies and Assessments

No significant changes

NOTE 15 Leases

No significant changes

NOTE 16 Information About Financial Instruments With Off-Balance Sheet Risk and Financial Instruments With Concentrations of Credit Risk

No significant changes

NOTE 17 Sale, Transfer and Servicing of Financial Assets and Extinguishments of Liabilities

B. Transfer and Servicing of Financial Assets

(2) Servicing Assets and Servicing Liabilities

Not Applicable

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

(a) Not Applicable
(b) Not Applicable

C. Wash Sales

(1) In the course of the Company's asset management, no securities were sold and reacquired within 30 days of the sale date.

Not applicable

(2) The details by NAIC designation 3 or below, or unrated of securities sold during the current quarter 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 Uninsured 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.

(1) Fair Value Measurements at Reporting Date

Description for each class of asset or liability	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Total
a. Assets at fair value					
Bonds		\$ 9,032			\$ 9,032
Total assets at fair value/NAV	\$ -	\$ 9,032	\$ -	\$ -	\$ 9,032

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

Not applicable

(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) Derivative 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. Aggregate fair value for all financial instruments and the level within the fair value hierarchy in which the fair value measurements in their entirety fall.

NOTES TO FINANCIAL STATEMENTS

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 178,758,947	\$ 196,958,882	\$ 5,120,866	\$ 173,638,081			
Preferred Stock	\$ 2,116,500	\$ 2,718,000		\$ 2,116,500			
Total	\$ 180,875,447	\$ 199,676,882	\$ 5,120,866	\$ 175,754,581			

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

NOTE 21 Other Items

No significant changes

NOTE 22 Events Subsequent

Subsequent events have been considered through August 12, 2022 for these statutory financial statements which are to be issued on August 12, 2022. 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 & 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

Current year losses and LAE reflected on the Statement of Income of \$70,231,000 were lower by \$6,015,000 due to favorable development of prior year estimates. This redundancy was 5.9% of the unpaid losses and LAE of \$102,743,000 as of prior year-end.

NOTE 26 Intercompany Pooling Arrangements

Effective January 1, 2022, the pooling agreement was amended to eliminate affiliate companies VERTI Insurance Company and MAPFRE Insurance Company of Florida. The pooling percentages were revised to reflect the ratio of each subsidiaries policyholders' surplus to the aggregate policyholders' surplus at September 30, 2021.

The resulting revised percentages will be as follows:

Company	NAIC Code	Pooling Percentage	
		2022	2021
The lead company The Commerce Insurance Company	34754	70.8%	66.2%
Affiliate company Citation Insurance Company	40274	7.4%	7.0%
Affiliate Company American Commerce Insurance Company	19941	12.4%	12.0%
Affiliate company Commerce West Insurance Company	13161	6.5%	6.2%
Affiliate company MAPFRE Insurance Company of Florida	34932	-	3.4%
Affiliate company MAPFRE Insurance Company	23876	2.9%	2.4%
Affiliate company Verti Insurance Company	15736	-	2.8%
		100.0%	100.0%

NOTE 27 Structured Settlements

No significant changes

NOTE 28 Health Care Receivables

No significant changes

NOTE 29 Participating Policies

No significant changes

NOTE 30 Premium Deficiency Reserves

No significant changes

NOTE 31 High Deductibles

No significant changes

NOTE 32 Discounting of Liabilities for Unpaid Losses or Unpaid Loss Adjustment Expenses

No significant changes

NOTE 33 Asbestos/Environmental Reserves

No significant changes

NOTE 34 Subscriber Savings Accounts

No significant changes

NOTES TO FINANCIAL STATEMENTS

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

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
GENERAL INTERROGATORIES

PART 1 - COMMON INTERROGATORIES

GENERAL

1.1 Did the reporting entity experience any material transactions requiring the filing of Disclosure of Material Transactions with the State of Domicile, as required by the Model Act? Yes [] No [X]

1.2 If yes, has the report been filed with the domiciliary state? Yes [] No []

2.1 Has any change been made during the year of this statement in the charter, by-laws, articles of incorporation, or deed of settlement of the reporting entity? Yes [] No [X]

2.2 If yes, date of change: _____

3.1 Is the reporting entity a member of an Insurance Holding Company System consisting of two or more affiliated persons, one or more of which is an insurer? Yes [X] No []
 If yes, complete Schedule Y, Parts 1 and 1A.

3.2 Have there been any substantial changes in the organizational chart since the prior quarter end? Yes [X] No []

3.3 If the response to 3.2 is yes, provide a brief description of those changes.
 The organizational chart has been updated to incorporate the addition of the new Auto Club Mapfre Insurance Company, domiciled in Ohio, effective 04/28/22.

3.4 Is the reporting entity publicly traded or a member of a publicly traded group? Yes [] No [X]

3.5 If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group. _____

4.1 Has the reporting entity been a party to a merger or consolidation during the period covered by this statement? Yes [] No [X]

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

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

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

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

6.2 State the as of date that the latest financial examination report became available from either the state of domicile or the reporting entity. This date should be the date of the examined balance sheet and not the date the report was completed or released. 12/31/2018

6.3 State as of what date the latest financial examination report became available to other states or the public from either the state of domicile or the reporting entity. This is the release date or completion date of the examination report and not the date of the examination (balance sheet date). 06/30/2020

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

6.5 Have all financial statement adjustments within the latest financial examination report been accounted for in a subsequent financial statement filed with Departments? Yes [] No [] N/A [X]

6.6 Have all of the recommendations within the latest financial examination report been complied with? Yes [] 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 by 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 response to 8.3 is yes, please provide below the names and location (city and state of the main office) of any affiliates regulated by a federal regulatory services agency [i.e. the Federal Reserve Board (FRB), the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC) and the Securities Exchange Commission (SEC)] and identify the affiliate's primary federal regulator.

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

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
GENERAL INTERROGATORIES

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

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

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

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

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

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

FINANCIAL

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

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

INVESTMENT

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

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

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

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

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

14.2 If yes, please complete the following:

	1	2
	Prior Year-End Book/Adjusted Carrying Value	Current Quarter Book/Adjusted Carrying Value
14.21 Bonds	\$ 0	\$ 0
14.22 Preferred Stock	\$ 0	\$ 0
14.23 Common Stock	\$ 0	\$ 0
14.24 Short-Term Investments	\$ 0	\$ 0
14.25 Mortgage Loans on Real Estate	\$ 0	\$ 0
14.26 All Other	\$ 0	\$ 0
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	\$ 0	\$ 0
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above	\$ 0	\$ 0

15.1 Has the reporting entity entered into any hedging transactions reported on Schedule DB? Yes [] No []

15.2 If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? Yes [] No [] N/A []
 If no, attach a description with this statement.

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

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
GENERAL INTERROGATORIES

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

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

1 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 []

17.4 If yes, give full 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	2	3	4	5 Investment Management Agreement (IMA) Filed
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	

18.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed? Yes [] No []

18.2 If no, list exceptions:

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

- Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
- Issuer or obligor is current on all contracted interest and principal payments.
- The insurer has an actual expectation of ultimate payment of all contracted interest and principal.

Has the reporting entity self-designated 5GI securities? Yes [] No []

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

- The security was purchased prior to January 1, 2018.
- The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
- The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
- The reporting entity is not permitted to share this credit rating of the PL security with the SVO.

Has the reporting entity self-designated PLGI securities? Yes [] No []

21. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:

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

Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria? Yes [] No []

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
GENERAL INTERROGATORIES

PART 2 - PROPERTY & CASUALTY INTERROGATORIES

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

Effective January 1, 2022, the pooling agreement was amended to eliminate affiliate companies VERTI Insurance Company and MAPFRE Insurance Company of Florida.

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

3.1 Have any of the reporting entity's primary reinsurance contracts been canceled? Yes [] No []

3.2 If yes, give full and complete information thereto.

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

4.2 If yes, complete the following schedule:

1 Line of Business	2 Maximum Interest	3 Discount Rate	TOTAL DISCOUNT			DISCOUNT TAKEN DURING PERIOD			10 IBNR	11 TOTAL
			4 Unpaid Losses	5 Unpaid LAE	6 IBNR	7 TOTAL	8 Unpaid Losses	9 Unpaid LAE		
TOTAL			0	0	0	0	0	0	0	0

5. Operating Percentages:

5.1 A&H loss percent %

5.2 A&H cost containment percent %

5.3 A&H expense percent excluding cost containment expenses %

6.1 Do you act as a custodian for health savings accounts? Yes [] No []

6.2 If yes, please provide the amount of custodial funds held as of the reporting date \$

6.3 Do you act as an administrator for health savings accounts? Yes [] No []

6.4 If yes, please provide the balance of the funds administered as of the reporting date \$

7. Is the reporting entity licensed or chartered, registered, qualified, eligible or writing business in at least two states? Yes [] No []

7.1 If no, does the reporting entity assume reinsurance business that covers risks residing in at least one state other than the state of domicile of the reporting entity? Yes [] No []

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

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	143,293	131,084	8,978	24,212	44,753	44,573
2. Alaska	AK	121,642	108,168	0	16,944	102,087	24,660
3. Arizona	AZ	363,977	383,065	124,047	415,390	737,546	895,073
4. Arkansas	AR	232,555	215,261	10,743	11,084	117,741	74,119
5. California	CA	789,050	769,712	0	0	0	4,310
6. Colorado	CO	502,058	482,628	36,503	10,428	459,537	120,831
7. Connecticut	CT	33,967,926	33,425,047	28,961,538	22,354,935	66,456,730	79,334,067
8. Delaware	DE	118,209	102,011	5,924	8,797	103,090	102,374
9. District of Columbia	DC	59,403	46,696	0	0	12,850	13,282
10. Florida	FL	1,013,569	952,301	292,229	191,241	909,214	623,863
11. Georgia	GA	384,751	388,544	375,174	55,526	263,966	167,676
12. Hawaii	HI	21,595	26,703	10,161	4,869	8,780	13,119
13. Idaho	ID	2,368,820	2,262,533	1,379,977	1,409,569	3,317,536	2,920,236
14. Illinois	IL	567,711	565,976	8,888	59,499	469,410	317,266
15. Indiana	IN	208,327	226,424	125,191	221,119	175,819	182,380
16. Iowa	IA	89,379	88,326	3,001	42,822	21,730	23,850
17. Kansas	KS	343,919	297,920	9,255	30,418	75,904	83,718
18. Kentucky	KY	38,749	41,894	71,460	12,734	138,252	160,195
19. Louisiana	LA	131,716	141,217	152,518	260,676	98,385	335,182
20. Maine	ME	377,300	363,040	6,762	13,011	11,624	52,853
21. Maryland	MD	117,965	115,546	56,096	43,124	94,198	88,774
22. Massachusetts	MA	119,407	127,667	11,407	17,986	281,383	107,642
23. Michigan	MI	203,360	221,833	40,435	82,250	208,102	223,864
24. Minnesota	MN	397,754	354,978	7,868	13,980	83,560	134,024
25. Mississippi	MS	39,325	30,108	929	20,990	13,426	16,476
26. Missouri	MO	110,045	119,141	20,500	4,822	8,393	16,815
27. Montana	MT	153,333	203,511	40,084	7,021	223,532	64,000
28. Nebraska	NE	39,466	60,512	25,797	159,259	301,708	225,733
29. Nevada	NV	268,158	329,862	1,830	666,712	85,917	96,847
30. New Hampshire	NH	161,922	141,228	26,000	4,184	36,600	25,036
31. New Jersey	NJ	340,250	298,871	1,576,469	2,541,536	4,903,854	9,766,237
32. New Mexico	NM	122,675	110,122	22,006	15,161	17,385	21,123
33. New York	NY	402,636	333,072	61,380	177,585	938,879	966,984
34. North Carolina	NC	302,303	328,664	20,449	79,528	150,826	139,455
35. North Dakota	ND	33,870	19,444	0	10,487	15,662	21,631
36. Ohio	OH	5,616,101	4,905,601	3,513,308	3,008,713	5,639,032	5,930,151
37. Oklahoma	OK	160,943	153,628	18,794	21,853	79,188	72,371
38. Oregon	OR	2,656,279	3,040,417	1,608,438	1,884,858	2,768,973	3,624,292
39. Pennsylvania	PA	395,744	375,877	37,381	26,899	174,154	162,502
40. Rhode Island	RI	20,140,141	19,113,813	12,130,742	10,336,192	22,748,468	25,489,445
41. South Carolina	SC	181,983	231,651	35,060	5,176	53,939	55,692
42. South Dakota	SD	96,969	103,406	21,328	6,253	15,681	20,898
43. Tennessee	TN	237,373	187,393	62,992	118,561	172,035	296,797
44. Texas	TX	763,842	859,643	257,952	187,037	657,193	573,227
45. Utah	UT	62,433	73,166	13,426	8,579	68,173	53,382
46. Vermont	VT	140,722	132,973	13,223	1,436	7,010	13,510
47. Virginia	VA	306,854	295,479	22,708	27,607	73,940	72,185
48. Washington	WA	4,340,739	4,739,737	3,435,308	3,012,366	7,986,706	8,852,824
49. West Virginia	WV	37,377	31,574	2,529	0	7,021	7,077
50. Wisconsin	WI	208,615	184,888	9,709	4,600	77,881	102,746
51. Wyoming	WY	49,306	38,360	2,353	2,926	49,611	24,285
52. American Samoa	AS	0	0	0	0	0	0
53. Guam	GU	0	0	0	0	0	0
54. Puerto Rico	PR	0	0	0	0	0	0
55. U.S. Virgin Islands	VI	0	0	0	0	0	0
56. Northern Mariana Islands	MP	0	0	0	0	0	0
57. Canada	CAN	0	0	0	0	0	0
58. Aggregate Other Alien OT	XXX	0	0	0	0	0	0
59. Totals	XXX	80,051,839	78,280,715	54,678,850	47,640,955	121,467,384	142,759,652
DETAILS OF WRITE-INS		XXX					
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 through 58003 plus 58998)(Line 58 above)		XXX	0	0	0	0	0

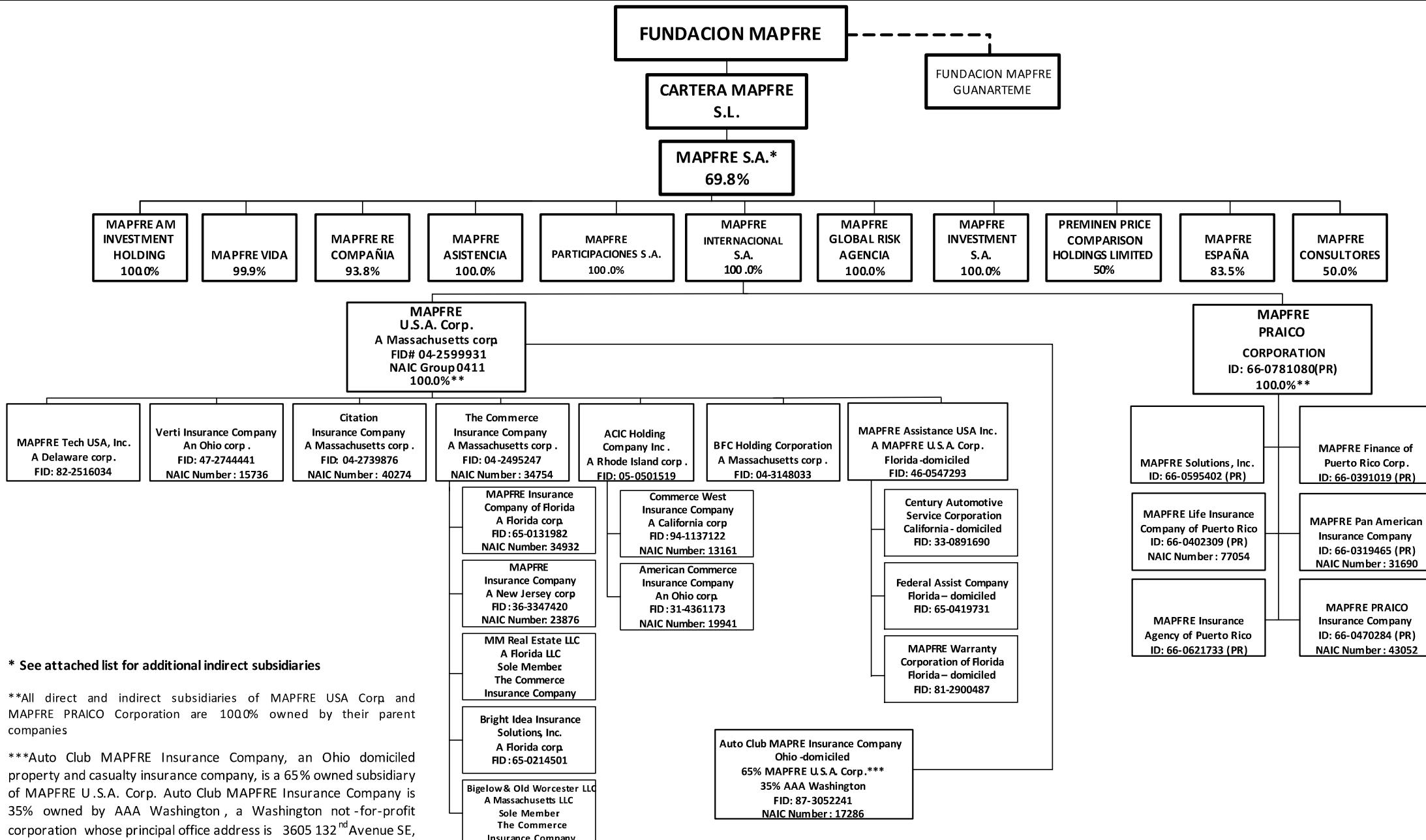
(a) Active Status Counts:

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

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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

PART 1 – ORGANIZATIONAL CHART



STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

COMPANY NAME	ULTIMATE CONTROLLING COMPANY	NAIC #	FED ID
MAPFRE INTERNACIONAL S.A.	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 COMPAÑIA 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, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	67.40	MAPFRE, S.A.	
CORPORACION FUNERARIA, S.A.	100.00	MAPFRE, S.A.	
MAPFRE PERU COMPAÑIA DE SEGUROS Y REASEGUROS	99.30	MAPFRE, S.A.	
MAPFRE PERU ENTIDAD PRESTADORA DE SALUD	98.60	MAPFRE, S.A.	
MAPFRE ATLAS COMPAÑIA DE SEGUROS, S.A.	60.00	MAPFRE, S.A.	
MAPFRE PARAGUAY COMPAÑIA 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 COMPAÑIA DE SEGUROS, 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 WARP PROPERTIES	50.00	MAPFRE, S.A.	
CHURCH WARP 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 COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	12.70	MAPFRE, S.A.	
MAPFRE COMPAÑIA 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.	

STATEMENT AS OF JUNE 30, 2022 OF THE 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.
FOND MAPFRE ELECCION DECIDIDA	40.00	MAPFRE, S.A.
FOND MAPFRE ELECCION MODERADA	47.20	MAPFRE, S.A.
FOND MAPFRE ELECCION PRUDENTE	53.30	MAPFRE, S.A.
FOND MAPFRE BOLSA AMERICA	25.20	MAPFRE, S.A.
FOND MAPFRE GLOBAL F.I.	36.90	MAPFRE, S.A.
FOND MAPFRE 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 COMPAÑIA 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 COMPAÑIA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPAÑIA 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.
FOND MAPFRE BOLSA AMERICA	13.50	MAPFRE, S.A.
FOND MAPFRE RENTA DOLAR	19.70	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPAÑIA 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.
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 ASSISTENCIA 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.
INSURE AND GO	100.00	MAPFRE, S.A.
TRAVEL CLAIMS SERVICES LIMITED	100.00	MAPFRE, S.A.
ANDIASISTENCIA COMPAÑIA 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 COMPAÑIA 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, COMPAÑIA 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.
RASTREATORE.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.
TECHNOLOGIAS DE LA INFORMACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	22.95	MAPFRE, S.A.
FOND MAPFRE BOLSA AMERICA	21.70	MAPFRE, S.A.
FOND MAPFRE 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.

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

FUNESPAÑA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNEUROPEA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNESPAÑA 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.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.00	MAPFRE, S.A.

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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	Domestic-ity 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? (Yes/No)	*
							FUNDACION MAPFRE	ESP.	UIP.	FUNDACION MAPFRE	Ownership.	100.000	FUNDACION MAPFRE	NO.		
							CARTERA MAPFRE, S.L.	ESP.	UIP.	FUNDACION MAPFRE	Ownership.	100.000	FUNDACION MAPFRE	NO.		
							MAPFRE, S.A.	ESP.	UIP.	CARTERA MAPFRE, S.L.	Ownership.	69.800	FUNDACION MAPFRE	NO.		
							MAPFRE INTERNACIONAL S.A.	ESP.	UIP.	MAPFRE, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE USA CORPORATION INC.	MA.	UIP.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	1	
							AUTO CLUB MAPFRE INSURANCE COMPANY	OH.	IA.	MAPFRE USA CORPORATION INC.	Ownership.	65.000	MAPFRE S.A.	NO.	2	
							AUTO CLUB MAPFRE INSURANCE COMPANY	OH.	IA.	AAA WASHINGTON	Ownership.	35.000	AAA WASHINGTON	NO.	2	
							MAPFRE TECH USA, INC	DE.	NIA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							VERTI INSURANCE COMPANY	OH.	IA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							CITATION INSURANCE COMPANY	MA.	IA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							THE COMMERCE INSURANCE COMPANY	MA.	IA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE INSURANCE COMPANY OF FLORIDA	FL.	IA.	THE COMMERCE INSURANCE COMPANY	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE INSURANCE COMPANY	NJ.	IA.	THE COMMERCE INSURANCE COMPANY	Ownership.	100.000	MAPFRE S.A.	NO.		
							MM REAL ESTATE, LLC	FL.	NIA.	THE COMMERCE INSURANCE COMPANY	Ownership.	100.000	MAPFRE S.A.	NO.		
							BRIGHT IDEA INSURANCE SOLUTIONS, INC.	FL.	NIA.	THE COMMERCE INSURANCE COMPANY	Ownership.	100.000	MAPFRE S.A.	NO.		
							BIGELOW & OLD WORCESTER, LLC	MA.	NIA.	THE COMMERCE INSURANCE COMPANY	Ownership.	100.000	MAPFRE S.A.	NO.		
							ACIC HOLDINGS COMPANY, INC.	RI.	UDP.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							COMMERCE WEST INSURANCE COMPANY	CA.	IA.	ACIC HOLDINGS COMPANY, INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							AMERICAN COMMERCE INSURANCE COMPANY	OH.	RE.	ACIC HOLDINGS COMPANY, INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							BFC HOLDING CORPORATION	MA.	NIA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE ASSISTANCE USA INC.	FL.	NIA.	MAPFRE USA CORPORATION INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							CENTURY AUTOMOTIVE SERVICES COMPANY	CA.	NIA.	MAPFRE ASSISTANCE USA INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							FEDERAL ASSIST COMPANY	FL.	NIA.	MAPFRE ASSISTANCE USA INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE WARRANTY CORPORATION OF FLORIDA	FL.	NIA.	MAPFRE ASSISTANCE USA INC.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE PRAICO CORPORATION	PR.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	1	
							MAPFRE SOLUTIONS, INC.	PR.	NIA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	PR.	IA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	PR.	IA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							66-0621733	PR.	IA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							66-0391019	PR.	NIA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE FINANCE OF PUERTO RICO CORP	PR.	NIA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE PAN AMERICAN INSURANCE COMPANY	PR.	IA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE PRAICO INSURANCE COMPANY	PR.	IA.	MAPFRE PRAICO CORPORATION	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE TECH	ESP.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	20.000	MAPFRE S.A.	NO.		
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	64.000	MAPFRE S.A.	NO.		
							MAPFRE LA SEGURIDAD C.A. DE SEGUROS	VEN.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.500	MAPFRE S.A.	NO.		
							MAPFRE ARGENTINA HOLDING S.A.	ARG.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		
							CLUB MAPFRE ARGENTINA	ARG.	NIA.	MAPFRE ARGENTINA HOLDING S.A.	Ownership.	97.000	MAPFRE S.A.	NO.		
							MAPFRE ARGENTINA SEGUROS S.A.	ARG.	IA.	MAPFRE ARGENTINA HOLDING S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		
							CESVI ARGENTINA, S.A.	ARG.	NIA.	MAPFRE ARGENTINA SEGUROS S.A.	Ownership.	60.600	MAPFRE S.A.	NO.		
							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	ARG.	IA.	MAPFRE ARGENTINA HOLDING S.A.	Ownership.	36.000	MAPFRE S.A.	NO.		
							MAPFRE CHILE SEGUROS S.A.	CHL.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE CHILE VIDA S.A.	CHL.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		
							MAPFRE COMPANIA DE SEGUROS DE VIDA DE CHILE	CHL.	IA.	MAPFRE CHILE VIDA S.A.	Ownership.	100.000	MAPFRE S.A.	NO.		

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries Or Affiliates	9 Domestic- ciliary Loca- tion	10 Rela- tion- ship to Report- ing Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Percent- age	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	16 *
						MAPFRE PERU COMPAÑIA DE SEGUROS Y REASEGUROS		PER.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.300	MAPFRE S.A.	NO.	
						MAPFRE PERU ENTIDAD PRESTADORA DE SALUD		PER.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	98.600	MAPFRE S.A.	NO.	
						MAPFRE ATLAS COMPAÑIA DE SEGUROS, S.A.		ECU.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	60.000	MAPFRE S.A.	NO.	
						MAPFRE PARAGUAY COMPAÑIA DE SEGUROS, S.A.		PRY.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	89.500	MAPFRE S.A.	NO.	
						APOINT S.A.		JRY.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE URUGUAY SEGUROS S.A.		JRY.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						GRUPO CORPORATIVO LML S.A. DE C.V.		MEX.	NIA.	GRUPO CORPORATIVO LML S.A. DE C.V.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE MEXICO S.A.		MEX.	IA.	GRUPO CORPORATIVO LML S.A. DE C.V.	Ownership.	44.300	MAPFRE S.A.	NO.	
						MAPFRE MEXICO S.A.		MEX.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	55.700	MAPFRE S.A.	NO.	
						MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.		MEX.	NIA.	MAPFRE MEXICO S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE TEPEYAC INC.		CA.	NIA.	MAPFRE MEXICO S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE SERVICIOS MEXICANOS		MEX.	NIA.	MAPFRE MEXICO S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE FIANZAS S.A.		MEX.	IA.	MAPFRE MEXICO S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE DEFENSA LEGAL S.A. DE C.V.		MEX.	NIA.	MAPFRE MEXICO S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						CESVI MEXICO, S.A.		MEX.	NIA.	MAPFRE MEXICO S.A.	Ownership.	16.700	MAPFRE S.A.	NO.	
						MAPFRE AMERICA CENTRAL, S.A.		PAN.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.900	MAPFRE S.A.	NO.	
						MAPFRE PANAMA S.A.		PAN.	IA.	MAPFRE AMERICA CENTRAL, S.A.	Ownership.	99.400	MAPFRE S.A.	NO.	
						INMOBILIARIA AMERICANA S.A.		SLV.	NIA.	MAPFRE AMERICA CENTRAL, S.A.	Ownership.	78.900	MAPFRE S.A.	NO.	
						MAPFRE TENEDORA DE ACC, S.A.		PAN.	IA.	MAPFRE AMERICA CENTRAL, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE SEGUROS HONDURAS S.A.		HND.	IA.	MAPFRE TENEDORA DE ACC, S.A.	Ownership.	73.300	MAPFRE S.A.	NO.	
						MAPFRE SEGUROS COSTA RICA, S.A.		CRI.	IA.	MAPFRE TENEDORA DE ACC, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE SEGUROS GUATEMALA, S.A.		GTM.	IA.	MAPFRE TENEDORA DE ACC, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE SEGUROS NICARAGUA, S.A.		NIC.	IA.	MAPFRE TENEDORA DE ACC, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE SEGUROS HONDURAS S.A.		HND.	IA.	MAPFRE AMERICA CENTRAL, S.A.	Ownership.	25.100	MAPFRE S.A.	NO.	
						AMA-ASISTENCIA MEDICA ADMISTRADA, C.A.		VEN.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.700	MAPFRE S.A.	NO.	
						MAPFRE SIGORTA, A.S.		TUR.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.700	MAPFRE S.A.	NO.	
						MAPFRE YASAM SIGORTA, A.S.		TUR.	IA.	MAPFRE SIGORTA, A.S.	Ownership.	99.500	MAPFRE S.A.	NO.	
						GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.		TUR.	NIA.	MAPFRE SIGORTA, A.S.	Ownership.	51.000	MAPFRE S.A.	NO.	
						MAPFRE INSULAR INSURANCE CORPORATION		PHL.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	74.900	MAPFRE S.A.	NO.	
						MAPFRE MIDDLESEA P.L.C.		MLT.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	54.600	MAPFRE S.A.	NO.	
						MIDDLESEA ASSIST LIMITED		MLT.	NIA.	MIDDLESEA INSURANCE P.L.C.	Ownership.	49.000	MAPFRE S.A.	NO.	
						MAPFRE M.S.V. LIFE P.L.C.		MLT.	IA.	MIDDLESEA INSURANCE P.L.C.	Ownership.	50.000	MAPFRE S.A.	NO.	
						GROWTH INVESTMENTS LIMITED		MLT.	NIA.	M.S.V. LIFE P.L.C.	Ownership.	100.000	MAPFRE S.A.	NO.	
						CHURCH WARP PROPERTIES		MLT.	NIA.	MIDDLESEA INSURANCE P.L.C.	Ownership.	50.000	MAPFRE S.A.	NO.	
						BEE INSURANCE MANAGEMENT LTD		MLT.	NIA.	MIDDLESEA INSURANCE P.L.C.	Ownership.	100.000	MAPFRE S.A.	NO.	
						EUROMED RISK SOLUTIONS LIMITED		MLT.	NIA.	BEE INSURANCE MANAGEMENT LTD	Ownership.	100.000	MAPFRE S.A.	NO.	
						EURO GLOBE HOLDINGS LIMITED		MLT.	NIA.	MIDDLESEA INSURANCE P.L.C.	Ownership.	100.000	MAPFRE S.A.	NO.	
						PT ASURANSI BINADANA ARTA TBK		IDN.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	62.300	MAPFRE S.A.	NO.	
						PT MAPFRE ABDA ASSISTANCE		IDN.	NIA.	PT ASURANSI BINADANA ARTA TBK	Ownership.	49.000	MAPFRE S.A.	NO.	
						VERTI VERSICHERUNG AG		DEU.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						VERTI ASSICURIZIONI S.P.A.		ITA.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	
						MAPFRE LA SEGURIDAD C.A. DE SEGUROS		VEN.	NIA.	MAPFRE INTERNACIONAL S.A.	Ownership.	99.500	MAPFRE S.A.	NO.	
						CLUB MAPFRE S.A.		VEN.	NIA.	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.	100.000	MAPFRE S.A.	NO.	
						CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.		VEN.	NIA.	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.	100.000	MAPFRE S.A.	NO.	
						INVERSCRA SEGURIDAD-FINACIADORA DE PRIMAS, C.A.		VEN.	NIA.	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.	100.000	MAPFRE S.A.	NO.	
						AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.		VEN.	NIA.	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.	97.000	MAPFRE S.A.	NO.	
						UNIDAD EDUCATIVA D.R. FERNANDO BRAVO PEREZ CA		VEN.	NIA.	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.	99.700	MAPFRE S.A.	NO.	
						MAPFRE CHILE SEGUROS, S.A.		CHL.	IA.	MAPFRE INTERNACIONAL, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.	

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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	Domestic- iliary Loca- tion	Rela- tion- ship to Report- ing Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Owner- ship Provide Per- cen- tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re- quired? (Yes/No)	*
						MAPFRE CHILE ASESORIAS, S.A.	MAPFRE CHILE ASESORIAS, S.A.	CHL	IA	MAPFRE CHILE SEGUROS S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL	IA	MAPFRE CHILE ASESORIAS, S.A.	Ownership	12.700	MAPFRE S.A.	NO	
						MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	MAPFRE COMPANIA DE SEGUROS GENERALES DE CHILE S.A.	CHL	IA	MAPFRE CHILE SEGUROS S.A.	Ownership	87.300	MAPFRE S.A.	NO	
						MAPFRE BRASIL PARTICIPACOES, S.A.	MAPFRE BRASIL PARTICIPACOES, S.A.	BRA	IA	MAPFRE INTERNACIONAL, S.A.	Ownership	99.200	MAPFRE S.A.	NO	
						MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	MAPFRE VERA CRUZ CONSULTORIA TECNICA E ADMINISTRACAO DE FUNDOS LTDA	BRA	IA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						PROTENSEG CORRETORA DE SEGUROS LTDA	PROTENSEG CORRETORA DE SEGUROS LTDA	BRA	NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE SAUDE LTDA	MAPFRE SAUDE LTDA	BRA	NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	BRA	NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAC INVESTIMENTOS S.A.	MAC INVESTIMENTOS S.A.	BRA	NIA	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE INVESTIMENTOS LTDS	MAPFRE INVESTIMENTOS LTDS	BRA	NIA	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE PARTICIPACOES, S.A.	MAPFRE PARTICIPACOES, S.A.	BRA	NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE PREVIDENCIA S.A.	MAPFRE PREVIDENCIA S.A.	BRA	IA	MAPFRE PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE CAPITALIZACAO, S.A.	MAPFRE CAPITALIZACAO, S.A.	BRA	NIA	MAPFRE PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE SEGUROS GERAIS S.A.	MAPFRE SEGUROS GERAIS S.A.	BRA	IA	MAPFRE PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE SERVICOS S.A.	MAPFRE SERVICOS S.A.	BRA	NIA	MAPFRE SEGUROS GERAIS S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE VIDA S.A.	MAPFRE VIDA S.A.	BRA	IA	MAPFRE PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						BB MAPFRE SH1 PARTICIPACOES, S.A.	BB MAPFRE SH1 PARTICIPACOES, S.A.	BRA	NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership	25.000	MAPFRE S.A.	NO	
						ALIANCA DO BRASIL SEGUROS S.A.	ALIANCA DO BRASIL SEGUROS S.A.	BRA	IA	BB MAPFRE SH1 PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	COMPANHIA DE SEGUROS ALIANCA DO BRASIL, S.A.	BRA	IA	BB MAPFRE SH1 PARTICIPACOES, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE AM INVESTMENT HOLDING, S.A.	MAPFRE AM INVESTMENT HOLDING, S.A.	ESP	NIA	MAPFRE S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						LA FINANCIERE RESPONSIBLE	LA FINANCIERE RESPONSIBLE	FRA	NIA	MAPFRE AM INVESTMENT HOLDING, S.A.	Ownership	25.000	MAPFRE S.A.	NO	
						MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP	IA	MAPFRE S.A.	Ownership	99.900	MAPFRE S.A.	NO	
						MAPFRE TECH	MAPFRE TECH	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	11.700	MAPFRE S.A.	NO	
						MAPFRE VIDEO Y COMUNICACION, S.A.	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.	NO	
						MIRACETI S.A.	MIRACETI S.A.	ESP	IA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	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.	NO	
						MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	MAPFRE ASSET MANAGEMENT S.G.I.I.C. SA	ESP	NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership	100.000	MAPFRE S.A.	NO	
						MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	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.	NO	
						MAPFRE AM-GOOD GOVERNANCE	MAPFRE AM-GOOD GOVERNANCE	ESP	NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership	7.900	MAPFRE S.A.	NO	
						MAPFRE AM-IBERIAN EQUITIES	MAPFRE AM-IBERIAN EQUITIES	ESP	NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership	9.800	MAPFRE S.A.	NO	
						MAPFRE AM-EUROPEAN EQUITIES	MAPFRE AM-EUROPEAN EQUITIES	ESP	NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership	4.000	MAPFRE S.A.	NO	
						FOND MAPFRE ELECCION DECIDIDA	FOND MAPFRE ELECCION DECIDIDA	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	40.000	MAPFRE S.A.	NO	
						FOND MAPFRE ELECCION MODERADA	FOND MAPFRE ELECCION MODERADA	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	47.200	MAPFRE S.A.	NO	
						FOND MAPFRE ELECCION PRUDENTE	FOND MAPFRE ELECCION PRUDENTE	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	53.300	MAPFRE S.A.	NO	
						FOND MAPFRE BOLSA AMERICA	FOND MAPFRE BOLSA AMERICA	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	25.200	MAPFRE S.A.	NO	
						FOND MAPFRE GLOBAL F.I.	FOND MAPFRE GLOBAL F.I.	ESP	NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership	36.900	MAPFRE S.A.	NO	

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STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries Or Affiliates	9 Domestic- ciliary Loca- tion	10 Rela- tion- ship to Report- ing Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Per- cen- tage	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	16 *
12.3	16475 83-2698500					FONDIMAPFRE BOLSA F.I. CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	ESP. NIA.	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.	54.900	MAPFRE S.A.	NO.			
						MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	ESP. NIA.	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.	99.900	MAPFRE S.A.	NO.			
						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.	NO.			
						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.	NO.			
						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.	NO.			
						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.	NO.			
						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.	NO.			
						MAPFRE RE COMPANIA DE REASEGUROS, S.A.	ESP. IA.	MAPFRE, S.A.	Ownership.	93.800	MAPFRE S.A.	NO.			
						INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	ARG. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						REINSURANCE MANAGEMENT INC.	N.J. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE EURO BONDS FUND	ESP. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE RE ESCRITORIO DE REPRESENTACION									
						COMPANIA DE REASEGUROS	BRA. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE RE DE BRASIL COMPANIA DE REASEGUROS	BRA. IA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE CHILE REASEGUROS, S.A.	CHL. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						C R ARGENTINA, S.A.	ARG. NIA.	MAPFRE CHILE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						CAJA REASEGURODORA DE CHILE, S.A.	CHL. IA.	MAPFRE CHILE REASEGUROS, S.A.	Ownership.	99.800	MAPFRE S.A.	NO.			
						MAPFRE MANDATOS Y SERVICIOS, S.A.	ARG. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	95.000	MAPFRE S.A.	NO.			
						FONDIMAPFRE BOLSA AMERICA	ESP. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	13.500	MAPFRE S.A.	NO.			
						FONDIMAPFRE RENTA DOLAR	ESP. NIA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	19.700	MAPFRE S.A.	NO.			
						MAPFRE RE VERMONT CORPORATION	VT. IA.	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	ESP. IA.	MAPFRE S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						IBEROASISTENCIA, ARGENTINA S.A.	ARG. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	98.400	MAPFRE S.A.	NO.			
						SERVICIOS GENERALES VENEASISTENCIA, S.A.	VEN. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						IRELAND ASSIST, LTD	IRL. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MEXICO ASISTENCIA, S.A.	MEX. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						ARABA ASSIST FOR LOGISTIC SERVICES	JOR. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						MAPFRE ASISTENCIA COMPANY LIMITED	TWN. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						QUETZAL ASISTENCIA, S.A.	GTM. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						NICASSIT, S.A.	NIC. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						EL SALVADOR ASISTENCIA, S.A.	SLV. NIA.	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	NO.			
						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.	NO.			
						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.	NO.			

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SCHEDULE Y
PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

1 Group Code	2 Group Name	3 NAIC Company Code	4 ID Number	5 Federal RSSD	6 CIK	7 Name of Securities Exchange if Publicly Traded (U.S. or International)	8 Names of Parent, Subsidiaries Or Affiliates	9 Domestic- ciliary Loca- tion	10 Rela- tionship to Reporting Entity	11 Directly Controlled by (Name of Entity/Person)	12 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Per- centage	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	16 *
							INSURE AND GO AUSTRALIA	AUS	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							EUROSOS ASISTANCE, S.A.	GRC	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.500	MAPFRE S.A.	NO	
							BRASIL ASISTENCIA S.A.	BRA	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE ABRAXAS SOFTWARE, LTD	GBR	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							ABRAXAS INSURANCE	GBR	NIA	MAPFRE ABRAXAS SOFTWARE, LTD	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE WARRANTY UK LIMITED	GBR	NIA	MAPFRE ABRAXAS SOFTWARE, LTD	Ownership	100.000	MAPFRE S.A.	NO	
							HOME 3	GBR	NIA	MAPFRE ABRAXAS SOFTWARE, LTD	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE WARRANTY S.P.A.	ITA	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MAPFRE WARRANTIES	LUX	NIA	MAPFRE WARRANTY S.P.A.	Ownership	100.000	MAPFRE S.A.	NO	
							INSURE AND GO	GBR	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							TRAVEL CLAIMS SERVICES LIMITED	GBR	NIA	INSURE AND GO	Ownership	100.000	MAPFRE S.A.	NO	
							ANDIASISTENCIA COMPAÑIA DE ASISTENCIA DE LOS ANDES, S.A.	COL	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	98.100	MAPFRE S.A.	NO	
							ECUASISTENCIA S.A.	ECU	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.300	MAPFRE S.A.	NO	
							PERÚ ASISTENCIA, S.A.	PER	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							CONSULTING DE SOLUCIONES Y TECNOLOGÍAS SIAM, S.A.	ESP	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.900	MAPFRE S.A.	NO	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	IND	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.600	MAPFRE S.A.	NO	
							URUGUAY ASISTENCIA, S.A.	URY	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	97.900	MAPFRE S.A.	NO	
							SUR ASISTENCIA, S.A.	CHL	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.000	MAPFRE S.A.	NO	
							IBEROASISTENCIA, S.A.	ESP	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.900	MAPFRE S.A.	NO	
							NILE ASSIST	EGY	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	98.000	MAPFRE S.A.	NO	
							TUR ASSIST, LTD.	TUR	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	99.700	MAPFRE S.A.	NO	
							ROAD CHINA ASSISTANCE CO., LTD.	CHN	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							IBERO ASISTENCIA, S.A.	PRT	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	100.000	MAPFRE S.A.	NO	
							MIDDLESEA ASSIST LIMITED	MLT	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	51.000	MAPFRE S.A.	NO	
							GULF ASSIST, B.S.C.	BHR	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	74.600	MAPFRE S.A.	NO	
							CARIBE ASISTENCIA	DOM	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	83.600	MAPFRE S.A.	NO	
							PANAMÁ ASISTENCIA, S.A.	PAN	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	84.000	MAPFRE S.A.	NO	
							ROADSIDE ASSIST ALGERIE SPA	DZA	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	60.300	MAPFRE S.A.	NO	
							PT MAPFRE ABDA ASSISTANCE	IDN	NIA	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership	51.000	MAPFRE S.A.	NO	

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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	Domi-ciliary Loca-tion	Rela-tionship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Owner-ship Provide Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
						AFRIQUE ASSISTANCE, S.A.		TUN.	NIA.....	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership...	49.000	MAPFRE S.A.	NO.	
						PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.		PRY.	NIA.....	MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership...	99.000	MAPFRE S.A.	NO.	
						MAPFRE INMUEBLES, S.G.A.		ESP.	NIA.....	MAPFRE S.A.	Ownership...	10.000	MAPFRE S.A.	NO.	
						DESARROLLOS URBANOS CIC, S.A.		ESP.	NIA.....	MAPFRE INMUEBLES, S.G.A.	Ownership...	99.900	MAPFRE S.A.	NO.	
						SERVICIOS INMOBILIARIOS MAPFRE S.A.		ESP.	NIA.....	MAPFRE INMUEBLES, S.G.A.	Ownership...	99.900	MAPFRE S.A.	NO.	
						MAPFRE PARTICIPACIONES, S.A.		ESP.	NIA.....	MAPFRE S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						INDUSTRIAL RE S.A.		LUX.	IA.....	MAPFRE PARTICIPACIONES, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						SOLUCION SEGUROS DE CREDITO S.A.		ESP.	IA.....	MAPFRE PARTICIPACIONES, S.A.	Ownership...	50.000	MAPFRE S.A.	NO.	
						MAPFRE INVESTMENT S.A.		URY.	NIA.....	MAPFRE S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.		ESP.	NIA.....	MAPFRE S.A.	Ownership...	50.000	MAPFRE S.A.	NO.	
						MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.		ESP.	IA.....	MAPFRE S.A.	Ownership...	83.500	MAPFRE S.A.	NO.	
						CENTROS MEDICOS MAPFRE, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						CLUB MAPFRE, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						MAPFRE AUTOMOCION S.A.U.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.		ESP.	IA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						MULTISERVICIOS MAPFRE MULTIMAP, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	97.500	MAPFRE S.A.	NO.	
						MAPFRE TECH		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	65.200	MAPFRE S.A.	NO.	
						MAPFRE VIDEO Y COMUNICACION, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	75.000	MAPFRE S.A.	NO.	
						MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	50.000	MAPFRE S.A.	NO.	
						MAPFRE QINGDAO ENTERPRISE MANAGEMENT CONSULTING LIMITED COMPANY		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	100.000	MAPFRE S.A.	NO.	
						AGROSEGURO, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	19.900	MAPFRE S.A.	NO.	
						SALVADOR CAETANO AUTO (SGPS), S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	24.600	MAPFRE S.A.	NO.	
						BANKINTER SEGUROS GENERALES, CIA DE SEGUROS Y REASEGUROS S.A.		ESP.	IA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	50.100	MAPFRE S.A.	NO.	
						RASTREATOR.COM LTD		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	25.000	MAPFRE S.A.	NO.	
						AUDATEX ESPANA, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	12.500	MAPFRE S.A.	NO.	
						INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	20.000	MAPFRE S.A.	NO.	
						TECNOLOGIAS DE LA INFORMACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	22.950	MAPFRE S.A.	NO.	
						FONDMAPFRE BOLSA AMERICA		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	21.700	MAPFRE S.A.	NO.	
						FONDMAPFRE BENTA DOLAR		ESP.	NIA.....	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership...	19.700	MAPFRE S.A.	NO.	

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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	Domi-ciliary Loca-tion	Rela-tionship to Reporting Entity	Directly Controlled by (Name of Entity/Person)	Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	If Control is Owner-ship Provide Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
							FUNESPAÑA, S.A.	ESP.	NIA.	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	99.800	MAPFRE S.A.
						TANATORIUM ZRT	HUN.	NIA.	FUNESPAÑA, S.A.	Ownership.	100.000	MAPFRE S.A.	
						ALL FUNERAL SERVICES, S.L.	ESP.	NIA.	FUNESPAÑA, S.A.	Ownership.	100.000	MAPFRE S.A.	
						FUNESPAÑA CHILE, S.A.	ESP.	NIA.	FUNESPAÑA, S.A.	Ownership.	50.000	MAPFRE S.A.	
						FUNEUROPA CHILE, S.A.	ESP.	NIA.	FUNESPAÑA, S.A.	Ownership.	50.000	MAPFRE S.A.	
						FUNESPAÑA DOS, S.L.	ESP.	NIA.	FUNESPAÑA, S.A.	Ownership.	100.000	MAPFRE S.A.	
						SALZILLO SERVICIOS FUNERARIOS S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	45.000	MAPFRE S.A.	
						SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	100.000	MAPFRE S.A.	
						SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	70.000	MAPFRE S.A.	
						INICIATIVAS ALCAESAR, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	40.000	MAPFRE S.A.	
						NUENO TANATORIO, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	50.000	MAPFRE S.A.	
						SERVICIOS FUNERARIOS LA CARIDAD, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	50.000	MAPFRE S.A.	
						EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	49.000	MAPFRE S.A.	
						POMPES FUNEBRES DOMINGO, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	100.000	MAPFRE S.A.	
						DE MENA SERVICIOS FUNERARIOS S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	70.000	MAPFRE S.A.	
						CEMENTERIO PARQUE ANDUJAR, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	72.800	MAPFRE S.A.	
						ISABELO ALVAREZ MAYORGА, S.A.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	50.000	MAPFRE S.A.	
						SERVICIOS FUNERARIOS DEL NERVION, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	50.000	MAPFRE S.A.	
						TANATORIO DE ECija, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	33.300	MAPFRE S.A.	
						TANATORIO SE-30 SEVILLA, S.L.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	10.000	MAPFRE S.A.	
						FUNERARIAS REUNIDAS EL BIERZO, S.A.	ESP.	NIA.	FUNESPAÑA DOS, S.L.	Ownership.	85.800	MAPFRE S.A.	
						MAPFRE INMUEBLES, S.G.A.	ESP.	NIA.	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	83.000	MAPFRE S.A.	
						MEDISEMAP, AGENCIA DE SEGUROS, S.L.	ESP.	NIA.	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	66.700	MAPFRE S.A.	
						MAPFRE SEGUROS GERAIS S.A.	PRT.	IA.	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	PRT.	IA.	MAPFRE SEGUROS GERAIS S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE MULTI ASSET STRAT	ESP.	NIA.	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	41.600	MAPFRE S.A.	
						MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	COL.	NIA.	MAPFRE INTERNACIONAL, S.A.	Ownership.	93.700	MAPFRE S.A.	
						CREDIMAPFRE	COL.	NIA.	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE SERVICIOS ESEQUIALES SAS	COL.	NIA.	CREDIMAPFRE	Ownership.	100.000	MAPFRE S.A.	
						CESVI COLOMBIA, S.A.	COL.	NIA.	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.	62.300	MAPFRE S.A.	
						MAPFRE COLOMBIA VIDA SEGUROS S.A.	COL.	IA.	MAPFRE INTERNACIONAL S.A.	Ownership.	94.400	MAPFRE S.A.	
						MAPFRE PERU VIDA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	PER.	NIA.	MAPFRE INTERNACIONAL, S.A.	Ownership.	67.400	MAPFRE S.A.	
						CORPORACION FUNERARIA, S.A.	PER.	NIA.	MAPFRE PERU VIDA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE DOMINICANA	DOM.	NIA.	MAPFRE INTERNACIONAL, S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	DOM.	NIA.	MAPFRE DOMINICANA	Ownership.	51.000	MAPFRE S.A.	
						CREDI PRIMAS, S.A.	DOM.	NIA.	MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	Ownership.	100.000	MAPFRE S.A.	
						MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	ESP.	IA.	MAPFRE S.A.	Ownership.	100.000	MAPFRE S.A.	

Asterisk	Explanation
1	All direct and indirect subsidiaries of MAPFRE USA Corp. and MAPFRE PRAICO Corporation are 100.0% owned by their parent companies.
2	Auto Club MAPFRE Insurance Company, an Ohio domiciled property and casualty insurance company, is a 65% owned subsidiary of MAPFRE U.S.A. Corp. Auto Club MAPFRE Insurance Company is 35% owned by AAA Washington, a Washington not-for-profit corporation.

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
PART 1 - LOSS EXPERIENCE

Line 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	2,086,007	1,584,155	75.9	53.6
2.1 Allied Lines	28,927	14,169	49.0	
2.2 Multiple peril crop	0	0	0.0	
2.3 Federal flood	2,571,762	(292,023)	(11.4)	
2.4 Private crop	0	0	0.0	
2.5 Private flood	0	0	0.0	
3. Farmowners multiple peril	0	0	0.0	0.0
4. Homeowners multiple peril	24,098,074	14,796,796	61.4	51.5
5. Commercial multiple peril	0	0	0.0	0.0
6. Mortgage guaranty	0	0	0.0	0.0
8. Ocean marine	0	0	0.0	0.0
9. Inland marine	6,660	0	0.0	0.0
10. Financial guaranty	0	0	0.0	0.0
11.1 Medical professional liability - occurrence	0	0	0.0	0.0
11.2 Medical professional liability - claims-made	0	0	0.0	0.0
12. Earthquake	0	0	0.0	0.0
13.1 Comprehensive (hospital and medical) individual	0	0	0.0	
13.2 Comprehensive (hospital and medical) group	0	0	0.0	
14. Credit accident and health	0	0	0.0	0.0
15.1 Vision only	0	0	0.0	
15.2 Dental only	0	0	0.0	
15.3 Disability income	0	0	0.0	
15.4 Medicare supplement	0	0	0.0	
15.5 Medicaid Title XIX	0	0	0.0	
15.6 Medicare Title XVIII	0	0	0.0	
15.7 Long-term care	0	0	0.0	
15.8 Federal employees health benefits plan	0	0	0.0	
15.9 Other health	0	0	0.0	
16. Workers' compensation	0	0	0.0	0.0
17.1 Other liability - occurrence	3,128,649	(366,487)	(11.7)	45.3
17.2 Other liability - claims-made	0	0	0.0	0.0
17.3 Excess workers' compensation	0	0	0.0	0.0
18.1 Products liability - occurrence	0	0	0.0	0.0
18.2 Products liability - claims-made	0	0	0.0	0.0
19.1 Private passenger auto no-fault (personal injury protection)	357,771	278,541	77.9	
19.2 Other private passenger auto liability	23,709,826	10,098,935	42.6	
19.3 Commercial auto no-fault (personal injury protection)	0	0	0.0	
19.4 Other commercial auto liability	0	0	0.0	
21.1 Private passenger auto physical damage	14,850,034	10,090,472	67.9	
21.2 Commercial auto physical damage	0	0	0.0	
22. Aircraft (all perils)	10,648,198	3,004,628	28.2	24.5
23. Fidelity	0	0	0.0	0.0
24. Surety	0	0	0.0	0.0
26. Burglary and theft	0	0	0.0	0.0
27. Boiler and machinery	0	0	0.0	0.0
28. Credit	0	0	0.0	0.0
29. International	0	0	0.0	0.0
30. Warranty	0	0	0.0	0.0
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	0.0	0.0
35. Totals	81,485,908	39,209,186	48.1	48.3
DETAILS OF WRITE-INS				
3401. TRAVEL			0.0	0.0
3402.				
3403.				
3498. Summary of remaining write-ins for Line 34 from overflow page	0	0	0.0	
3499. Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	0	0	0.0	0.0

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
PART 2 - DIRECT PREMIUMS WRITTEN

Line of Business	1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1. Fire	1,047,134	1,905,506	2,102,739
2.1 Allied Lines	15,486	29,569	26,464
2.2 Multiple peril crop	0		
2.3 Federal flood	997,366	1,961,994	2,222,273
2.4 Private crop	0		
2.5 Private flood	0		
3. Farmowners multiple peril	0		0
4. Homeowners multiple peril	13,532,310	24,060,984	23,086,590
5. Commercial multiple peril	0	0	0
6. Mortgage guaranty	0	0	0
8. Ocean marine	0	0	0
9. Inland marine	7,281	7,982	5,264
10. Financial guaranty	0	0	0
11.1 Medical professional liability - occurrence	0	0	0
11.2 Medical professional liability - claims-made	0	0	0
12. Earthquake	0	0	0
13.1 Comprehensive (hospital and medical) individual	0	0	
13.2 Comprehensive (hospital and medical) group	0	0	
14. Credit accident and health	0	0	0
15.1 Vision only	0	0	
15.2 Dental only	0	0	
15.3 Disability income	0	0	
15.4 Medicare supplement	0	0	
15.5 Medicaid Title XIX	0	0	
15.6 Medicare Title XVIII	0	0	
15.7 Long-term care	0	0	
15.8 Federal employees health benefits plan	0	0	
15.9 Other health	0	0	
16. Workers' compensation	0	0	0
17.1 Other liability - occurrence	1,644,659	3,184,052	2,944,505
17.2 Other liability - claims-made	0	0	0
17.3 Excess workers' compensation	0	0	0
18.1 Products liability - occurrence	0	0	0
18.2 Products liability - claims-made	0	0	0
19.1 Private passenger auto no-fault (personal injury protection)	163,007	338,076	401,234
19.2 Other private passenger auto liability	13,176,170	24,694,675	24,220,067
19.3 Commercial auto no-fault (personal injury protection)	0	0	
19.4 Other commercial auto liability	0	0	
21.1 Private passenger auto physical damage	8,387,241	15,566,207	15,002,159
21.2 Commercial auto physical damage	0	0	
22. Aircraft (all perils)	4,229,917	8,302,794	8,269,421
23. Fidelity	0		0
24. Surety	0		0
26. Burglary and theft	0		0
27. Boiler and machinery	0		0
28. Credit	0		0
29. International	0		0
30. Warranty	0		0
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	43,200,571	80,051,839	78,280,716
DETAILS OF WRITE-INS			
3401.			0
3402.			
3403.			
3498. Summary of remaining write-ins for Line 34 from overflow page	0	0	0
3499. Totals (Lines 3401 through 3403 plus 3498)(Line 34 above)	0	0	0

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

Years in Which Losses Occurred	1 Prior Year-End Known Case Loss and LAE Reserves	2 Prior Year-End IBNR Loss and LAE Reserves	3 Total Prior Year-End Loss and LAE Reserves (Cols. 1+2)	4 2022 Loss and LAE Payments on Claims Reported as of Prior Year-End	5 2022 Loss and LAE Payments on Unreported as of Prior Year-End	6 Total 2022 Loss and LAE Payments (Cols. 4+5)	7 Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year End	8 Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year End	9 Q.S. Date IBNR Loss and LAE Reserves	10 Total Q.S. Loss and LAE Reserves (Cols. 7+8+9)	11 Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols. 4+7 minus Col. 1)	12 Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols. 5+8+9 minus Col. 2)	13 Prior Year-End Total Loss and LAE Reserve Developed (Savings)/ Deficiency (Cols. 11+12)
1. 2019 + Prior	37,355	(2,338)	35,017	7,189	273	7,462	25,238	127	(1,745)	23,620	(4,928)	993	(3,935)
2. 2020	16,666	3,875	20,541	4,522	88	4,610	13,348	79	88	13,465	1,204	(3,670)	(2,466)
3. Subtotals 2020 + Prior	54,021	1,537	55,558	11,711	361	12,072	38,586	206	(1,707)	37,085	(3,724)	(2,677)	(6,401)
4. 2021	32,456	14,729	47,185	22,246	266	22,512	24,877	414	(232)	25,059	14,667	(14,281)	386
5. Subtotals 2021 + Prior	86,477	16,266	102,743	33,957	627	34,584	63,463	620	(1,939)	62,144	10,943	(16,958)	(6,015)
6. 2022	XXX	XXX	XXX	XXX	43,213	43,213	XXX	22,552	10,481	33,033	XXX	XXX	XXX
7. Totals	86,477	16,266	102,743	33,957	43,840	77,797	63,463	23,172	8,542	95,177	10,943	(16,958)	(6,015)
8. Prior Year-End Surplus As Regards Policyholders		111,268									Col. 11, Line 7 As % of Col. 1 Line 7	Col. 12, Line 7 As % of Col. 2 Line 7	Col. 13, Line 7 As % of Col. 3 Line 7
											1. 12.7	2. (104.3)	3. (5.9)
													4. (5.4)

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
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

AUGUST FILING

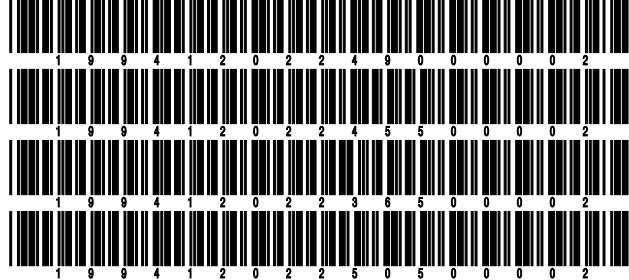
5. Will the regulator-only (non-public) Communication of Internal Control Related Matters Noted in Audit be filed with the state of domicile and electronically with the NAIC (as a regulator-only non-public document) by August 1? The response for 1st and 3rd quarters should be N/A. A NO response resulting with a bar code is only appropriate in the 2nd quarter.	YES
---	-----

Explanations:

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 Codes:

1. Trusteed Surplus Statement [Document Identifier 490]
2. Supplement A to Schedule T [Document Identifier 455]
3. Medicare Part D Coverage Supplement [Document Identifier 365]
4. Director and Officer Supplement [Document Identifier 505]



STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY
OVERFLOW PAGE FOR WRITE-INS

Additional Write-ins for Assets Line 25

	Current Statement Date			4 December 31 Prior Year Net Admitted Assets
	1 Assets	2 Nonadmitted Assets	3 Net Admitted Assets (Cols. 1 - 2)	
2504. Miscellaneous Assets	8,803		8,803	1,592
2597. Summary of remaining write-ins for Line 25 from overflow page	8,803	0	8,803	1,592

Additional Write-ins for Statement of Income Line 14

	1 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
1404. Other technical income (other reinsurer)	138,988	161,731	161,731
1497. Summary of remaining write-ins for Line 14 from overflow page	138,988	161,731	161,731

SCHEDULE A - VERIFICATION

Real Estate

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
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		
4. Total gain (loss) on disposals		
5. Deduct amounts received on disposals		
6. Total foreign exchange change in book/adjusted carrying value		
7. Deduct current year's other than temporary impairment recognized		
8. Deduct current year's depreciation		
9. Book/adjusted carrying value at the end of current period (Lines 1+2+3+4-5+6-7-8)		
10. Deduct total nonadmitted amounts		
11. Statement value at end of current period (Line 9 minus Line 10)		

NONE**SCHEDULE B - VERIFICATION**

Mortgage Loans

	1 Year to Date	2 Prior Year Ended December 31
1. Book value/recorded investment excluding accrued interest, December 31 of prior year		
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 paid 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)		
12. Total valuation allowance		
13. Subtotal (Line 11 plus Line 12)		
14. Deduct total nonadmitted amounts		
15. Statement value at end of current period (Line 13 minus Line 14)		

NONE**SCHEDULE BA - VERIFICATION**

Other Long-Term Invested Assets

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
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)		
12. Deduct total nonadmitted amounts		
13. Statement value at end of current period (Line 11 minus Line 12)		

NONE**SCHEDULE D - VERIFICATION**

Bonds and Stocks

	1 Year to Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year	201,469,648	210,580,463
2. Cost of bonds and stocks acquired	11,444,410	37,259,389
3. Accrual of discount	67,543	156,684
4. Unrealized valuation increase (decrease)	(1,210)	(100)
5. Total gain (loss) on disposals	26,924	736,764
6. Deduct consideration for bonds and stocks disposed of	13,257,743	46,453,035
7. Deduct amortization of premium	72,691	965,909
8. Total foreign exchange change in book/adjusted carrying value	0	0
9. Deduct current year's other than temporary impairment recognized	0	0
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees	0	155,392
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10)	199,676,881	201,469,648
12. Deduct total nonadmitted amounts	0	0
13. Statement value at end of current period (Line 11 minus Line 12)	199,676,881	201,469,648

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 1B

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

NAIC Designation	1 Book/Adjusted Carrying Value Beginning of Current Quarter	2 Acquisitions During Current Quarter	3 Dispositions During Current Quarter	4 Non-Trading Activity During Current Quarter	5 Book/Adjusted Carrying Value End of First Quarter	6 Book/Adjusted Carrying Value End of Second Quarter	7 Book/Adjusted Carrying Value End of Third Quarter	8 Book/Adjusted Carrying Value December 31 Prior Year
BONDS								
1. NAIC 1 (a)	163,499,309	485,705	3,694,610	100,410	163,499,309	160,390,814	0	162,435,352
2. NAIC 2 (a)	38,615,359	0	2,000,000	(47,292)	38,615,359	36,568,067	0	37,045,260
3. NAIC 3 (a)	0	0	0	0	0	0	0	11,103
4. NAIC 4 (a)	0	0	0	0	0	0	0	0
5. NAIC 5 (a)	0	0	0	0	0	0	0	0
6. NAIC 6 (a)	0	0	0	0	0	0	0	0
7. Total Bonds	202,114,668	485,705	5,694,610	53,118	202,114,668	196,958,881	0	199,491,715
PREFERRED STOCK								
8. NAIC 1	0	0	0	0	0	0	0	0
9. NAIC 2	2,718,000	0	0	0	2,718,000	2,718,000	0	2,718,000
10. NAIC 3	0	0	0	0	0	0	0	0
11. NAIC 4	0	0	0	0	0	0	0	0
12. NAIC 5	0	0	0	0	0	0	0	0
13. NAIC 6	0	0	0	0	0	0	0	0
14. Total Preferred Stock	2,718,000	0	0	0	2,718,000	2,718,000	0	2,718,000
15. Total Bonds and Preferred Stock	204,832,668	485,705	5,694,610	53,118	204,832,668	199,676,881	0	202,209,715

(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

SI02

SCHEDULE DA - PART 1

Short-Term Investments

	1 Book/Adjusted Carrying Value	2 Premium xx	3 Actual Cost	4 Interest Collected Year-to-Date	5 Paid for Accrued Interest Year-to-Date
7709999999 Totals					

NONE**SCHEDULE DA - VERIFICATION**

Short-Term Investments

	1 Year To Date	2 Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year	740,067	0
2. Cost of short-term investments acquired	2,014,000	2,500,355
3. Accrual of discount	0	0
4. Unrealized valuation increase (decrease)	0	0
5. Total gain (loss) on disposals	0	(249)
6. Deduct consideration received on disposals	2,740,000	1,760,000
7. Deduct amortization of premium	14,067	39
8. Total foreign exchange change in book/adjusted carrying value	0	0
9. Deduct current year's other than temporary impairment recognized	0	0
10. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9)	0	740,067
11. Deduct total nonadmitted amounts	0	0
12. Statement value at end of current period (Line 10 minus Line 11)	0	740,067

Schedule DB - Part A - Verification - Options, Caps, Floors, Collars, Swaps and Forwards
N O N E

Schedule DB - Part B - Verification - Futures Contracts
N O N E

Schedule DB - Part C - Section 1 - Replication (Synthetic Asset) Transactions (RSATs) Open
N O N E

Schedule DB-Part C-Section 2-Reconciliation of Replication (Synthetic Asset) Transactions Open
N O N E

Schedule DB - Verification - Book/Adjusted Carrying Value, Fair Value and Potential Exposure of Derivatives
N O N E

Schedule E - Part 2 - Verification - Cash Equivalents
N O N E

Schedule A - Part 2 - Real Estate Acquired and Additions Made
N O N E

Schedule A - Part 3 - Real Estate Disposed
N O N E

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made
N O N E

Schedule B - Part 3 - Mortgage Loans Disposed, Transferred or Repaid
N O N E

Schedule BA - Part 2 - Other Long-Term Invested Assets Acquired and Additions Made
N O N E

Schedule BA - Part 3 - Other Long-Term Invested Assets Disposed, Transferred or Repaid
N O N E

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 3

Show All Long-Term Bonds and Stock Acquired During the Current Quarter

1 CUSIP Identification	2 Description	3 Foreign	4 Date Acquired	5 Name of Vendor	6 Number of Shares of Stock	7 Actual Cost	8 Par Value	9 Paid for Accrued Interest and Dividends	10 NAIC Designation, NAIC Designation Modifier and SVO Adminis- trative Symbol
057246-AB-5	BAKER HUGHES LLC/CO-BBL		04/29/2022	RAYMOND JAMES	485,705	500,000		2,462	1.G FE
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)					485,705	500,000		2,462	XXX
2509999997. Total - Bonds - Part 3					485,705	500,000		2,462	XXX
2509999998. Total - Bonds - Part 5					XXX	XXX	XXX	XXX	XXX
2509999999. Total - Bonds					485,705	500,000		2,462	XXX
4509999997. Total - Preferred Stocks - Part 3					0	XXX		0	XXX
4509999998. Total - Preferred Stocks - Part 5					XXX	XXX	XXX	XXX	XXX
4509999999. Total - Preferred Stocks					0	XXX		0	XXX
5989999997. Total - Common Stocks - Part 3					0	XXX		0	XXX
5989999998. Total - Common Stocks - Part 5					XXX	XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks					0	XXX		0	XXX
5999999999. Total - Preferred and Common Stocks					0	XXX		0	XXX
6009999999 - Totals					485,705	XXX		2,462	XXX

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 4

Show All Long-Term Bonds and Stock Sold, Redeemed or Otherwise Disposed of During the Current Quarter

1 CUSIP Ident- ification	2 Description	3 For- eign	4 Disposal Date	5 Name of Purchaser	6 Number of Shares of Stock	7 Consid- eration	8 Par Value	9 Actual Cost	10 Prior Year Book/ Adjusted Carrying Value	Change In Book/Adjusted Carrying Value					16 Book/ Adjusted Carrying Value at Disposal Date	17 Foreign Exchange Gain (Loss) on Disposal	18 Realized Gain (Loss) on Disposal	19 Total Gain (Loss) on Disposal	20 Bond Interest/ Stock Dividends Received During Year	21 Stated Con- tractual Maturity Date	22 NAIC Design- nation, NAIC Design- nation Modifier and SVO Adminis- trative Symbol			
										11 Unrealized Valuation Increase/ (Decrease)	12 Current Year's (Amor- tization)/ Accretion	13 Current Year's Other Than Temporary Impairment Recogn- ized	14 Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	15 Total Foreign Exchange Change in Book/ Adjusted Carrying Value										
.36225B-GW-2	GNMA POOL #0781113		.06/15/2022	BANK OF NEW YORK		1,649	1,649	1,709	1,678	0	(1)	0	(1)	0	0	0	0	(28)	0	48	.11/15/2029	1.A		
.912828-X4-7	U.S. TREASURY NOTE		.05/02/2022	MATURITY		165,000	165,000	160,649	164,633	0	367	0	367	0	0	0	0	165,000	0	1,547	.04/30/2022	1.A		
0109999999. Subtotal - Bonds - U.S. Governments					166,649	166,649	162,358	166,311	0	366	0	366	0	0	166,677	0	0	(28)	(28)	(28)	1,595	XXX		
.31366P-GT-2	FANNIE MAE - ACES		.06/27/2022	PRINCIPAL RECEIPT		4,211	4,211	4,711	4,435	0	(224)	0	(224)	0	0	4,211	0	0	0	0	0	.95	10/25/2032	1.A
.3136A7-DJ-8	FEDERAL NATL MTG ASSN REMIC TR		.06/27/2022	PRINCIPAL RECEIPT		35,758	35,758	35,618	35,703	0	55	0	55	0	0	35,758	0	0	0	0	0	474	.01/25/2042	1.A
.3140X5-M4-2	FN #FM2178		.06/27/2022	PRINCIPAL RECEIPT		26,201	26,201	27,322	27,129	0	(928)	0	(928)	0	0	26,201	0	0	0	0	0	378	.01/01/2050	1.A
.3140J9-VX-6	FN PL#BMS129		.06/27/2022	PRINCIPAL RECEIPT		47,067	47,067	50,001	49,700	0	(2,633)	0	(2,633)	0	0	47,067	0	0	0	0	0	698	.07/01/2047	1.A
.3138ER-2K-5	FNCL PL#A9777		.06/27/2022	PRINCIPAL RECEIPT		49,644	49,644	53,756	52,817	0	(3,172)	0	(3,172)	0	0	49,644	0	0	0	0	0	930	.01/01/2047	1.A
.3138WG-RK-2	FNCL PL#A6789		.06/27/2022	PRINCIPAL RECEIPT		21,693	21,693	23,049	22,544	0	(851)	0	(851)	0	0	21,693	0	0	0	0	0	304	.03/01/2046	1.A
.3138WJ-B3-1	FNCL PL#A8517		.06/27/2022	PRINCIPAL RECEIPT		285,944	285,944	308,060	303,289	0	(17,345)	0	(17,345)	0	0	285,944	0	0	0	0	0	5,223	.10/01/2046	1.A
.31334X-G8-9	FNCL PL#A1094		.06/27/2022	PRINCIPAL RECEIPT		112,219	112,219	116,287	116,033	0	(3,813)	0	(3,813)	0	0	112,219	0	0	0	0	0	1,327	.07/01/2049	1.A
.31334X-ZZ-5	FNCL PL#A1660		.06/27/2022	PRINCIPAL RECEIPT		39,172	39,172	40,188	40,145	0	(973)	0	(973)	0	0	39,172	0	0	0	0	0	489	.08/01/2049	1.A
.31339U-CN-8	FNCL PL#A3677		.06/27/2022	PRINCIPAL RECEIPT		16,378	16,378	16,168	16,153	0	225	0	225	0	0	16,378	0	0	0	0	0	148	.10/01/2049	1.A
.31339U-3M-0	FNCL PL#A44044		.06/27/2022	PRINCIPAL RECEIPT		51,144	51,144	51,739	52,715	0	(1,570)	0	(1,570)	0	0	51,144	0	0	0	0	0	628	.11/01/2049	1.A
.3133N3-VII-1	FNCL PL#E6029		.06/27/2022	PRINCIPAL RECEIPT		25,359	25,359	25,652	25,676	0	(317)	0	(317)	0	0	25,359	0	0	0	0	0	304	.02/01/2050	1.A
.3133N3-IV-9	FNCL PL#E6072		.06/27/2022	PRINCIPAL RECEIPT		19,277	19,277	19,651	19,648	0	(371)	0	(371)	0	0	19,277	0	0	0	0	0	157	.11/01/2050	1.A
.31418A-L5-5	FNMA PASS-THRU PL#MA1247		.06/27/2022	PRINCIPAL RECEIPT		29,347	29,347	30,906	30,083	0	(736)	0	(736)	0	0	29,347	0	0	0	0	0	423	.11/01/2042	1.A
.3140X8-AZ-0	FNMA PL#FMA523		.06/27/2022	PRINCIPAL RECEIPT		26,808	26,808	27,847	27,791	0	(983)	0	(983)	0	0	26,808	0	0	0	0	0	196	.10/01/2050	1.A
.3140X8-K6-3	FNMA PL#FMA4816		.06/27/2022	PRINCIPAL RECEIPT		6,376	6,376	6,619	6,604	0	(229)	0	(229)	0	0	6,376	0	0	0	0	0	53	.11/01/2050	1.A
0909999999. Subtotal - Bonds - U.S. Special Revenues					796,598	796,598	838,574	830,465	0	(33,865)	0	(33,865)	0	0	796,598	0	0	0	0	0	11,827	XXX		
.590218-AF-0	ML MTG INV TR 2006-F1		.06/27/2022	PRINCIPAL RECEIPT		783	783	780	521	259	2	0	261	0	783	0	0	0	0	0	18	.04/25/2036	1.D FM	
.744448-CH-2	PUBLIC SERVICE CO COLO		.05/23/2022	LLC		2,000,000	2,000,000	1,945,000	1,986,047	0	4,505	0	4,505	0	0	1,990,552	0	9,448	9,448	9,448	34,722	.03/15/2023	1.F FE	
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)					2,000,783	2,000,783	1,945,780	1,986,568	259	4,507	0	4,766	0	1,991,335	0	9,448	9,448	9,448	34,740	XXX				
2509999997. Total - Bonds - Part 4					2,964,030	2,964,030	2,946,712	2,983,344	259	(28,992)	0	(28,733)	0	0	2,954,610	0	9,420	9,420	9,420	48,162	XXX			
2509999998. Total - Bonds - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX			
2509999999. Total - Bonds					2,964,030	2,964,030	2,946,712	2,983,344	259	(28,992)	0	(28,733)	0	0	2,954,610	0	9,420	9,420	9,420	48,162	XXX			
4509999997. Total - Preferred Stocks - Part 4					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	0	0	XXX			
4509999998. Total - Preferred Stocks - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX			
4509999999. Total - Preferred Stocks					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	0	0	XXX			
5989999997. Total - Common Stocks - Part 4					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	0	0	XXX			
5989999998. Total - Common Stocks - Part 5					XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX			
5989999999. Total - Common Stocks					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	0	0	XXX			
5999999999. Total - Preferred and Common Stocks					0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	0	0	XXX			
6009999999 - Totals					2,964,030	XXX	2,946,712	2,983,344	259	(28,992)	0	(28,733)	0	0	2,954,610	0	9,420	9,420	9,420	48,162	XXX			

Schedule DB - Part A - Section 1 - Options, Caps, Floors, Collars, Swaps and Forwards Open
N O N E

Schedule DB - Part B - Section 1 - Futures Contracts Open
N O N E

Schedule DB - Part B - Section 1B - Brokers with whom cash deposits have been made
N O N E

Schedule DB - Part D - Section 1 - Counterparty Exposure for Derivative Instruments Open
N O N E

Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged By
N O N E

Schedule DB - Part D-Section 2 - Collateral for Derivative Instruments Open - Pledged To
N O N E

Schedule DB - Part E - Derivatives Hedging Variable Annuity Guarantees
N O N E

Schedule DL - Part 1 - Reinvested Collateral Assets Owned
N O N E

Schedule DL - Part 2 - Reinvested Collateral Assets Owned
N O N E

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1 Depository	2 Code	3 Rate of Interest	4 Amount of Interest Received During Current Quarter	5 Amount of Interest Accrued at Current Statement Date	Book Balance at End of Each Month During Current Quarter			9 *
					6 First Month	7 Second Month	8 Third Month	
Bank of America	MA 02110	0.292	764		(353,077)	(4,968,050)	(5,486,619)	XXX
The Bank of New York Mellon	NY 10286	0.010	46		695,072	110,119	127,275	XXX
JPMorgan Chase	100 E.Broad St., Columbus, OH 43215				134,414	163,144	30,837	XXX
BlackRock 30	One Financial Center, Boston, MA 02111	1.020	6,208		1,012,050	3,560,242	3,243,809	XXX
Fidelity Gov't 2642	500 Salem Street, Smithfield, RI 02917	0.970	567		.385,019	.338,244	.254,032	XXX
0199998. Deposits in ...	depositories that do not exceed the allowable limit in any one depository (See instructions) - Open Depositories	XXX	XXX					XXX
0199999. Totals - Open Depositories		XXX	XXX	7,585	0	1,873,478	(796,301)	(1,830,666)
0299998. Deposits in ...	depositories that do not exceed the allowable limit in any one depository (See instructions) - Suspended Depositories	XXX	XXX					XXX
0299999. Totals - Suspended Depositories		XXX	XXX	0	0	0	0	XXX
0399999. Total Cash on Deposit		XXX	XXX	7,585	0	1,873,478	(796,301)	(1,830,666)
0499999. Cash in Company's Office		XXX	XXX	XXX	XXX			XXX
0599999. Total - Cash		XXX	XXX	7,585	0	1,873,478	(796,301)	(1,830,666)

STATEMENT AS OF JUNE 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

NONE

8609999999 - Total Cash Equivalents

E14