



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

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

American Commerce Insurance Company

NAIC Group Code 0411 0411 NAIC Company Code 18841 Employer's ID Number 31-4381173
(Current) (Prior)

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

Country of Domicile United States of America

Incorporated/Organized 08/18/1946 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
(Street and Number)
WEBSTER, MA, US 01570-0758 508-943-9000
(City or Town, State, Country and Zip Code) (Area Code) (Telephone Number)

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

Primary Location of Books and Records 211 MAIN STREET
(Street and Number)
WEBSTER, MA, US 01570-0758 508-943-9000
(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
(Name) (Area Code) (Telephone Number)
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(E-mail Address) (FAX Number)

OFFICERS

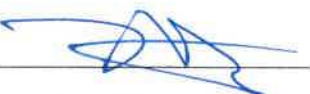
PRESIDENT & CEO	<u>JAIME TAMAYO</u>	TREASURER, CHIEF ACCOUNTING OFFICER & SVP	<u>JOHN MARTIN MECIAK JR. #</u>
SECRETARY, GENERAL COUNSEL, & EVP	<u>DANIEL PATRICK OLOHAN</u>	CHIEF FINANCIAL OFFICER & EVP	<u>JESUS AMADORI</u>

OTHER

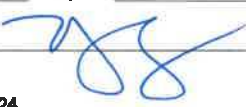
DIRECTORS OR TRUSTEES		
<u>RANDALL VAUGHN BECKER</u>	<u>JAIME TAMAYO</u>	<u>DAVID HILL COCHRANE</u>
<u>TIMOTHY JOHN MORGAN</u>	<u>DANIEL PATRICK OLOHAN</u>	<u>DAVID MCMULLEN</u>
<u>HEATHER SNAVELY</u>	<u>JOSE CORRAL #</u>	

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 & CEO	DANIEL PATRICK OLOHAN SECRETARY, GENERAL COUNSEL, & EVP	JOHN MARTIN MECIAK, JR. TREASURER, CHIEF ACCOUNTING OFFICER & SVP

Subscribed and sworn to before me this 1st day of November 2022



Yariessa Gomez
Public Notary
September 6, 2024



a. Is this an original filing? Yes [X] No []

b. If no,

1. State the amendment number

2. Date filed

3. Number of pages attached

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

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	194,975,786		194,975,786	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 (\$ (2,644,000)), cash equivalents (\$) and short-term investments (\$ 0)	(2,644,000)		(2,644,000)	(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)	195,049,786	0	195,049,786	201,100,170
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,364,814		1,364,814	1,426,514
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	40,047,884		40,047,884	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	12,757,862		12,757,862	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	1,345,647		1,345,647	0
18.2 Net deferred tax asset	3,307,833	315,442	2,992,391	2,602,049
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	557,770		557,770	1,121,178
21. Furniture and equipment, including health care delivery assets (\$)	185,216	185,216	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	4,142,508		4,142,508	4,438,947
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	75,401,163	676,435	74,724,728	76,978,905
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	334,160,483	1,177,093	332,983,390	334,149,933
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	334,160,483	1,177,093	332,983,390	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	676,435	676,435	0	
2502. Equity in pools and associations	73,895,193		73,895,193	75,745,315
2503. Premium Tax Recoverable	827,943		827,943	1,231,998
2598. Summary of remaining write-ins for Line 25 from overflow page	1,592	0	1,592	1,592
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	75,401,163	676,435	74,724,728	76,978,905

STATEMENT AS OF SEPTEMBER 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 \$ 38,691,000)	86,613,575	90,924,311
2. Reinsurance payable on paid losses and loss adjustment expenses	11,224,241	7,953,650
3. Loss adjustment expenses	9,905,990	11,818,043
4. Commissions payable, contingent commissions and other similar charges	2,017,275	2,695,657
5. Other expenses (excluding taxes, licenses and fees)	368,915	1,730,129
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	11,627	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
8. Borrowed money \$ and interest thereon \$		0
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$ 168,453,695 and including warranty reserves of \$ and accrued accident and health experience rating refunds including \$ 0 for medical loss ratio rebate per the Public Health Service Act)	106,467,531	93,072,724
10. Advance premium	2,823,701	1,900,468
11. Dividends declared and unpaid:		
11.1 Stockholders		0
11.2 Policyholders		0
12. Ceded reinsurance premiums payable (net of ceding commissions)	11,598,272	10,083,535
13. Funds held by company under reinsurance treaties		0
14. Amounts withheld or retained by company for account of others		0
15. Remittances and items not allocated		0
16. Provision for reinsurance (including \$ certified)		0
17. Net adjustments in assets and liabilities due to foreign exchange rates		0
18. Drafts outstanding		0
19. Payable to parent, subsidiaries and affiliates		0
20. Derivatives	0	0
21. Payable for securities		0
22. Payable for securities lending		0
23. Liability for amounts held under uninsured plans		0
24. Capital notes \$ and interest thereon \$		0
25. Aggregate write-ins for liabilities	733,941	1,129,339
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	231,765,068	222,881,490
27. Protected cell liabilities		0
28. Total liabilities (Lines 26 and 27)	231,765,068	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
32. Aggregate write-ins for other than special surplus funds	0	0
33. Surplus notes		0
34. Gross paid in and contributed surplus	42,714,462	42,714,462
35. Unassigned funds (surplus)	55,277,720	65,327,840
36. Less treasury stock, at cost:		
36.1 shares common (value included in Line 30 \$)		0
36.2 shares preferred (value included in Line 31 \$)		0
37. Surplus as regards policyholders (Lines 29 to 35, less 36)	101,218,322	111,268,442
38. Totals (Page 2, Line 28, Col. 3)	332,983,390	334,149,932
DETAILS OF WRITE-INS		
2501. Unclaimed property	733,941	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)	733,941	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 OF INCOME

	1	2	3
	Current Year to Date	Prior Year to Date	Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct (written \$ 127,379,602)	123,555,809	124,549,619	166,399,611
1.2 Assumed (written \$ 154,026,833)	140,632,025	138,616,411	184,134,701
1.3 Ceded (written \$ 127,379,602)	123,555,809	124,549,619	166,399,611
1.4 Net (written \$ 154,026,833)	140,632,025	138,616,411	184,134,701
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 95,028,000):			
2.1 Direct	62,486,657	60,697,166	84,461,912
2.2 Assumed	92,917,996	78,308,936	107,680,095
2.3 Ceded	62,486,657	60,697,166	84,461,912
2.4 Net	92,917,996	78,308,936	107,680,095
3. Loss adjustment expenses incurred	17,120,298	18,163,108	24,192,329
4. Other underwriting expenses incurred	44,115,278	42,825,467	56,425,726
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	154,153,572	139,297,511	188,298,150
7. Net income of protected cells			0
8. Net underwriting gain or (loss) (Line 1 minus Line 6 + Line 7)	(13,521,547)	(681,100)	(4,163,449)
INVESTMENT INCOME			
9. Net investment income earned	3,993,986	4,127,004	5,974,601
10. Net realized capital gains (losses) less capital gains tax of \$ (27,411)	54,545	338,385	641,542
11. Net investment gain (loss) (Lines 9 + 10)	4,048,531	4,465,389	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	663,768	735,183	963,949
14. Aggregate write-ins for miscellaneous income	62,515	1,158,561	1,523,262
15. Total other income (Lines 12 through 14)	726,283	1,893,744	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)	(8,746,733)	5,678,033	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)	(8,746,733)	5,678,033	4,939,905
19. Federal and foreign income taxes incurred	(1,177,676)	1,514,331	1,502,360
20. Net income (Line 18 minus Line 19)(to Line 22)	(7,569,057)	4,163,702	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)	(7,569,057)	4,163,702	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 \$ 344	(1,295)	(26,364)	(79)
25. Change in net unrealized foreign exchange capital gain (loss)			0
26. Change in net deferred income tax	492,333	255,722	111,036
27. Change in nonadmitted assets	(435,601)	(254,472)	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	663,500	745,919	2,122,469
38. Change in surplus as regards policyholders (Lines 22 through 37)	(10,050,120)	3,584,507	(2,228,642)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	101,218,322	117,081,591	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	14,964	21,430	32,715
1403. Loss on sale of fixed assets	(61,511)	0	0
1498. Summary of remaining write-ins for Line 14 from overflow page	109,062	161,731	161,731
1499. Totals (Lines 1401 through 1403 plus 1498)(Line 14 above)	62,515	1,158,561	1,523,262
3701. STATUTORY POOLING ADJUSTMENT	1,192,277	745,919	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)	663,500	745,919	2,122,469

STATEMENT AS OF SEPTEMBER 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	152,164,339	143,915,625	183,103,576
2. Net investment income	4,234,423	4,664,327	6,833,724
3. Miscellaneous income	726,283	1,893,744	2,487,211
4. Total (Lines 1 to 3)	157,125,045	150,473,696	192,424,511
5. Benefit and loss related payments	95,981,254	80,856,603	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	64,690,375	60,357,589	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)	1,535,916	2,358,357	2,419,771
10. Total (Lines 5 through 9)	162,207,545	143,572,549	192,045,076
11. Net cash from operations (Line 4 minus Line 10)	(5,082,500)	6,901,147	379,435
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	15,066,988	24,781,807	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	41	0	(249)
12.7 Miscellaneous proceeds	0	0	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	15,067,029	24,781,807	46,297,394
13. Cost of investments acquired (long-term only):			
13.1 Bonds	11,444,410	30,121,549	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	30,121,549	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)	3,622,619	(5,339,742)	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	1,300,000	7,900,000
16.6 Other cash provided (applied)	2,385,360	(1,100,482)	(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)	(814,640)	(2,400,482)	(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) ..	(2,274,521)	(839,077)	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)	(2,644,000)	(1,241,210)	(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	\$ (7,569,057)	\$ 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	\$ (7,569,057)	\$ 3,437,545
SURPLUS					
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$ 101,218,322	\$ 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	\$ 101,218,322	\$ 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 third 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 third 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\$ 1,745,524

2. 12 Months or Longer\$ 909,659

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

1. Less than 12 Months\$ 12,972,399

2. 12 Months or Longer\$ 3,475,662
- (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		\$ 8,003			\$ 8,003
Total assets at fair value/NAV	\$ -	\$ 8,003	\$ -	\$ -	\$ 8,003

(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	\$ 168,078,372	\$ 194,975,787	\$ 4,945,626	\$ 163,132,746			
Preferred Stock	\$ 2,233,410	\$ 2,718,000		\$ 2,233,410			
Total	\$ 170,311,782	\$ 197,693,787	\$ 4,945,626	\$ 165,366,156			

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

NOTE 21 Other Items

No significant changes

NOTE 22 Events Subsequent

Subsequent events have been considered through November 14, 2022 for these statutory financial statements which are to be issued on November 14, 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 \$110,038,000 were lower by \$4,865,000 due to favorable development of prior year estimates. This redundancy was 4.7% 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

NOTE 35 Multiple Peril Crop Insurance

NOTES TO FINANCIAL STATEMENTS

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 SEPTEMBER 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?

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

Yes [X] No []
- 3.2

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

Yes [] No [X]
- 3.3

If the response to 3.2 is yes, provide a brief description of those changes.
- 3.4

Is the reporting entity publicly traded or a member of a publicly traded group?

Yes [] No [X]
- 3.5

If the response to 3.4 is yes, provide the CIK (Central Index Key) code issued by the SEC for the entity/group.
- 4.1

Has the reporting entity been a party to a merger or consolidation during the period covered by this statement?

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 | 2 | 3 |
| Name of Entity | NAIC Company Code | State of Domicile |
| | | |
5.

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

If yes, attach an explanation.

Yes [] No [X] N/A []
- 6.1

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

12/31/2018
- 6.2

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

12/31/2018
- 6.3

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

06/30/2020
- 6.4

By what department or departments?
State of Ohio Department of Insurance
- 6.5

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

Yes [] No [] N/A [X]
- 6.6

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

Yes [] No [] N/A [X]
- 7.1

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

Yes [] No [X]
- 7.2

If yes, give full information:
- 8.1

Is the company a subsidiary of a bank holding company regulated 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	2	3	4	5	6
Affiliate Name	Location (City, State)	FRB	OCC	FDIC	SEC

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?
(a) Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
(b) Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the reporting entity;
(c) Compliance with applicable governmental laws, rules and regulations;
(d) The prompt internal reporting of violations to an appropriate person or persons identified in the code; and
(e) Accountability for adherence to the code.

Yes [X] No []
- 9.11

If the response to 9.1 is No, please explain:
- 9.2

Has the code of ethics for senior managers been amended?

Yes [] No [X]
- 9.21

If the response to 9.2 is Yes, provide information related to amendment(s).
- 9.3

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

Yes [] No [X]
- 9.31

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

FINANCIAL

- 10.1

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

Yes [X] No []
- 10.2

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

\$0

INVESTMENT

- 11.1

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

Yes [] No [X]
- 11.2

If yes, give full and complete information relating thereto:
12.

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

\$
13.

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

\$
- 14.1

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

Yes [] No [X]
- 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 | \$ |
| 14.22 Preferred Stock | \$0 | \$ |
| 14.23 Common Stock | \$0 | \$ |
| 14.24 Short-Term Investments | \$0 | \$ |
| 14.25 Mortgage Loans on Real Estate | \$0 | \$ |
| 14.26 All Other | \$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 | \$ | \$ |
- 15.1

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

Yes [] No [X]
- 15.2

If yes, has a comprehensive description of the hedging program been made available to the domiciliary state?
If no, attach a description with this statement.

Yes [] No [] N/A [X]
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 SEPTEMBER 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 [X] No []
- 17.1 For all agreements that comply with the requirements of the NAIC Financial Condition Examiners Handbook, complete the following:

1 Name of Custodian(s)	2 Custodian Address
Bank of New York Mellon	One Wall Street New York, NY 10286

- 17.2 For all agreements that do not comply with the requirements of the NAIC Financial Condition Examiners Handbook, provide the name, location and a complete explanation:

1 Name(s)	2 Location(s)	3 Complete Explanation(s)

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]
- 17.4 If yes, give full 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
Central Registration Depository Number	Name of Firm or Individual	Legal Entity Identifier (LEI)	Registered With	Investment Management Agreement (IMA) Filed

- 18.1 Have all the filing requirements of the Purposes and Procedures Manual of the NAIC Investment Analysis Office been followed? Yes [X] No []
- 18.2 If no, list exceptions:

19. By self-designating 5GI securities, the reporting entity is certifying the following elements for each self-designated 5GI security:
- a. Documentation necessary to permit a full credit analysis of the security does not exist or an NAIC CRP credit rating for an FE or PL security is not available.
 - b. Issuer or obligor is current on all contracted interest and principal payments.
 - c. The insurer has an actual expectation of ultimate payment of all contracted interest and principal.
- Has the reporting entity self-designated 5GI securities? Yes [] No [X]

20. By self-designating PLGI securities, the reporting entity is certifying the following elements of each self-designated PLGI security:
- a. The security was purchased prior to January 1, 2018.
 - b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
 - c. The NAIC Designation was derived from the credit rating assigned by an NAIC CRP in its legal capacity as a NRSRO which is shown on a current private letter rating held by the insurer and available for examination by state insurance regulators.
 - d. The reporting entity is not permitted to share this credit rating of the PL security with the SVO.
- Has the reporting entity self-designated PLGI securities? Yes [] No [X]

21. By assigning FE to a Schedule BA non-registered private fund, the reporting entity is certifying the following elements of each self-designated FE fund:
- a. The shares were purchased prior to January 1, 2019.
 - b. The reporting entity is holding capital commensurate with the NAIC Designation reported for the security.
 - c. The security had a public credit rating(s) with annual surveillance assigned by an NAIC CRP in its legal capacity as an NRSRO prior to January 1, 2019.
 - d. The fund only or predominantly holds bonds in its portfolio.
 - e. The current 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.
 - f. The public credit rating(s) with annual surveillance assigned by an NAIC CRP has not lapsed.
- Has the reporting entity assigned FE to Schedule BA non-registered private funds that complied with the above criteria? Yes [] No [X]

STATEMENT AS OF SEPTEMBER 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:

			TOTAL DISCOUNT				DISCOUNT TAKEN DURING PERIOD			
1	2	3	4	5	6	7	8	9	10	11
Line of Business	Maximum Interest	Discount Rate	Unpaid Losses	Unpaid LAE	IBNR	TOTAL	Unpaid Losses	Unpaid LAE	IBNR	TOTAL
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 SEPTEMBER 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

1	2	3	4	5	6	7
NAIC Company Code	ID Number	Name of Reinsurer	Domiciliary Jurisdiction	Type of Reinsurer	Certified Reinsurer Rating (1 through 6)	Effective Date of Certified Reinsurer Rating
NONE						

SCHEDULE T - EXHIBIT OF PREMIUMS WRITTEN

Current Year to Date - Allocated by States and Territories

			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
States, etc.									
1.	Alabama	AL	L	198,174	184,374	9,435	24,618	64,500	59,471
2.	Alaska	AK	L	124,657	118,233	66,150	44,019	42,820	107,375
3.	Arizona	AZ	L	573,046	1,099,310	142,639	542,350	738,112	828,005
4.	Arkansas	AR	L	269,225	238,311	16,742	15,622	282,009	77,115
5.	California	CA	L	1,157,585	1,204,779	0	0	0	4,310
6.	Colorado	CO	L	815,861	762,297	433,242	18,975	177,827	106,818
7.	Connecticut	CT	L	51,946,993	51,257,522	40,620,323	32,743,483	63,177,719	79,026,406
8.	Delaware	DE	L	196,570	165,078	7,367	39,618	108,860	67,529
9.	District of Columbia	DC	L	59,086	69,851	0	0	15,085	14,039
10.	Florida	FL	L	1,630,970	1,498,721	387,556	275,269	1,116,526	607,823
11.	Georgia	GA	L	501,177	499,108	393,238	71,080	276,640	217,321
12.	Hawaii	HI	L	25,778	31,689	10,228	5,225	18,516	13,119
13.	Idaho	ID	L	3,664,432	3,510,534	2,315,626	2,112,575	2,940,567	2,770,045
14.	Illinois	IL	L	1,390,114	1,374,969	101,889	143,940	558,390	396,116
15.	Indiana	IN	L	384,537	398,355	142,262	228,815	170,180	205,428
16.	Iowa	IA	L	143,171	141,574	3,001	62,422	37,568	32,965
17.	Kansas	KS	L	451,860	412,417	566,412	33,002	109,822	87,714
18.	Kentucky	KY	L	57,052	57,644	72,259	22,991	137,718	182,027
19.	Louisiana	LA	L	200,979	172,533	162,171	263,793	114,746	322,293
20.	Maine	ME	L	566,814	600,051	12,160	33,405	11,804	23,053
21.	Maryland	MD	L	262,076	196,191	56,816	46,348	175,303	100,040
22.	Massachusetts	MA	L	183,565	218,860	11,819	19,846	334,437	103,426
23.	Michigan	MI	L	407,162	447,750	86,750	162,538	178,365	138,914
24.	Minnesota	MN	L	533,267	469,681	(79,721)	19,980	113,625	106,096
25.	Mississippi	MS	L	61,213	45,858	231	20,990	22,368	16,626
26.	Missouri	MO	L	172,467	181,411	20,500	4,822	8,287	13,025
27.	Montana	MT	L	203,844	238,995	55,601	7,453	222,996	106,008
28.	Nebraska	NE	L	413,474	385,725	97,042	226,991	278,771	236,489
29.	Nevada	NV	L	340,557	418,617	15,155	667,064	82,880	94,640
30.	New Hampshire	NH	L	210,942	181,945	32,341	4,222	26,261	68,470
31.	New Jersey	NJ	L	463,674	446,476	1,475,309	3,261,602	4,738,451	8,692,011
32.	New Mexico	NM	L	160,208	150,754	23,355	17,149	39,789	21,905
33.	New York	NY	L	788,731	780,265	72,976	201,676	958,676	1,008,292
34.	North Carolina	NC	L	663,727	674,481	23,677	90,349	165,860	150,712
35.	North Dakota	ND	L	43,518	28,561	1,663	12,338	15,508	19,543
36.	Ohio	OH	L	12,470,019	10,322,226	5,643,397	4,489,805	6,530,109	6,132,199
37.	Oklahoma	OK	L	213,901	216,729	18,794	26,598	100,242	76,286
38.	Oregon	OR	L	3,991,969	4,581,386	2,088,510	3,151,141	2,603,406	3,388,616
39.	Pennsylvania	PA	L	545,151	519,732	47,474	48,495	297,920	146,507
40.	Rhode Island	RI	L	31,074,588	28,979,041	18,768,310	16,105,779	23,504,883	24,319,482
41.	South Carolina	SC	L	280,156	316,074	38,440	20,892	59,154	57,929
42.	South Dakota	SD	L	144,474	147,415	20,943	7,159	17,417	18,827
43.	Tennessee	TN	L	434,810	370,000	48,372	117,427	211,346	295,679
44.	Texas	TX	L	1,249,129	1,356,377	450,253	442,543	768,900	562,107
45.	Utah	UT	L	120,947	96,567	13,426	14,313	59,705	52,480
46.	Vermont	VT	L	198,129	189,244	15,677	1,636	8,956	14,008
47.	Virginia	VA	L	400,571	360,850	22,708	29,342	113,502	96,617
48.	Washington	WA	L	6,565,836	7,333,401	4,480,217	4,884,286	8,378,479	8,899,955
49.	West Virginia	WV	L	41,816	35,951	2,529	0	8,370	7,285
50.	Wisconsin	WI	L	323,791	287,495	33,168	(315)	103,029	90,262
51.	Wyoming	WY	L	57,810	57,896	43,753	8,262	105,114	54,576
52.	American Samoa	AS	N	0	0	0	0	0	0
53.	Guam	GU	N	0	0	0	0	0	0
54.	Puerto Rico	PR	N	0	0	0	0	0	0
55.	U.S. Virgin Islands	VI	N	0	0	0	0	0	0
56.	Northern Mariana Islands	MP	N	0	0	0	0	0	0
57.	Canada	CAN	N	0	0	0	0	0	0
58.	Aggregate Other Alien	OT	XXX	0	0	0	0	0	0
59.	Totals	XXX		127,379,603	123,833,304	79,092,185	70,791,933	120,331,518	140,237,984
DETAILS OF WRITE-INS									
58001.		XXX							
58002.		XXX							
58003.		XXX							
58998.	Summary of remaining write-ins for Line 58 from overflow page	XXX		0	0	0	0	0	0
58999.	Totals (Lines 58001 through 58003 plus 58998)(Line 58 above)	XXX		0	0	0	0	0	0

(a) Active Status Counts:

L - Licensed or Chartered - Licensed Insurance carrier or domiciled RRG.....51

E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - see DSLI).....0

D - Domestic Surplus Lines Insurer (DSLI) - Reporting entities authorized to write surplus lines in the state of domicile.....0

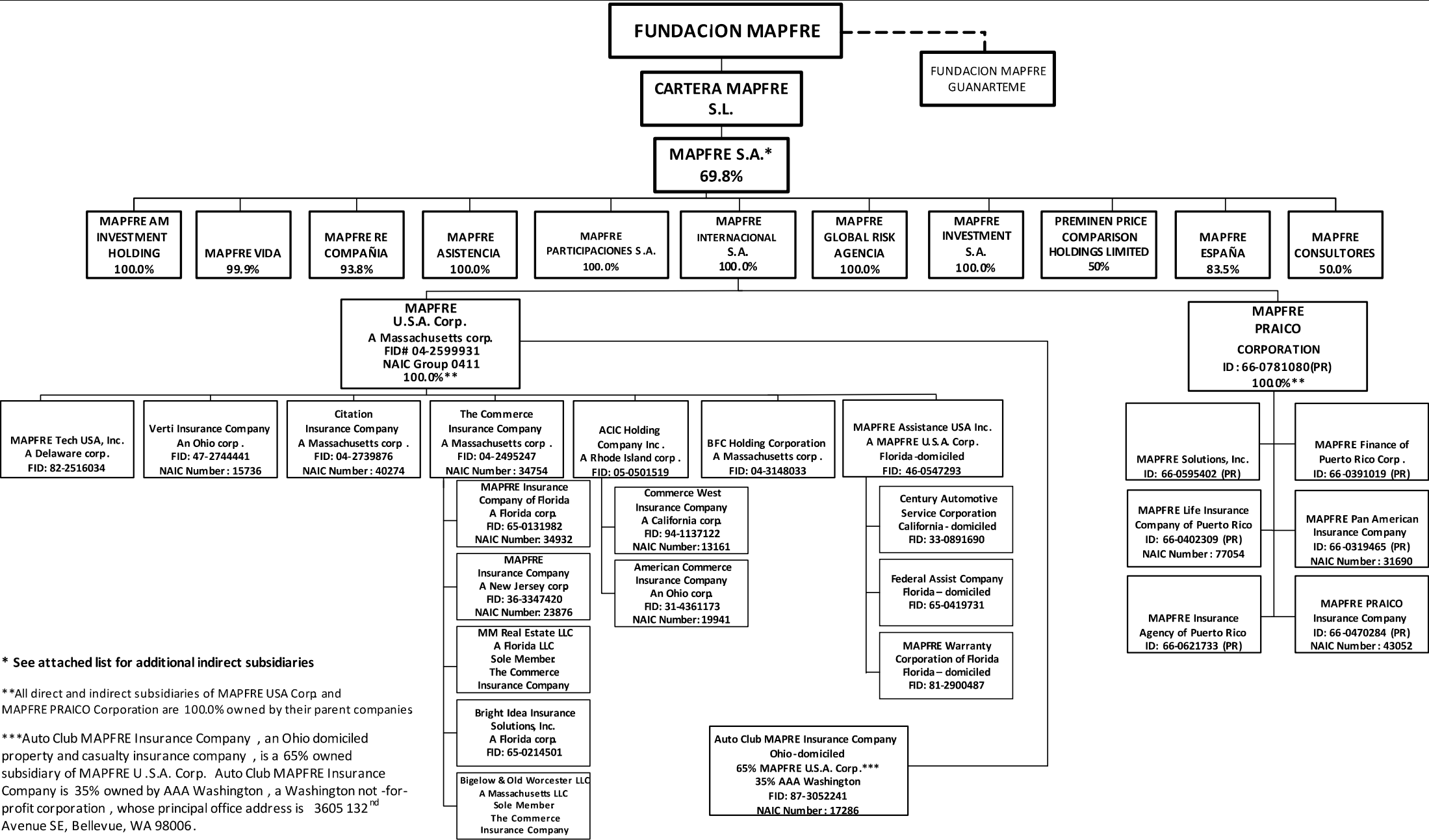
R - Registered - Non-domiciled RRGs.....0

Q - Qualified - Qualified or accredited reinsurer.....0

N - None of the above - Not allowed to write business in the state.....6

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

PART 1 – ORGANIZATIONAL CHART



* See attached list for additional indirect subsidiaries

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

***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 , whose principal office address is 3605 132nd Avenue SE, Bellevue, WA 98006.

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

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

STATEMENT AS OF SEPTEMBER 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.
FONDMAPFRE ELECCION DECIDIDA	40.00	MAPFRE, S.A.
FONDMAPFRE ELECCION MODERADA	47.20	MAPFRE, S.A.
FONDMAPFRE ELECCION PRUDENTE	53.30	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	25.20	MAPFRE, S.A.
FONDMAPFRE GLOBAL F.I.	36.90	MAPFRE, S.A.
FONDMAPFRE BOLSA F.I.	54.90	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	99.90	MAPFRE, S.A.
GESTION MODA SHOPPING S.A.	99.80	MAPFRE, S.A.
BANKIA MAPFRE VIDA, S.A. DE SEGUROS Y REASEGUROS	51.00	MAPFRE, S.A.
BANKINTER SEGUROS DE VIDA, S.A.	50.00	MAPFRE, S.A.
CAJA CASTILLA LA MANCHA VIDA Y PENSIONES S.A.	50.00	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.30	MAPFRE, S.A.
MAPFRE RE COMPANIA DE REASEGUROS, S.A.	93.80	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.00	MAPFRE, S.A.
REINSURANCE MANAGEMENT INC.	100.00	MAPFRE, S.A.
MAPFRE EURO BONDS FUND	100.00	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPANIA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	100.00	MAPFRE, S.A.
C R ARGENTINA, S.A.	100.00	MAPFRE, S.A.
CAJA REASEGURADORA DE CHILE, S.A.	99.80	MAPFRE, S.A.
MAPFRE MANDATOS Y SERVICIOS, S.A.	95.00	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	13.50	MAPFRE, S.A.
FONDMAPFRE RENTA DOLAR	19.70	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.00	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	98.40	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	100.00	MAPFRE, S.A.
IRELAND ASSIST, LTD	100.00	MAPFRE, S.A.
MEXICO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
ARABA ASSIST FOR LOGISTIC SERVICES	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPANY LIMITED	100.00	MAPFRE, S.A.
QUETZAL ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
NICASSIT, S.A.	100.00	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
NORASIST, INC D/B/A ROAD CANADA	100.00	MAPFRE, S.A.
D/B/A ROAD AMERICA MOTOR CLUB	100.00	MAPFRE, S.A.
INSURE AND GO AUSTRALIA	100.00	MAPFRE, S.A.
EUROSOS ASSISTANCE, S.A.	99.50	MAPFRE, S.A.
BRASIL ASISTENCIA S.A.	100.00	MAPFRE, S.A.
MAPFRE ABRAXAS SOFTWARE, LTD	100.00	MAPFRE, S.A.
ABRAXAS INSURANCE	100.00	MAPFRE, S.A.
MAPFRE WARRANTY UK LIMITED	100.00	MAPFRE, S.A.
HOME 3	100.00	MAPFRE, S.A.
MAPFRE WARRANTY S.P.A.	100.00	MAPFRE, S.A.
MAPFRE WARRANTIES	100.00	MAPFRE, S.A.
INSURE AND GO	100.00	MAPFRE, S.A.
TRAVEL CLAIMS SERVICES LIMITED	100.00	MAPFRE, S.A.
ANDIASISTENCIA COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	98.10	MAPFRE, S.A.
ECUASISTENCIA S.A.	99.30	MAPFRE, S.A.
PERÚ ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
CONSULTING DE SOLUCIONES Y TECNOLOGÍAS SIAM, S.A.	99.90	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.60	MAPFRE, S.A.
URUGUAY ASISTENCIA, S.A.	97.90	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.00	MAPFRE, S.A.
IBEROASISTENCIA, S.A.	99.90	MAPFRE, S.A.
NILE ASSIST	98.00	MAPFRE, S.A.
TUR ASSIST, LTD.	99.70	MAPFRE, S.A.
ROAD CHINA ASSISTANCE CO., LTD.	100.00	MAPFRE, S.A.
IBERO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	51.00	MAPFRE, S.A.
GULF ASSIST, B.S.C.	74.60	MAPFRE, S.A.
CARIBE ASISTENCIA	83.60	MAPFRE, S.A.
PANAMÁ ASISTENCIA, S.A.	84.00	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	60.30	MAPFRE, S.A.
PT MAPFRE ABDA ASSISTANCE	51.00	MAPFRE, S.A.
AFRIQUE ASSISTANCE, S.A.	49.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	99.00	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	10.00	MAPFRE, S.A.
DESARROLLOS URBANOS CIC, S.A.	99.90	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.90	MAPFRE, S.A.
MAPFRE PARTICIPACIONES, S.A.	100.00	MAPFRE, S.A.
INDUSTRIAL RE S.A.	100.00	MAPFRE, S.A.
SOLUNION SEGUROS DE CREDITO S.A.	50.00	MAPFRE, S.A.
MAPFRE INVESTMENT, S.A.	100.00	MAPFRE, S.A.
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.00	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	83.50	MAPFRE, S.A.
CENTRO MEDICOS MAPFRE, S.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE, S.A.	100.00	MAPFRE, S.A.
MAPFRE AUTOMOCION S.A.U.	100.00	MAPFRE, S.A.
CENTRO DE EXPERIMENTACION Y SEGURIDAD VIAL MAPFRE S.A.	100.00	MAPFRE, S.A.
VERTI ASEGURADORA, 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, Cía DE SEGUROS Y REASEGUROS S.A.	50.10	MAPFRE, S.A.
RASTREATOR.COM LTD	25.00	MAPFRE, S.A.
AUDATEX ESPANA, S.A.	12.50	MAPFRE, S.A.
INMO ALEMANIA GESTION DE ACTIVOS INMOBILIARIOS, S.L.	20.00	MAPFRE, S.A.
TECNOLOGIAS DE LA INFORMACION Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A.	22.95	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	21.70	MAPFRE, S.A.
FONDMAPFRE RENTA DOLAR	19.70	MAPFRE, S.A.
FUNESPANA, S.A.	99.80	MAPFRE, S.A.
TANATORIUM ZRT	100.00	MAPFRE, S.A.
ALL FUNERAL SERVICES, S.L.	100.00	MAPFRE, S.A.

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

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

STATEMENT AS OF SEPTEMBER 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	Domi-ciliary Location	Relation-ship 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 Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (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	
			04-2599931												
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	17286	87-3052241				AUTO CLUB MAPFRE INSURANCE COMPANY	.OH	.IA	MAPFRE USA CORPORATION INC.	Ownership.....	65.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	17286	87-3052241				AUTO CLUB MAPFRE INSURANCE COMPANY	.OH	.IA	AAA WASHINGTON	Ownership.....	35.000	AAA WASHINGTON	..NO	
			82-2516034				MAPFRE TECH USA, INC	.DE	NIA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736	47-2744441				VERTI INSURANCE COMPANY	.OH	.IA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274	04-2739876				CITATION INSURANCE COMPANY	.MA	.IA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34754	04-2495247				THE COMMERCE INSURANCE COMPANY	.MA	.IA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932	65-0131982				MAPFRE INSURANCE COMPANY OF FLORIDA	.FL	.IA	THE COMMERCE INSURANCE COMPANY	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876	36-3347420				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	
			65-0214501				BRIGHT IDEA INSURANCE SOLUTIONS, INC.	.FL	NIA	THE COMMERCE INSURANCE COMPANY	Ownership.....	100.000	MAPFRE S.A.	..NO	
			04-2495247				BIGELOW & OLD WORCESTER, LLC	.MA	NIA	THE COMMERCE INSURANCE COMPANY	Ownership.....	100.000	MAPFRE S.A.	..NO	
			05-0501519				ACTIC HOLDINGS COMPANY, INC.	.RI	UDP	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161	94-1137122				COMMERCE WEST INSURANCE COMPANY	.CA	.IA	ACTIC HOLDINGS COMPANY, INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941	31-4361173				AMERICAN COMMERCE INSURANCE COMPANY	.OH	.RE	ACTIC HOLDINGS COMPANY, INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			04-3148033				BFC HOLDING CORPORATION	.MA	NIA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			46-0547293				MAPFRE ASSISTANCE USA INC.	.FL	NIA	MAPFRE USA CORPORATION INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			33-0891690				CENTURY AUTOMOTIVE SERVICES COMPANY	.CA	NIA	MAPFRE ASSISTANCE USA INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			65-0419731				FEDERAL ASSIST COMPANY	.FL	NIA	MAPFRE ASSISTANCE USA INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			81-2900487				MAPFRE WARRANTY CORPORATION OF FLORIDA	.FL	NIA	MAPFRE ASSISTANCE USA INC.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			66-0781080				MAPFRE PRAICO CORPORATION	.PR	NIA	MAPFRE INTERNACIONAL S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
			66-0595402				MAPFRE SOLUTIONS, INC.	.PR	NIA	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	MAPFRE INSURANCE GROUP	77054	66-0402309				MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	.PR	.IA	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.								
			66-0621733					.PR	.IA	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	MAPFRE INSURANCE GROUP	31690	66-0391019				MAPFRE FINANCE OF PUERTO RICO CORP	.PR	NIA	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	..NO	
.0411	MAPFRE INSURANCE GROUP	43052	66-0319465				MAPFRE PAN AMERICAN INSURANCE COMPANY	.PR	.IA	MAPFRE PRAICO CORPORATION	Ownership.....	100.000	MAPFRE S.A.	..NO	
			66-0470284				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	

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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	Domi-ciliary Location	Relation-ship 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 Percen-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
							MAPFRE PERU COMPANIA 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 COMPANIA DE SEGUROS, S.A.	.ECU	.IA	MAPFRE INTERNACIONAL S.A.	Ownership	60.000	MAPFRE S.A.	.NO	
							MAPFRE PARAGUAY COMPANIA DE SEGUROS, S.A.	.PRY	.IA	MAPFRE INTERNACIONAL S.A.	Ownership	89.500	MAPFRE S.A.	.NO	
							APOINT S.A.	.URY	NIA	MAPFRE INTERNACIONAL S.A.	Ownership	100.000	MAPFRE S.A.	.NO	
							MAPFRE URUGUAY SEGUROS S.A.	.URY	.IA	MAPFRE INTERNACIONAL S.A.	Ownership	100.000	MAPFRE S.A.	.NO	
							GRUPO CORPORATIVO LML S.A. DE C.V.	.MEX	NIA	MAPFRE INTERNACIONAL S.A.	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 WARF PROPERTIES	.MLT	NIA	M.S.V. LIFE P.L.C.	Ownership	50.000	MAPFRE S.A.	.NO	
							CHURCH WARF 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 BINA DANA ARTA TBK	.IDN	.IA	MAPFRE INTERNACIONAL S.A.	Ownership	62.300	MAPFRE S.A.	.NO	
							PT MAPFRE ABDA ASSISTANCE	.IDN	NIA	PT ASURANSI BINA DANA 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	
							INVERSORA 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 SEPTEMBER 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	Domi-ciliary Location	Relation-ship 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)	*
							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.	.CHL	.IA	MAPFRE CHILE ASESORIAS, S.A.	Ownership.....	12.700	MAPFRE S.A.	..NO	
							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.	.BRA	.IA	MAPFRE INTERNACIONAL, S.A.	Ownership.....	99.200	MAPFRE S.A.	..NO	
							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	.BRA	.NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE SAUDE LTDA	.BRA	.NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	.BRA	.NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAC INVESTIMENTOS S.A.	.BRA	.NIA	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE INVESTIMENTOS LTDS	.BRA	.NIA	MAPFRE INVESTIMENTOS E PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE PARTICIPACOES, S.A.	.BRA	.NIA	MAPFRE BRASIL PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE PREVIDENCIA S.A.	.BRA	.IA	MAPFRE PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE CAPITALIZACAO, S.A.	.BRA	.NIA	MAPFRE PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE SEGUROS GERAIS S.A.	.BRA	.IA	MAPFRE PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE SERVICOS S.A.	.BRA	.NIA	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE VIDA S.A.	.BRA	.IA	MAPFRE PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							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.	.BRA	.IA	BB MAPFRE SH1 PARTICIPACOES, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							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.	.ESP	.NIA	MAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							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	.ESP	.IA	MAPFRE, S.A.	Ownership.....	99.900	MAPFRE S.A.	..NO	
							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.	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	25.000	MAPFRE S.A.	..NO	
							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.	.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	.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.	.ESP	.NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO	
							MAPFRE AM-GOOD GOVERNANCE	.ESP	.NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership.....	7.900	MAPFRE S.A.	..NO	
							MAPFRE AM-IBERIAN EQUITITIES	.ESP	.NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership.....	9.800	MAPFRE S.A.	..NO	
							MAPFRE AM-EUROPEAN EQUITITIES	.ESP	.NIA	MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	Ownership.....	4.000	MAPFRE S.A.	..NO	
							FONDIMAPFRE ELECCION DECIDIDA	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	40.000	MAPFRE S.A.	..NO	
							FONDIMAPFRE ELECCION MODERADA	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	47.200	MAPFRE S.A.	..NO	
							FONDIMAPFRE ELECCION PRUDENTE	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	53.300	MAPFRE S.A.	..NO	
							FONDIMAPFRE BOLSA AMERICA	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	25.200	MAPFRE S.A.	..NO	
							FONDIMAPFRE GLOBAL F.I.	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	36.900	MAPFRE S.A.	..NO	

STATEMENT AS OF SEPTEMBER 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	Domi-ciliary Location	Relation-ship 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)	*
							FONDMAPFRE BOLSA F.I.	.ESP	.NIA	REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	54.900	MAPFRE S.A.	.NO	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA, S.A.	.ESP	.NIA	MAPFRE VIDA SOCIEDAD ANONIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	Ownership.....	99.900	MAPFRE S.A.	.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	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.	.NJ	.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 DO 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 REASEGURADORA 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	
							FONDMAPFRE BOLSA AMERICA	.ESP	.NIA	MAPFRE RE COMPANIA DE REASEGUROS, S.A.	Ownership.....	13.500	MAPFRE S.A.	.NO	
		.16475	83-2698500				FONDMAPFRE 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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							INSURE AND GO AUSTRALIA	.AUS	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							EUROSOS ASSISTANCE, S.A.	.GRC	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.500	MAPFRE S.A.	.NO	
							BRASIL ASISTENCIA S.A.	.BRA	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE ABRAXAS SOFTWARE, LTD	.GBR	.NIA	MAPFRE ASISTENCIA COMPANIA 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 COMPANIA 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 COMPANIA 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 COMPANIA DE ASISTENCIA DE LOS ANDES, S.A.	.COL	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	98.100	MAPFRE S.A.	.NO	
							ECUASISTENCIA S.A.	.ECU	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.300	MAPFRE S.A.	.NO	
							PERÚ ASISTENCIA, S.A.	.PER	.NIA	MAPFRE ASISTENCIA COMPANIA 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 COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.900	MAPFRE S.A.	.NO	
							INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	.IND	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.600	MAPFRE S.A.	.NO	
							URUGUAY ASISTENCIA, S.A.	.URY	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	97.900	MAPFRE S.A.	.NO	
							SUR ASISTENCIA, S.A.	.CHL	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.000	MAPFRE S.A.	.NO	
							IBEROASISTENCIA, S.A.	.ESP	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.900	MAPFRE S.A.	.NO	
							NILE ASSIST	.EGY	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	98.000	MAPFRE S.A.	.NO	
							TUR ASSIST, LTD.	.TUR	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	99.700	MAPFRE S.A.	.NO	
							ROAD CHINA ASSISTANCE CO., LTD.	.CHN	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							IBERO ASISTENCIA, S.A.	.PRT	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MIDDLESEA ASSIST LIMITED	.MLT	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	51.000	MAPFRE S.A.	.NO	
							GULF ASSIST, B.S.C.	.BHR	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	74.600	MAPFRE S.A.	.NO	
							CARIBE ASISTENCIA	.DOM	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	83.600	MAPFRE S.A.	.NO	
							PANAMÁ ASISTENCIA, S.A.	.PAN	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	84.000	MAPFRE S.A.	.NO	
							ROADSIDE ASSIST ALGERIE SPA	.DZA	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	60.300	MAPFRE S.A.	.NO	
							PT MAPFRE ABDA ASSISTANCE	.IDN	.NIA	MAPFRE ASISTENCIA COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	51.000	MAPFRE S.A.	.NO	

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							AFRIQUE ASSISTANCE, S.A.	.TUN	.NIA	MAPFRE ASISTENCIA COMPANIA 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 COMPANIA 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	
							SOLUNION 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, COMPANIA 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 QUINGDAO 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 ESPAÑA, 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	
							FONDIMAPFRE BOLSA AMERICA	.ESP	.NIA	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	21.700	MAPFRE S.A.	.NO	
							FONDIMAPFRE RENTA DOLAR	.ESP	.NIA	MAPFRE ESPAÑA COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	19.700	MAPFRE S.A.	.NO	

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							FUNESPANA, S.A.	.ESP	NIA	REASEGUROS, S.A.	Ownership.....	99.800	MAPFRE S.A.	.NO	
							TANATORIUM ZRT	.HUN	NIA	FUNESPANA, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							ALL FUNERAL SERVICES, S.L.	.ESP	NIA	FUNESPANA, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							FUNESPANA CHILE, S.A.	.ESP	NIA	FUNESPANA, S.A.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							FUNEUROPEA CHILE, S.A.	.ESP	NIA	FUNESPANA, S.A.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							FUNESPANA DOS, S.L.	.ESP	NIA	FUNESPANA, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							SALZILLO SERVICIOS FUNERARIOS S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	45.000	MAPFRE S.A.	.NO	
							SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	.NO	
							INICIATIVAS ALCAESAR, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	40.000	MAPFRE S.A.	.NO	
							NUOVO TANATORIO, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							SERVICIOS FUNERARIOS LA CARIDAD, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	49.000	MAPFRE S.A.	.NO	
							POMPEES FUNEBRES DOMINGO, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							DE MENA SERVICIOS FUNERARIOS S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	.NO	
							CEMENTERIO PARQUE ANDUJAR, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	72.800	MAPFRE S.A.	.NO	
							ISABELO ALVAREZ MAYORGA, S.A.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							SERVICIOS FUNERARIOS DEL NERVION, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	.NO	
							TANATORIO DE ECIJA, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	33.300	MAPFRE S.A.	.NO	
							TANATORIO SE-30 SEVILLA, S.L.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	10.000	MAPFRE S.A.	.NO	
							FUNERARIAS REUNIDAS EL BIERZO, S.A.	.ESP	NIA	FUNESPANA DOS, S.L.	Ownership.....	85.800	MAPFRE S.A.	.NO	
							MAPFRE INMUEBLES, S.G.A.	.ESP	NIA	REASEGUROS, S.A.	Ownership.....	83.000	MAPFRE S.A.	.NO	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.	.ESP	NIA	REASEGUROS, S.A.	Ownership.....	66.700	MAPFRE S.A.	.NO	
							MAPFRE SEGUROS GERAIS S.A.	.PRT	.IA	MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE PORTUGAL SEGUROS DE VIDA S.A.	.PRT	.IA	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE MULTI ASSET STRAT	.ESP	NIA	REASEGUROS, S.A.	Ownership.....	41.600	MAPFRE S.A.	.NO	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	.COL	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership.....	93.700	MAPFRE S.A.	.NO	
							CREDIMAPFRE	.COL	NIA	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE SERVICIOS EXEQUIALES SAS	.COL	NIA	CREDIMAPFRE	Ownership.....	100.000	MAPFRE S.A.	.NO	
							CESVI COLOMBIA, S.A.	.COL	NIA	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	62.300	MAPFRE S.A.	.NO	
							MAPFRE COLOMBIA VIDA SEGUROS S.A.	.COL	.IA	MAPFRE INTERNACIONAL S.A.	Ownership.....	94.400	MAPFRE S.A.	.NO	
							MAPFRE PERÚ VIDA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	.PER	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership.....	67.400	MAPFRE S.A.	.NO	
							CORPORACION FUNERARIA, S.A.	.PER	NIA	MAPFRE PERÚ VIDA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE DOMINICANA	.DOM	NIA	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	.DOM	NIA	MAPFRE DOMINICANA	Ownership.....	51.000	MAPFRE S.A.	.NO	
							CREDI PRIMAS, S.A.	.DOM	NIA	MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	
							MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	.ESP	.IA	MAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	.NO	

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, whose principal office address is 3605 132nd Avenue SE, Bellevue, WA 98006.

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

Asterisk	Explanation

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	3,054,754	1,679,909	55.0	59.5
2.1	Allied Lines	43,890	19,243	43.8	
2.2	Multiple peril crop		0	0.0	
2.3	Federal flood	3,792,215	(261,934)	(6.9)	
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	36,555,525	21,304,469	58.3	56.0
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	8,380	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	4,696,511	(39,690)	(0.8)	39.4
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)	528,099	233,074	44.1	
19.2	Other private passenger auto liability	36,016,003	16,795,949	46.6	
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	22,617,068	16,508,417	73.0	
21.2	Commercial auto physical damage	0	0	0.0	
22.	Aircraft (all perils)	16,243,364	6,247,220	38.5	24.3
23.	Fidelity			0.0	0.0
24.	Surety			0.0	0.0
26.	Burglary and theft			0.0	0.0
27.	Boiler and machinery			0.0	0.0
28.	Credit			0.0	0.0
29.	International			0.0	0.0
30.	Warranty			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	123,555,809	62,486,657	50.6	48.7
DETAILS OF WRITE-INS					
3401.					
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

PART 2 - DIRECT PREMIUMS WRITTEN

Line of Business		1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1.	Fire	922,623	2,828,129	3,191,754
2.1	Allied Lines	15,473	45,042	41,209
2.2	Multiple peril crop	0	0	
2.3	Federal flood	1,075,874	3,037,868	3,586,803
2.4	Private crop	0	0	
2.5	Private flood	0	0	
3.	Farmowners multiple peril	0	0	0
4.	Homeowners multiple peril	13,632,135	37,693,119	36,054,421
5.	Commercial multiple peril	0	0	0
6.	Mortgage guaranty	0	0	0
8.	Ocean marine	0	0	0
9.	Inland marine	1,242	9,224	6,929
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	1,553,392	4,737,444	4,543,744
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)	169,754	507,830	600,711
19.2	Other private passenger auto liability	12,666,062	37,360,737	36,405,106
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	8,210,141	23,776,348	22,596,026
21.2	Commercial auto physical damage	0	0	
22.	Aircraft (all perils)	9,081,067	17,383,861	16,806,603
23.	Fidelity	0	0	0
24.	Surety	0	0	0
26.	Burglary and theft	0	0	0
27.	Boiler and machinery	0	0	0
28.	Credit	0	0	0
29.	International	0	0	0
30.	Warranty	0	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	47,327,763	127,379,602	123,833,306
DETAILS OF WRITE-INS				
3401.				
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 SEPTEMBER 30, 2022 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 3 (000 omitted)

LOSS AND LOSS ADJUSTMENT EXPENSE RESERVES SCHEDULE

	1	2	3	4	5	6	7	8	9	10	11	12	13											
Years in Which Losses Occurred	Prior Year-End Known Case Loss and LAE Reserves	Prior Year-End IBNR Loss and LAE Reserves	Total Prior Year-End Loss and LAE Reserves (Cols. 1+2)	2022 Loss and LAE Payments on Claims Reported as of Prior Year-End	2022 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2022 Loss and LAE Payments (Cols. 4+5)	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported and Open as of Prior Year End	Q.S. Date Known Case Loss and LAE Reserves on Claims Reported or Reopened Subsequent to Prior Year End	Q.S. Date IBNR Loss and LAE Reserves	Total Q.S. Loss and LAE Reserves (Cols.7+8+9)	Prior Year-End Known Case Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols.4+7 minus Col. 1)	Prior Year-End IBNR Loss and LAE Reserves Developed (Savings)/ Deficiency (Cols. 5+8+9 minus Col. 2)	Prior Year-End Total Loss and LAE Reserve Developed (Savings)/ Deficiency (Cols. 11+12)											
1. 2019 + Prior	37,355	(2,338)	35,017	11,210	351	11,561	21,904	127	(2,214)	19,817	(4,241)	602	(3,639)											
2. 2020	16,666	3,875	20,541	6,327	88	6,415	11,892	79	(553)	11,418	1,553	(4,261)	(2,708)											
3. Subtotals 2020 + Prior	54,021	1,537	55,558	17,537	439	17,976	33,796	206	(2,767)	31,235	(2,688)	(3,659)	(6,347)											
4. 2021	32,456	14,729	47,185	26,607	254	26,861	21,574	414	(182)	21,806	15,725	(14,243)	1,482											
5. Subtotals 2021 + Prior	86,477	16,266	102,743	44,144	693	44,837	55,370	620	(2,949)	53,041	13,037	(17,902)	(4,865)											
6. 2022	XXX	XXX	XXX	XXX	71,424	71,424	XXX	32,066	11,413	43,479	XXX	XXX	XXX											
7. Totals	86,477	16,266	102,743	44,144	72,117	116,261	55,370	32,686	8,464	96,520	13,037	(17,902)	(4,865)											
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. 15.1	2. (110.1)	3. (4.7)										
													Col. 13, Line 7 As a % of Col. 1 Line 8		4. (4.4)									

STATEMENT AS OF SEPTEMBER 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.	N/A

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 SEPTEMBER 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	1,592		1,592	1,592
2597. Summary of remaining write-ins for Line 25 from overflow page	1,592	0	1,592	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)	109,062	161,731	161,731
1497. Summary of remaining write-ins for Line 14 from overflow page	109,062	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)		

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)		

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)		

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	104,054	156,684
4. Unrealized valuation increase (decrease)	(1,640)	(100)
5. Total gain (loss) on disposals	27,094	736,764
6. Deduct consideration for bonds and stocks disposed of	15,066,988	46,453,035
7. Deduct amortization of premium	282,791	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)	197,693,787	201,469,648
12. Deduct total nonadmitted amounts	0	0
13. Statement value at end of current period (Line 11 minus Line 12)	197,693,787	201,469,648

STATEMENT AS OF SEPTEMBER 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)	160,390,814	0	1,809,075	(134,970)	163,499,309	160,390,814	158,446,769	162,435,352
2. NAIC 2 (a)	36,568,067	0	0	(39,049)	38,615,359	36,568,067	36,529,018	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	196,958,881	0	1,809,075	(174,019)	202,114,668	196,958,881	194,975,787	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	2,718,000	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	2,718,000	2,718,000
15. Total Bonds and Preferred Stock	199,676,881	0	1,809,075	(174,019)	204,832,668	199,676,881	197,693,787	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

SCHEDULE DA - PART 1

Short-Term Investments

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

NONE

SCHEDULE DA - VERIFICATION

Short-Term Investments

	1	2
	Year To Date	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

Schedule D - Part 3 - Long-Term Bonds and Stocks Acquired

N O N E

STATEMENT AS OF SEPTEMBER 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	2	3	4	5	6	7	8	9	10	Change In Book/Adjusted Carrying Value					16	17	18	19	20	21	22
										11	12	13	14	15							
CUSIP Identification	Description	For- eign	Disposal Date	Name of Purchaser	Number of Shares of Stock	Consid- eration	Par Value	Actual Cost	Prior Year Book/ Adjusted Carrying Value	Unrealized Valuation Increase/ (Decrease)	Current Year's (Amor- tization)/ Accretion	Current Year's Other Than Temporary Impairment Recogn- ized	Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book /Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Stated Con- tractual Maturity Date	NAIC Desig- nation, NAIC Desig- nation Modifier and SVO Admini- strative Symbol
36225B-GW-2	GNMA POOL #0781113		09/15/2022	BANK OF NEW YORK		1,716	1,716	1,779	1,747	0	(3)	0	(3)	0	1,744	0	(28)	(28)	80	11/15/2029	1.A
83162C-TA-1	SMALL BUS ADMIN GTD DEV PTC		07/01/2022	PRINCIPAL RECEIPT		142,092	142,092	156,812	148,412	0	(6,320)	0	(6,320)	0	142,092	0	0	0	6,224	01/01/2030	1.A
0109999999. Subtotal - Bonds - U.S. Governments						143,808	143,808	158,591	150,159	0	(6,323)	0	(6,323)	0	143,836	0	(28)	(28)	6,304	XXX	XXX
57582R-YN-0	MASSACHUSETTS ST		09/01/2022	Sink PMT @ 100.0000000		16,174	16,174	17,062	17,022	0	(847)	0	(847)	0	16,174	0	0	0	431	09/01/2039	1.B FE
0509999999. Subtotal - Bonds - U.S. States, Territories and Possessions						16,174	16,174	17,062	17,022	0	(847)	0	(847)	0	16,174	0	0	0	431	XXX	XXX
01026C-AC-5	ALABAMA ECONOMIC SETTLEMENT		09/15/2022	Sink PMT @ 100.0000000		165,000	165,000	162,931	163,756	0	1,244	0	1,244	0	165,000	0	0	0	5,219	09/15/2025	1.G FE
31396P-GT-2	FANNIE MAE - ACES		09/26/2022	PRINCIPAL RECEIPT		4,397	4,397	4,919	4,631	0	(234)	0	(234)	0	4,397	0	0	0	157	10/25/2032	1.A
3136A7-DJ-8	FEDERAL NATL MTG ASSN REMIC TR		09/25/2022	PRINCIPAL RECEIPT		8,219	8,219	8,187	8,206	0	13	0	13	0	8,219	0	0	0	144	01/25/2042	1.A
3137AW-JW-6	FHR 4136 LV		09/15/2022	PRINCIPAL RECEIPT		10,586	10,586	10,791	10,610	0	(24)	0	(24)	0	10,586	0	0	0	229	08/15/2042	1.A
3140X5-MA-2	FN #FM2178		09/26/2022	PRINCIPAL RECEIPT		10,665	10,665	11,121	11,043	0	(378)	0	(378)	0	10,665	0	0	0	230	01/01/2050	1.A
3140J9-VX-6	FN PL#BM5129		09/26/2022	PRINCIPAL RECEIPT		12,704	12,704	13,496	13,415	0	(711)	0	(711)	0	12,704	0	0	0	325	07/01/2047	1.A
3138ER-2K-5	FNCL PL#AL9777		09/26/2022	PRINCIPAL RECEIPT		90,952	90,952	98,484	96,764	0	(5,812)	0	(5,812)	0	90,952	0	0	0	2,881	01/01/2047	1.A
3138WG-RK-2	FNCL PL#AS6789		09/26/2022	PRINCIPAL RECEIPT		14,855	14,855	15,783	15,437	0	(583)	0	(583)	0	14,855	0	0	0	346	03/01/2046	1.A
3138WJ-B3-1	FNCL PL#AS8157		09/26/2022	PRINCIPAL RECEIPT		131,275	131,275	141,428	139,238	0	(7,963)	0	(7,963)	0	131,275	0	0	0	4,005	10/01/2046	1.A
31334X-GB-9	FNCL PL#QA1094		09/26/2022	PRINCIPAL RECEIPT		6,648	6,648	6,889	6,873	0	(226)	0	(226)	0	6,648	0	0	0	154	07/01/2049	1.A
31334X-ZZ-5	FNCL PL#QA1660		09/26/2022	PRINCIPAL RECEIPT		10,785	10,785	11,064	11,053	0	(268)	0	(268)	0	10,785	0	0	0	215	08/01/2049	1.A
31339U-CN-8	FNCL PL#QA3677		09/26/2022	PRINCIPAL RECEIPT		14,083	14,083	13,903	13,890	0	193	0	193	0	14,083	0	0	0	254	10/01/2049	1.A
31339U-3M-0	FNCL PL#QA4404		09/26/2022	PRINCIPAL RECEIPT		47,943	47,943	49,438	49,415	0	(1,472)	0	(1,472)	0	47,943	0	0	0	937	11/01/2049	1.A
3133N3-VII-1	FNCL PL#RE6029		09/26/2022	PRINCIPAL RECEIPT		9,498	9,498	9,607	9,616	0	(119)	0	(119)	0	9,498	0	0	0	184	02/01/2050	1.A
3133N3-III-1	FNCL PL#RE6072		09/26/2022	PRINCIPAL RECEIPT		13,760	13,760	14,027	14,025	0	(265)	0	(265)	0	13,760	0	0	0	181	11/01/2050	1.A
31418A-L5-5	FNMA PASS-THRU PL#MA1247		09/26/2022	PRINCIPAL RECEIPT		30,888	30,888	32,529	31,663	0	(775)	0	(775)	0	30,888	0	0	0	587	11/01/2042	1.A
3140X8-AZ-0	FNMA PL#FM4523		09/26/2022	PRINCIPAL RECEIPT		10,658	10,658	11,071	11,049	0	(391)	0	(391)	0	10,658	0	0	0	142	10/01/2050	1.A
3140X8-K6-3	FNMA PL#FM4816		09/26/2022	PRINCIPAL RECEIPT		26,814	26,814	27,836	27,776	0	(962)	0	(962)	0	26,814	0	0	0	323	11/01/2050	1.A
0909999999. Subtotal - Bonds - U.S. Special Revenues						619,730	619,730	643,504	638,460	0	(18,733)	0	(18,733)	0	619,730	0	0	0	16,513	XXX	XXX
314353-AA-1	FEDEX 2020-1 CLASS AA		08/22/2022	PRINCIPAL RECEIPT		29,330	29,330	29,405	29,401	0	(71)	0	(71)	0	29,330	0	0	0	550	02/20/2034	1.D FE
590218-AF-0	ML MTG INV TR 2006-F1		09/26/2022	PRINCIPAL RECEIPT		603	603	600	600	200	2	0	202	0	603	0	0	0	21	04/25/2036	1.D FM
69349L-AG-3	PNC BANK NA		09/19/2022	RAYMOND JAMES		999,600	1,000,000	966,970	995,795	0	3,606	0	3,606	0	999,402	0	198	198	24,000	11/01/2022	1.G FE
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)						1,029,533	1,029,932	996,975	1,025,597	200	3,537	0	3,737	0	1,029,335	0	198	198	24,571	XXX	XXX
2509999997. Total - Bonds - Part 4						1,809,245	1,809,645	1,816,132	1,831,238	200	(22,366)	0	(22,166)	0	1,809,075	0	170	170	47,819	XXX	XXX
2509999998. Total - Bonds - Part 5						XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
2509999999. Total - Bonds						1,809,245	1,809,645	1,816,132	1,831,238	200	(22,366)	0	(22,166)	0	1,809,075	0	170	170	47,819	XXX	XXX
4509999997. Total - Preferred Stocks - Part 4						0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
4509999998. Total - Preferred Stocks - Part 5						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	XXX	XXX
5989999997. Total - Common Stocks - Part 4						0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
5989999998. Total - Common Stocks - Part 5						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	XXX	XXX
5999999999. Total - Preferred and Common Stocks						0	XXX	0	0	0	0	0	0	0	0	0	0	0	0	XXX	XXX
6009999999 - Totals						1,809,245	XXX	1,816,132	1,831,238	200	(22,366)	0	(22,166)	0	1,809,075	0	170	170	47,819	XXX	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

SCHEDULE E - PART 1 - CASH

Month End Depository Balances

1	2	3	4	5	Book Balance at End of Each Month During Current Quarter			9
					6	7	8	
					First Month	Second Month	Third Month	
Depository	Code	Rate of Interest	Amount of Interest Received During Current Quarter	Amount of Interest Accrued at Current Statement Date				*
Bank of America 100 Federal Street, Boston, MA 02110		0.292	1,121		(4,153,279)	(4,214,930)	(5,352,524)	XXX
The Bank of New York Mellon ... One Wall Street, New York, NY 10286		0.900	333		104,500	361,301	99,893	XXX
JPMorgan Chase 100 E.Broad St, Columbus, OH 43215					84,886	134,510	26,901	XXX
BlackRock 30 One Financial Center, Boston, MA 02111		2.260	14,928		5,989,684	3,020,141	522,736	XXX
Fidelity Govn't 2642 500 Salem Street, Smithfield, RI 02917		2.350	15,688		3,572,494	2,642,548	2,058,994	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	32,070	0	5,598,285	1,943,570	(2,644,000)	XXX
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	0	XXX
0399999. Total Cash on Deposit	XXX	XXX	32,070	0	5,598,285	1,943,570	(2,644,000)	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX				XXX
0599999. Total - Cash	XXX	XXX	32,070	0	5,598,285	1,943,570	(2,644,000)	XXX

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

SCHEDULE E - PART 2 - CASH EQUIVALENTS

Show Investments Owned End of Current Quarter

1 CUSIP	2 Description	3 Code	4 Date Acquired	5 Rate of Interest	6 Maturity Date	7 Book/Adjusted Carrying Value	8 Amount of Interest Due and Accrued	9 Amount Received During Year
NONE								
8609999999 - Total Cash Equivalents								