



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF SEPTEMBER 30, 2023
OF THE CONDITION AND AFFAIRS OF THE

American Commerce Insurance Company

NAIC Group Code 0411 0411 0411 NAIC Company Code 19941 Employer's ID Number 31-4361173
(Current) (Prior) Ohio, State of Domicile or Port of Entry OH

Country of Domicile United States of America

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

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

Main Administrative Office 211 MAIN STREET 508-943-9000
(Street and Number) (Area Code) (Telephone Number)

WEBSTER, MA, US 01570-0758 (City or Town, State, Country and Zip Code)

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

WEBSTER, MA, US 01570-0758 (City or Town, State, Country and Zip Code)

Internet Website Address www.mapfreinsurance.com (Area Code) (Telephone Number)

Statutory Statement Contact CHRISTINE A CONRAD 508-943-9000-14376
(Name) (Area Code) (Telephone Number)

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OFFICERS

PRESIDENT & CEO	JAIIME TAMAYO	TREASURER, CHIEF ACCOUNTING OFFICER & SVP	JOHN MARTIN MECIAK JR.
SECRETARY, GENERAL COUNSEL, & EVP	DANIEL PATRICK OLOHAN	CHIEF FINANCIAL OFFICER & EVP	JESUS AMADORI

OTHER

DIRECTORS OR TRUSTEES		
RANDALL VAUGHN BECKER	JAIIME TAMAYO	DAVID HILL COCHRANE
TIMOTHY JOHN MORGAN	DANIEL PATRICK OLOHAN	DAVID MCMULLEN
HEATHER SNAVELY	JOSE CORRAL	

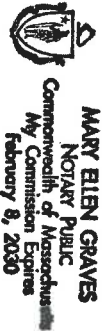
State of Massachusetts SS: Worcester

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.

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

Subscribed and sworn to before me this 18th day of October
Mary Ellen Graves

Mary Ellen Graves
Notary Public
February 8, 2030



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

STATEMENT AS OF SEPTEMBER 30, 2023 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	189,155,962		189,155,962	190,158,157
2. Stocks:				
2.1 Preferred stocks	2,373,300		2,373,300	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 (\$(917,335)), cash equivalents (\$) and short-term investments (\$)	(917,335)		(917,335)	3,847,253
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)	190,611,927	0	190,611,927	196,723,410
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,363,982		1,363,982	1,345,116
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	24,398,560		24,398,560	38,339,896
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ earned but unbilled premiums)	17,243,936		17,243,936	0
15.3 Accrued retrospective premiums (\$) and contracts subject to redetermination (\$)			0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	12,448,455		12,448,455	10,201,827
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	2,488,377		2,488,377	3,464,120
18.2 Net deferred tax asset	3,635,679	310,146	3,325,533	2,611,661
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	196,508		196,508	398,924
21. Furniture and equipment, including health care delivery assets (\$)	78,377	78,377	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	5,087,977		5,087,977	5,283,588
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	78,667,759	1,143,159	77,524,600	71,151,368
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	336,221,537	1,531,682	334,689,855	329,519,910
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	336,221,537	1,531,682	334,689,855	329,519,910
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	1,143,159	1,143,159	0	0
2502. Equity in pools and associations	74,956,412		74,956,412	70,695,408
2503. Premium Tax Recoverable	2,568,188		2,568,188	455,960
2598. Summary of remaining write-ins for Line 25 from overflow page	0	0	0	0
2599. Totals (Lines 2501 through 2503 plus 2598)(Line 25 above)	78,667,759	1,143,159	77,524,600	71,151,368

STATEMENT AS OF SEPTEMBER 30, 2023 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 \$ 42,259,000)	90,488,532	92,217,652
2. Reinsurance payable on paid losses and loss adjustment expenses	9,879,468	9,356,912
3. Loss adjustment expenses	10,789,453	10,226,952
4. Commissions payable, contingent commissions and other similar charges	1,745,874	1,978,805
5. Other expenses (excluding taxes, licenses and fees)	780,469	596,270
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	63,855	40,050
7.1 Current federal and foreign income taxes (including \$ on realized capital gains (losses))		
7.2 Net deferred tax liability		
8. Borrowed money \$ and interest thereon \$		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$ 177,243,814 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)	113,798,986	102,682,495
10. Advance premium	2,957,477	1,680,200
11. Dividends declared and unpaid:		
11.1 Stockholders		
11.2 Policyholders		
12. Ceded reinsurance premiums payable (net of ceding commissions)	15,378,871	10,055,092
13. Funds held by company under reinsurance treaties		0
14. Amounts withheld or retained by company for account of others		
15. Remittances and items not allocated		
16. Provision for reinsurance (including \$ certified)		0
17. Net adjustments in assets and liabilities due to foreign exchange rates		
18. Drafts outstanding		
19. Payable to parent, subsidiaries and affiliates		
20. Derivatives	0	0
21. Payable for securities		
22. Payable for securities lending		
23. Liability for amounts held under uninsured plans		
24. Capital notes \$ and interest thereon \$		
25. Aggregate write-ins for liabilities	764,767	903,267
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	246,647,752	229,737,695
27. Protected cell liabilities		
28. Total liabilities (Lines 26 and 27)	246,647,752	229,737,695
29. Aggregate write-ins for special surplus funds	0	0
30. Common capital stock	3,226,140	3,226,140
31. Preferred capital stock		
32. Aggregate write-ins for other than special surplus funds	0	0
33. Surplus notes	4,000,000	4,000,000
34. Gross paid in and contributed surplus	42,714,462	42,714,462
35. Unassigned funds (surplus)	38,101,501	49,841,613
36. Less treasury stock, at cost:		
36.1 shares common (value included in Line 30 \$)		
36.2 shares preferred (value included in Line 31 \$)		
37. Surplus as regards policyholders (Lines 29 to 35, less 36)	88,042,103	99,782,215
38. Totals (Page 2, Line 28, Col. 3)	334,689,855	329,519,910
DETAILS OF WRITE-INS		
2501. Unclaimed property	522,647	903,267
2502. Global Premium Tax Payable	242,120	
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)	764,767	903,267
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 \$140,647,750)	133,259,693	123,555,809	165,594,685
1.2 Assumed (written \$159,812,934)	148,696,443	140,632,025	190,135,875
1.3 Ceded (written \$140,647,750)	133,259,693	123,555,809	165,594,685
1.4 Net (written \$159,812,934)	148,696,443	140,632,025	190,135,875
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 102,590,000):			
2.1 Direct	85,076,982	62,486,657	86,213,857
2.2 Assumed	101,479,580	92,917,996	130,636,750
2.3 Ceded	85,076,982	62,486,657	86,213,857
2.4 Net	101,479,580	92,917,996	130,636,750
3. Loss adjustment expenses incurred	19,572,388	17,120,298	23,673,950
4. Other underwriting expenses incurred	45,184,644	44,115,278	58,305,310
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	166,236,612	154,153,572	212,616,010
7. Net income of protected cells			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7)	(17,540,169)	(13,521,547)	(22,480,135)
INVESTMENT INCOME			
9. Net investment income earned	3,984,868	3,993,986	5,727,395
10. Net realized capital gains (losses) less capital gains tax of \$ (80,308)	(641,404)	54,545	(2,879)
11. Net investment gain (loss) (Lines 9 + 10)	3,343,464	4,048,531	5,724,516
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	696,184	663,768	891,092
14. Aggregate write-ins for miscellaneous income	(3,004)	62,515	74,039
15. Total other income (Lines 12 through 14)	693,180	726,283	965,131
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	(13,503,525)	(8,746,733)	(15,790,488)
17. Dividends to policyholders			
18. Net income, after dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Line 16 minus Line 17)	(13,503,525)	(8,746,733)	(15,790,488)
19. Federal and foreign income taxes incurred	(2,408,068)	(1,177,676)	(3,072,572)
20. Net income (Line 18 minus Line 19)(to Line 22)	(11,095,457)	(7,569,057)	(12,717,916)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year	99,782,215	111,268,442	111,268,442
22. Net income (from Line 20)	(11,095,457)	(7,569,057)	(12,717,916)
23. Net transfers (to) from Protected Cell accounts			
24. Change in net unrealized capital gains (losses) less capital gains tax of \$ 72,497	(272,724)	(1,295)	(1,317)
25. Change in net unrealized foreign exchange capital gain (loss)			
26. Change in net deferred income tax	630,592	492,333	117,082
27. Change in nonadmitted assets	(489,524)	(435,601)	(300,668)
28. Change in provision for reinsurance			0
29. Change in surplus notes			4,000,000
30. Surplus (contributed to) withdrawn from protected cells			
31. Cumulative effect of changes in accounting principles			
32. Capital changes:			
32.1 Paid in			
32.2 Transferred from surplus (Stock Dividend)			
32.3 Transferred to surplus			
33. Surplus adjustments:			
33.1 Paid in	0	0	0
33.2 Transferred to capital (Stock Dividend)			
33.3 Transferred from capital			
34. Net remittances from or (to) Home Office			
35. Dividends to stockholders		(3,200,000)	(3,200,000)
36. Change in treasury stock			0
37. Aggregate write-ins for gains and losses in surplus	(512,999)	663,500	616,592
38. Change in surplus as regards policyholders (Lines 22 through 37).....	(11,740,112)	(10,050,120)	(11,486,227)
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	88,042,103	101,218,322	99,782,215
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. Gain on sale of fixed assets		14,964	26,485
1402. Loss on sale of fixed assets	(3,004)	(61,511)	(61,510)
1403. Other technical income (other reinsurer)		109,062	109,064
1498. Summary of remaining write-ins for Line 14 from overflow page	0	0	0
1499. Totals (Lines 1401 through 1403 plus 1498)(Line 14 above)	(3,004)	62,515	74,039
3701. STATUTORY POOLING ADJUSTMENT	(512,999)	1,192,277	1,145,369
3702. DAC CHANGE IN POOLING – CASH SETTLEMENT		(528,777)	(528,777)
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)	(512,999)	663,500	616,592

STATEMENT AS OF SEPTEMBER 30, 2023 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	163,111,390	152,164,339	196,904,460
2. Net investment income	4,366,615	4,234,423	6,105,871
3. Miscellaneous income	693,180	726,283	965,131
4. Total (Lines 1 to 3)	168,171,185	157,125,045	203,975,462
5. Benefit and loss related payments	104,932,772	95,981,254	127,407,225
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	64,732,457	64,690,375	84,942,700
8. Dividends paid to policyholders	0	0	0
9. Federal and foreign income taxes paid (recovered) net of \$0 tax on capital gains (losses)	(3,464,119)	1,535,916	1,789,365
10. Total (Lines 5 through 9)	166,201,110	162,207,545	214,139,290
11. Net cash from operations (Line 4 minus Line 10)	1,970,075	(5,082,500)	(10,163,828)
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	6,241,932	15,066,988	20,936,355
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	0	41	37
12.7 Miscellaneous proceeds	0	0	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	6,241,932	15,067,029	20,936,392
13. Cost of investments acquired (long-term only):			
13.1 Bonds	6,362,587	11,444,410	12,642,068
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)	6,362,587	11,444,410	12,642,068
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)	(120,655)	3,622,619	8,294,324
Cash from Financing and Miscellaneous Sources			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes	0	0	4,000,000
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	0	3,200,000	3,200,000
16.6 Other cash provided (applied)	(6,614,007)	2,385,360	5,286,235
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	(6,614,007)	(814,640)	6,086,235
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) .	(4,764,587)	(2,274,521)	4,216,731
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year	3,847,252	(369,479)	(369,479)
19.2 End of period (Line 18 plus Line 19.1)	(917,335)	(2,644,000)	3,847,252

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 #	2023		2022	
NET INCOME							
(1) State basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$	(11,095,457)	\$	(12,717,916)
(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	\$	(11,095,457)	\$	(12,717,916)
SURPLUS							
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$	88,042,103	\$	99,782,215
(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	\$	88,042,103	\$	99,782,215

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 change

NOTE 3 Business Combinations and Goodwill

No significant change

NOTE 4 Discontinued Operations

No significant change

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 2023 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 2023 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

2. 12 Months or Longer\$2,986,961

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

1. Less than 12 Months

2. 12 Months or Longer\$13,849,196
- (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

Not applicable

NOTE 7 Investment Income

No significant change

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 change

NOTE 10 Information Concerning Parent, Subsidiaries, Affiliates and Other Related Parties

No significant change

NOTE 11 Debt

- B. FHLB (Federal Home Loan Bank) Agreements

Not applicable

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

- A. Defined Benefit Plan

(4) Components of net periodic benefit cost

Not applicable

NOTES TO FINANCIAL STATEMENTS

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

No significant change

NOTE 14 Liabilities, Contingencies and Assessments

No significant change

NOTE 15 Leases

No significant change

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

No significant change

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.

(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 change

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

No significant change

NOTE 20 Fair Value Measurements

A. Inputs Used for Assets and Liabilities Measured and Reported at Fair Value.

(1) Summary of Financial Assets Measured and Reported at Fair Value at 9/30/23

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		\$ 6,701			\$ 6,701
Preferred Stock		\$ 2,373,300			\$ 2,373,300
Total assets at fair value/NAV	\$ -	\$ 2,380,001	\$ -	\$ -	\$ 2,380,001

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

Type of Financial Instrument	Aggregate Fair Value	Admitted Assets	(Level 1)	(Level 2)	(Level 3)	Net Asset Value (NAV)	Not Practicable (Carrying Value)
Bonds	\$ 161,756,446	\$ 189,155,962	\$ 4,962,685	\$ 156,793,761			
Preferred Stock	\$ 2,373,300	\$ 2,373,300		\$ 2,373,300			
Total	\$ 164,129,746	\$ 191,529,262	\$ 4,962,685	\$ 159,167,061			

D. Not Practicable to Estimate Fair Value

NOTES TO FINANCIAL STATEMENTS

- Not applicable
- E. Instruments measured at Net Asset Value (NAV)
- Not applicable

NOTE 21 Other Items

On October 12, 2023 American Commerce Insurance Company's (the "Company") parent ACIC Holding Co., Inc. contributed \$25 million of surplus to the Company.

NOTE 22 Events Subsequent

- Type I – Recognized Subsequent Events:
- Subsequent events have been considered through November 14, 2023 for these statutory financial statements which are to be issued on November 14, 2023.
- Type II – Nonrecognized Subsequent Events:
- No significant change

NOTE 23 Reinsurance

No significant change

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 \$121,052,000 were lower by \$1,481,000 due to favorable development of prior year estimates. This redundancy was 1.4% of the unpaid losses and LAE of \$102,445,000 as of prior year-end.

NOTE 26 Intercompany Pooling Arrangements

No significant change

NOTE 27 Structured Settlements

No significant change

NOTE 28 Health Care Receivables

No significant change

NOTE 29 Participating Policies

No significant change

NOTE 30 Premium Deficiency Reserves

No significant change

NOTE 31 High Deductibles

No significant change

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

No significant change

NOTE 33 Asbestos/Environmental Reserves

No significant change

NOTE 34 Subscriber Savings Accounts

No significant change

NOTE 35 Multiple Peril Crop Insurance

No significant change

NOTE 36 Financial Guaranty Insurance

- B. Schedule of insured financial obligations at the end of the period
- Not applicable

STATEMENT AS OF SEPTEMBER 30, 2023 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

STATEMENT AS OF SEPTEMBER 30, 2023 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

9.1

Are the senior officers (principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) of the reporting entity subject to a code of ethics, which includes the following standards?
(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 Prior Year-End Book/Adjusted Carrying Value	2 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? Yes [] No [] N/A [X]
If no, attach a description with this statement.
.....

16.

For the reporting entity's security lending program, state the amount of the following as of 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, 2023 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 Central Registration Depository Number	2 Name of Firm or Individual	3 Legal Entity Identifier (LEI)	4 Registered With	5 Investment Management Agreement (IMA) Filed

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

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?
If yes, attach an explanation.
.....

Yes [] No [X] N/A []
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?
If yes, attach an explanation.
.....

Yes [] No [X]
- 3.1

Have any of the reporting entity's primary reinsurance contracts been canceled?

Yes [] No [X]
- 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 [X]

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 [X]
- 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 [X]
- 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 [X] 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, 2023 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

[illegible]

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.			(a)	To Date	To Date	To Date	To Date	To Date	To Date
1.	Alabama	AL	L	246,338	198,174	10,500	9,435	65,668	64,500
2.	Alaska	AK	L	108,729	124,657	0	66,150	47,021	42,820
3.	Arizona	AZ	L	591,187	573,046	53,868	142,639	587,104	738,112
4.	Arkansas	AR	L	320,905	269,225	78,738	16,742	237,597	282,009
5.	California	CA	L	1,023,420	1,157,585	0	0	0	0
6.	Colorado	CO	L	3,223,306	815,861	734,902	433,242	131,390	177,827
7.	Connecticut	CT	L	53,949,822	51,946,993	39,091,931	40,620,323	60,377,958	63,177,719
8.	Delaware	DE	L	225,396	196,570	50,079	7,367	113,336	108,860
9.	District of Columbia	DC	L	102,823	59,086	2,618	0	22,275	15,085
10.	Florida	FL	L	1,644,318	1,630,970	495,478	387,556	1,276,496	1,116,526
11.	Georgia	GA	L	616,483	501,177	711,909	393,238	530,117	276,640
12.	Hawaii	HI	L	27,376	25,778	28,661	10,228	23,680	18,516
13.	Idaho	ID	L	3,700,966	3,664,432	2,907,553	2,315,626	2,882,982	2,940,567
14.	Illinois	IL	L	1,523,139	1,390,114	397,596	101,889	819,066	558,390
15.	Indiana	IN	L	363,831	384,537	29,960	142,262	116,243	170,180
16.	Iowa	IA	L	334,033	143,171	5,501	3,001	34,260	37,568
17.	Kansas	KS	L	543,213	451,860	35,018	566,412	304,838	109,822
18.	Kentucky	KY	L	75,968	57,052	19,994	72,259	56,510	137,718
19.	Louisiana	LA	L	249,196	200,979	23,879	162,171	98,708	114,746
20.	Maine	ME	L	568,184	566,814	223,346	12,160	15,291	11,804
21.	Maryland	MD	L	234,320	262,076	91,426	56,816	176,678	175,303
22.	Massachusetts	MA	L	2,070,055	183,565	346,634	11,819	254,612	334,437
23.	Michigan	MI	L	527,867	407,162	45,152	86,750	235,112	178,365
24.	Minnesota	MN	L	607,634	533,267	21,828	(79,721)	218,486	113,625
25.	Mississippi	MS	L	66,337	61,213	30,890	231	15,121	22,368
26.	Missouri	MO	L	173,330	172,467	0	20,500	8,622	8,287
27.	Montana	MT	L	205,656	203,844	144,062	55,601	241,644	222,996
28.	Nebraska	NE	L	509,482	413,474	348,046	97,042	353,644	278,771
29.	Nevada	NV	L	402,037	340,557	47,248	15,155	103,998	82,880
30.	New Hampshire	NH	L	157,418	210,942	6,616	32,341	34,383	26,261
31.	New Jersey	NJ	L	504,251	463,674	596,399	1,475,309	2,029,867	4,738,451
32.	New Mexico	NM	L	121,801	160,208	9,385	23,355	28,111	39,789
33.	New York	NY	L	930,913	788,731	534,183	72,976	475,475	958,676
34.	North Carolina	NC	L	788,795	663,727	39,133	23,677	206,260	165,860
35.	North Dakota	ND	L	30,616	43,518	6,519	1,663	15,276	15,508
36.	Ohio	OH	L	15,466,655	12,470,019	8,388,380	5,643,397	7,927,057	6,530,109
37.	Oklahoma	OK	L	233,666	213,901	207,994	18,794	203,609	100,242
38.	Oregon	OR	L	3,764,792	3,991,969	2,177,057	2,088,510	2,981,773	2,603,406
39.	Pennsylvania	PA	L	819,781	545,151	73,272	47,474	204,130	297,920
40.	Rhode Island	RI	L	33,223,367	31,074,588	20,236,786	18,768,310	27,097,237	23,504,883
41.	South Carolina	SC	L	277,727	280,156	14,725	38,440	91,871	59,154
42.	South Dakota	SD	L	600,441	144,474	29,195	20,943	19,116	17,417
43.	Tennessee	TN	L	491,501	434,810	25,233	48,372	187,912	211,346
44.	Texas	TX	L	1,575,302	1,249,129	635,744	450,253	1,330,431	768,900
45.	Utah	UT	L	152,850	120,947	36,613	13,426	65,276	59,705
46.	Vermont	VT	L	172,881	198,129	4,632	15,677	14,511	8,956
47.	Virginia	VA	L	435,261	400,571	76,048	22,708	105,101	113,502
48.	Washington	WA	L	6,285,422	6,565,836	5,130,442	4,480,217	6,623,610	8,378,479
49.	West Virginia	WV	L	48,800	41,816	3,465	2,529	10,394	8,370
50.	Wisconsin	WI	L	282,039	323,791	43,564	33,168	149,023	103,029
51.	Wyoming	WY	L	48,123	57,810	6,073	43,753	38,323	105,114
52.	American Samoa	AS	N						0
53.	Guam	GU	N						0
54.	Puerto Rico	PR	N						0
55.	U.S. Virgin Islands	VI	N						0
56.	Northern Mariana Islands	MP	N						0
57.	Canada	CAN	N						0
58.	Aggregate Other Alien OT	OT	XXX	0	0	0	0	0	0
59.	Totals	XXX		140,647,753	127,379,603	84,258,275	79,092,185	119,187,203	120,331,518
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

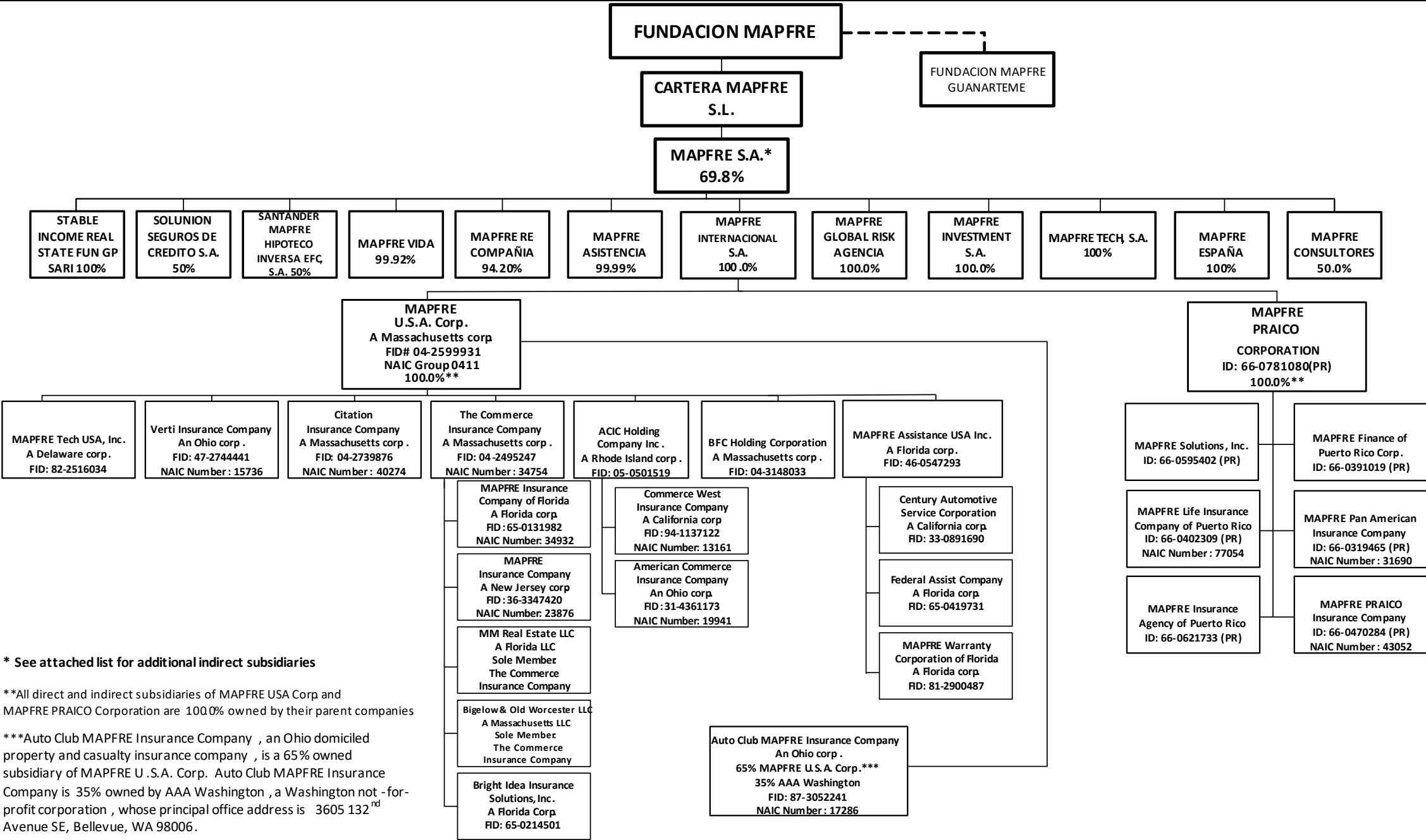
(a) Active Status Counts:

1. L - Licensed or Chartered - Licensed insurance carrier or domiciled RRG.....	51	4. Q - Qualified - Qualified or accredited reinsurer.....	0
2. R - Registered - Non-domiciled RRGs.....	0	5. D - Domestic Surplus Lines Insurer (DSLII) - Reporting entities authorized to write surplus lines in the state of domicile.....	0
3. E - Eligible - Reporting entities eligible or approved to write surplus lines in the state (other than their state of domicile - see DSLII).....	0	6. 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

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* 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.

COMPANY NAME	% OWNED	ULTIMATE CONTROLLING COMPANY
MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	100.00	MAPFRE, S.A.
AFRIQUE ASSISTANCE, S.A.	49.00	MAPFRE, S.A.
ANDIASISTENCIA COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	98.09	MAPFRE, S.A.
CARIBE ASISTENCIA, S.A.	83.58	MAPFRE, S.A.
ECUASISTENCIA, S.A.	99.26	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
EUROSOS ASSISTANCE, S.A.	25.00	MAPFRE, S.A.
IBERO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	98.42	MAPFRE, S.A.
IBEROASISTENCIA, S.A.	99.93	MAPFRE, S.A.
ANDIASISTENCIA COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	1.91	MAPFRE, S.A.
IBEROASISTENCIA, ARGENTINA S.A.	1.58	MAPFRE, S.A.
NILE ASSIST	1.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	1.05	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	1.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	2.67	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.63	MAPFRE, S.A.
IRELAND ASSIST, LTD	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA LTDA	100.00	MAPFRE, S.A.
MAPFRE WARRANTY S.P.A.	100.00	MAPFRE, S.A.
MÉXICO ASISTENCIA, S.A.	100.00	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	51.00	MAPFRE, S.A.
NICASSIST, S.A.	100.00	MAPFRE, S.A.
NILE ASSIST	98.00	MAPFRE, S.A.
PANAMÁ ASISTENCIA, S.A.	84.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	98.95	MAPFRE, S.A.
QUETZAL ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
ROAD CHINA ASSISTANCE Co, LTD	100.00	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	60.30	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	100.00	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	97.33	MAPFRE, S.A.
ABRAXAS INSURANCE	100.00	MAPFRE, S.A.
NILE ASSIST	1.00	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	100.00	MAPFRE, S.A.
AGROSEGURO	19.23	MAPFRE, S.A.
AUDATEX ESPAÑA, S.A.	12.50	MAPFRE, S.A.
BANKINTER SEGUROS GENERALES, Cía DE SEGUROS Y REASEGUROS S.A.	50.10	MAPFRE, S.A.
CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	100.00	MAPFRE, S.A.
CENTROS MÉDICOS MAPFRE, S.A.	100.00	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	2.50	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	2.50	MAPFRE, S.A.
CLUB MAPFRE, S.A.	99.99	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	20.79	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	20.01	MAPFRE, S.A.
FUNESPAÑA, S.A.U.	99.79	MAPFRE, S.A.
ALL FUNERAL SERVICES, S.L.	100.00	MAPFRE, S.A.
FUNESPAÑA CHILE, S.A.	50.00	MAPFRE, S.A.
FUNEUROPA CHILE, S.A.	50.00	MAPFRE, S.A.
TANATORIUM ZRT	100.00	MAPFRE, S.A.
FUNESPAÑA DOS, S.L.	100.00	MAPFRE, S.A.
FUNERARIA ALIANZA CANARIA, S.L.	100.00	MAPFRE, S.A.
CEMENTERIO PARQUE ANDUJAR, S.A.	72.82	MAPFRE, S.A.
DE MENA SERVICIOS FUNERARIOS, S.L.	70.00	MAPFRE, S.A.
EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	49.00	MAPFRE, S.A.
FUNERARIA SAN VICENTE, S.L.	50.00	MAPFRE, S.A.
FUNERARIAS REUNIDAS DEL BIERZO, S.A.	85.82	MAPFRE, S.A.
INICIATIVAS ALCAÉ SAR, S.L.	40.00	MAPFRE, S.A.
INVERSIONES FUNERARIAS ANDALUZAS, S.L.	33.33	MAPFRE, S.A.
ISABELO ALVAREZ MAYORGA, S.A.	50.00	MAPFRE, S.A.
NUEVO TANATORIO, S.L.	50.00	MAPFRE, S.A.
POMPES FÚNEBRES DOMINGO, S.L.	100.00	MAPFRE, S.A.
SALZILLO SERVICIOS FUNERARIOS, S.L.	45.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	70.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS DEL NERVIÓN, S.L.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	100.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS LA CARIDAD, S.L.	50.00	MAPFRE, S.A.
SERVICIOS FUNERARIOS LUCEM S.L.	50.00	MAPFRE, S.A.
TANATORIO DE ÉCIJA, S.L.	33.33	MAPFRE, S.A.
TANATORIO SE-30 SEVILLA, S.L.	10.00	MAPFRE, S.A.
MAPFRE AM GLOBAL BOND FUND	9.38	MAPFRE, S.A.
MAPFRE AM SELECTION	100.00	MAPFRE, S.A.

MAPFRE AM- SHORT TERM EURO I	32.56	MAPFRE, S.A.
MAPFRE AM-INCLUSION RESPONSABLE	8.74	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	44.27	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	34.44	MAPFRE, S.A.
MAPFRE AUTOMOCIÓN S.A.U	100.00	MAPFRE, S.A.
CLUB MAPFRE, S.A.	0.01	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	0.00	MAPFRE, S.A.
VERTI MEDIACION SOCIEDAD DE AGENCIA DE VALORES VINCULADA, S.L.	2.00	MAPFRE, S.A.
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.00	MAPFRE, S.A.
MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	26.49	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	8.07	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	28.08	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	0.00	MAPFRE, S.A.
MAPFRE VIDEO Y COMUNICACIÓN S.A.	75.00	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.50	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	66.67	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	97.50	MAPFRE, S.A.
MULTISERVICIOS MAPFRE MULTIMAP, S.A.	100.00	MAPFRE, S.A.
OLIFAN INMO 18 OPCÍ	24.24	MAPFRE, S.A.
PUY DU FOU ESPAÑA,S.A.	19.54	MAPFRE, S.A.
SALUD DIGITAL MAPFRE S.A.	97.50	MAPFRE, S.A.
SALVADOR CAETANO AUTO (SGPS), S.A.	24.61	MAPFRE, S.A.
SANTANDER MAPFRE SEGUROS Y REASEGUROS S.A	50.01	MAPFRE, S.A.
SANTANDER ASSURANCE SOLUTIONS, S.A.	33.00	MAPFRE, S.A.
SWISSLIFE SPPICAV	14.98	MAPFRE, S.A.
TECNOLOGÍAS DE LA INFORMACIÓN Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A	22.95	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	100.00	MAPFRE, S.A.
VERTI MEDIAC VERTI ASEGURADORA S.A.	98.00	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	82.97	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	99.92	MAPFRE, S.A.
MAP SL EUROPEAN INVEST SARL	50.00	MAPFRE, S.A.
MAPAR IMPERIAL 14, S.L.	100.00	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	99.90	MAPFRE, S.A.
CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.	49.00	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	100.00	MAPFRE, S.A.
MAPFRE USA CORPORATION INC	100.00	MAPFRE, S.A.
ACIC HOLDINGS COMPANY, INC.	100.00	MAPFRE, S.A.
AMERICAN COMMERCE INSURANCE COMPANY	100.00	MAPFRE, S.A.
THE COMMERCE WEST INSURANCE COMPANY	100.00	MAPFRE, S.A.
AUTO CLUB MAPFRE INSURANCE	65.00	MAPFRE, S.A.
BFC HOLDING CORPORATION	100.00	MAPFRE, S.A.
MAPFRE TECH USA CORPORATION	100.00	MAPFRE, S.A.
THE CITATION INSURANCE COMPANY	100.00	MAPFRE, S.A.
VERTI INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE ASSISTANCE USA INC.	100.00	MAPFRE, S.A.
CENTURY AUTOMOTIVE SERVICES COMPANY	100.00	MAPFRE, S.A.
MAPFRE WARRANTY CORPORATION OF FLORIDA	100.00	MAPFRE, S.A.
FEDERAL ASSIST COMPANY	100.00	MAPFRE, S.A.
THE COMMERCE INSURANCE COMPANY	100.00	MAPFRE, S.A.
BIGELOW & OLD WORCESTER, LLC	100.00	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE INSURANCE COMPANY OF FLORIDA	100.00	MAPFRE, S.A.
MAPFRE INTERMEDIARIES	100.00	MAPFRE, S.A.
MM REAL ESTATE, LLC	100.00	MAPFRE, S.A.
AMA-ASISTENCIA MEDICA ADMINISTRADA, C.A.	99.70	MAPFRE, S.A.
APOINT S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	6.14	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	5.65	MAPFRE, S.A.
GRUPO CORPORATIVO LML S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	44.34	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	94.35	MAPFRE, S.A.
CESVI COLOMBIA, S.A.	67.77	MAPFRE, S.A.
CREDIMAPFRE S.A.	100.00	MAPFRE, S.A.
MAPFRE SERVICIOS EXEQUIALES SAS	100.00	MAPFRE, S.A.
MAPFRE SIGORTA, A.S.	99.75	MAPFRE, S.A.
GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	51.00	MAPFRE, S.A.
MAPFRE YASAM SIGORTA, A.S.	99.78	MAPFRE, S.A.
MAPFRE AMERICA CENTRAL S.A	99.90	MAPFRE, S.A.
INMOBILIARIA AMERICANA S.A.	78.90	MAPFRE, S.A.
MAPFRE PANAMÁ S.A.	99.38	MAPFRE, S.A.
MAPFRE SEGUROS EL SALVADOR, S.A.	78.11	MAPFRE, S.A.
MAPFRE SEGUROS HONDURAS S.A.	25.10	MAPFRE, S.A.
MAPFRE TENEDORA DE ACC, S.A.	100.00	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 HONDURAS S.A.	73.26	MAPFRE, S.A.
MAPFRE SEGUROS NICARAGUA S.A.	100.00	MAPFRE, S.A.
MAPFRE ARGENTINA HOLDING S.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	97.00	MAPFRE, S.A.

MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	36.00	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS S.A.	100.00	MAPFRE, S.A.
CESVI ARGENTINA, S.A.	60.64	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.00	MAPFRE, S.A.
CLUB MAPFRE ARGENTINA S.A.	3.00	MAPFRE, S.A.
MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	67.66	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	99.17	MAPFRE, S.A.
BB MAPFRE PARTICIPAÇÕES, S.A.	25,0100(*)	MAPFRE, S.A.
ALIANÇA DO BRASIL SEGUROS, S.A.	100.00	MAPFRE, S.A.
BRASILSEG COMPANHIA DE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE ASSISTENCIA LTDA	0.00	MAPFRE, S.A.
MAPFRE INVESTIMENTOS E PARTICIPAÇÕES, S.A.	100.00	MAPFRE, S.A.
MAC INVESTIMENTOS S.A	100.00	MAPFRE, S.A.
MAPFRE INVESTIMENTOS LTDA.	99.99	MAPFRE, S.A.
MAPFRE PARTICIPAÇÕES, S.A.	100.00	MAPFRE, S.A.
MAPFRE SAUDE LTDA	99.99	MAPFRE, S.A.
MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA.	100.00	MAPFRE, S.A.
PROTENSEG CORRETORA DE SEGUROS LTDA	100.00	MAPFRE, S.A.
MAPFRE PARTICIPAÇÕES, S.A.	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS S.A.	100.00	MAPFRE, S.A.
MAPFRE SANTANDER PORTUGAL COMPANHIA DE SEGUROS,	50.01	MAPFRE, S.A.
MAPFRE SEGUROS DE VIDA S.A.	100.00	MAPFRE, S.A.
MAPFRE CAPITALIZAÇÃO S.A.	100.00	MAPFRE, S.A.
MAPFRE PREVIDENCIA S.A.	100.00	MAPFRE, S.A.
MAPFRE VIDA S.A.	100.00	MAPFRE, S.A.
BANKINTER SEGUROS DE VIDA, S.A. DE SEGUROS Y REASEGL	50.00	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA S.	99.93	MAPFRE, S.A.
FONDMAPFRE BOLSA AMERICA	31.91	MAPFRE, S.A.
FONDMAPFRE BOLSA EUROPA F.I	9.29	MAPFRE, S.A.
FONDMAPFRE BOLSA MIXTO F.I.	58.52	MAPFRE, S.A.
FONDMAPFRE ELECCION DECIDIDA	38.47	MAPFRE, S.A.
FONDMAPFRE ELECCION MODERADA	45.08	MAPFRE, S.A.
FONDMAPFRE ELECCION PRUDENTE	44.35	MAPFRE, S.A.
FONDMAPFRE GARANTIA II, F.I	100.00	MAPFRE, S.A.
FONDMAPFRE GARANTIA IV, F.I.	100.00	MAPFRE, S.A.
FONDMAPFRE GARANTIA, F.I	100.00	MAPFRE, S.A.
FONDMAPFRE GLOBAL F.I.	43.23	MAPFRE, S.A.
FONDMAPFRE RENTA DÓLAR	38.57	MAPFRE, S.A.
FONDMAPFRE RENTA FIJA FLEXIBLE	41.52	MAPFRE, S.A.
GESTIÓN MODA SHOPPING S.A.	99.82	MAPFRE, S.A.
MAPFRE AM- GOOD GOVERNANCE	33.71	MAPFRE, S.A.
MAPFRE AM CAPITAL RESPONSABLE	18.14	MAPFRE, S.A.
MAPFRE AM GLOBAL BOND FUND	39.77	MAPFRE, S.A.
MAPFRE AM- IBERIAN EQUITIES	44.22	MAPFRE, S.A.
MAPFRE AM-EUROPEAN EQUITIES	46.52	MAPFRE, S.A.
MAPFRE FONDTESORO PLUS, F.I.	13.93	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	7.03	MAPFRE, S.A.
MAPFRE INVERSIÓN SOCIEDAD DE VALORES S.A.	100.00	MAPFRE, S.A.
MAPFRE VIDEO Y COMUNICACIÓN S.A.	25.00	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.33	MAPFRE, S.A.
MIRACETI S.A.	100.00	MAPFRE, S.A.
SIEREFF MACQURIE 2	12.70	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	20.00	MAPFRE, S.A.
MAPFRE CHILE VIDA, S.A.	100.00	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	100.00	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	0.00	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	100.00	MAPFRE, S.A.
MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	51.00	MAPFRE, S.A.
CREDIPRIMAS, S.A.	100.00	MAPFRE, S.A.
MAPFRE SALUD ARS	51.00	MAPFRE, S.A.
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.52	MAPFRE, S.A.
AUTOMOTRIZ MULTISERVICAR-VENEZUELA, C.A.	97.00	MAPFRE, S.A.
CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	100.00	MAPFRE, S.A.
CLUB MAPFRE S.A.	100.00	MAPFRE, S.A.
INVERSORA SEGURIDAD-FINANCIADORA DE PRIMAS, C.A.	100.00	MAPFRE, S.A.
UNIDAD EDUCATIVA D.R FERNANDO BRAVO PEREZ CA	99.70	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	55.66	MAPFRE, S.A.
CESVI MÉXICO, S.A.	16.67	MAPFRE, S.A.
MAPFRE DEFENSA LEGAL S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE FIANZAS S.A.	100.00	MAPFRE, S.A.
MAPFRE SERVICIOS MEXICANOS S.A.	99.99	MAPFRE, S.A.
MAPFRE TEPEYAC INC.	100.00	MAPFRE, S.A.
MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE MIDDLESEA P.L.C.	55.83	MAPFRE, S.A.
BEE INSURANCE MANAGEMENT LTD	100.00	MAPFRE, S.A.
EUROMED RISKS SOLUTIONS LIMITED	100.00	MAPFRE, S.A.
MIDDLESEA ASSIST LIMITED	49.00	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.
EURO GLOBE HOLDINGS LIMITED	100.00	MAPFRE, S.A.

MAPFRE M.S.V. LIFE P.L.C.	50.00	MAPFRE, S.A.
CHURCH WARF PROPERTIES	50.00	MAPFRE, S.A.
SIEREFF MACQUORIE 2	15.87	MAPFRE, S.A.
BEE INSURANCE MANAGEMENT LTD	50.00	MAPFRE, S.A.
MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	89.54	MAPFRE, S.A.
MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A. (in 2021 Mapfe Peru Vida cia. De Seguro	99.59	MAPFRE, S.A.
MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A. (in 2021 Mapfe Peru Vida ci	0.00	MAPFRE, S.A.
CORPORACIÓN FUNERARIA, S.A.	100.00	MAPFRE, S.A.
MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	1.41	MAPFRE, S.A.
MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	98.59	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.85	MAPFRE, S.A.
MAPFRE URUGUAY SEGUROS S.A.	100.00	MAPFRE, S.A.
VERTI ASSICURIZIONI S.P.A.	100.00	MAPFRE, S.A.
VERTI VERSICHERUNG AG	100.00	MAPFRE, S.A.
MAPFRE PRAICO CORPORATION	100.00	MAPFRE, S.A.
MAPFRE FINANCE OF PUERTO RICO CORP.	100.00	MAPFRE, S.A.
MAPFRE INSURANCE AGENCY OF PUERTO RICO, INC.	100.00	MAPFRE, S.A.
MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO	100.00	MAPFRE, S.A.
MAPFRE PAN AMERICAN INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE PRAICO INSURANCE COMPANY	100.00	MAPFRE, S.A.
MAPFRE SOLUTIONS, INC	100.00	MAPFRE, S.A.
MAPFRE CHILE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	100.00	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	12.71	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	87.29	MAPFRE, S.A.
MAPFRE VIDA SOCIEDAD ANÓNIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	99.92	MAPFRE, S.A.
MAPFRE INVERSIÓN, S.A.		
MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A	99.99	MAPFRE, S.A.
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	100.00	MAPFRE, S.A.
OTHER GROUP COMPANIES		
FONDMAPFRE BOLSA AMERICA	14.47	MAPFRE, S.A.
FONDMAPFRE BOLSA EUROPA F.I	18.40	MAPFRE, S.A.
FONDMAPFRE BOLSA MIXTO F.I.	3.49	MAPFRE, S.A.
FONDMAPFRE ELECCION DECIDIDA	26.10	MAPFRE, S.A.
FONDMAPFRE ELECCION MODERADA	12.05	MAPFRE, S.A.
FONDMAPFRE ELECCION PRUDENTE	10.66	MAPFRE, S.A.
FONDMAPFRE GLOBAL F.I.	1.99	MAPFRE, S.A.
MAPFRE AM CAPITAL RESPONSABLE	12.78	MAPFRE, S.A.
MAPFRE AM GLOBAL BOND FUND	13.89	MAPFRE, S.A.
MAPFRE AM- IBERIAN EQUITIES	19.60	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	3.36	MAPFRE, S.A.
MAPFRE AM-BEHAVORIAL FUND I	13.60	MAPFRE, S.A.
MAPFRE AM-EUROPEAN EQUITIES	18.71	MAPFRE, S.A.
MAPFRE AM-INCLUSION RESPONSABLE	29.09	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	9.36	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	9.78	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	4.51	MAPFRE, S.A.
OLIFAN INMO 18 OPC	4.41	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	9.00	MAPFRE, S.A.
SWISSLIFE SPPICAV	17.19	MAPFRE, S.A.
MAPFRE AM- GOOD GOVERNANCE	22.56	MAPFRE, S.A.
OTRAS SOCIEDADES DEL GRUPO		
FONDMAPFRE GARANTIA III, F.I.	13.69	MAPFRE, S.A.
FONDMAPFRE RENTA FIJA FLEXIBLE	1.06	MAPFRE, S.A.
MAPFRE FONDTESORO PLUS, F.I.	11.58	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	14.64	MAPFRE, S.A.
SIEREFF MACQUORIE 2	19.05	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	27.93	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	80.00	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	94.21	MAPFRE, S.A.
FONDMAPFRE BOLSA EUROPA F.I	22.54	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	22.01	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	100.00	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	44.54	MAPFRE, S.A.
MAPFRE AM-BEHAVORIAL FUND I	25.93	MAPFRE, S.A.
MAPFRE AM-INCLUSION RESPONSABLE	22.79	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	46.37	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	23.07	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	99.99	MAPFRE, S.A.
C R ARGENTINA, S.A.	100.00	MAPFRE, S.A.
CAJA REASEGURADORA DE CHILE S.A.	99.85	MAPFRE, S.A.
MAPFRE EURO BONDS FUND	100.00	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	9.34	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	35.76	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	100.00	MAPFRE, S.A.
MAPFRE RE VERMONT CORPORATION	100.00	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	22.50	MAPFRE, S.A.
OLIFAN INMO 18 OPC	30.21	MAPFRE, S.A.

REINSURANCE MANAGAMENT INC.	100.00	MAPFRE, S.A.
RISK MED SOLUTIONS, S.L.	100.00	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	16.00	MAPFRE, S.A.
SWISSLIFE SPPICAV	16.98	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	25.36	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	10.00	MAPFRE, S.A.
ALMA MUNDI INSURTECH FUND, FCRE	26.40	MAPFRE, S.A.
ALMA MUNDI INSURTECH II FUND, FCRE	35.47	MAPFRE, S.A.
LA FINANCIERE RESPONSABLE	24.95	MAPFRE, S.A.
MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	5.00	MAPFRE, S.A.
SANTANDER MAPFRE HIPOTECA INVERSA EFC, S.A.	50.00	MAPFRE, S.A.
SOLUNION SEGUROS DE CREDITO S.A.	50.00	MAPFRE, S.A.
STABLE INCOME REAL STATE FUN GP S.A.R.I.	100.00	MAPFRE, S.A.
MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	50.00	MAPFRE, S.A.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.00	MAPFRE, S.A.
MAPFRE INVESTMENT S.A.	100.00	MAPFRE, S.A.
MAPFRE TECH, S.A.	100.00	MAPFRE, S.A.

STATEMENT AS OF SEPTEMBER 30, 2023 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.....	
			04-2495247 ..				BIGELOW & OLD WORCESTER, LLC	.MA.....	NIA.....	COMMERCE INSURANCE	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	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			04-2599931 ..				MAPFRE USA CORPORATION INC	.MA.....	UIP.....	MAPFRE INTERNACIONAL S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	40274	04-2739876 ..				THE CITATION INSURANCE COMPANY	.MA.....	.IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			04-3148033 ..				BFC HOLDING CORPORATION	.MA.....	NIA.....	MAPFRE USA CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			05-0501519 ..				ACIC HOLDINGS COMPANY, INC.	.RI.....	UDP.....	MAPFRE USA CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	19941	31-4361173 ..				AMERICAN COMMERCE INSURANCE COMPANY	.OH.....	.RE.....	ACIC HOLDINGS	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.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	23876	36-3347420 ..				MAPFRE INSURANCE COMPANY	.NJ.....	.IA.....	COMMERCE INSURANCE	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.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	15736	47-2744441 ..				VERTI INSURANCE COMPANY	.OH.....	.IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	34932	65-0131982 ..				MAPFRE INSURANCE COMPANY OF FLORIDA	.FL.....	.IA.....	COMMERCE INSURANCE	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.....	
. 0411 ...	MAPFRE INSURANCE GROUP	31690	66-0319465 ..				MAPFRE PAN AMERICAN INSURANCE COMPANY	.PR.....	.IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			66-0391019 ..				MAPFRE FINANCE OF PUERTO RICO CORP.	.PR.....	NIA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE LIFE INSURANCE COMPANY OF PUERTO RICO								
. 0411 ...	MAPFRE INSURANCE GROUP	77054	66-0402309 ..					.PR.....	.IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	MAPFRE INSURANCE GROUP	43052	66-0470284 ..				MAPFRE PRAICO INSURANCE COMPANY	.PR.....	.IA.....	MAPFRE PRAICO CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			66-0595402 ..				MAPFRE SOLUTIONS, INC	.PR.....	NIA.....	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.....	
			66-0781080 ..				MAPFRE PRAICO CORPORATION	.PR.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	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.....	
			82-2516034 ..				MAPFRE TECH USA CORPORATION	.DE.....	NIA.....	MAPFRE USA CORPORATION	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
			83-2698500 ..				MAPFRE RE VERMONT CORPORATION	.VT.....	.IA.....	MAPFRE RE, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	17286	87-3052241 ..				AUTO CLUB MAPFRE INSURANCE	.OH.....	.IA.....	MAPFRE USA CORPORATION	Ownership.....	65.000 ...	MAPFRE S.A.	... NO.....	
. 0411 ...	COMMERCE INSURANCE COMPANY AND AFFILIATES	13161	94-1137122 ..				THE COMMERCE WEST INSURANCE COMPANY	.CA.....	.IA.....	ACIC HOLDINGS	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE SEGUROS GENERALES DE COLOMBIA S.A. .	.COL.....	NIA.....	APOINT S.A.	Ownership.....	6.143 ...	MAPFRE S.A.	... NO.....	
							MAPFRE COLOMBIA VIDA SEGUROS S.A.	.COL.....	.IA.....	APOINT S.A.	Ownership.....	5.646 ...	MAPFRE S.A.	... NO.....	
							ALIANÇA DO BRASIL SEGUROS, S.A.	.BRA.....	.IA.....	BB MAPFRE PARTICIPAÇÕES S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							BRASILSEG COMPANHIA DE SEGUROS S.A.	.BRA.....	.IA.....	BB MAPFRE PARTICIPAÇÕES S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							EUROMED RISKS SOLUTIONS LIMITED	.MLT.....	NIA.....	BEE INSURANCE MANAGEMENT LTD	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							SALUD DIGITAL MAPFRE S.A.	.ESP.....	NIA.....	CENTROS MÉDICOS MAPFRE, S.A.	Ownership.....	2.500 ...	MAPFRE S.A.	... NO.....	
							MULTISERVICIOS MAPFRE MULTIMAP, S.A.	.ESP.....	NIA.....	CENTROS MÉDICOS S.A.	Ownership.....	2.500 ...	MAPFRE S.A.	... NO.....	
							VERTI MEDIACION SOCIEDAD DE AGENCIA DE VALORES VINCULADA, S.L.	.ESP.....	.IA.....	CLUB MAPFRE, S.A.	Ownership.....	2.000 ...	MAPFRE S.A.	... NO.....	
							MAPFRE INTERMEDIARIES	.FL.....	NIA.....	COMMERCE INSURANCE	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							MM REAL ESTATE, LLC	.FL.....	NIA.....	COMMERCE INSURANCE	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	
							NILE ASSIST	.EGY.....	NIA.....	CONSULTING SOL.Y TEC. SIAM S.A.	Ownership.....	1.000 ...	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2023 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 Per-centage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/No)	*
.....							MAPFRE SERVICIOS EXEQUIALES SAS	.COL.....	NIA.....	CREDIMAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.	.ESP.....	NIA.....	FUNEIMADRID	Ownership.....	49.000	MAPFRE S.A.	... NO.....	
.....							POMPES FÚNEBRES DOMINGO, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							SERVICIOS FUNERARIOS FUNEMADRID, S.A.U.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							EMPRESA MIXTA SERVEIS MUNICIPALS DE TARRAGONA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	49.000	MAPFRE S.A.	... NO.....	
.....							CEMENTERIO PARQUE ANDUJAR, S.A.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	72.820	MAPFRE S.A.	... NO.....	
.....							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	... NO.....	
.....							INICIATIVAS ALCAÉSAR, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	40.000	MAPFRE S.A.	... NO.....	
.....							SALZILLO SERVICIOS FUNERARIOS, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	45.000	MAPFRE S.A.	... NO.....	
.....							DE MENA SERVICIOS FUNERARIOS, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	... NO.....	
.....							ISABELO ALVAREZ MAYORGA, S.A.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							SERVICIOS FUNERARIOS DEL NERVIÓN, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							NUEVO TANATORIO, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							SERVICIOS FUNERARIOS LA CARIDAD, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							TANATORIO DE ÉCIJA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	33.330	MAPFRE S.A.	... NO.....	
.....							TANATORIO SE-30 SEVILLA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	10.000	MAPFRE S.A.	... NO.....	
.....							FUNERARIAS REUNIDAS DEL BIERZO, S.A.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	85.820	MAPFRE S.A.	... NO.....	
.....							SERVICIOS FUNERARIOS LUCEM S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							FUNERARIA SAN VICENTE, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							INVERSIONES FUNERARIAS ANDALUZAS, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	33.330	MAPFRE S.A.	... NO.....	
.....							FUNERARIA ALIANZA CANARIA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							FUNESPAÑA DOS, S.L.	.ESP.....	NIA.....	FUNESPAÑA, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							TANATORIUM ZRT	.HUN.....	NIA.....	FUNESPAÑA, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							ALL FUNERAL SERVICES, S.L.	.ESP.....	NIA.....	FUNESPAÑA, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							FUNESPAÑA CHILE, S.A.	.ESP.....	NIA.....	FUNESPAÑA, S.A.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							FUNEUROPA CHILE, S.A.	.ESP.....	NIA.....	FUNESPAÑA, S.A.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE MÉXICO S.A.	.MEX.....	IA.....	GRUPO CORPORATIVO LML S.A.	Ownership.....	44.340	MAPFRE S.A.	... NO.....	
.....							ANDIASISTENCIA COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	.COL.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	1.910	MAPFRE S.A.	... NO.....	
.....							IBEROASISTENCIA, ARGENTINA S.A.	.ARG.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	1.580	MAPFRE S.A.	... NO.....	
.....							SUR ASISTENCIA, S.A.	.CHL.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	1.000	MAPFRE S.A.	... NO.....	
.....							URUGUAY ASISTENCIA S.A.	.URY.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	2.668	MAPFRE S.A.	... NO.....	
.....							NILE ASSIST	.EGY.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	1.000	MAPFRE S.A.	... NO.....	
.....							PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	.PRY.....	NIA.....	IBEROASISTENCIA S.A.	Ownership.....	1.050	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS GERAIS S.A.	.PRT.....	IA.....	MAPFRE PARTICIPAÇÕES, 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 TENEDORA DE AOC, S.A.	.PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS HONDURAS S.A.	.HND.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	25.103	MAPFRE S.A.	... NO.....	
.....							MAPFRE PANAMÁ S.A.	.PAN.....	IA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	99.377	MAPFRE S.A.	... NO.....	
.....							MAPFRE SEGUROS EL SALVADOR, S.A.	.SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	78.107	MAPFRE S.A.	... NO.....	
.....							INMOBILIARIA AMERICANA S.A.	.SLV.....	NIA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	78.900	MAPFRE S.A.	... NO.....	
.....							MAPFRE ARGENTINA SEGUROS S.A.	.ARG.....	IA.....	MAPFRE ARGENTINA HOLDING S.A.	Ownership.....	99.999	MAPFRE S.A.	... NO.....	
.....							CLUB MAPFRE ARGENTINA S.A.	.ARG.....	NIA.....	MAPFRE ARGENTINA HOLDING S.A.	Ownership.....	97.000	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.....	
.....							CLUB MAPFRE ARGENTINA S.A.	.ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	Ownership.....	3.000	MAPFRE S.A.	... NO.....	
.....							CESVI ARGENTINA, S.A.	.ARG.....	NIA.....	MAPFRE ARGENTINA SEGUROS S.A.	Ownership.....	60.640	MAPFRE S.A.	... NO.....	
.....							MAPFRE ASSISTENCIA LTDA	.ESP.....	IA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	99.999	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2023 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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

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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)	*
...	...	...	...	...	...	...	AFRIQUE ASSISTANCE, S.A.	.TUN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..49.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	SERVICIOS GENERALES VENEASISTENCIA, S.A.	.VEN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.998	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	ANDIASISTENCIA COMPAÑIA DE ASISTENCIA DE LOS ANDES, S.A.S	.COL.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..98.090	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	IBERO ASISTENCIA, S.A.	.PRT.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	IBEROASISTENCIA, ARGENTINA S.A.	.ARG.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..98.420	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	IBEROASISTENCIA, S.A.	.ESP.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.930	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	SUR ASISTENCIA, S.A.	.CHL.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	IRELAND ASSIST, LTD	.IRL.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	EUROSOS ASSISTANCE, S.A.	.GRC.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..25.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	CARIBE ASISTENCIA, S.A.	.DOM.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..83.582	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	ECUASISTENCIA, S.A.	.ECU.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.260	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MÉXICO ASISTENCIA, S.A.	.MEX.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	PANAMÁ ASISTENCIA, S.A.	.PAN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..84.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	URUGUAY ASISTENCIA,S.A.	.URY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..97.332	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	QUETZAL ASISTENCIA, S.A.	.GTM.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.992	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	EL SALVADOR ASISTENCIA, S.A.	.SLV.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.990	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	NICASSIST, S.A.	.NIC.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE WARRANTY S.P.A.	.ITA.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	ROAD CHINA ASSISTANCE Co, LTD	.CHN.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED ...	.IND.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.630	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	ROADSIDE ASSIST ALGERIE SPA	.DZA.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..60.300	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	NILE ASSIST	.EGY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..98.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MIDDLESEA ASSIST LIMITED	.MLT.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..51.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	.PRY.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..98.950	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	CREDIPRIMAS, S.A.	.DOM.....	NIA.....	MAPFRE BHD COMPAÑIA DE SEGUROS S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE VERA CRUZ CONSULTORIA E ADMINISTRACAO DE FUNDOS LTDA.	.BRA.....	IA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	BB MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..25.010	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE INVESTIMENTOS E PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE SAUDE LTDA	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..99.990	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	PROTENSEG CORRETORA DE SEGUROS LTDA	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE ASESORÍAS, S.A.	Ownership.....	..12.710	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	CAJA REASEGURADORA DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE REASEGUROS S.A.	Ownership.....	..99.847	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	C R ARGENTINA, S.A.	.ARG.....	NIA.....	MAPFRE CHILE REASEGUROS S.A.	Ownership.....	..99.996	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE CHILE ASESORÍAS, S.A.	.CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE COMPAÑIA DE SEGUROS GENERALES DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE SEGUROS S.A.	Ownership.....	..87.290	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE COMPAÑIA DE SEGUROS DE VIDA DE CHILE S.A.	.CHL.....	IA.....	MAPFRE CHILE VIDA S.A.	Ownership.....	..99.997	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE BHD COMPAÑIA DE SEGUROS, S.A.	.DOM.....	NIA.....	MAPFRE DOMINICANA S.A.	Ownership.....	..51.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE SALUD ARS	.MEX.....	NIA.....	MAPFRE DOMINICANA S.A.	Ownership.....	..51.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	ENERGIAS RENOVABLES IBERMAP, S.L.	.ESP.....	NIA.....	MAPFRE ENERGIAS RENOVABLES I, F.C.R.	Ownership.....	..80.000	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..99.998	MAPFRE S.A.	... NO.....	
...	...	...	...	...	...	...	MAPFRE AUTOMOCIÓN S.A.U	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2023 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)	*
.....							VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A	.ESP	..IA	MAPFRE ESPAÑA, S.A.	Ownership	..99.999	MAPFRE S.A.	..NO	
.....							MAPFRE CONSULTORES DE SEGUROS Y REASEGUROS, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..50.000	MAPFRE S.A.	..NO	
.....							MULTISERVICIOS MAPFRE MULTIMAP, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..97.500	MAPFRE S.A.	..NO	
.....							FUNESPAÑA, S.A.U.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..99.786	MAPFRE S.A.	..NO	
.....							MEDISEMAP, AGENCIA DE SEGUROS, S.L.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..66.667	MAPFRE S.A.	..NO	
.....							CENTROS MÉDICOS MAPFRE, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							MAPFRE VIDEO Y COMUNICACIÓN S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..75.000	MAPFRE S.A.	..NO	
.....							BANKINTER SEGUROS GENERALES, CÍA DE SEGUROS Y REASEGUROS S.A.	.ESP	..IA	MAPFRE ESPAÑA, S.A.	Ownership	..50.100	MAPFRE S.A.	..NO	
.....							AUDATEX ESPAÑA, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..12.500	MAPFRE S.A.	..NO	
.....							TECNOLOGÍAS DE LA INFORMACIÓN Y REDES PARA LAS ENTIDADES ASEGURADORAS, S.A	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..22.951	MAPFRE S.A.	..NO	
.....							AGROSEGURO	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..19.230	MAPFRE S.A.	..NO	
.....							SALVADOR CAETANO AUTO (SGPS), S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..24.610	MAPFRE S.A.	..NO	
.....							SALUD DIGITAL MAPFRE S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..97.500	MAPFRE S.A.	..NO	
.....							PUY DU FOU ESPAÑA,S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..19.543	MAPFRE S.A.	..NO	
.....							SANTANDER MAPFRE SEGUROS Y REASEGUROS S.A	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..50.010	MAPFRE S.A.	..NO	
.....							MAPFRE INMUEBLES, S.G.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..82.973	MAPFRE S.A.	..NO	
.....							MULTISERVICIOS MAPFRE MULTIMAP, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							MAPFRE AM-MULTI ASSET STRATEGY	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..44.268	MAPFRE S.A.	..NO	
.....							FONDMAPFRE BOLSA AMERICA	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..20.792	MAPFRE S.A.	..NO	
.....							MAPFRE AM- SHORT TERM EURO I	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..32.559	MAPFRE S.A.	..NO	
.....							MAPFRE AM-INCLUSION RESPONSABLE	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..8.741	MAPFRE S.A.	..NO	
.....							MAPFRE AM-US FORGOTTEN VALUE	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..34.437	MAPFRE S.A.	..NO	
.....							MAPFRE AM GLOBAL BOND FUND	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..9.379	MAPFRE S.A.	..NO	
.....							SWISSLIFE SPPICAV	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..14.980	MAPFRE S.A.	..NO	
.....							OLIFAN INMO 18 OPC1	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..24.242	MAPFRE S.A.	..NO	
.....							MAPFRE INFRAESTRUCTURAS FCR	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..8.065	MAPFRE S.A.	..NO	
.....							MAPFRE PRIVATE EQUITY I FCR	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..28.080	MAPFRE S.A.	..NO	
.....							MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..26.490	MAPFRE S.A.	..NO	
.....							MAPFRE AM SELECTION	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							FONDMAPFRE GARANTIA III, F.I.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..20.011	MAPFRE S.A.	..NO	
.....							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..22.500	MAPFRE S.A.	..NO	
.....							CLUB MAPFRE, S.A.	.ESP	..NIA	MAPFRE ESPAÑA, S.A.	Ownership	..99.988	MAPFRE S.A.	..NO	
.....							MAPFRE ASISTENCIA COMPAÑIA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	.ESP	..IA	MAPFRE ESPAÑA, S.A.	Ownership	..0.003	MAPFRE S.A.	..NO	
.....							DESARROLLOS URBANOS C1C. S.A.	.ESP	..NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	..99.922	MAPFRE S.A.	..NO	
.....							SERVICIOS INMOBILIARIOS MAPFRE S.A.	.ESP	..NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	..99.900	MAPFRE S.A.	..NO	
.....							MAP SL EROPEAN INVEST SARL	.LUX	..NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	..50.000	MAPFRE S.A.	..NO	
.....							MAPAR IMPERIAL 14, S.L.	.ESP	..NIA	MAPFRE INMUEBLES, S.G.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							MAPFRE BRASIL PARTICIPAÇÕES, S.A.	.BRA	..IA	MAPFRE INTERNACIONAL, S.A.	Ownership	..99.170	MAPFRE S.A.	..NO	
.....							MAPFRE AMERICA CENTRAL S.A	.PAN	..NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	..99.900	MAPFRE S.A.	..NO	
.....							MAPFRE DOMINICANA S.A.	.DOM	..NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							MAPFRE MÉXICO S.A.	.MEX	..IA	MAPFRE INTERNACIONAL, S.A.	Ownership	..55.660	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 ARGENTINA HOLDING S.A.	.ARG	..NIA	MAPFRE INTERNACIONAL, S.A.	Ownership	..100.000	MAPFRE S.A.	..NO	
.....							MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	.ARG	..IA	MAPFRE INTERNACIONAL, S.A.	Ownership	..64.000	MAPFRE S.A.	..NO	

STATEMENT AS OF SEPTEMBER 30, 2023 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)	*
...	...	...	...	...	...	...	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 SEGUROS GENERALES DE COLOMBIA S.A.	.COL.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	93.853 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE COLOMBIA VIDA SEGUROS S.A.	.COL.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	94.354 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	.ECU.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	67.655 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	.PRY.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	89.540 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A. (in 2021 Mapfe Peru Vida cia. De Seguros y Reaseguros)	.PER.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	99.590 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD APOINT S.A.	.PER.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	98.587 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE URUGUAY SEGUROS S.A.	.URY.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	.URY.....	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.....	99.516 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	AMA-ASISTENCIA MEDICA ADMINISTRADA, C.A.	.VEN.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	99.700 ...	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 MIDDLESEA P.L.C.	.MLT.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	55.833 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE SIGORTA, A.S.	.TUR.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	99.745 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A	.ESP.....	NIA.....	MAPFRE INVERSIÓN, S.A.	Ownership.....	99.985 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	.ESP.....	NIA.....	MAPFRE INVERSIÓN, S.A.	Ownership.....	99.997 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE INVESTIMENTOS LTDA.	.BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPAÇÕES SA ..	Ownership.....	99.990 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAC INVESTIMENTOS S.A.	.BRA.....	NIA.....	MAPFRE INVESTIMENTOS E PARTICIPAÇÕES SA ..	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	.BRA.....	IA.....	MAPFRE INVESTMENT S.A.	Ownership.....	0.830 ...	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-FINANCIADORA DE PRIMAS, C.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	CLUB MAPFRE S.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.....	...
...	...	...	...	...	...	...	GROWTH INVESTMENTS LIMITED	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	99.700 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE DEFENSA LEGAL S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	99.998 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE TEPEYAC INC.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE SERVICIOS MEXICANOS S.A.	.CA.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	CESVI MÉXICO, S.A.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	99.990 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE FIANZAS S.A.	.MEX.....	NIA.....	MAPFRE MEXICO S.A.	Ownership.....	16.670 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE M.S.V. LIFE P.L.C.	.MEX.....	IA.....	MAPFRE MEXICO S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	BEE INSURANCE MANAGEMENT LTD	.MLT.....	IA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	EURO GLOBE HOLDINGS LIMITED	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE CAPITALIZAÇÃO S.A.	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE VIDA S.A.	.BRA.....	NIA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PREVIDENCIA S.A.	.BRA.....	IA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	.BRA.....	IA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000 ...	MAPFRE S.A.	... NO.....	...
...	...	...	...	...	...	...	MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	.PER.....	NIA.....	MAPFRE PERU CIA. SEGUROS Y REASEGUROS S.A.	Ownership.....	1.413 ...	MAPFRE S.A.	... NO.....	...

STATEMENT AS OF SEPTEMBER 30, 2023 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)	*
							CORPORACIÓN FUNERARIA, S.A.	.PER.....	NIA.....	MAPFRE PERU COMPAÑIA DE SEGUROS Y REASEGUROS S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							MAPFRE AM-MULTI ASSET STRATEGY	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	46.369	MAPFRE S.A.	..NO.....	
							FONDMAPFRE BOLSA EUROPA F.I	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	22.539	MAPFRE S.A.	..NO.....	
							MAPFRE AM- SHORT TERM EURO I	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	44.539	MAPFRE S.A.	..NO.....	
							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	16.000	MAPFRE S.A.	..NO.....	
							MAPFRE AM-BEHAVORIAL FUND I	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	25.925	MAPFRE S.A.	..NO.....	
							MAPFRE AM-INCLUSION RESPONSABLE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	22.789	MAPFRE S.A.	..NO.....	
							MAPFRE AM-US FORGOTTEN VALUE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	23.068	MAPFRE S.A.	..NO.....	
							SWISSLIFE SPPICAV	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	16.980	MAPFRE S.A.	..NO.....	
							OLIFAN INMO 18 OPC1	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	30.206	MAPFRE S.A.	..NO.....	
							MAPFRE INFRAESTRUCTURAS FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	9.337	MAPFRE S.A.	..NO.....	
							MAPFRE PRIVATE EQUITY I FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	35.760	MAPFRE S.A.	..NO.....	
							MAPFRE ENERGIAS RENOVABLES I, F.C.R.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	25.360	MAPFRE S.A.	..NO.....	
							FONDMAPFRE GARANTIA III, F.I.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	22.012	MAPFRE S.A.	..NO.....	
							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	22.500	MAPFRE S.A.	..NO.....	
							SERVICIOS GENERALES VENEASISTENCIA, S.A.	.VEN.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	0.002	MAPFRE S.A.	..NO.....	
							MAPFRE CHILE REASEGUROS, S.A.	.CHL.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	99.990	MAPFRE S.A.	..NO.....	
							MAPFRE RE DO BRASIL COMPAÑIA DE REASEGUROS S.A.	.BRA.....	IA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑIA DE REASEGUROS	.BRA.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	.ARG.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	99.999	MAPFRE S.A.	..NO.....	
							REINSURANCE MANAGAIMENT INC.	.NJ.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							MAPFRE EURO BONDS FUND	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							RISK MED SOLUTIONS, S.L.	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							SANTANDER MAPFRE HIPOTECA INVERSA	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	50.000	MAPFRE S.A.	..NO.....	
							MEAG EUROPE OFFICE SELECT EOS SCSP SICAV-RIAV	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	5.000	MAPFRE S.A.	..NO.....	
							LA FINANCIERE RESPONSABLE	.FRA.....	NIA.....	MAPFRE S.A.	Ownership.....	24.950	MAPFRE S.A.	..NO.....	
							STABLE INCOME REAL STATE FUN GP S.A.R.I.	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							SOLUNION SEGUROS DE CREDITO S.A.	.ESP.....	IA.....	MAPFRE S.A.	Ownership.....	50.000	MAPFRE S.A.	..NO.....	
							ALMA MUNDI INSURTECH FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	26.399	MAPFRE S.A.	..NO.....	
							ALMA MUNDI INSURTECH II FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	35.470	MAPFRE S.A.	..NO.....	
							CREDIMAPFRE S.A.	.COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							CESVI COLOMBIA, S.A.	.COL.....	NIA.....	MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	Ownership.....	67.772	MAPFRE S.A.	..NO.....	
							MAPFRE SEGUROS DE VIDA S.A.	.PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	100.000	MAPFRE S.A.	..NO.....	
							MAPFRE SANTANDER PORTUGAL COMPANHIA DE SEGUROS, S.A.	.PRT.....	IA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	50.010	MAPFRE S.A.	..NO.....	
							MAPFRE YASAM SIGORTA, A.S.	.TUR.....	IA.....	MAPFRE SIGORTA, A.S.	Ownership.....	99.778	MAPFRE S.A.	..NO.....	
							GENEL SERVİS YEDEK PARÇA DAĞITIM TICARET A.S.	.TUR.....	NIA.....	MAPFRE SIGORTA, A.S.	Ownership.....	51.000	MAPFRE S.A.	..NO.....	
							MAPFRE SEGUROS HONDURAS S.A.	.HND.....	IA.....	MAPFRE TENEDORA DE ACC, S.A.	Ownership.....	73.257	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.....	
							MEDISEMAP, AGENCIA DE SEGUROS, S.L.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	33.333	MAPFRE S.A.	..NO.....	

STATEMENT AS OF SEPTEMBER 30, 2023 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)	*
							MAPFRE VIDEO Y COMUNICACIÓN S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	25.000	MAPFRE S.A.	... NO.....	
							MAPFRE INMUEBLES, S.G.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	7.028	MAPFRE S.A.	... NO.....	
							CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	99.934	MAPFRE S.A.	... NO.....	
							GESTIÓN MODA SHOPPING S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	99.822	MAPFRE S.A.	... NO.....	
							MAPFRE INVERSIÓN SOCIEDAD DE VALORES S.A.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	99.999	MAPFRE S.A.	... NO.....	
							MIRACETI S.A.	.ESP.....	IA.....	MAPFRE VIDA, S.A.	Ownership.....	99.999	MAPFRE S.A.	... NO.....	
							BANKINTER SEGUROS DE VIDA, S.A. DE SEGUROS Y REASEGUROS	.ESP.....	IA.....	MAPFRE VIDA, S.A.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
							MAPFRE AM- GOOD GOVERNANCE	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	33.712	MAPFRE S.A.	... NO.....	
							MAPFRE AM- IBERIAN EQUITIES	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	44.217	MAPFRE S.A.	... NO.....	
							MAPFRE AM-EUROPEAN EQUITIES	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	46.518	MAPFRE S.A.	... NO.....	
							FONDMAPFRE ELECCION DECIDIDA	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	38.466	MAPFRE S.A.	... NO.....	
							FONDMAPFRE ELECCION MODERADA	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	45.077	MAPFRE S.A.	... NO.....	
							FONDMAPFRE ELECCION PRUDENTE	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	44.346	MAPFRE S.A.	... NO.....	
							FONDMAPFRE BOLSA AMERICA	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	31.910	MAPFRE S.A.	... NO.....	
							FONDMAPFRE RENTA DÓLAR	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	38.571	MAPFRE S.A.	... NO.....	
							FONDMAPFRE GLOBAL F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	43.232	MAPFRE S.A.	... NO.....	
							FONDMAPFRE BOLSA MIXTO F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	58.520	MAPFRE S.A.	... NO.....	
							FONDMAPFRE BOLSA EUROPA F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	9.293	MAPFRE S.A.	... NO.....	
							FONDMAPFRE GARANTIA, F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	99.999	MAPFRE S.A.	... NO.....	
							FONDMAPFRE GARANTIA II, F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	99.997	MAPFRE S.A.	... NO.....	
							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	20.000	MAPFRE S.A.	... NO.....	
							MAPFRE AM CAPITAL RESPONSABLE	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	18.139	MAPFRE S.A.	... NO.....	
							MAPFRE AM GLOBAL BOND FUND	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	39.772	MAPFRE S.A.	... NO.....	
							MAPFRE FONDTESORO PLUS, F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	13.928	MAPFRE S.A.	... NO.....	
							FONDMAPFRE RENTA FIJA FLEXIBLE	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	41.523	MAPFRE S.A.	... NO.....	
							FONDMAPFRE GARANTIA IV, F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							SIEREFF MACQUORIE 2	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	12.698	MAPFRE S.A.	... NO.....	
							MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	.ESP.....	IA.....	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 INMUEBLES, S.G.A.	.ESP.....	NIA.....	MAPFRE, S.A.	Ownership.....	9.998	MAPFRE S.A.	... NO.....	
							MAPFRE TECH, S.A.	.ESP.....	NIA.....	MAPFRE, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE VIDA SOCIEDAD ANÓNIMA DE SEGUROS Y REASEGUROS SOBRE LA VIDA HUMANA	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	99.923	MAPFRE S.A.	... NO.....	
							MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	99.997	MAPFRE S.A.	... NO.....	
							MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE, S.A.	Ownership.....	94.209	MAPFRE S.A.	... NO.....	
							MAPFRE INTERNACIONAL S.A.	.ESP.....	UIP.....	MAPFRE, S.A.	Ownership.....	100.000	MAPFRE, S.A.	... NO.....	
							MAPFRE INVESTMENT S.A.	.URY.....	NIA.....	MAPFRE, 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.....	
							MIDDLESEA ASSIST LIMITED	.MLT.....	NIA.....	MIDDLESEA INSURANCE P.L.C.	Ownership.....	49.000	MAPFRE S.A.	... NO.....	
							SIEREFF MACQUORIE 2	.LUX.....	NIA.....	MSV LIFE PLC	Ownership.....	15.873	MAPFRE S.A.	... NO.....	
							MAPFRE AM- IBERIAN EQUITIES	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	19.605	MAPFRE S.A.	... NO.....	
							MAPFRE AM-EUROPEAN EQUITIES	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	18.710	MAPFRE S.A.	... NO.....	
							MAPFRE AM-MULTI ASSET STRATEGY	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	9.363	MAPFRE S.A.	... NO.....	
							FONDMAPFRE ELECCION DECIDIDA	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	26.101	MAPFRE S.A.	... NO.....	
							FONDMAPFRE ELECCION MODERADA	.ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	12.047	MAPFRE S.A.	... NO.....	

STATEMENT AS OF SEPTEMBER 30, 2023 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE Y

PART 1A - DETAIL OF INSURANCE HOLDING COMPANY SYSTEM

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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)	*
....							FONDMAPFRE ELECCION PRUDENTE	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..10.656	MAPFRE S.A.	NO.....	
....							FONDMAPFRE BOLSA AMERICA	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..14.473	MAPFRE S.A.	NO.....	
....							FONDMAPFRE GLOBAL F.I.	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..1.986	MAPFRE S.A.	NO.....	
....							FONDMAPFRE BOLSA MIXTO F.I.	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..3.488	MAPFRE S.A.	NO.....	
....							FONDMAPFRE BOLSA EUROPA F.I.	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..18.398	MAPFRE S.A.	NO.....	
....							MAPFRE AM- SHORT TERM EURO I	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..3.356	MAPFRE S.A.	NO.....	
....							STABLE INCOME EUROPEAN REAL ESTATE FUND	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..9.000	MAPFRE S.A.	NO.....	
....							MAPFRE AM-BEHAVORIAL FUND I	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..13.600	MAPFRE S.A.	NO.....	
....							MAPFRE AM-INCLUSION RESPONSABLE	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..29.089	MAPFRE S.A.	NO.....	
....							MAPFRE AM-US FORGOTTEN VALUE	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..9.782	MAPFRE S.A.	NO.....	
....							MAPFRE AM CAPITAL RESPONSABLE	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..12.781	MAPFRE S.A.	NO.....	
....							MAPFRE AM GLOBAL BOND FUND	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..13.892	MAPFRE S.A.	NO.....	
....							SWISSLIFE SPPICAV	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..17.190	MAPFRE S.A.	NO.....	
....							OLIFAN INMO 18 OPCI	..LUX.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..4.411	MAPFRE S.A.	NO.....	
....							MAPFRE INFRAESTRUCTURAS FOR	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..4.515	MAPFRE S.A.	NO.....	
....							MAPFRE AM- GOOD GOVERNANCE	..ESP.....	..NIA.....	OTHER GROUP COMPANIES	Ownership.....	..22.564	MAPFRE S.A.	NO.....	
....							MAPFRE PRIVATE EQUITY I FOR	..ESP.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..14.640	MAPFRE S.A.	NO.....	
....							MAPFRE FONDTESORO PLUS, F.I.	..ESP.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..11.581	MAPFRE S.A.	NO.....	
....							MAPFRE ENERGIAS RENOVABLES I, F.C.R.	..ESP.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..27.930	MAPFRE S.A.	NO.....	
....							FONDMAPFRE RENTA FIJA FLEXIBLE	..ESP.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..1.063	MAPFRE S.A.	NO.....	
....							FONDMAPFRE GARANTIA III, F.I.	..ESP.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..13.695	MAPFRE S.A.	NO.....	
....							SIEREFF MACQUORIE 2	..LUX.....	..NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..19.048	MAPFRE S.A.	NO.....	
....							SANTANDER ASSURANCE SOLUTIONS, S.A.	..ESP.....	..NIA.....	SANTANDER MAPFRE SEGUROS Y REASEGUROS, S.A.	Ownership.....	..33.000	MAPFRE S.A.	NO.....	
....							VERTI MEDIACION SOCIEDAD DE AGENCIA DE VALORES VINCULADA, S.L.	..ESP.....	..IA.....	VERTI ASEGURADORA S.A.	Ownership.....	..98.000	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.

PART 1 - LOSS EXPERIENCE

Line of Business		Current Year to Date			4 Prior Year to Date Direct Loss Percentage
		1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	
1.	Fire	2,775,247	1,557,406	56.1	55.0
2.1	Allied Lines	49,731	17,448	35.1	43.8
2.2	Multiple peril crop	0	0	0.0	0.0
2.3	Federal flood	2,974,423	401,769	13.5	(6.9)
2.4	Private crop	0	0	0.0	0.0
2.5	Private flood	0	0	0.0	0.0
3.	Farmowners multiple peril	0	0	0.0	0.0
4.	Homeowners multiple peril	39,913,863	27,107,354	67.9	58.3
5.1	Commercial multiple peril (non-liability portion)	0	0	0.0	0.0
5.2	Commercial multiple peril (liability portion)	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	11,794	3,400	28.8	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	0.0
13.2	Comprehensive (hospital and medical) group	0	0	0.0	0.0
14.	Credit accident and health	0	0	0.0	0.0
15.1	Vision only	0	0	0.0	0.0
15.2	Dental only	0	0	0.0	0.0
15.3	Disability income	0	0	0.0	0.0
15.4	Medicare supplement	0	0	0.0	0.0
15.5	Medicaid Title XIX	0	0	0.0	0.0
15.6	Medicare Title XVIII	0	0	0.0	0.0
15.7	Long-term care	0	0	0.0	0.0
15.8	Federal employees health benefits plan	0	0	0.0	0.0
15.9	Other health	0	0	0.0	0.0
16.	Workers' compensation	0	0	0.0	0.0
17.1	Other liability - occurrence	5,527,261	2,411,420	43.6	(0.8)
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)	448,828	(13,982)	(3.1)	44.1
19.2	Other private passenger auto liability	38,045,957	28,702,595	75.4	46.6
19.3	Commercial auto no-fault (personal injury protection)	0	0	0.0	0.0
19.4	Other commercial auto liability	0	0	0.0	0.0
21.1	Private passenger auto physical damage	24,820,404	17,821,023	71.8	73.0
21.2	Commercial auto physical damage	0	0	0.0	0.0
22.	Aircraft (all perils)	18,692,185	7,068,549	37.8	38.5
23.	Fidelity	0	0	0.0	0.0
24.	Surety	0	0	0.0	0.0
26.	Burglary and theft	0	0	0.0	0.0
27.	Boiler and machinery	0	0	0.0	0.0
28.	Credit	0	0	0.0	0.0
29.	International	0	0	0.0	0.0
30.	Warranty	0	0	0.0	0.0
31.	Reinsurance - Nonproportional Assumed Property	XXX	XXX	XXX	XXX
32.	Reinsurance - Nonproportional Assumed Liability	XXX	XXX	XXX	XXX
33.	Reinsurance - Nonproportional Assumed Financial Lines	XXX	XXX	XXX	XXX
34.	Aggregate write-ins for other lines of business	0	0	0.0	0.0
35.	Totals	133,259,693	85,076,982	63.8	50.6
DETAILS OF WRITE-INS					
3401.					
3402.					
3403.					
3498.	Summary of remaining write-ins for Line 34 from overflow page	0	0	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	949,951	2,780,507	2,828,129
2.1	Allied Lines	19,068	52,007	45,042
2.2	Multiple peril crop	0	0	0
2.3	Federal flood	1,120,272	2,818,075	3,037,868
2.4	Private crop	0	0	0
2.5	Private flood	0	0	0
3.	Farmowners multiple peril	0	0	0
4.	Homeowners multiple peril	15,078,474	42,713,101	37,693,119
5.1	Commercial multiple peril (non-liability portion)	0	0	0
5.2	Commercial multiple peril (liability portion)	0	0	0
6.	Mortgage guaranty	0	0	0
8.	Ocean marine	0	0	0
9.	Inland marine	7,626	24,225	9,224
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	0
13.2	Comprehensive (hospital and medical) group	0	0	0
14.	Credit accident and health	0	0	0
15.1	Vision only	0	0	0
15.2	Dental only	0	0	0
15.3	Disability income	0	0	0
15.4	Medicare supplement	0	0	0
15.5	Medicaid Title XIX	0	0	0
15.6	Medicare Title XVIII	0	0	0
15.7	Long-term care	0	0	0
15.8	Federal employees health benefits plan	0	0	0
15.9	Other health	0	0	0
16.	Workers' compensation	0	0	0
17.1	Other liability - occurrence	4,636,300	7,341,060	4,737,444
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)	148,428	439,372	507,830
19.2	Other private passenger auto liability	12,088,054	37,928,854	37,360,737
19.3	Commercial auto no-fault (personal injury protection)	0	0	0
19.4	Other commercial auto liability	0	0	0
21.1	Private passenger auto physical damage	8,618,859	25,497,106	23,776,348
21.2	Commercial auto physical damage	0	0	0
22.	Aircraft (all perils)	11,125,350	21,053,443	17,383,861
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	53,792,382	140,647,750	127,379,602
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, 2023 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)	2023 Loss and LAE Payments on Claims Reported as of Prior Year-End	2023 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2023 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. 2020 + Prior	29,021	(3,505)	25,516	9,465	343	9,808	17,239	128	(2,027)	15,340	(2,317)	1,949	(368)									
2. 2021	19,987	516	20,503	6,264	85	6,349	13,803	79	(508)	13,374	80	(860)	(780)									
3. Subtotals 2021 + Prior	49,008	(2,989)	46,019	15,729	428	16,157	31,042	207	(2,535)	28,714	(2,237)	1,089	(1,148)									
4. 2022	42,440	13,986	56,426	30,802	245	31,047	26,903	418	(2,275)	25,046	15,265	(15,598)	(333)									
5. Subtotals 2022 + Prior	91,448	10,997	102,445	46,531	673	47,204	57,945	625	(4,810)	53,760	13,028	(14,509)	(1,481)									
6. 2023	XXX	XXX	XXX	XXX	75,013	75,013	XXX	31,512	16,007	47,519	XXX	XXX	XXX									
7. Totals	91,448	10,997	102,445	46,531	75,686	122,217	57,945	32,137	11,197	101,279	13,028	(14,509)	(1,481)									
8. Prior Year-End Surplus As Regards Policyholders	99,782										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. 14.2	2. (131.9)	3. (1.4)									
											Col. 13, Line 7 As a % of Col. 1 Line 8 4. (1.5)											

STATEMENT AS OF SEPTEMBER 30, 2023 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.

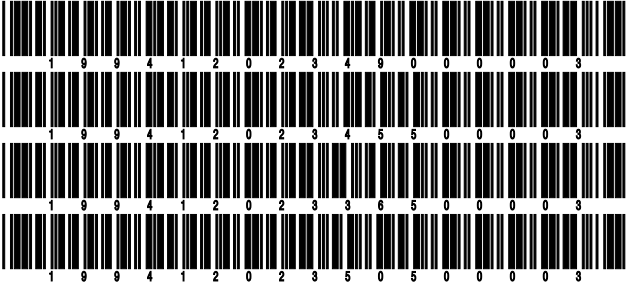
	Response
1. Will the Trusteed Surplus Statement be filed with the state of domicile and the NAIC with this statement?	NO
2. Will Supplement A to Schedule T (Medical Professional Liability Supplement) be filed with this statement?	NO
3. Will the Medicare Part D Coverage Supplement be filed with the state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

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]



NONE

SCHEDULE A - VERIFICATION

Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
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	2
	Year to Date	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	2
	Year to Date	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	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value of bonds and stocks, December 31 of prior year	192,876,157	201,469,648
2. Cost of bonds and stocks acquired	6,362,587	12,642,068
3. Accrual of discount	119,394	140,386
4. Unrealized valuation increase (decrease)	(345,223)	(1,666)
5. Total gain (loss) on disposals	(354,259)	(460)
6. Deduct consideration for bonds and stocks disposed of	6,241,932	20,936,355
7. Deduct amortization of premium	520,007	437,464
8. Total foreign exchange change in book/adjusted carrying value	0	
9. Deduct current year's other than temporary impairment recognized	367,455	
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees	0	
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10)	191,529,262	192,876,157
12. Deduct total nonadmitted amounts	0	
13. Statement value at end of current period (Line 11 minus Line 12)	191,529,262	192,876,157

STATEMENT AS OF SEPTEMBER 30, 2023 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)	157,236,035	1,490,760	876,323	(1,111,527)	158,732,139	157,236,035	156,738,945	157,632,627
2. NAIC 2 (a)	30,799,453	0	0	986,684	31,837,743	30,799,453	31,786,137	32,518,261
3. NAIC 3 (a)	0	0	0	0	0	0	0	
4. NAIC 4 (a)	0	0	0	0	0	0	0	
5. NAIC 5 (a)	0	0	0	0	7,259	0	0	7,269
6. NAIC 6 (a)	630,880	0	0	0	630,880	630,880	630,880	
7. Total Bonds	188,666,368	1,490,760	876,323	(124,843)	191,208,021	188,666,368	189,155,962	190,158,157
PREFERRED STOCK								
8. NAIC 1	0	0	0	0	0	0	0	0
9. NAIC 2	2,282,250	0	0	91,050	2,718,000	2,282,250	2,373,300	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	2,282,250	0	0	91,050	2,718,000	2,282,250	2,373,300	2,718,000
15. Total Bonds and Preferred Stock	190,948,618	1,490,760	876,323	(33,793)	193,926,021	190,948,618	191,529,262	192,876,157

(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	Par Value	Actual Cost	Interest Collected Year-to-Date	Paid for Accrued Interest Year-to-Date
7709999999 Totals		XXX			

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	0	740,067
2. Cost of short-term investments acquired	0	2,014,000
3. Accrual of discount	0	0
4. Unrealized valuation increase (decrease)	0	0
5. Total gain (loss) on disposals	0	0
6. Deduct consideration received on disposals	0	2,740,000
7. Deduct amortization of premium	0	14,067
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	0
11. Deduct total nonadmitted amounts	0	0
12. Statement value at end of current period (Line 10 minus Line 11)	0	0

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

N O N E

Schedule DB - Part B - Verification - Futures Contracts

N O N E

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

N O N E

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

N O N E

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

N O N E

Schedule E - Part 2 - Verification - Cash Equivalents

N O N E

Schedule A - Part 2 - Real Estate Acquired and Additions Made

N O N E

Schedule A - Part 3 - Real Estate Disposed

N O N E

Schedule B - Part 2 - Mortgage Loans Acquired and Additions Made

N O N E

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

N O N E

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

N O N E

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

N O N E

STATEMENT AS OF SEPTEMBER 30, 2023 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE D - PART 3

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

1	2	3	4	5	6	7	8	9	10 NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	
554885-K3-6	MACOMB CO-TXBL		07/13/2023.....	RIBBARD		1,490,760	1,500,000	13,984	1.B FE
0709999999. Subtotal - Bonds - U.S. Political Subdivisions of States, Territories and Possessions						1,490,760	1,500,000	13,984	XXX
2509999997. Total - Bonds - Part 3						1,490,760	1,500,000	13,984	XXX
2509999998. Total - Bonds - Part 5						XXX	XXX	XXX	XXX
2509999999. Total - Bonds						1,490,760	1,500,000	13,984	XXX
4509999997. Total - Preferred Stocks - Part 3						0	XXX	0	XXX
4509999998. Total - Preferred Stocks - Part 5						XXX	XXX	XXX	XXX
4509999999. Total - Preferred Stocks						0	XXX	0	XXX
5989999997. Total - Common Stocks - Part 3						0	XXX	0	XXX
5989999998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks						0	XXX	0	XXX
5999999999. Total - Preferred and Common Stocks						0	XXX	0	XXX
6009999999 - Totals						1,490,760	XXX	13,984	XXX

STATEMENT AS OF SEPTEMBER 30, 2023 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 Ident- ification	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 Recog- nized	Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book /Adjusted Carrying Value	Book/ 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		09/15/2023	VARIOUS		1,481	1,481	1,535	1,505	0	(2)	0	(2)	0	1,503	0	(22)	(22)	70	11/15/2029	1.A	
..83162C-TA-1	SMALL BUS ADMIN GTD DEV PTC		07/03/2023	PRINCIPAL RECEIPT		35,918	35,918	39,639	37,435	0	(1,516)	0	(1,516)	0	35,918	0	0	0	1,573	01/01/2030	1.A	
0109999999. Subtotal - Bonds - U.S. Governments						37,399	37,399	41,174	38,940	0	(1,518)	0	(1,518)	0	37,421	0	(22)	(22)	1,643	XXX	XXX	
..57582R-YN-0	MASSACHUSETTS ST		09/01/2023	Sink PMT @ 100.0000000		16,614	16,614	17,526	17,433	0	(820)	0	(820)	0	16,614	0	0	0	442	09/01/2039	1.B FE	
..917542-QV-7	UTAH ST		07/03/2023	Sink PMT @ 100.0000000		268,277	268,277	264,656	265,068	0	3,210	0	3,210	0	268,277	0	0	0	9,494	07/01/2025	1.A FE	
0509999999. Subtotal - Bonds - U.S. States, Territories and Possessions						284,891	284,891	282,182	282,501	0	2,390	0	2,390	0	284,891	0	0	0	9,936	XXX	XXX	
..01026C-AC-5	ALABAMA ECONOMIC SETTLEMENT		09/15/2023	Sink PMT @ 100.0000000		175,000	175,000	172,806	173,973	0	1,027	0	1,027	0	175,000	0	0	0	5,535	09/15/2025	1.G FE	
..31396P-GT-2	FANNIE MAE - ACES		09/25/2023	PRINCIPAL RECEIPT		3,823	3,823	4,277	4,005	0	(183)	0	(183)	0	3,823	0	0	0	134	10/25/2032	1.A	
..3136A7-DJ-8	FEDERAL NATL MTG ASSN REMIC TR		09/25/2023	PRINCIPAL RECEIPT		2,767	2,767	2,756	2,764	0	3	0	3	0	2,767	0	0	0	62	01/25/2042	1.A	
..3137A1-WJ-6	FHR 4136 LV		09/15/2023	PRINCIPAL RECEIPT		55,002	55,002	56,067	55,288	0	(286)	0	(286)	0	55,002	0	0	0	1,181	08/15/2042	1.A	
..3140X5-M4-2	FN #FM2178		09/25/2023	PRINCIPAL RECEIPT		20,328	20,328	21,198	21,851	0	(1,523)	0	(1,523)	0	20,328	0	0	0	494	01/01/2050	1.A	
..3140J9-VX-6	FN PL#BM5129		09/25/2023	PRINCIPAL RECEIPT		14,552	14,552	15,459	15,763	0	(1,211)	0	(1,211)	0	14,552	0	0	0	389	07/01/2047	1.A	
..3138ER-ZK-5	FNCL PL#AL9777		09/25/2023	PRINCIPAL RECEIPT		10,757	10,757	11,648	12,033	0	(1,276)	0	(1,276)	0	10,757	0	0	0	317	01/01/2047	1.A	
..3138WG-RK-2	FNCL PL#AS6789		09/25/2023	PRINCIPAL RECEIPT		2,371	2,371	2,519	2,562	0	(192)	0	(192)	0	2,371	0	0	0	55	03/01/2046	1.A	
..3138WJ-B3-1	FNCL PL#AS8157		09/25/2023	PRINCIPAL RECEIPT		11,678	11,678	12,582	12,895	0	(1,217)	0	(1,217)	0	11,678	0	0	0	351	10/01/2046	1.A	
..31334X-GB-9	FNCL PL#QA1094		09/25/2023	PRINCIPAL RECEIPT		78,567	78,567	81,415	84,812	0	(6,244)	0	(6,244)	0	78,567	0	0	0	2,045	07/01/2049	1.A	
..31334X-ZZ-5	FNCL PL#QA1660		09/25/2023	PRINCIPAL RECEIPT		48,279	48,279	49,531	50,510	0	(2,231)	0	(2,231)	0	48,279	0	0	0	870	08/01/2049	1.A	
..31339U-CN-8	FNCL PL#QA3677		09/25/2023	PRINCIPAL RECEIPT		7,432	7,432	7,337	7,272	0	160	0	160	0	7,432	0	0	0	126	10/01/2049	1.A	
..31339U-3M-0	FNCL PL#QA4404		09/25/2023	PRINCIPAL RECEIPT		41,498	41,498	42,792	43,396	0	(1,897)	0	(1,897)	0	41,498	0	0	0	812	11/01/2049	1.A	
..3133N3-VW-1	FNCL PL#RE6029		09/25/2023	PRINCIPAL RECEIPT		4,355	4,355	4,406	4,510	0	(154)	0	(154)	0	4,355	0	0	0	93	02/01/2050	1.A	
..3133N3-W9-1	FNCL PL#RE6072		09/25/2023	PRINCIPAL RECEIPT		10,272	10,272	10,471	10,490	0	(218)	0	(218)	0	10,272	0	0	0	138	11/01/2050	1.A	
..31418A-L5-5	FNMA PASS-THRU PL#MA1247		09/25/2023	PRINCIPAL RECEIPT		7,247	7,247	7,632	7,590	0	(343)	0	(343)	0	7,247	0	0	0	145	11/01/2042	1.A	
..3140X8-AZ-0	FNMA PL#FM4523		09/25/2023	PRINCIPAL RECEIPT		11,410	11,410	11,852	11,835	0	(425)	0	(425)	0	11,410	0	0	0	155	10/01/2050	1.A	
..3140X8-K6-3	FNMA PL#FM4816		09/25/2023	PRINCIPAL RECEIPT		19,336	19,336	20,074	20,054	0	(717)	0	(717)	0	19,336	0	0	0	239	11/01/2050	1.A	
0909999999. Subtotal - Bonds - U.S. Special Revenues						524,674	524,674	534,822	541,603	0	(16,927)	0	(16,927)	0	524,674	0	0	0	13,141	XXX	XXX	
..314353-AA-1	FEDEX 2020-1 CLASS AA		08/21/2023	PRINCIPAL RECEIPT		29,330	29,330	29,405	29,392	0	(63)	0	(63)	0	29,330	0	0	0	550	02/20/2034	1.D FE	
..590218-AF-0	ML MTG INV TR 2006-F1		09/25/2023	PRINCIPAL RECEIPT		7	7	7	4	4	0	0	4	0	7	0	0	0	0	04/25/2036	1.A FM	
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)						29,337	29,337	29,412	29,396	4	(63)	0	(59)	0	29,337	0	0	0	550	XXX	XXX	
2509999997. Total - Bonds - Part 4						876,301	876,301	887,590	892,440	4	(16,118)	0	(16,114)	0	876,323	0	(22)	(22)	25,270	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						876,301	876,301	887,590	892,440	4	(16,118)	0	(16,114)	0	876,323	0	(22)	(22)	25,270	XXX	XXX	
4509999997. Total - Preferred Stocks - Part 4						0	XXX	0	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	0	XXX	XXX
5989999997. Total - Common Stocks - Part 4						0	XXX	0	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	XXX
5989999999. Total - Common Stocks						0	XXX	0	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	0	XXX	XXX
6009999999 - Totals						876,301	XXX	887,590	892,440	4	(16,118)	0	(16,114)	0	876,323	0	(22)	(22)	25,270	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				*
100 Federal Street, Boston, MA 02110					(6,067,403)	(3,246,943)	(5,687,693)	XXX.
One Wall Street, New York, NY 10286		1.450	851		351,292	320,583	479,336	XXX.
100 E.Broad St, Columbus, OH 43215					73,755	27,728	46,750	XXX.
One Financial Center, Boston, MA 02111		5.220	7,035		541,634	544,030	546,364	XXX.
500 Salem Street, Smithfield, RI 02917		5.270	62,828		9,496,954	2,193,521	3,697,908	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	70,714	0	4,396,232	(161,081)	(917,335)	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	70,714	0	4,396,232	(161,081)	(917,335)	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX				XXX
0599999. Total - Cash	XXX	XXX	70,714	0	4,396,232	(161,081)	(917,335)	XXX

Schedule E - Part 2 - Cash Equivalents - Investments Owned End of Current Quarter

N O N E