



PROPERTY AND CASUALTY COMPANIES - ASSOCIATION EDITION

QUARTERLY STATEMENT

AS OF MARCH 31, 2024
OF THE CONDITION AND AFFAIRS OF THE

American Commerce Insurance Company

NAIC Group Code04110411NAIC Company Code19941Employer's ID Number31-4361173
(Current)(Prior)

Organized under the Laws ofOhio, State of Domicile or Port of EntryOH

Country of DomicileUnited States of America

Incorporated/Organized09/18/1946Commenced Business03/19/1947

Statutory Home Office4400 EASTON COMMONS WAY, SUITE 125COLUMBUS, OH, US 43219
(Street and Number)(City or Town, State, Country and Zip Code)

Main Administrative Office211 MAIN STREET
(Street and Number)

WEBSTER, MA, US 01570-0758508-943-9000
(City or Town, State, Country and Zip Code)(Area Code) (Telephone Number)

Mail Address211 MAIN STREETWEBSTER, MA, US 01570-0758
(Street and Number or P.O. Box)(City or Town, State, Country and Zip Code)

Primary Location of Books and Records211 MAIN STREET
(Street and Number)

WEBSTER, MA, US 01570-0758508-943-9000
(City or Town, State, Country and Zip Code)(Area Code) (Telephone Number)

Internet Website Addresswww.mapfreinsurance.com

Statutory Statement ContactCHRISTINE A CONRAD508-943-9000-14376
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OFFICERS

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

OTHER

DIRECTORS OR TRUSTEES		
RANDALL VAUGHN BECKER	JAIME TAMAYO	
TIMOTHY JOHN MORGAN	DANIEL PATRICK OLOHAN	DAVID MATTHEW MCMULLEN
HEATHER MARIE WAHL SNAVELY	JOSE MANUEL CORRAL VAZQUEZ	

State ofMassachusetts
County ofWorcesterSS:

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

JAIME TAMAYO
PRESIDENT & CEO

DANIEL PATRICK OLOHAN
SECRETARY, GENERAL COUNSEL, & EVP

JOHN MARTIN MECIAK, JR.
TREASURER, CHIEF ACCOUNTING OFFICER & SVP

Subscribed and sworn to before me this 14th day of May 2024

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. Date filed
3. Number of pages attached.....



MARY ELLEN GRAVES
NOTARY PUBLIC
Commonwealth of Massachusetts
My Commission Expires
February 8, 2030

STATEMENT AS OF MARCH 31, 2024 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	198,761,987		198,761,987	199,466,630
2. Stocks:				
2.1 Preferred stocks	2,540,010		2,540,010	2,411,220
2.2 Common stocks	2,116,600		2,116,600	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 (\$ 11,509,318), cash equivalents (\$) and short-term investments (\$)	11,509,318		11,509,318	13,732,973
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)	214,927,915	0	214,927,915	215,610,823
13. Title plants less \$ charged off (for Title insurers only)			0	0
14. Investment income due and accrued	1,582,963		1,582,963	1,449,630
15. Premiums and considerations:				
15.1 Uncollected premiums and agents' balances in the course of collection	24,335,214		24,335,214	26,300,731
15.2 Deferred premiums, agents' balances and installments booked but deferred and not yet due (including \$ earned but unbilled premiums)	17,761,600		17,761,600	14,435,594
15.3 Accrued retrospective premiums (\$) and contracts subject to redetermination (\$)			0	0
16. Reinsurance:				
16.1 Amounts recoverable from reinsurers	12,132,613		12,132,613	11,164,656
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			0	2,402,404
18.2 Net deferred tax asset	3,630,981	322,248	3,308,733	3,253,905
19. Guaranty funds receivable or on deposit			0	0
20. Electronic data processing equipment and software	98,596		98,596	137,122
21. Furniture and equipment, including health care delivery assets (\$)	53,696	53,696	0	0
22. Net adjustment in assets and liabilities due to foreign exchange rates			0	0
23. Receivables from parent, subsidiaries and affiliates	5,035,133		5,035,133	2,846,186
24. Health care (\$) and other amounts receivable			0	0
25. Aggregate write-ins for other than invested assets	76,347,836	1,466,433	74,881,403	74,859,545
26. Total assets excluding Separate Accounts, Segregated Accounts and Protected Cell Accounts (Lines 12 to 25)	355,906,547	1,842,377	354,064,170	352,460,596
27. From Separate Accounts, Segregated Accounts and Protected Cell Accounts			0	0
28. Total (Lines 26 and 27)	355,906,547	1,842,377	354,064,170	352,460,596
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	1,466,433	1,466,433	0	0
2502. Equity in pools and associations	73,003,654		73,003,654	72,726,260
2503. Premium Tax Recoverable	1,877,749		1,877,749	2,133,285
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)	76,347,836	1,466,433	74,881,403	74,859,545

STATEMENT AS OF MARCH 31, 2024 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 \$ 19,686,000)	89,090,232	93,794,465
2. Reinsurance payable on paid losses and loss adjustment expenses	9,692,433	7,720,096
3. Loss adjustment expenses	10,748,744	10,676,910
4. Commissions payable, contingent commissions and other similar charges	2,201,888	1,864,838
5. Other expenses (excluding taxes, licenses and fees)	637,818	798,884
6. Taxes, licenses and fees (excluding federal and foreign income taxes)	367,367	90,993
7.1 Current federal and foreign income taxes (including \$ 846 on realized capital gains (losses))	196,888	
7.2 Net deferred tax liability		
8. Borrowed money \$ and interest thereon \$		
9. Unearned premiums (after deducting unearned premiums for ceded reinsurance of \$173,075,086 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)	112,580,978	111,909,377
10. Advance premium	2,615,186	1,754,783
11. Dividends declared and unpaid:		
11.1 Stockholders		
11.2 Policyholders		
12. Ceded reinsurance premiums payable (net of ceding commissions)	11,319,379	9,553,207
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	474,293	948,108
26. Total liabilities excluding protected cell liabilities (Lines 1 through 25)	239,925,206	239,111,661
27. Protected cell liabilities		
28. Total liabilities (Lines 26 and 27)	239,925,206	239,111,661
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	67,714,462	67,714,462
35. Unassigned funds (surplus)	39,198,362	38,408,333
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)	114,138,964	113,348,935
38. Totals (Page 2, Line 28, Col. 3)	354,064,170	352,460,596
DETAILS OF WRITE-INS		
2501. Unclaimed property	474,293	689,565
2502. Global Premium Tax Payable		258,543
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)	474,293	948,108
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 Current Year to Date	2 Prior Year to Date	3 Prior Year Ended December 31
UNDERWRITING INCOME			
1. Premiums earned:			
1.1 Direct (written \$ 42,723,596)	45,846,801	43,037,677	179,103,342
1.2 Assumed (written \$ 52,582,504)	51,910,902	48,586,826	200,393,051
1.3 Ceded (written \$ 42,723,596)	45,846,801	43,037,677	179,103,342
1.4 Net (written \$ 52,582,504)	51,910,902	48,586,826	200,393,051
DEDUCTIONS:			
2. Losses incurred (current accident year \$ 33,556,000):			
2.1 Direct	21,355,524	28,994,733	111,893,704
2.2 Assumed	31,306,555	33,260,481	135,591,594
2.3 Ceded	21,355,524	28,994,733	111,893,704
2.4 Net	31,306,555	33,260,481	135,591,594
3. Loss adjustment expenses incurred	6,734,819	6,753,784	25,776,458
4. Other underwriting expenses incurred	15,380,630	14,609,944	58,145,264
5. Aggregate write-ins for underwriting deductions	0	0	0
6. Total underwriting deductions (Lines 2 through 5)	53,422,004	54,624,209	219,513,316
7. Net income of protected cells			
8. Net underwriting gain (loss) (Line 1 minus Line 6 + Line 7)	(1,511,102)	(6,037,383)	(19,120,265)
INVESTMENT INCOME			
9. Net investment income earned	1,623,586	1,277,384	5,774,986
10. Net realized capital gains (losses) less capital gains tax of \$ (846)	827	(654,285)	(650,464)
11. Net investment gain (loss) (Lines 9 + 10)	1,624,413	623,099	5,124,522
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	209,447	224,440	918,541
14. Aggregate write-ins for miscellaneous income	8,507	0	(3,006)
15. Total other income (Lines 12 through 14)	217,954	224,440	915,535
16. Net income before dividends to policyholders, after capital gains tax and before all other federal and foreign income taxes (Lines 8 + 11 + 15)	331,265	(5,189,844)	(13,080,208)
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)	331,265	(5,189,844)	(13,080,208)
19. Federal and foreign income taxes incurred	197,736	(833,564)	(2,378,318)
20. Net income (Line 18 minus Line 19)(to Line 22)	133,529	(4,356,280)	(10,701,890)
CAPITAL AND SURPLUS ACCOUNT			
21. Surplus as regards policyholders, December 31 prior year	113,348,935	99,782,215	99,782,215
22. Net income (from Line 20)	133,529	(4,356,280)	(10,701,890)
23. Net transfers (to) from Protected Cell accounts			
24. Change in net unrealized capital gains (losses) less capital gains tax of \$ 1,174	(4,415)	20	(242,369)
25. Change in net unrealized foreign exchange capital gain (loss)			
26. Change in net deferred income tax	20,462	169,195	612,327
27. Change in nonadmitted assets	(73,773)	(374,735)	(726,447)
28. Change in provision for reinsurance			0
29. Change in surplus notes		0	0
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	25,000,000
33.2 Transferred to capital (Stock Dividend)			
33.3 Transferred from capital			
34. Net remittances from or (to) Home Office			
35. Dividends to stockholders		0	0
36. Change in treasury stock			0
37. Aggregate write-ins for gains and losses in surplus	714,226	589,806	(374,901)
38. Change in surplus as regards policyholders (Lines 22 through 37)	790,029	(3,971,994)	13,566,720
39. Surplus as regards policyholders, as of statement date (Lines 21 plus 38)	114,138,964	95,810,221	113,348,935
DETAILS OF WRITE-INS			
0501.			
0502.			
0503.			
0598. Summary of remaining write-ins for Line 5 from overflow page	0	0	0
0599. Totals (Lines 0501 through 0503 plus 0598)(Line 5 above)	0	0	0
1401. Miscellaneous Income	8,507	0	0
1402. Loss on sale of fixed assets	0	0	(3,006)
1403.			
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)	8,507	0	(3,006)
3701. STATUTORY POOLING ADJUSTMENT	714,226	589,806	(374,901)
3702.			
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)	714,226	589,806	(374,901)

STATEMENT AS OF MARCH 31, 2024 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	53,848,589	45,871,919	206,796,202
2. Net investment income	1,651,231	1,390,947	6,204,042
3. Miscellaneous income	217,954	224,440	915,535
4. Total (Lines 1 to 3)	55,717,774	47,487,306	213,915,779
5. Benefit and loss related payments	35,006,408	36,619,154	136,614,426
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	20,877,031	21,187,844	83,707,075
8. Dividends paid to policyholders	0	0	0
9. Federal and foreign income taxes paid (recovered) net of \$ tax on capital gains (losses)	(2,402,402)	0	(3,507,100)
10. Total (Lines 5 through 9)	53,481,037	57,806,998	216,814,401
11. Net cash from operations (Line 4 minus Line 10)	2,236,737	(10,319,692)	(2,898,622)
Cash from Investments			
12. Proceeds from investments sold, matured or repaid:			
12.1 Bonds	866,113	2,129,012	8,170,553
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	0	0
12.7 Miscellaneous proceeds	0	0	0
12.8 Total investment proceeds (Lines 12.1 to 12.7)	866,113	2,129,012	8,170,553
13. Cost of investments acquired (long-term only):			
13.1 Bonds	322,588	4,039,067	18,730,145
13.2 Stocks	2,250,858	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)	2,573,446	4,039,067	18,730,145
14. Net increase (or decrease) in contract loans and premium notes	0	0	0
15. Net cash from investments (Line 12.8 minus Line 13.7 and Line 14)	(1,707,333)	(1,910,055)	(10,559,592)
Cash from Financing and Miscellaneous Sources			
16. Cash provided (applied):			
16.1 Surplus notes, capital notes	0	0	0
16.2 Capital and paid in surplus, less treasury stock	0	0	25,000,000
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	0	0
16.6 Other cash provided (applied)	(2,753,058)	4,728,756	(1,656,066)
17. Net cash from financing and miscellaneous sources (Line 16.1 through Line 16.4 minus Line 16.5 plus Line 16.6)	(2,753,058)	4,728,756	23,343,934
RECONCILIATION OF CASH, CASH EQUIVALENTS AND SHORT-TERM INVESTMENTS			
18. Net change in cash, cash equivalents and short-term investments (Line 11, plus Lines 15 and 17) .	(2,223,654)	(7,500,991)	9,885,720
19. Cash, cash equivalents and short-term investments:			
19.1 Beginning of year	13,732,972	3,847,252	3,847,252
19.2 End of period (Line 18 plus Line 19.1)	11,509,318	(3,653,739)	13,732,972

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

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STATEMENT AS OF MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

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 #	2024		2023	
NET INCOME							
(1) State basis (Page 4, Line 20, Columns 1 & 3)	XXX	XXX	XXX	\$	133,529	\$	(10,701,890)
(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	\$	133,529	\$	(10,701,890)
SURPLUS							
(5) State basis (Page 3, Line 37, Columns 1 & 2)	XXX	XXX	XXX	\$	114,138,964	\$	113,348,935
(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	\$	114,138,964	\$	113,348,935

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 a NAIC approved rating organization or the NAIC Securities Valuation Office), and the relationship of amortized value to par value and amortized value to fair value. Bonds whose decline has been determined to be Other-Than-Temporary are written down to a new cost basis and the write down amount is accounted for as a realized loss.

D. Going Concern

Based on its evaluation of relevant conditions and events, management does not have substantial doubt about the Company's ability to continue as a going concern.

NOTE 2 Accounting Changes and Corrections of Errors

No significant 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 first quarter 2024 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 first quarter 2024 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\$2,383,844

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

1. Less than 12 Months\$-

2. 12 Months or Longer\$13,740,618
- (5) Information Investor Considered in Reaching Conclusion that Impairments are Not Other-Than-Temporary

NOTES TO FINANCIAL STATEMENTS

All Loan-Backed and Structured Securities in an unrealized loss position were reviewed to determine whether Other-Than-Temporary impairments should be recognized. The Company asserts that it has the intent and ability to hold these securities long enough to allow the cost basis of these securities to be recovered. These conclusions are supported by analysis of the underlying credit and cash flows of each security. Unrealized losses are primarily attributable to general changes in interest rates, credit spread widening, and increased liquidity discounts. It is possible that the Company could recognize Other-Than-Temporary impairments in the future on some of the securities, if future events, information and the passage of time cause it to conclude that declines in the value are Other-Than-Temporary.

E. Dollar Repurchase Agreements and/or Securities Lending Transactions

(3) Collateral Received

b. Not applicable

F. Repurchase Agreements Transactions Accounted for as Secured Borrowing

REPURCHASE TRANSACTION – CASH TAKER – OVERVIEW OF SECURED BORROWING TRANSACTIONS

Not applicable

G. Reverse Repurchase Agreements Transactions Accounted for as Secured Borrowing

REPURCHASE TRANSACTION – CASH PROVIDER – OVERVIEW OF SECURED BORROWING TRANSACTIONS

Not applicable

H. Repurchase Agreements Transactions Accounted for as a Sale

REPURCHASE TRANSACTION – CASH TAKER – OVERVIEW OF SALE TRANSACTIONS

Not applicable

I. Reverse Repurchase Agreements Transactions Accounted for as a Sale

REPURCHASE TRANSACTION – CASH PROVIDER – OVERVIEW OF SALE TRANSACTIONS

Not applicable

M. Working Capital Finance Investments

2 Not applicable

3 Not applicable

N. Offsetting and Netting of Assets and Liabilities

Not applicable

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

Not applicable

NOTE 6 Joint Ventures, Partnerships and Limited Liability Companies

No significant change

NOTE 7 Investment Income

A. The bases, by category of investment income, for excluding (nonadmitting) any investment income due and accrued:

Investment income due and accrued with amounts over 90 days past due are non-admitted assets and excluded from surplus.

B. The total amount excluded:

Not applicable

C. The gross, nonadmitted and admitted amounts for interest income due and accrued.

Interest Income Due and Accrued	Amount
1. Gross	\$ 1,582,963
2. Nonadmitted	
3. Admitted	\$ 1,582,963

D. The aggregate deferred interest.

Not applicable

E. The cumulative amounts of paid-in-kind (PIK) interest included in the current principal balance.

Not applicable

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

NOTES TO FINANCIAL STATEMENTS

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

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 Liabilites Measured and Reported at Fair Value

(1) Summary of Financial Assets Measured and Reported at Fair Value at 3/31/24

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		\$ 5,639			\$ 5,639
Preferred Stock		\$ 2,540,010			\$ 2,540,010
Common Stock	\$ 2,116,600				\$ 2,116,600
Total assets at fair value/NAV	\$ 2,116,600	\$ 2,545,649	\$ -	\$ -	\$ 4,662,249

(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.

NOTES TO FINANCIAL STATEMENTS

(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	\$ 178,407,226	\$ 198,761,987	\$ 15,212,884	\$ 163,194,342			
Preferred Stock	\$ 2,540,010	\$ 2,540,010	\$ -	\$ 2,540,010			
Common Stock	\$ 2,116,600	\$ 2,116,600	\$ 2,116,600	\$ -			
Total	\$ 183,063,836	\$ 203,418,597	\$ 17,329,484	\$ 165,734,352			

D. Not Practicable to Estimate Fair Value

Not applicable

E. Instruments measured at Net Asset Value (NAV)

Not applicable

NOTE 21 Other Items

No significant change

NOTE 22 Events Subsequent

Type I – Recognized Subsequent Events:

Subsequent events have been considered through May 13, 2024 for these statutory financial statements which are to be issued on May 15, 2024.

Type II – Nonrecognized Subsequent Events:

None

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 \$38,041,374 were lower by \$4,473,000 due to favorable development of prior year estimates. This redundancy was 4.3% of the unpaid losses and LAE of \$104,471,375 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

The Company evaluated the need to record a premium deficiency reserve as of the end of the current quarter. This evaluation was completed on April 12, 2024 and it was determined that the Company does not have a premium deficiency.

NOTE 31 High Deductibles

No significant change

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

NOTES TO FINANCIAL STATEMENTS

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 MARCH 31, 2024 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.

12/31/2023
- 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 MARCH 31, 2024 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	2
	Prior Year-End Book/Adjusted Carrying Value	Current Quarter Book/Adjusted Carrying Value
14.21 Bonds	\$.....0	\$.....
14.22 Preferred Stock	\$.....0	\$.....
14.23 Common Stock	\$.....0	\$.....
14.24 Short-Term Investments	\$.....0	\$.....
14.25 Mortgage Loans on Real Estate	\$.....0	\$.....
14.26 All Other	\$.....0	\$.....
14.27 Total Investment in Parent, Subsidiaries and Affiliates (Subtotal Lines 14.21 to 14.26)	\$.....0	\$.....0
14.28 Total Investment in Parent included in Lines 14.21 to 14.26 above	\$.....	\$.....

15.1

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

Yes [] No [X]

15.2

If yes, has a comprehensive description of the hedging program been made available to the domiciliary state? 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 MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

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

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

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

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

- 17.3 Have there been any changes, including name changes, in the custodian(s) identified in 17.1 during the current quarter? Yes [] No [X]
- 17.4 If yes, give full information relating thereto:

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

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

1 Name of Firm or Individual	2 Affiliation
Eric Trigilio	I.....

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

- 17.5098 For firms/individuals unaffiliated with the reporting entity (i.e. designated with a "U") listed in the table for Question 17.5, does the total assets under management aggregate to more than 50% of the reporting entity's invested assets?..... Yes [] No []

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

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

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

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

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

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

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

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

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

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

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

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

STATEMENT AS OF MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

GENERAL INTERROGATORIES

PART 2 - PROPERTY & CASUALTY INTERROGATORIES

1.

If the reporting entity is a member of a pooling arrangement, did the agreement or the reporting entity's participation change?
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 MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE F - CEDED REINSURANCE

Showing All New Reinsurers - Current Year to Date

[illegible]

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)							
1.	Alabama	AL	L	140,471	126,611	735	(693)	44,118	67,178
2.	Alaska	AK	L	44,411	57,930	597	0	40,545	43,488
3.	Arizona	AZ	L	187,587	165,868	24,670	14,646	693,099	577,074
4.	Arkansas	AR	L	40,841	42,510	188,050	57,834	203,269	218,035
5.	California	CA	L	480,530	308,414	0	0	0	0
6.	Colorado	CO	L	348,579	223,975	146,886	44,220	141,477	207,373
7.	Connecticut	CT	L	16,645,606	16,221,217	11,677,201	14,515,638	58,833,563	59,333,067
8.	Delaware	DE	L	58,229	48,709	3,510	2,661	62,498	89,438
9.	District of Columbia	DC	L	7,327	26,409	0	0	30,139	18,944
10.	Florida	FL	L	595,994	453,740	178,450	190,133	1,497,642	1,214,298
11.	Georgia	GA	L	242,327	296,734	34,136	3,632	411,726	276,661
12.	Hawaii	HI	L	16,853	13,693	834	1,250	20,885	31,939
13.	Idaho	ID	L	1,033,672	1,097,948	643,301	1,071,607	3,069,638	3,060,641
14.	Illinois	IL	L	374,251	275,214	129,739	53,163	751,858	628,458
15.	Indiana	IN	L	156,026	119,260	12,936	12,086	100,745	130,817
16.	Iowa	IA	L	204,976	46,337	23,480	0	47,582	34,107
17.	Kansas	KS	L	122,605	127,483	1,666	(81,881)	277,930	144,388
18.	Kentucky	KY	L	26,745	19,467	16,607	2,292	78,201	78,170
19.	Louisiana	LA	L	71,295	72,464	1,850	24,530	93,537	129,400
20.	Maine	ME	L	188,400	215,645	0	2,485	7,690	11,646
21.	Maryland	MD	L	4,275	26,098	22,177	524	165,170	195,063
22.	Massachusetts	MA	L	667,140	651,927	321,156	49,360	304,838	343,121
23.	Michigan	MI	L	124,766	128,251	4,176	4,662	254,238	206,145
24.	Minnesota	MN	L	231,407	193,992	140,063	10,984	107,318	118,769
25.	Mississippi	MS	L	27,802	17,724	0	15,951	13,938	27,518
26.	Missouri	MO	L	52,539	50,207	0	0	3,165	5,652
27.	Montana	MT	L	31,770	80,361	41,663	16,139	214,822	369,825
28.	Nebraska	NE	L	37,437	13,191	65,920	52,298	290,972	274,073
29.	Nevada	NV	L	244,719	141,371	6,750	14,466	144,733	93,372
30.	New Hampshire	NH	L	119,849	121,213	71,250	3,200	42,074	35,030
31.	New Jersey	NJ	L	195,078	184,665	113,836	79,075	1,305,383	3,167,230
32.	New Mexico	NM	L	53,545	30,112	6,903	6,962	27,017	22,797
33.	New York	NY	L	192,409	250,403	35,688	27,297	382,516	832,676
34.	North Carolina	NC	L	270,650	243,300	3,125	18,857	188,022	175,994
35.	North Dakota	ND	L	9,869	9,055	0	2,144	13,919	16,341
36.	Ohio	OH	L	3,427,658	3,204,245	2,248,520	2,132,946	7,927,974	7,333,228
37.	Oklahoma	OK	L	98,683	90,191	21,914	8,733	106,017	136,617
38.	Oregon	OR	L	1,074,551	1,167,520	929,750	800,946	3,042,380	3,580,919
39.	Pennsylvania	PA	L	288,179	261,516	26,307	19,157	168,625	255,049
40.	Rhode Island	RI	L	10,603,377	10,121,927	9,046,943	8,671,904	24,280,008	24,566,717
41.	South Carolina	SC	L	72,001	83,590	4,915	4,910	157,854	72,516
42.	South Dakota	SD	L	375,428	55,394	37,481	27,846	9,990	18,289
43.	Tennessee	TN	L	153,709	142,947	21,486	8,779	194,646	269,461
44.	Texas	TX	L	496,298	584,863	(3,029)	247,972	855,981	1,119,030
45.	Utah	UT	L	60,210	22,447	1,711	10,626	56,422	53,913
46.	Vermont	VT	L	60,403	69,653	274,329	0	16,272	11,517
47.	Virginia	VA	L	176,183	199,858	9,709	40,165	457,876	98,690
48.	Washington	WA	L	2,476,443	1,990,973	2,331,727	2,533,779	6,231,641	6,792,671
49.	West Virginia	WV	L	6,416	39,472	3,303	1,037	9,107	11,854
50.	Wisconsin	WI	L	88,100	66,909	8,555	10,643	129,180	110,192
51.	Wyoming	WY	L	15,977	14,129	0		48,046	18,874
52.	American Samoa	AS	N						
53.	Guam	GU	N						
54.	Puerto Rico	PR	N						
55.	U.S. Virgin Islands	VI	N						
56.	Northern Mariana Islands	MP	N						
57.	Canada	CAN	N						
58.	Aggregate Other Alien OT	XXX		0	0	0	0	0	0
59.	Totals	XXX		42,723,596	40,217,132	28,880,975	30,734,965	113,556,286	116,628,265
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

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

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

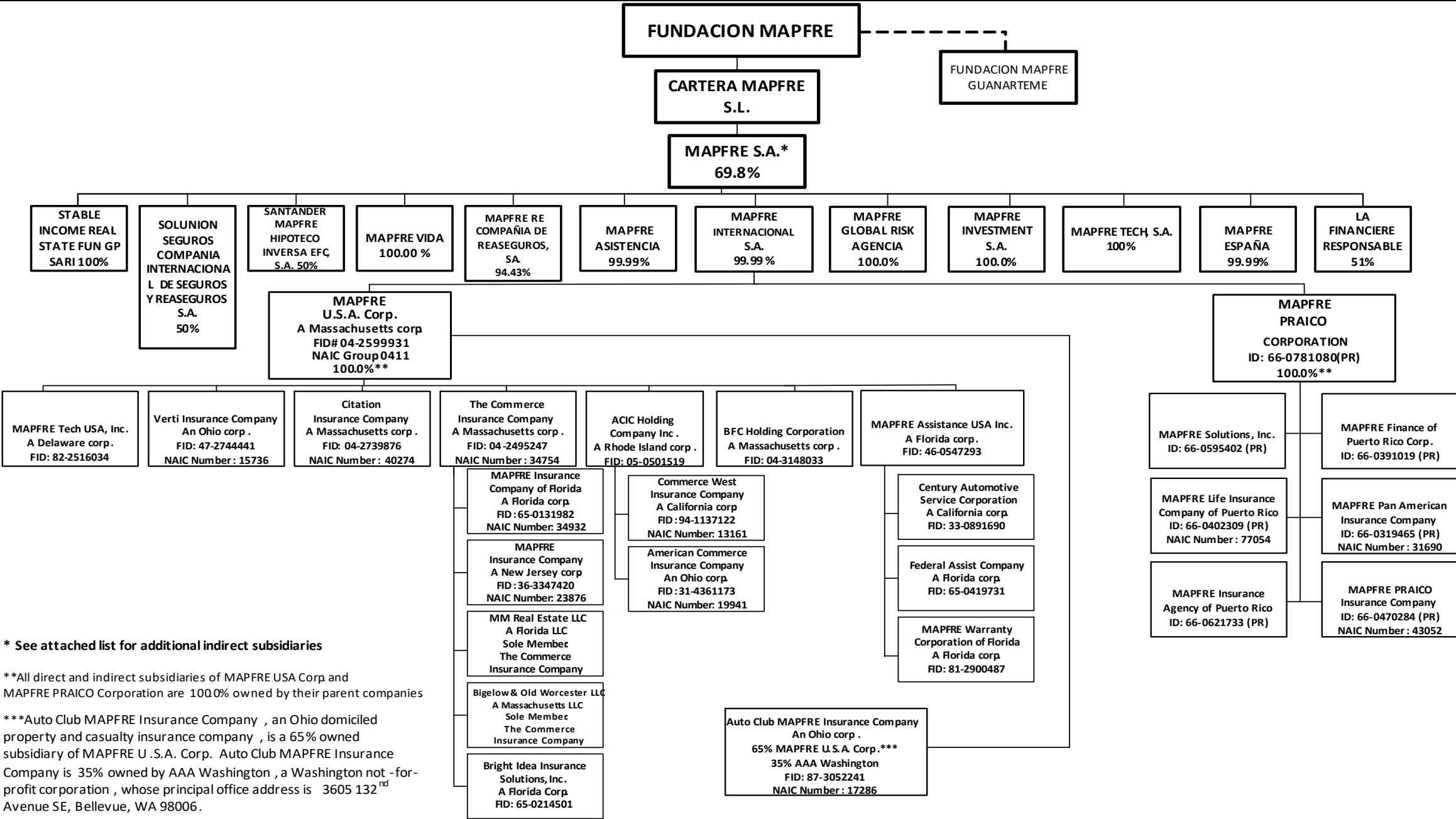
4. Q - Qualified - Qualified or accredited reinsurer..... 0

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



* 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.	99.99	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.
ECUASISTENCIA, S.A.	1.00	MAPFRE, S.A.
CARIBE ASISTENCIA, S.A.	83.58	MAPFRE, S.A.
ECUASISTENCIA, S.A.	99.00	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	99.99	MAPFRE, S.A.
EUROSOS ASSISTANCE, S.A.	25.00	MAPFRE, S.A.
GENYO SERVIZI E SOLUZIONI S.R.L	50.00	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.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	0.37	MAPFRE, S.A.
NILE ASSIST	1.00	MAPFRE, S.A.
PARAGUAY ASISTENCIA CIA. DE SERVICIOS S.A.	1.05	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.40	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	1.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	2.67	MAPFRE, S.A.
EL SALVADOR ASISTENCIA, S.A.	0.01	MAPFRE, S.A.
INDIA ROADSIDE ASSISTANCE PRIVATE LIMITED	99.63	MAPFRE, S.A.
IRELAND ASSIST, LTD	100.00	MAPFRE, S.A.
MAPFRE ASISTENCIA LTDA	99.99	MAPFRE, S.A.
MAPFRE WARRANTY S.P.A.	100.00	MAPFRE, S.A.
MÉXICO ASISTENCIA, S.A.	99.99	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.	99.99	MAPFRE, S.A.
SUR ASISTENCIA, S.A.	99.00	MAPFRE, S.A.
URUGUAY ASISTENCIA,S.A.	97.33	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.99	MAPFRE, S.A.
AGROSEGURO	19.23	MAPFRE, S.A.
MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.	0.0030	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.	99.99	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.	99.98	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	21.87	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.	100.00	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 ALCAÉSAR, S.L.	40.00	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.
CEMENTERIO JARDÍN DE ALCALA DE HENARES, S.A.	49.00	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.
IBEROASISTENCIA, S.A.	0.07	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	38.87	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	40.06	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	34.84	MAPFRE, S.A.
MAPFRE AUTOMOCIÓN S.A.U	100.00	MAPFRE, S.A.
CLUB MAPFRE, S.A.	0.0125	MAPFRE, S.A.
VERTI ASEGURADORA, COMPAÑÍA DE SEGUROS Y REASEGUROS, S.A	0.0009	MAPFRE, S.A.
MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	26.49	MAPFRE, S.A.
ENERGÍAS RENOVABLES IBERMAP, S.L.	49.00	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	5.67	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	39.63	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	31.39	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	0.0003	MAPFRE, S.A.
MAPFRE SEGUROS GERAIS S.A.	100.00	MAPFRE, S.A.
JORNADA ANCESTRAL, S.A.	100.00	MAPFRE, S.A.
MAPFRE SANTANDER PORTUGAL COMPANHIA DE SEGUROS, S.A.	50.01	MAPFRE, S.A.
MAPFRE SEGUROS DE VIDA S.A.	100.00	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.
PUY DU FOU ESPAÑA,S.A.	19.64	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.
SIEREFF MAPFRE	23.69	MAPFRE, S.A.
OLIFAN INMO 18 OPC	75.11	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.74	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	99.99	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	82.97	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	99.92	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.10	
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.
MAPFRE INTERNACIONAL S.A.	99.99	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.
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 COLOMBIA VIDA SEGUROS S.A.	5.64	MAPFRE, S.A.
GRUPO CORPORATIVO LML S.A. DE C.V.	100.00	MAPFRE, S.A.
MAPFRE MÉXICO S.A.	44.33	MAPFRE, S.A.
MAPFRE COLOMBIA VIDA SEGUROS S.A.	94.35	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.	99.37	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.
CLUB MAPFRE ARGENTINA S.A.	3.00	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS S.A.	99.99	MAPFRE, S.A.
CESVI ARGENTINA, S.A.	60.64	MAPFRE, S.A.
MAPFRE ARGENTINA SEGUROS DE VIDA S.A.	64.00	MAPFRE, S.A.
MAPFRE ATLAS COMPAÑÍA DE SEGUROS, S.A.	68.55	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.
BROTO, S.A.	50.00	MAPFRE, S.A.
BRASILSEG COMPANHIA DE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE ASSISTENCIA LTDA	0.0010	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPANIA DE REASEGUROS S.A.	0.0001	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 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 REAS	50.00	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIC	99.93	MAPFRE, S.A.
FONDMAPFRE BOLSA MIXTO F.I.	59.30	MAPFRE, S.A.
GESTIÓN MODA SHOPPING S.A.	99.82	MAPFRE, S.A.
MAPFRE AM- IBERIAN EQUITIES	38.91	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	7.03	MAPFRE, S.A.
MAPFRE INVERSIÓN SOCIEDAD DE VALORES S.A.	99.99	MAPFRE, S.A.
MEDISEMAP, AGENCIA DE SEGUROS, S.L.	33.33	MAPFRE, S.A.
MIRACETI S.A.	99.99	MAPFRE, S.A.
SIEREFF MACQUORIE 2	12.69	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	19.90	MAPFRE, S.A.
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	99.99	MAPFRE, S.A.
MAPFRE ASSET MANAGEMENT, S.G.I.I.C., S.A	99.98	MAPFRE, S.A.
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA	99.99	MAPFRE, S.A.
MAPFRE CHILE VIDA, S.A.	100.00	MAPFRE, S.A.

MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	99.99	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS DE VIDA DE CHILE S.A.	0.0032	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	99.99	MAPFRE, S.A.
MAPFRE BHD COMPAÑÍA DE SEGUROS, S.A.	51.00	MAPFRE, S.A.
CREDIPRIMAS, S.A.	100.00	MAPFRE, S.A.
MAPFRE DOMINICANA S.A.	0.0001	MAPFRE, S.A.
MAPFRE SALUD ARS	51.00	MAPFRE, S.A.
MAPFRE LA SEGURIDAD C.A. DE SEGUROS	99.51	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.	99.99	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.
MAPFRE PARAGUAY COMPAÑÍA DE SEGUROS S.A.	89.54	MAPFRE, S.A.
MAPFRE PERÚ COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	99.59	MAPFRE, S.A.
CORPORACIÓN FUNERARIA, S.A.	100.00	MAPFRE, S.A.
MAPFRE PERÚ ENTIDAD PRESTADORA DE SALUD	100.00	MAPFRE, S.A.
MAPFRE SEGUROS GENERALES DE COLOMBIA S.A.	93.85	MAPFRE, S.A.
MAPFRE S.E.M. SA	100.00	
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 ASESORÍAS, S.A	0.0001	MAPFRE, S.A.
MAPFRE COMPAÑÍA DE SEGUROS GENERALES DE CHILE S.A.	12.71	MAPFRE, S.A.
MAPFRE CHILE SEGUROS S.A.	100.00	MAPFRE, S.A.
MAPFRE CHILE ASESORÍAS, S.A	99.99	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	100.00	MAPFRE, S.A.
OTHER GROUP COMPANIES		
MAPFRE AM- IBERIAN EQUITIES	16.29	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	3.47	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	12.25	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	9.87	MAPFRE, S.A.
MAPFRE INFRAESTRUCTURAS FCR	19.05	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	15.92	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	8.45	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	7.21	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	11.03	MAPFRE, S.A.
SIEREFF MAPFRE	19.76	MAPFRE, S.A.
OLIFAN INMO 18 OPC	75.11	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.74	MAPFRE, S.A.

SIEREFF MACQUQRIE 2	19.04	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	27.93	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	49.00	MAPFRE, S.A.
MAPFRE RE COMPAÑÍA DE REASEGUROS, S.A.	94.42	MAPFRE, S.A.
FONDMAPFRE GARANTIA III, F.I.	24.06	MAPFRE, S.A.
INMOBILIARIA PRESIDENTE FIGUEROA ALCORTA, S.A.	99.99	MAPFRE, S.A.
MAPFRE AM- SHORT TERM EURO I	56.65	MAPFRE, S.A.
MAPFRE AM-MULTI ASSET STRATEGY	47.68	MAPFRE, S.A.
MAPFRE AM-US FORGOTTEN VALUE	23.37	MAPFRE, S.A.
MAPFRE CHILE REASEGUROS, S.A.	99.99	MAPFRE, S.A.
C R ARGENTINA, S.A.	99.99	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	6.56	MAPFRE, S.A.
MAPFRE PRIVATE DBT, FII	32.75	MAPFRE, S.A.
MAPFRE PRIVATE EQUITY I FCR	40.60	MAPFRE, S.A.
MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	99.99	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	0.0001	MAPFRE, S.A.
MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	99.99	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.
REINSURANCE MANAGAMENT INC.	100.00	MAPFRE, S.A.
RISK MED SOLUTIONS, S.L.	100.00	MAPFRE, S.A.
SERVICIOS GENERALES VENEASISTENCIA, S.A.	0.002	MAPFRE, S.A.
SIEREFF MAPFRE	40.540	MAPFRE, S.A.
OLIFAN INMO 18 OPC	75.110	MAPFRE, S.A.
SWISSLIFE SPPICAV	49.740	MAPFRE, S.A.
STABLE INCOME EUROPEAN REAL ESTATE FUND	16.26	MAPFRE, S.A.
MAPFRE ENERGIAS RENOVABLES I, F.C.R.	25.36	MAPFRE, S.A.
ENERGIAS RENOVABLES IBERMAP, S.L.	49.000	MAPFRE, S.A.
MAPFRE INMUEBLES, S.G.A.	9.998	MAPFRE, S.A.
ALMA MUNDI INSURTECH FUND, FCRE	24.94	MAPFRE, S.A.
ALMA MUNDI INSURTECH II FUND, FCRE	35.47	MAPFRE, S.A.
LA FINANCIERE RESPONSABLE	51.00	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.
New Company Name: Solunion Seguros Compania Internacional De Seguros Y Reaseguros S.A.	50.00	MAPFRE, S.A.
STABLE INCOME REAL STATE FUN GP S.A.R.I.	100.00	MAPFRE, S.A.
MAPFRE GLOBAL RISK AGENCIA DE SUSCRIPCION	100.00	MAPFRE, S.A.
MAPFRE INTERNACIONAL S.A.	0.0001	MAPFRE, S.A.
MAPFRE INVESTMENT S.A.	100.00	MAPFRE, S.A.
MAPFRE BRASIL PARTICIPAÇÕES, S.A.	0.83	MAPFRE, S.A.
MAPFRE TECH, S.A.	100.00	MAPFRE, S.A.
MAPFRE ESPAÑA COMPAÑÍA DE SEGUROS Y REASEGUROS S.A.	0.0006	MAPFRE, S.A.
ROADSIDE ASSIST ALGERIE SPA	0.3000	MAPFRE, S.A.
CENTRO DE EXPERIMENTACIÓN Y SEGURIDAD VIAL MAPFRE, S.A.	0.0018	MAPFRE, S.A.
CONSULTORA ACTUARIAL Y DE PENSIONES MAPFRE VIDA S.A.	0.06	MAPFRE, S.A.
GESTION MODA SHOPPING S.A.	0.1785	MAPFRE, S.A.
MAPFRE INVERSION SOCIEDAD DE VALORES S.A.	0.0009	MAPFRE, S.A.
MIRACETI, S.A.	0.0009	MAPFRE, S.A.
MAPFRE ASSET MANAGEMENT, S.G.I.C, S.A.	0.0147	MAPFRE, S.A.
MAPFRE VIDA PENSIONES, ENTIDAD GESTORA DE FONDOS DE PENSIONES S.A.	0.0029	MAPFRE, S.A.
DESARROLLOS URBANOS CIC. S.A.	0.07	MAPFRE, S.A.
SERVICIOS INMOBILIARIOS MAPFRE S.A.	0.10	MAPFRE, S.A.

STATEMENT AS OF MARCH 31, 2024 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	MAPFRE INSURANCE GROUP	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	MAPFRE INSURANCE GROUP	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	MAPFRE INSURANCE GROUP	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	MAPFRE INSURANCE GROUP	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	MAPFRE INSURANCE GROUP	15736	47-2744441				VERTI INSURANCE COMPANY	.OH.....	IA.....	MAPFRE USA CORPORATION	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	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	MAPFRE INSURANCE GROUP	16475	87-3052241				AUTO CLUB MAPFRE INSURANCE	.OH.....	IA.....	MAPFRE USA CORPORATION	Ownership.....	65.000	MAPFRE S.A.	... NO.....	
.0411	MAPFRE INSURANCE GROUP	17286	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.....	
							Bright Idea Insurance Solutions	.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.....	
							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.....	FUNEMADRID	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.....	100.000	MAPFRE S.A.	... NO.....	
							SERVICIOS FUNERARIOS DE ZARAGOZA, S.L.	.ESP.....	NIA.....	FUNESPAÑA DOS, S.L.	Ownership.....	70.000	MAPFRE S.A.	... NO.....	

STATEMENT AS OF MARCH 31, 2024 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 Loca-tion	Rela-tion-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)	*
							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.....	
							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.....	
							MAPFRE TENEDORA DE ACC, S.A.	.PAN	IA.....	MAPFRE AMERICA CENTRAL, S.A.	Ownership.....	..100.000	MAPFRE S.A.	... NO.....	
							MAPFRE SEGUROS HONDURAS S.A.	.HND	IA.....	MAPFRE 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.....	
							GENYO SERVIZI E SOLUZIONI S.R.L.	.ITA	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..50.000	MAPFRE S.A.	... 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 COMPAÑÍA DE ASISTENCIA DE LOS ANDES, S.A.S	.COL	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..98.090	MAPFRE S.A.	... NO.....	
							ECUASISTENCIA, S.A.	.ECU	IA.....	ANDIASISTENCIA, S.A.	Ownership.....	..1.000	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.....	

STATEMENT AS OF MARCH 31, 2024 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 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Percen- tage	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	16 *
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domi- ciliary Loca- tion	Relation- ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)					
.....							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.....	..99.000	MAPFRE S.A.	 NO.....	
.....							MÉXICO ASISTENCIA, S.A.	.MEX.....	NIA.....	MAPFRE ASISTENCIA, S.A.	Ownership.....	..99.990	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.....	
.....												250,100.000			
.....							BB MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....		MAPFRE S.A.	 NO.....	
.....							MAPFRE PARTICIPAÇÕES, S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	..100.000	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.....	..99.990	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.....	..49.000	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.....	
.....							Siereff MAPFRE	.LUX.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..23.690	MAPFRE S.A.	 NO.....	
.....							MAPFRE Private DBT, FII	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..39.630	MAPFRE S.A.	 NO.....	
.....							MAPFRE AUTOMOCIÓN S.A.U	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	 NO.....	
.....							VERTI ASEGURADORA, COMPAÑIA DE SEGUROS Y REASEGUROS, S.A.	.ESP.....	IA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..99.999	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.....	
.....							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.....	

STATEMENT AS OF MARCH 31, 2024 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 Per-centage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/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.....	19.640	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.....	97.500	MAPFRE S.A.	... NO.....	
.....							MAPFRE AM-MULTI ASSET STRATEGY	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	40.060	MAPFRE S.A.	... NO.....	
.....							MAPFRE AM- SHORT TERM EURO I	.LUX.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	38.870	MAPFRE S.A.	... NO.....	
.....							MAPFRE AM-US FORGOTTEN VALUE	.LUX.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	34.840	MAPFRE S.A.	... NO.....	
.....							SWISSLIFE SPPICAV	.LUX.....	NIA.....	SIEREFF MAPFRE	Ownership.....	49.740	MAPFRE S.A.	... NO.....	
.....							OLIFAN INMO 18 OPC1	.LUX.....	NIA.....	SIEREFF MAPFRE	Ownership.....	75.110	MAPFRE S.A.	... NO.....	
.....							MAPFRE INFRAESTRUCTURAS FCR	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	5.670	MAPFRE S.A.	... NO.....	
.....							MAPFRE PRIVATE EQUITY I FCR	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	31.390	MAPFRE S.A.	... NO.....	
.....							MAPFRE ENERGÍAS RENOVABLES I, F.C.R.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	26.490	MAPFRE S.A.	... NO.....	
.....							FONDMAPFRE GARANTIA III, F.I.	.ESP.....	NIA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	21.870	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.....	
.....							DESARROLLOS URBANOS CIC. 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 EUROPEAN 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 S.E.M., S.A.	.PAN.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	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.....	99.900	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.....	
.....							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.....	68.550	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	.PER.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							APOINT S.A.	.URY.....	NIA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE URUGUAY SEGUROS S.A.	.URY.....	IA.....	MAPFRE INTERNACIONAL, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							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.....	

STATEMENT AS OF MARCH 31, 2024 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 Perce-n-tage	Ultimate Controlling Entity(ies)/Person(s)	Is an SCA Filing Re-quired? (Yes/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 INVERSIONES LTDA.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAC INVERSIONES S.A.	.BRA.....	NIA.....	MAPFRE BRASIL PARTICIPAÇÕES, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							CENTRO DE FORMACION PROFESIONAL SEGUROS LA SEGURIDAD C.A.	.VEN.....	NIA.....	MAPFRE LA SEGURIDAD C.A. DE SEGUROS	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							INVERSORA SEGURIDAD-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	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE M.S.V. LIFE P.L.C.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
							MAPFRE UNIDAD DE SERVICIOS S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	99.998	MAPFRE S.A.	... NO.....	
							MAPFRE DEFENSA LEGAL S.A. DE C.V.	.MEX.....	NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE TEPEYAC INC.	.CA.....	NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE SERVICIOS MEXICANOS S.A.	.MEX.....	NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	99.990	MAPFRE S.A.	... NO.....	
							CESVI MÉXICO, S.A.	.MEX.....	NIA.....	MAPFRE MÉXICO S.A.	Ownership.....	16.670	MAPFRE S.A.	... NO.....	
							MAPFRE FIANZAS S.A.	.MEX.....	IA.....	MAPFRE MÉXICO S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE M.S.V. LIFE P.L.C.	.MLT.....	IA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
							BEE INSURANCE MANAGEMENT LTD	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							CHURCH WARF PROPERTIES	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	50.000	MAPFRE S.A.	... NO.....	
							EURO GLOBE HOLDINGS LIMITED	.MLT.....	NIA.....	MAPFRE MIDDLESEA INSURANCE P.L.C.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE CAPITALIZAÇÃO S.A.	.BRA.....	NIA.....	MAPFRE PARTICIPAÇÕES, S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							MAPFRE VIDA S.A.	.BRA.....	IA.....	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 COMPAÑÍA DE SEGUROS Y					
							CORPORACIÓN FUNERARIA, S.A.	.PER.....	NIA.....	REASEGUROS S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
							Siereff MAPFRE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	40.540	MAPFRE S.A.	... NO.....	
							MAPFRE Private DBT, FII	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	32.750	MAPFRE S.A.	... NO.....	
							MAPFRE AM-MULTI ASSET STRATEGY	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	47.680	MAPFRE S.A.	... NO.....	
							MAPFRE AM- SHORT TERM EURO I	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	56.650	MAPFRE S.A.	... NO.....	
							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	16.260	MAPFRE S.A.	... NO.....	
							MAPFRE AM-US FORGOTTEN VALUE	.LUX.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	23.370	MAPFRE S.A.	... NO.....	
							MAPFRE INFRAESTRUCTURAS FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	6.560	MAPFRE S.A.	... NO.....	
							MAPFRE PRIVATE EQUITY I FCR	.ESP.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	40.600	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.....	24.060	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.....	
							MAPFRE CHILE REASEGUROS, S.A.	.CHL.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	99.990	MAPFRE S.A.	... NO.....	
							MAPFRE RE DO BRASIL COMPAÑÍA DE REASEGUROS S.A.	.BRA.....	IA.....	MAPFRE RE, S.A.	Ownership.....	99.990	MAPFRE S.A.	... NO.....	
							MAPFRE RE ESCRITORIO DE REPRESENTACION COMPAÑÍA DE REASEGUROS	.BRA.....	NIA.....	MAPFRE RE, S.A.	Ownership.....	99.990	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.....	

STATEMENT AS OF MARCH 31, 2024 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 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.....	51.000	MAPFRE S.A.	... NO.....	
.....							STABLE INCOME REAL STATE FUN GP S.A.R.L.	.LUX.....	NIA.....	MAPFRE S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							SOLUNION SEGUROS COMPANIA INTERNACIONAL DE SEGUROS Y REASEGUROS, 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.....	24.940	MAPFRE S.A.	... NO.....	
.....							ALMA MUNDI INSURTECH II FUND, FCRE	.ESP.....	NIA.....	MAPFRE S.A.	Ownership.....	23.850	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.....	
.....							Jornada Ancestral, S.A.	.PRT.....	NIA.....	MAPFRE SEGUROS GERAIS S.A.	Ownership.....	100.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE YASAM SIGORTA, A.S.	.TUR.....	IA.....	MAPFRE SIGORTA, A.S.	Ownership.....	99.778	MAPFRE S.A.	... NO.....	
.....							GENEL SERVIS YEDEK PARCA DAGITIM TICARET A.S.	.TUR.....	NIA.....	MAPFRE SIGORTA, A.S.	Ownership.....	51.000	MAPFRE S.A.	... NO.....	
.....							MAPFRE 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.....	
.....							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- IBERIAN EQUITIES	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	38.910	MAPFRE S.A.	... NO.....	
.....							FONDIMAPFRE BOLSA MIXTO F.I.	.ESP.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	59.300	MAPFRE S.A.	... NO.....	
.....							STABLE INCOME EUROPEAN REAL ESTATE FUND	.LUX.....	NIA.....	MAPFRE VIDA, S.A.	Ownership.....	19.900	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.....	99.990	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.....	100.000	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.....	94.420	MAPFRE S.A.	... NO.....	
.....							MAPFRE INTERNACIONAL S.A.	.ESP.....	UIP.....	MAPFRE, S.A.	Ownership.....	99.990	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.....	

STATEMENT AS OF MARCH 31, 2024 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 Type of Control (Ownership, Board, Management, Attorney-in-Fact, Influence, Other)	13 If Control is Owner- ship Provide Percen- tage	14 Ultimate Controlling Entity(ies)/Person(s)	15 Is an SCA Filing Re- quired? (Yes/No)	16 *
Group Code	Group Name	NAIC Company Code	ID Number	Federal RSSD	CIK	Name of Securities Exchange if Publicly Traded (U.S. or International)	Names of Parent, Subsidiaries Or Affiliates	Domi- ciliary Loca- tion	Relation- ship to Reporting Entity	Directly Controlled by (Name of Entity/Person)					
....							SIEREFF MACQUORIE 2	..LUX.....	NIA.....	MSV LIFE PLC	Ownership.....	..15.873	MAPFRE S.A.	NO.....	
....							MAPFRE AM- SHORT TERM EURO I	..LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..3.470	MAPFRE S.A.	NO.....	
....							STABLE INCOME EUROPEAN REAL ESTATE FUND	..LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..8.450	MAPFRE S.A.	NO.....	
....							MAPFRE AM-US FORGOTTEN VALUE	..LUX.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..9.870	MAPFRE S.A.	NO.....	
....							SWISSLIFE SPPICAV	..LUX.....	NIA.....	SIEREFF MAPFRE	Ownership.....	..49.740	MAPFRE S.A.	NO.....	
....							OLIFAN INMO 18 OPCI	..LUX.....	NIA.....	SIEREFF MAPFRE	Ownership.....	..75.100	MAPFRE S.A.	NO.....	
....							MAPFRE INFRAESTRUCTURAS FCR	..ESP.....	NIA.....	OTHER GROUP COMPANIES	Ownership.....	..19.050	MAPFRE S.A.	NO.....	
....							MAPFRE SEGUROS GERAIS S.A.	..PRT.....	IA.....	MAPFRE ESPAÑA, S.A.	Ownership.....	..100.000	MAPFRE S.A.	NO.....	
....							MAPFRE PRIVATE EQUITY I FCR	..ESP.....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..11.030	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 GARANTIA III, F.I.	..ESP.....	NIA.....	OTRAS SOCIEDADES DEL GRUPO	Ownership.....	..7.220	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.....	
....							Siereff MAPFRE	..LUX.....	NIA.....	Other Group Companies	Ownership.....	..19.760	MAPFRE S.A.	NO.....	
....							MAPFRE Private DBT, FII	..ESP.....	NIA.....	Other Group Companies	Ownership.....	..15.920	MAPFRE S.A.	NO.....	
....							BROTO, S.A.	..BRA.....	IA.....	ALIANCA DO BRASIL SEGUROS, S.A.	Ownership.....	..50.000	MAPFRE S.A.	NO.....	

Asterisk	Explanation
1	All direct and indirect subsidiaries of MAPFRE USA Corp. and MAPFRE PRAICO Corporation are 100.0% owned by their parent companies.
2	Auto Club MAPFRE Insurance Company, an Ohio domiciled property and casualty insurance company, is a 65% owned subsidiary of MAPFRE U.S.A. Corp. Auto Club MAPFRE Insurance Company is 35% owned by AAA Washington, a Washington not-for-profit corporation, whose principal office address is 3605 132nd Avenue SE, Bellevue, WA 98006.

STATEMENT AS OF MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 1 - LOSS EXPERIENCE

Line of Business		Current Year to Date			4
		1 Direct Premiums Earned	2 Direct Losses Incurred	3 Direct Loss Percentage	Prior Year to Date Direct Loss Percentage
1.	Fire	892,477	(216,290)	(24.2)	38.7
2.1	Allied Lines	18,936	16,467	87.0	4.8
2.2	Multiple peril crop	0	0	0.0	0.0
2.3	Federal flood	993,447	550,894	55.5	17.9
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	14,231,899	6,064,776	42.6	77.5
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
9.1	Inland marine	6,807	0	0.0	0.0
9.2	Pet insurance	0	0	0.0	0.0
10.	Financial guaranty	0	0	0.0	0.0
11.1	Medical professional liability - occurrence	0	0	0.0	0.0
11.2	Medical professional liability - claims-made	0	0	0.0	0.0
12.	Earthquake	0	0	0.0	0.0
13.1	Comprehensive (hospital and medical) individual	0	0	0.0	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	1,969,675	154,246	7.8	22.2
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)	132,179	(48,670)	(36.8)	5.9
19.2	Other private passenger auto liability	12,322,608	7,786,900	63.2	86.0
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	8,603,305	5,524,323	64.2	70.8
21.2	Commercial auto physical damage	0	0	0.0	0.0
22.	Aircraft (all perils)	6,675,468	1,522,878	22.8	30.8
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	45,846,801	21,355,524	46.6	67.4
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

STATEMENT AS OF MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

PART 2 - DIRECT PREMIUMS WRITTEN

Line of Business		1 Current Quarter	2 Current Year to Date	3 Prior Year Year to Date
1.	Fire	817,667	817,667	859,456
2.1	Allied Lines	20,457	20,457	16,279
2.2	Multiple peril crop	0	0	0
2.3	Federal flood	896,354	896,354	854,672
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	13,241,252	13,241,252	12,123,608
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
9.1	Inland marine	7,290	7,290	6,840
9.2	Pet insurance	0	0	0
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	2,640,329	2,640,329	1,345,321
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)	129,077	129,077	150,641
19.2	Other private passenger auto liability	11,608,891	11,608,891	12,270,763
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	8,519,158	8,519,158	7,842,075
21.2	Commercial auto physical damage	0	0	0
22.	Aircraft (all perils)	4,843,122	4,843,122	4,747,476
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	42,723,597	42,723,597	40,217,131
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 MARCH 31, 2024 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)	2024 Loss and LAE Payments on Claims Reported as of Prior Year-End	2024 Loss and LAE Payments on Claims Unreported as of Prior Year-End	Total 2024 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. 2021 + Prior	26,683	(3,668)	23,015	3,446	26	3,472	22,148	65	(2,903)	19,310	(1,089)	856	(233)	
2. 2022	25,136	(2,150)	22,986	2,677	7	2,684	21,468	20	(1,649)	19,839	(991)	528	(463)	
3. Subtotals 2022 + Prior	51,819	(5,818)	46,001	6,123	33	6,156	43,616	85	(4,552)	39,149	(2,080)	1,384	(696)	
4. 2023	40,256	18,214	58,470	17,787	98	17,885	31,319	283	5,206	36,808	8,850	(12,627)	(3,777)	
5. Subtotals 2023 + Prior	92,075	12,396	104,471	23,910	131	24,041	74,935	368	654	75,957	6,770	(11,243)	(4,473)	
6. 2024	XXX	XXX	XXX	XXX	18,633	18,633	XXX	13,615	10,267	23,882	XXX	XXX	XXX	
7. Totals	92,075	12,396	104,471	23,910	18,764	42,674	74,935	13,983	10,921	99,839	6,770	(11,243)	(4,473)	
8. Prior Year-End Surplus As Regards Policyholders	113,349											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. 7.4	2. (90.7)	3. (4.3)
												Col. 13, Line 7 As a % of Col. 1 Line 8 4. (3.9)		

STATEMENT AS OF MARCH 31, 2024 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

STATEMENT AS OF MARCH 31, 2024 OF THE AMERICAN COMMERCE INSURANCE COMPANY

SCHEDULE A - VERIFICATION

Real Estate

	1	2
	Year to Date	Prior Year Ended December 31
1. Book/adjusted carrying value, December 31 of prior year		
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	201,877,850	192,876,157
2. Cost of bonds and stocks acquired	2,573,446	18,730,145
3. Accrual of discount	50,045	165,285
4. Unrealized valuation increase/(decrease)	(5,589)	(306,798)
5. Total gain (loss) on disposals	(19)	(350,076)
6. Deduct consideration for bonds and stocks disposed of	866,113	8,170,553
7. Deduct amortization of premium	211,023	698,855
8. Total foreign exchange change in book/adjusted carrying value	0	0
9. Deduct current year's other than temporary impairment recognized	0	367,455
10. Total investment income recognized as a result of prepayment penalties and/or acceleration fees	0	0
11. Book/adjusted carrying value at end of current period (Lines 1+2+3+4+5-6-7+8-9+10)	203,418,597	201,877,850
12. Deduct total nonadmitted amounts	0	0
13. Statement value at end of current period (Line 11 minus Line 12)	203,418,597	201,877,850

STATEMENT AS OF MARCH 31, 2024 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)	169,095,392	322,588	866,132	853,033	169,404,881	0	0	169,095,392
2. NAIC 2 (a)	29,740,358	0	0	(1,014,132)	28,726,226	0	0	29,740,358
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	0	0	0	
6. NAIC 6 (a)	630,880	0	0	0	630,880	0	0	630,880
7. Total Bonds	199,466,630	322,588	866,132	(161,099)	198,761,987	0	0	199,466,630
PREFERRED STOCK								
8. NAIC 1	0	0	0	0	0	0	0	0
9. NAIC 2	2,411,220	0	0	128,790	2,540,010	0	0	2,411,220
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	2,411,220	0	0	128,790	2,540,010	0	0	2,411,220
15. Total Bonds and Preferred Stock	201,877,850	322,588	866,132	(32,309)	201,301,997	0	0	201,877,850

(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

N O N E

Schedule DA - Verification - Short-Term Investments

N O N E

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 MARCH 31, 2024 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
CUSIP Identification	Description	Foreign	Date Acquired	Name of Vendor	Number of Shares of Stock	Actual Cost	Par Value	Paid for Accrued Interest and Dividends	NAIC Designation, NAIC Designation Modifier and SVO Administrative Symbol
91282C-JR-3	US TREASURY NOTE		01/02/2024	RAYMOND JAMES		322,588	325,000	100	1.A
0109999999. Subtotal - Bonds - U.S. Governments						322,588	325,000	100	XXX
2509999997. Total - Bonds - Part 3						322,588	325,000	100	XXX
2509999998. Total - Bonds - Part 5						XXX	XXX	XXX	XXX
2509999999. Total - Bonds						322,588	325,000	100	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
22822V-10-1	CROWN CASTLE INC		03/08/2024	GOLDMAN SACHS	20,000,000	2,250,858		0	
5019999999. Subtotal - Common Stocks - Industrial and Miscellaneous (Unaffiliated) Publicly Traded						2,250,858	XXX	0	XXX
5989999997. Total - Common Stocks - Part 3						2,250,858	XXX	0	XXX
5989999998. Total - Common Stocks - Part 5						XXX	XXX	XXX	XXX
5989999999. Total - Common Stocks						2,250,858	XXX	0	XXX
5999999999. Total - Preferred and Common Stocks						2,250,858	XXX	0	XXX
6009999999 - Totals						2,573,446	XXX	100	XXX

STATEMENT AS OF MARCH 31, 2024 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 Recogn- ized	Total Change in Book/ Adjusted Carrying Value (11 + 12 - 13)	Total Foreign Exchange Change in Book /Adjusted Carrying Value	Book/ Adjusted Carrying Value at Disposal Date	Foreign Exchange Gain (Loss) on Disposal	Realized Gain (Loss) on Disposal	Total Gain (Loss) on Disposal	Bond Interest/ Stock Dividends Received During Year	Stated Con- tractual Maturity Date	NAIC Desig- nation, NAIC Desig- nation Modifier and SVO Admini- strative Symbol	
36225B-GW-2	GNMA POOL #0781113		03/15/2024	BEAR STEARNS		1,389	1,389	1,439	1,408	0	0	0	0	0	1,408	0	(19)	(19)	17	11/15/2029	1.A	
83162C-TA-1	SMALL BUS ADMIN GTD DEV PTC		01/02/2024	PRINCIPAL RECEIPT		54,140	54,140	59,749	56,269	0	(2,129)	0	(2,129)	0	54,140	0	0	0	1,186	01/01/2030	1.A	
912828-5Z-9	U.S. TREASURY NOTE		01/31/2024	MATURITY		325,000	325,000	325,279	325,005	0	(5)	0	(5)	0	325,000	0	0	0	4,063	01/31/2024	1.A	
0109999999. Subtotal - Bonds - U.S. Governments						380,529	380,529	386,467	382,682	0	(2,134)	0	(2,134)	0	380,548	0	(19)	(19)	5,266	XXX	XXX	
31396P-GT-2	FANNIE MAE - ACES		03/25/2024	PRINCIPAL RECEIPT		4,574	4,574	5,117	4,745	0	(171)	0	(171)	0	4,574	0	0	0	37	10/25/2032	1.A	
3136A7-DJ-8	FEDERAL NATL MTG ASSN REMIC TR		03/25/2024	PRINCIPAL RECEIPT		4,479	4,479	4,461	4,474	0	4	0	4	0	4,479	0	0	0	18	01/25/2042	1.A	
3137AW-JW-6	FHR 4136 LV		03/15/2024	PRINCIPAL RECEIPT		52,129	52,129	53,139	52,362	0	(233)	0	(233)	0	52,129	0	0	0	340	08/15/2042	1.A	
3140X5-M4-2	FN #FM12178		03/25/2024	PRINCIPAL RECEIPT		5,966	5,966	6,222	6,420	0	(454)	0	(454)	0	5,966	0	0	0	39	01/01/2050	1.A	
3140X4-T4-8	FN FM1470		03/25/2024	PRINCIPAL RECEIPT		121,217	121,217	111,739	111,723	0	9,495	0	9,495	0	121,217	0	0	0	403	11/01/2031	1.A	
3140J9-VX-6	FN PL#BM5129		03/25/2024	PRINCIPAL RECEIPT		15,010	15,010	15,946	16,249	0	(1,239)	0	(1,239)	0	15,010	0	0	0	111	07/01/2047	1.A	
3138ER-2K-5	FNCL PL#AL9777		03/25/2024	PRINCIPAL RECEIPT		9,506	9,506	10,293	10,549	0	(1,043)	0	(1,043)	0	9,506	0	0	0	71	01/01/2047	1.A	
3138WG-RK-2	FNCL PL#AS6789		03/25/2024	PRINCIPAL RECEIPT		5,806	5,806	6,169	6,300	0	(494)	0	(494)	0	5,806	0	0	0	37	03/01/2046	1.A	
3138WJ-B3-1	FNCL PL#AS8157		03/25/2024	PRINCIPAL RECEIPT		74,342	74,342	80,091	83,321	0	(8,980)	0	(8,980)	0	74,342	0	0	0	426	10/01/2046	1.A	
31334X-GB-9	FNCL PL#QA1094		03/25/2024	PRINCIPAL RECEIPT		5,425	5,425	5,622	5,841	0	(415)	0	(415)	0	5,425	0	0	0	31	07/01/2049	1.A	
31334X-ZZ-5	FNCL PL#QA1660		03/25/2024	PRINCIPAL RECEIPT		77,443	77,443	79,452	80,875	0	(3,432)	0	(3,432)	0	77,443	0	0	0	410	08/01/2049	1.A	
31339U-QN-8	FNCL PL#QA3677		03/25/2024	PRINCIPAL RECEIPT		4,947	4,947	4,883	4,843	0	104	0	104	0	4,947	0	0	0	21	10/01/2049	1.A	
31339U-3M-0	FNCL PL#QA4404		03/25/2024	PRINCIPAL RECEIPT		18,217	18,217	18,784	19,005	0	(789)	0	(789)	0	18,217	0	0	0	106	11/01/2049	1.A	
3133N3-VW-1	FNCL PL#RE6029		03/25/2024	PRINCIPAL RECEIPT		4,530	4,530	4,582	4,694	0	(164)	0	(164)	0	4,530	0	0	0	16	02/01/2050	1.A	
3133N3-W9-1	FNCL PL#RE6072		03/25/2024	PRINCIPAL RECEIPT		7,338	7,338	7,480	7,490	0	(152)	0	(152)	0	7,338	0	0	0	25	11/01/2050	1.A	
31418A-L5-5	FNMA PASS-THRU PL#MA1247		03/25/2024	PRINCIPAL RECEIPT		8,019	8,019	8,445	8,420	0	(401)	0	(401)	0	8,019	0	0	0	40	11/01/2042	1.A	
3140X8-AZ-0	FNMA PL#FM4523		03/25/2024	PRINCIPAL RECEIPT		24,388	24,388	25,333	25,328	0	(941)	0	(941)	0	24,388	0	0	0	106	10/01/2050	1.A	
3140X8-K6-3	FNMA PL#FM4816		03/25/2024	PRINCIPAL RECEIPT		12,918	12,918	13,411	13,396	0	(478)	0	(478)	0	12,918	0	0	0	31	11/01/2050	1.A	
0909999999. Subtotal - Bonds - U.S. Special Revenues						456,254	456,253	461,169	466,035	0	(9,783)	0	(9,783)	0	456,254	0	0	0	2,268	XXX	XXX	
314353-AA-1	FEDEX 2020-1 CLASS AA		02/20/2024	PRINCIPAL RECEIPT		29,330	29,330	29,405	29,385	0	(55)	0	(55)	0	29,330	0	0	0	275	02/20/2034	1.D FE	
1109999999. Subtotal - Bonds - Industrial and Miscellaneous (Unaffiliated)						29,330	29,330	29,405	29,385	0	(55)	0	(55)	0	29,330	0	0	0	275	XXX	XXX	
2509999997. Total - Bonds - Part 4						866,113	866,111	877,041	878,102	0	(11,972)	0	(11,972)	0	866,132	0	(19)	(19)	7,809	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						866,113	866,111	877,041	878,102	0	(11,972)	0	(11,972)	0	866,132	0	(19)	(19)	7,809	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						866,113	XXX	877,041	878,102	0	(11,972)	0	(11,972)	0	866,132	0	(19)	(19)	7,809	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, Bank of America MA 02110					(4,970,355)	(6,930,103)	(5,448,112)	..XXX.
One Wall Street, New York, The Bank of New York Mellon .. NY 10286					100,234	487,742	908,469	..XXX.
100 E.Broad St, Columbus, JPMorgan Chase OH 43215					42,841	63,726	108,951	..XXX.
One Financial Center, BlackRock 30 Boston, MA 02111		5.190	7,210		556,063	558,360	560,820	..XXX.
500 Salem Street, Fidelity Gov'n't 2642 Smithfield, RI 02917		5.240	301,775		28,694,820	26,140,497	15,379,190	..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	308,985	0	24,423,603	20,320,222	11,509,318	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	308,985	0	24,423,603	20,320,222	11,509,318	XXX
0499999. Cash in Company's Office	XXX	XXX	XXX	XXX				XXX
.....								
.....								
.....								
.....								
.....								
.....								
.....								
0599999. Total - Cash	XXX	XXX	308,985	0	24,423,603	20,320,222	11,509,318	XXX

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

N O N E