

CONSOLIDATED STATEMENT OF FINANCIAL CONDITION AND SUPPLEMENTAL  
INFORMATION

ADM Investor Services, Inc.  
Year Ended December 31, 2018  
With Reports of Independent Registered Public Accounting Firm

ADM INVESTOR SERVICES, INC.

141 West Jackson Boulevard, Suite 2100A, Chicago, Illinois 60604

ADM Investor Services, Inc.

## LETTER OF ATTESTATION

February 28, 2019

I, the undersigned, hereby certify that, to the best of my knowledge and belief, the accompanying audited financial statements for the year ending December 31, 2018, submitted pursuant to the requirements of the Chicago Board of Trade, presents fairly and accurately in all material respects the financial condition of:

**ADM Investor Services, Inc.**  
(Name of Firm)

I further certify that a copy of the accompanying audited financial report has been made available to each general partner (if partnership) or to each member of the Chicago Board of Trade whose membership is registered on behalf of the corporation (if a corporation), as well as each individual designated by the firm in accordance with CBOT Regulation 230.03(a), if he is a member or has executed a Designated Person Consent to Jurisdiction.



(Signature)

**Thomas R. Kadlec, President**  
(Name and Title)

**NOTE:** This Letter of Attestation must be signed by the Chief Financial Officer, or the person who has these responsibilities, provided that he is either a member registered on behalf of the firm or he has executed a Designated Person Consent to Jurisdiction pursuant to CBOT Regulation 230.03(a). If a partnership, the signatory must also be a general partner. If the CFO does not meet these requirements the firm must request a waiver, pursuant to Capital Rule 311, so that another qualifying individual may sign this Letter of Attestation.

The firm submitting this Form and its attachments and the person whose signature appears above represent that, to the best of their knowledge, all information contained therein is true, correct and complete. It is understood that all required item statements and schedules are integral parts of this Form and that the submission of any amendment represents that all unamended items, statements and schedules remain true, correct and complete as previously submitted. It is further understood that any intentional misstatements or omissions of facts constitute a felony under the Commodity Exchange Act (See 7 U.S.C. 13).

**CFTC FORM 1-FR-FCM** 0005

Name of Company:		Employer ID No:		NFA ID No:	
ADM Investor Services, Inc. <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0010</span></span>		37-1075552 <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0020</span></span>		0000360 <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0030</span></span>	
Address of Principal Place of Business:			Person to Contact Concerning This Report:		
2100A Chicago Board of Trade			Richy Macanip <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0040</span></span>		
141 W. Jackson Boulevard			Telephone No:		
Chicago, IL 60604 <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0050</span></span>			(312) 242-7000 <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0060</span></span>		

1. Report for the period beginning 01/01/2018 0070 and ending 12/31/2018 0080

2. Type of report 0090:  Certified  Regular quarterly/semiannual  Monthly 1.12(b)  
 Special call by: \_\_\_\_\_  Other - Identify: \_\_\_\_\_

3. Check whether 0095:  Initial filing  Amended filing

4. Name of FCM's Designated Self-Regulatory Organization: CME 0100

5. Names(s) of consolidated subsidiaries and affiliated companies:

Name	Percentage Ownership	Line of Business
Archer Financial Services <span style="border: 1px solid black; padding: 0 5px;">0110</span>	100% <span style="border: 1px solid black; padding: 0 5px;">0120</span>	Guaranteed IB <span style="float: right;"><span style="border: 1px solid black; padding: 0 5px;">0130</span></span>

The futures commission merchant, or applicant for registration therefore, submitting this Form and its attachments and the person whose signature appears below represent that, to the best of their knowledge, all information contained therein is true, correct and complete. It is understood that all required items, statements and schedules are integral parts of this Form and that the submission of any amendment represents that all unamended items, statements and schedules remain true, correct and complete as previously submitted. It is further understood that any intentional misstatements or omissions of facts constitute Federal Criminal Violation (see 18 U.S.C. 1001).

Signed this 28th day of February, 2019

Manual signature 

Type or print name Thomas R. Kadlec

Chief Executive Officer  Chief Financial Officer Corporate Title President  
 General Partner  Sole Proprietor

# Consolidated Statement of Financial Condition and Supplemental Information

Year Ended December 31, 2018

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## Report of Independent Registered Public Accounting Firm

To the Stockholder and the Board of Directors of ADM Investor Services, Inc.

### Opinion on the Financial Statement

We have audited the accompanying consolidated statement of financial condition of ADM Investor Services, Inc., (the Company) as of December 31, 2018 and the related notes (the "consolidated financial statement"). In our opinion, the consolidated financial statement presents fairly, in all material respects, the financial position of the Company at December 31, 2018, in conformity with U.S. generally accepted accounting principles.

### Basis for Opinion

This consolidated financial statement is the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statement based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB and in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement, whether due to error or fraud. Our audit included performing procedures to assess the risks of material misstatement of the financial statement, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statement. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

### Supplemental Information

The accompanying information contained in Schedules I, II, III IV, V, and VI has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statement. Such information is the responsibility of the Company's management. Our audit procedures included determining whether the information reconciles to the consolidated financial statement or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information. In forming our opinion on the information, we evaluated whether such information, including its form and content, is presented in conformity with Regulation 1.10 under the Commodity Exchange Act. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statement as a whole.

*Ernst & Young LLP*

We have served as the entity's auditor since at least 1993, but were unable to determine the specific year.

February 28, 2019

ADM Investor Services, Inc.

Consolidated Statement of Financial Condition

December 31, 2018

**Assets**

Cash and cash equivalents	\$ 86,976,596
Funds segregated for customers, including U.S. and foreign government securities and short-term investments of \$2,515,648,000	4,097,153,379
Receivable from and deposits with clearing organizations and broker-dealers, including U.S. government securities and short-term investments of \$161,766,000	247,754,444
Receivable from customers	5,359,018
Receivable from affiliates	12,188,702
U.S. Government securities owned	12,964,346
Note Receivable	48,052,817
Net deferred tax assets	3,359,366
Exchange memberships, at cost (fair value: \$14,346,167)	617,359
Other assets	9,421,404
Total assets	<u><u>\$ 4,523,847,431</u></u>

**Liabilities and stockholder's equity**

Payable to:	
Customers	\$ 3,863,293,750
Affiliates	197,496,199
Introducing brokers	21,480,911
Clearing organizations and broker-dealers	12,458,644
Current taxes payable	17,102,255
Other liabilities	27,165,761
Total liabilities	<u><u>4,138,997,520</u></u>

Stockholder's equity:

Common stock, no par value; 20,000 shares authorized and outstanding	3,000,000
Retained earnings	381,849,911
Total stockholder's equity	<u><u>384,849,911</u></u>
Total liabilities and stockholder's equity	<u><u>\$ 4,523,847,431</u></u>

*See accompanying notes.*

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **1. Organization and Nature of the Business**

ADM Investor Services, Inc. (ADMIS or the Company) is a wholly owned subsidiary of Archer Daniels Midland Company (ADM or the Parent). ADMIS is registered as a futures commission merchant (FCM) with the Commodity Futures Trading Commission (CFTC), a member of the National Futures Association (NFA), and a clearing member of principal U.S. commodities exchanges. The Company is primarily and substantially in the business of clearing regulated exchange-traded derivative contracts. In addition, the Company specializes in foreign currency trading on behalf of foreign currency customers (i.e., eligible contract participants). The consolidated statement of financial condition includes the accounts of its wholly-owned subsidiary, Archer Financial Services, Inc.

### **2. Significant Accounting Policies**

#### **Basis of Accounting**

The Company has prepared the accompanying consolidated statement of financial condition in accordance with accounting principles generally accepted in the United States (U.S. GAAP).

#### **Cash and Cash Equivalents**

The Company considers all highly liquid investments with a maturity of three months or less at the time of purchase, including money market funds, to be cash equivalents. All cash and cash equivalents are held with major financial institutions. Funds segregated for customers includes cash and cash equivalents that are considered restricted cash and cash equivalents on the statement of cash flows.

#### **Collateralized Financing**

Repurchase agreements are accounted for as collateralized financing and carried at their contracted value, which approximates fair value. The Company's policy is to obtain possession of the collateral and to monitor the value daily. The Company's reverse repurchase agreements generally have a maturity of one day. At December 31, 2018, the Company had \$1,535,722,000 in reverse repurchase agreement collateralized by \$1,546,670,000 of U.S. Government Securities.

#### **Marketable Securities**

Marketable securities are recorded on a settlement date basis and consist primarily of U.S. government securities obligations with financial institutions. All securities are carried at fair value based on quoted market prices at the date of the consolidated statement of financial condition.

#### **Exchange Membership**

Exchange memberships and stock of exchanges held for operating purposes and membership privileges are carried at cost and assessed annually for other than temporary impairment.

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **2. Significant Accounting Policies (continued)**

#### **Receivables from and payables to customers, affiliates, and clearing organizations and broker-dealers**

Receivables from and payables to customers, affiliates, and clearing organizations and broker-dealers, arise primarily in connection with futures transactions and include gains and losses on those trades. Unrealized gains and losses arising from forward transactions are netted by counterparty, where appropriate, and are recorded as receivables from and payables to customers, affiliates, and clearing organizations and broker-dealers, as applicable.

#### **Other assets**

Other assets include furniture, equipment, leasehold improvements, other receivables, allowance for doubtful accounts, and prepayments. Furniture and equipment are depreciated and amortized using the straight-line method over the estimated lives of the assets. Leasehold improvements are amortized using the straight-line method over the lesser of the lease term or the economic useful life of the improvement. At December 31, 2018, ADMIS has accumulated depreciation of \$3,824,000.

#### **Note Receivable**

The Company records note receivables at net realizable value and estimates allowances based on market conditions, its customer relationship and their economic status. Its note requires amortized monthly payments of principal and interest and no allowance has been recorded.

#### **Income Taxes**

The Company is included in the federal and state income tax returns filed by ADM. Federal income taxes are calculated as if the Company filed a separate return, and the amount of current tax expense or benefit calculated is either remitted to or received from ADM. The amount of current and deferred taxes payable is recognized as of the date of the consolidated statement of financial condition utilizing currently enacted tax laws and rates. Deferred income taxes arise from the effects of timing differences in the book and tax bases of assets and liabilities. The Company recognizes those income tax positions determined more likely than not to be sustained upon examination, based on the technical merits of the position. The Parent has evaluated tax positions taken or expected to be taken in the course of preparing the Company's tax returns to determine whether the tax positions are more likely than not to be sustained by the applicable tax authority.

#### **Translation of Foreign Currencies**

Assets and liabilities denominated in foreign currencies are translated at fiscal year-end rates of exchange.



# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **2. Significant Accounting Policies (continued)**

#### **Use of Estimate**

The preparation of consolidated statement of financial condition in conformity with U.S. GAAP requires management to make estimates and assumptions that affect the amounts reported in the consolidated statement of financial condition and accompanying notes. Management believes that the estimate use on its financial statements and accompanying notes are reasonable, however, actual results may differ from those estimates.

#### **Fair Value Measurements**

The Company's financial instruments are reported at fair value, or amounts that approximate fair value in accordance with Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) 820, Fair Value Measurements and Disclosures. The estimated fair value of trading assets and liabilities are generally based on quoted market prices or dealer quotes.

#### **Recently Adopted Accounting Pronouncements**

In May 2014, the FASB issued ASU 2014-09, Revenue from Contracts with Customers, to clarify the principles of recognizing revenue from contracts with customers and to improve financial reporting by creating common revenue recognition guidance for U.S. GAAP and International Financial Reporting Standards. This ASU will supersede the revenue recognition requirements in ASC Topic 605, Revenue Recognition, and most industry specific guidance. Entities are required to apply the following steps when recognizing revenue under ASU 2014-09: (1) identify the contract(s) with a customer; (2) identify the performance obligations in the contract; (3) determine the transaction price; (4) allocate the transaction price to the performance obligations in the contract; and, (5) recognize revenue when (or as) the entity satisfies a performance obligation. This ASU also requires additional disclosures related to the nature, amount, timing and uncertainty of revenue and cash flows arising from customer contracts. An entity may apply the amendments by using one of the following two methods: (1) retrospective application to each prior reporting period presented or (2) a modified retrospective approach, requiring the standard be applied only to the most current period presented, with the cumulative effect of initially applying the standard recognized at the date of initial application. ASU 2014-09 is effective for annual reporting periods beginning after December 15, 2018, including interim periods within that reporting period with

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **2. Significant Accounting Policies (continued)**

early adoption permitted. Subsequent to issuing ASU 2014-09, the FASB has issued additional standards for the purpose of clarifying certain aspects of ASU 2014-09. The subsequently issued ASUs have the same effective date and transition requirements as ASU 2014-09.

The Company adopted the revenue recognition standard January 1, 2018. The guidance does not apply to revenue associated with financial instruments, such as interest revenue, which is accounted for under other GAAP. The Company has selected a modified retrospective transition method and did not have a material impact on its financial statements.

#### **Pending Accounting Standards**

In February 2016, FASB issued ASU 2016-02, Leases. This ASU will supersede the guidance in ASC Topic 840, Leases. Under ASU 2016-02, for lease arrangements exceeding a 12 month term, a lessee will be required to recognize in the statement of financial position a liability to make lease payments (the lease liability) and a right-of-use asset representing its right to use the underlying asset for the lease term. ASU 2016-02 will retain a distinction between finance and operating leases; however, the principal difference from the previous guidance is that lease assets and liabilities arising from operating leases will be recognized in the statement of financial position. The recognition, measurement and presentation of expenses and cash flows arising from a lease by a lessee will not significantly change from current GAAP. The accounting applied by a lessor will be largely unchanged from that applied under current GAAP. ASU 2016-02 is effective for fiscal years beginning after December 15, 2019, including interim periods within those fiscal years, and will require an entity to recognize and measure leases at the beginning of the earliest period presented using a modified retrospective approach. The Company adopted this standard January 1, 2019 recognizing a right-of-use asset of \$11,085,000 and an incremental rent lease liability of \$11,138,000 and has concluded the transition adjustments impact on beginning equity is immaterial.

In June 2016, the FASB issued guidance that changes how credit losses are measured for most financial assets measured at amortized cost and certain other instruments. The standard requires an entity to estimate its lifetime expected credit loss and record an allowance, that when deducted from the amortized cost basis of the financial asset, presents the net amount expected to be collected on the financial asset. This forward-looking expected loss model generally will result in the earlier recognition of allowances for losses. The standard also amends the impairment model for available-for-sale debt securities and requires entities to determine whether all or a portion of the unrealized loss on an available-for-sale debt security is a credit loss. Severity and duration of the unrealized loss are no longer permissible factors in concluding whether a credit loss exists. Entities will recognize improvements to estimated credit losses on available-for-sale debt securities immediately in earnings rather than as interest income over time. The standard is effective for reporting periods beginning after December 15, 2019. The standard's provisions must

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **2. Significant Accounting Policies (continued)**

be applied as a cumulative adjustment to retained earnings as of the beginning of the first reporting period in which the guidance is effective. Early adoption is permitted for reporting periods beginning in 2019. The company does not believe that the adoption of this guidance will have a material impact on the consolidated statement of financial condition.

### **3. Related-Party Transactions**

Payable to affiliates is a net payable to the Parent of approximately \$92,510,000 and includes amounts arising from trading activities in the ordinary course of business, interest income and expense, corporate allocations for administrative services, and transactions paid by the Parent on behalf of the Company or paid by the Company on behalf of the Parent. The net payable to the Parent includes a trading-related payable of approximately \$90,168,000.

Payable to affiliates arising from trading activity total \$104,986,000. U.S. government securities obligations owned by affiliates that are pledged to the Company as collateral for trading activities of approximately \$159,611,000 are not reflected in the consolidated statement of financial condition. In addition, the net short option value of the affiliates' options on futures positions of approximately \$6,540,000 are not reflected in the consolidated statement of financial condition.

In the normal course of business, the Company enters into transactions on behalf of its customers with affiliated companies. The Company has a net receivable of \$83,695,000 and net payable of \$261,940,000 as of December 31, 2018 with its affiliates. The net receivable is reported within funds segregated for customers and net payable is reported within payable to customers and payable to affiliates on the consolidated statement of financial condition.

At December 31, 2018, the Company had a \$10,000,000 subordinated loan issued to an affiliate

The Company participates in a 50% joint venture arrangement with an external third party, who operates a similar business as the Company. The Company has a net receivable of approximately \$2,189,000 at December 31, 2018. This includes its equity investment and is reported in receivable from affiliates on the consolidated statement of financial condition.

Notes to Consolidated Statement of Financial Condition

**4. Fair Value Measurements**

The Company defines fair value as an exit price, which is the price that would be received for an asset or paid to transfer a liability in the Company's principal or most advantageous market for the asset or liability in an orderly transaction between market participants on the measurement date. The Company's policy is to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. Observable inputs reflect the assumptions market participants would use in pricing the asset or liability and are developed based on market data obtained from sources independent of the reporting entity. Unobservable inputs reflect the entity's own assumptions based on market data and the entity's judgments about the assumptions that market participants would use in pricing the asset or liability and are to be developed based on the best information available in the circumstances. The three levels within the hierarchy used to measure fair value include:

- Level 1 – Inputs may include quoted prices (unadjusted) in active markets for identical assets and liabilities that the Company has the ability to access. Financial assets and liabilities utilizing Level 1 inputs include active exchange-traded derivative contracts, U.S. and Canadian government securities obligations.
- Level 2 – Inputs may include quoted prices for similar assets and liabilities in active markets or quoted prices in markets that are less active than traded exchanges or other observable inputs (other than quoted prices included in Level 1) for the asset or liability that can be corroborated by observable market data, such as interest rates and yield curves that are observable at commonly quoted intervals. This includes foreign currency forwards.
- Level 3 – Inputs may include unobservable inputs that are supported by little or no market activity and that are a significant component of the fair value of the asset or liability.

In certain cases, the inputs used to measure the fair value may fall into different levels of the fair value hierarchy. In such cases, the level in the fair value hierarchy within which fair value measurement in its entirety falls has been determined based on the lowest level of input that is significant to the fair value measurement. The Company's assessment of the significance of a particular input to the fair value measurement requires judgment and considers factors specific to the asset or liability.

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### 4. Fair Value Measurements (continued)

The following table presents information about the Company's financial instruments measured at fair value on a recurring basis as of December 31, 2018, and indicates the fair value hierarchy of the valuation techniques utilized by the Company to determine such fair value:

	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Funds segregated for customers:				
U.S. government securities	\$ 979,795,000	\$ -	\$ -	\$ 979,795,000
Receivables from and deposits with clearing organizations and broker-dealers:				
U.S. government securities	\$ 161,766,000	\$ -	\$ -	\$ 161,766,000
Foreign currency forwards	-	197,000	-	197,000
Receivable from customers:				
Foreign currency forwards	-	11,150,000	-	11,150,000
Securities owned:				
U.S. government securities	\$ 12,964,000	\$ -	\$ -	\$ 12,964,000
Total assets at fair value	<u>\$ 1,154,525,000</u>	<u>\$ 11,347,000</u>	<u>\$ -</u>	<u>\$ 1,165,872,000</u>
<b>Liabilities</b>				
Payable to customers:				
Foreign currency forwards	\$ -	\$ 165,000	\$ -	165,000
Payable to clearing organizations and broker dealers:				
Foreign currency forwards	-	11,231,000	-	11,231,000
Total liabilities at fair value	<u>\$ -</u>	<u>\$ 11,396,000</u>	<u>\$ -</u>	<u>\$ 11,396,000</u>

The fair values of foreign exchange forward contracts are determined using forward exchange rates at the reporting date. The valuation principles for derivative financial instruments have been described in more detail in Note 7.

The Company assesses its financial instruments on an annual basis to determine the appropriate classification within the fair value hierarchy. Transfers between fair value classifications occur when there are changes in pricing observability levels. Transfers of financial instruments among the levels are deemed to occur at the end of the reporting period. There were no transfers between the Company's Level 1, Level 2, or Level 3 classified instruments during the year ended December 31, 2018.

## ADM Investor Services, Inc.

### Notes to Consolidated Statement of Financial Condition

#### **5. Funds Segregated for Regulatory Purposes**

ADMIS is required under the Commodity Exchange Act (“CEA”) to segregate assets representing deposits received from customers trading in U.S. exchanges, foreign secured customers trading on foreign exchanges and customer cleared swaps under 4D(F) of the CEA. At December 31, 2018, the Company had segregated funds for U.S. exchanges, funds deposited in separate regulation 30.7 accounts and customer cleared swaps in the amounts of approximately \$4,294,270,000, \$326,780,000 and \$14,743,000 respectively, which were \$200,637,000, \$47,456,000 and \$10,129,000, respectively, in excess of CEA requirements. Securities owned by customers, consisting primarily of U.S. government securities obligations, are held by ADMIS as collateral. Securities owned by customers held by ADMIS of \$488,051,000 and the net long value of customers’ options on futures positions of approximately \$59,970,000 are not reflected on the consolidated statement of financial condition.

#### **6. Minimum Capital Requirements**

The Company is subject to the minimum capital requirements of several commodities regulatory organizations. Under these requirements, the Company is required to maintain adjusted net capital equal to the greater of \$50,000,000 or the sum of 8% of customer and noncustomer risk maintenance margin requirements on all positions, as defined. Adjusted net capital changes from day to day. At December 31, 2018 the Company had adjusted net capital and excess net capital of approximately \$298,928,000 and \$124,874,000, respectively.

#### **7. Derivative Financial Instruments**

In the normal course of business, the Company executes customer and affiliated customer (collectively, customers) transactions for the purchase and sale of futures contracts and options on futures contracts, substantially all of which are transacted on a margin basis subject to exchange regulations. Such transactions may expose the Company to credit risk in the event the collateral is not sufficient to fully cover losses that customers may incur. In the event a customer fails to satisfy its obligations, the Company may be required to purchase or sell the collateral at then-prevailing market prices. The Company seeks to control the risks associated with its customers’ activities by requiring customers to maintain margin collateral in compliance with various regulatory guidelines. The Company monitors margin levels daily and, pursuant to such guidelines, requires customers to deposit additional collateral or to reduce positions when necessary.

Notes to Consolidated Statement of Financial Condition

**7. Derivative Financial Instruments (continued)**

The Company enters into foreign currency forward contracts primarily to facilitate customer transactions. Risks arise from the possible inability of counterparties to meet the terms of their contracts and from unfavorable changes in the underlying instrument, foreign currency exchange rates, interest rates, and other factors. The Company's exposure to credit risk arises from the possibility that a counterparty to a transaction might fail to perform under its contractual commitment, resulting in the Company incurring a loss. For futures contracts, the clearing organization acts as the counterparty to specific transactions and, therefore, bears the risk of delivery to and from counterparties.

To further mitigate counterparty risk for foreign currency forward contracts, The Company generally matches a contract (either long or short) entered into with one customer with an opposing contract entered into with another counterparty such that the notional and duration of the contracts are the same. Finally, the Company limits counterparty exposure through the use of reputable institutions.

The Company has established controls to monitor the creditworthiness of its counterparties, as well as the quality of pledged collateral, and uses master netting agreements whenever possible to mitigate the Company's exposure to counterparty credit risk. The credit risk associated with forward contracts is typically limited to the cost of replacing all contracts on which the Company has an unrealized gain. The Company executes these transactions with affiliates and a limited number of commercial customers and broker-dealers.

The Company records its derivative activities at fair value (as described in Notes 2 and 4). The following table sets forth the fair value of the Company's derivative contracts by primary risk exposure as of December 31, 2018. The values in the table below exclude the effects of cash received or posted pursuant to derivative contracts and therefore are not representative of the Company's net exposure:

ADM Investor Services, Inc.

Notes to Consolidated Statement of Financial Condition

**7. Derivative Financial Instruments (continued)**

<b>Primary Risk Exposure</b>	<b>Asset Derivatives</b>		<b>Liability Derivatives</b>	
	<b>Balance Sheet Location</b>	<b>Fair Value</b>	<b>Balance Sheet Location</b>	<b>Fair Value</b>
Foreign currency	Receivable from clearing organizations and broker-dealers, receivable from customers, and receivable from affiliates	\$11,347,000	Payable from clearing organizations and broker-dealers, receivables from customers, and receivable from affiliates	\$11,396,000

During the year ended December 31, 2018, the month-end average notional value of foreign exchange forward contracts for the year ended December 31, 2018, was \$3,482,681,000.

**8. Offsetting Arrangements**

The Company manages credit and counterparty risk by entering into enforceable netting agreements and other collateral arrangement with counterparties to derivative financial instruments. These netting agreements mitigate the Company's counterparty risk by providing for a single net settlement with a counterparty of all financial transactions covered by the agreement in an event of default as defined under such agreement. In limited cases, a netting agreement may also provide for the periodic netting of settlement payments with respect to multiple transaction types in the normal course of business.

The derivative contracts are executed under standardized netting agreements or, for exchange-traded derivatives, the relevant contracts for a particular exchange that contain enforceable netting provisions. A derivative netting arrangement creates an enforceable right of setoff that becomes effective, and impacts the realization or settlement of individual financial assets and liabilities, only following a specified event of default. A collateral requirement is associated with the derivative contracts, and is generally in the form of cash.

Derivative assets and liabilities are recorded as offset in the consolidated statement of financial condition that are executed under legally enforceable netting arrangements with the derivative counterparties.



# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### 8. Offsetting Arrangements (continued)

The following tables present information about the offsetting of derivative financial instruments as of December 31, 2018:

	<b>Gross Amounts of Recognized Assets/Liabilities<sup>(1)</sup></b>	<b>Netting Adjustments<sup>(2)</sup></b>	<b>Collateral Offsetting Position in the Consolidated Statement of Financial Condition</b>	<b>Net Amounts Presented in the Consolidated Statement of Financial Condition</b>
<b>Assets</b>				
Foreign currency forwards	\$ 18,006,000	\$ 6,659,000	\$ 11,101,000	\$ 246,000
Total derivatives	<u>\$ 18,006,000</u>	<u>\$ 6,659,000</u>	<u>\$ 11,101,000</u>	<u>\$ 246,000</u>
<b>Liabilities</b>				
Foreign currency forwards	\$ 18,055,000	\$ 6,659,000	\$ -	\$ 11,396,000
Total derivatives	<u>\$ 18,055,000</u>	<u>\$ 6,659,000</u>	<u>\$ -</u>	<u>\$ 11,396,000</u>

<sup>(1)</sup> Amounts include all transactions regardless of whether they are subject to an enforceable netting arrangement.

<sup>(2)</sup> Amounts subject to legally enforceable netting arrangements.

### 9. Commitments and Contingencies

The Company leases office space and equipment under noncancelable leases that expire on various dates through fiscal year 2030. The leases for office space contain escalation clauses that provide for an annual adjustment of the base rent based upon changes in the consumer price index. In addition, the Company is subject to annual charges for common maintenance costs of the buildings. Annual rental commitments for the fiscal years ending December 31 approximate \$3,676,000 in 2019, \$3,473,000 in 2020, \$1,821,000 in 2021, \$1,614,000 in 2022, \$1,549,000 in 2023 and \$7,898,000 thereafter.

The Company is a member of various U.S. exchanges that trade and clear futures and futures on options contracts. Associated with its memberships, the Company may be required to pay a proportionate share of the financial obligations of another member that may default on its obligations to the exchanges or clearing corporations. While the rules governing different exchange memberships vary, in general, the Company's obligations would arise only if the exchange had previously exhausted its resources. In addition, any such obligation would be apportioned among the other non-defaulting members of the exchange. Any potential contingent

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### **9. Commitments and Contingencies (continued)**

liability under these membership agreements cannot be estimated. The Company has made no specific guarantee and has not recorded any contingent liability in its consolidated statement of financial condition for these agreements, and management believes that any potential requirement to make payments under these agreements is remote.

In the normal course of business, the Company is subject to litigation and arbitration matters. Management of the Company believes that there are no outstanding matters that will result in a material adverse effect on the Company's consolidated statement of financial condition.

### **10. Income Taxes**

The Company is subject to income taxation in multiple jurisdictions. Resolution of the related tax positions, through negotiations with relevant tax authorities or through litigation, may take years to complete. Therefore, it is difficult to predict the timing for resolution of tax positions. However, the Company does not anticipate that the total amount of unrecognized tax benefits will increase or decrease significantly in the next twelve months. The Company's tax positions, through their inclusion in the ADM U.S. federal tax return, remain subject to examination for the calendar tax years 2016, 2017 and 2018.

Net deferred tax assets are primarily attributable to differences in the timing of deductibility of accrued employee bonuses and amortization of intangible assets for book and tax purposes. As of December 31, 2018, deferred tax assets and liabilities amounted to \$3,540,743 and \$181,377, respectively. The effective tax rate differs from the current federal statutory rate due to state income taxes and nondeductible expenses, as well as the impact of US tax reform.

The Tax Cuts and Jobs Act ("Act") was enacted on December 22, 2017. The income tax effects of changes in tax laws are recognized in the period when enacted. The Act provides for numerous significant tax law changes and modifications with varying effective dates, which include reducing the corporate income tax rate from 35% to 21% and allowing for immediate capital expensing of certain qualified property. The Company completed the assessment of the impact of the Act on our consolidated statement of financial condition considering also as new guidance on the Act was issued in 2018 with no material adjustment to the estimates recorded at December 31, 2017. The Company expects its effective tax rate to be in the range of 20% to 25% for 2018 and future years.

At December 31, 2017 certain US deferred tax assets and liabilities were remeasured based on the rates at which they are expected to reverse in the future, which is generally 21%.

# ADM Investor Services, Inc.

## Notes to Consolidated Statement of Financial Condition

### 10. Income Taxes (continued)

The following table sets forth a rollforward of activity of unrecognized tax benefits for the year ended December 31, 2018 (in millions) as follows:

	<b>Unrecognized Tax Benefits December 31, 2018</b>
	(In Millions)
Beginning balance	\$ 1.4
Additions related to current year's tax positions	-
Additions related to prior years' tax positions	-
Reductions related to prior years' tax positions	-
Reductions related to lapse of statute of limitations	-
Settlements with tax authorities	-
	<u>\$ 1.4</u>

At December 31, 2018 the Company had accrued interest and penalties on unrecognized tax benefits of \$0.8 million. At December 31, 2018, the gross liability for unrecognized tax benefits and accrued interest was \$2.2 million. In 2018, The Company was under audit in the jurisdiction of New York City for the tax years 2010 through 2014.

### 11. Subsequent Events

Subsequent events have been evaluated through February 28, 2019, which is the date the consolidated financial statements were available to be issued. The Company had no subsequent events to be disclosed.

**ADM Investor Services, Inc**  
**Supplementary Schedule**  
**December 31, 2018**

**Reconciliation of Current Assets and Total Liabilities**

The following is a reconciliation of current assets and total liabilities, as reported in the consolidated statement of financial condition included herein, to the amounts shown in the Statement of the Computation of the Minimum Capital Requirements, as reported on Form 1-FR-FCM:

	<b>Current Assets</b>	<b>Total Liabilities</b>
Total assets/liabilities, as reported in the statement of financial condition	\$4,523,847,431	(\$4,138,997,520)
Market value of securities owned by customers	489,004,353	(489,004,353)
Market value of securities owned by affiliates	159,610,707	(159,610,707)
Market value of commodity options owned by customers	59,970,215	(59,970,215)
Payable to clearing organizations included in segregated customer funds	(8,873,121)	8,873,121
Deficit balances adjustment for market value of commodity options owned by customers	(1,352,146)	1,352,146
Less noncurrent assets:		
Cash	2,485,109	-
Payable to affiliates	-	3,321,269
Receivable from customers	335,051	-
Receivable from Clearing Organization	13,271	
Note Receivable	48,052,816	
Exchange memberships	617,359	-
Recivable from affiliates	12,188,702	
Net deferred tax assets	3,359,366	
Other assets	9,421,405	-
As reported on the Statement of the Computation of the Minimum Capital Requirements	<u>\$5,145,734,360</u>	<u>(\$4,840,678,797)</u>

Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No: 0000360

**CFTC FORM 1-FR-FCM  
STATEMENT OF THE COMPUTATION OF THE MINIMUM CAPITAL REQUIREMENTS  
AS OF 12/31/2018**

Net Capital

1. Current assets (page 3, line 20)		\$	5,145,734,360	<b>3000</b>
2. Increase/(decrease) to U.S. clearing organization stock to reflect margin value				<b>3010</b>
3. Net current assets			5,145,734,360	<b>3020</b>
4. Total liabilities (page 5, line 32)	\$	4,840,678,797		<b>3030</b>
5. Deductions from total liabilities				
A. Liabilities subject to satisfactory subordination agreements (page 5, line 31.A)	\$	0		<b>3040</b>
B. Certain deferred income tax liability (see regulation 1.17(c)(4)(iv))		0		<b>3050</b>
C. Certain current income tax liability (see regulation 1.179c)(4)(v))		0		<b>3060</b>
D. Long term debt pursuant to regulation 1.17(c)(4)(vi)		0		<b>3070</b>
E. Total deductions (add lines 5.A. – 5.D.)		0		<b>3080</b>
F. Adjusted liabilities (subtract line 5.E from line 4)			4,840,678,797	<b>3090</b>
6. Net Capital	\$	305,055,563		<b>3100</b>

Charges Against Net Capital (see regulation 1.17(c)(5))

7. Excess of advances paid on cash commodity contracts over 95% of the market value of commodities covered by such contracts	\$			<b>3110</b>
8. Five percent (5%) of the market value of inventories covered by open futures contracts or commodity options (no charges applicable to inventories registered as deliverable on a contract market and which are covered by futures contracts)				<b>3120</b>
9. Twenty percent (20%) of the market value of uncovered inventories or lesser percentage charge for uncovered balances in specified foreign currencies			25,220	<b>3130</b>
10. Ten percent (10%) of the market value of commodities underlying fixed price commitments and forward contracts which are covered by open futures contracts or commodity options				<b>3140</b>
11. Twenty percent (20%) of the market value of commodities underlying fixed price commodities and forward contracts which are not covered by open futures contracts or commodity options				<b>3150</b>

**Note: There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2017.**

## Schedule 2, cont.

12. Charges as specified in section 240.15c3-1(c)(2)(iv) and (vii) against securities owned by firm, including securities representing investments of domestic and foreign customers' funds:

	Market Value	Charge
A. U.S. and Canadian government obligations	\$ 1,152,609,215 <b>3160</b>	\$ 5,694,153 <b>3170</b>
B. State and Municipal government obligations	<b>3180</b>	<b>3190</b>
C. Certificates of deposit, commercial paper and bankers' acceptances	<b>3200</b>	<b>3210</b>
D. Corporate obligations	<b>3220</b>	<b>3230</b>
E. Stocks and warrants	<b>3240</b>	<b>3250</b>
F. Other securities	<b>3260</b>	<b>3270</b>
G. Total charges (add lines 12.A. – 12.F.)		5,694,153 <b>3280</b>
13. Charges as specified in section 240.15c3-1(c)(2)(iv)(F)		
A. Against securities purchased under agreements to resell		<b>3290</b>
B. Against securities sold under agreements to repurchase		<b>3300</b>
14. Charges on securities options as specified in section 240.15c3-1, Appendix A		<b>3310</b>
15. Undermargined commodity futures and options accounts - amount in each account required to meet maintenance margin requirements, less the amount of current margin calls in that account and the amount of any noncurrent deficit in the account		
A. Customer accounts		371,829 <b>3320</b>
B. Noncustomer accounts		<b>3330</b>
C. Omnibus accounts		<b>3340</b>
16. Charges against open commodity positions in proprietary accounts		
A. Uncovered exchange-traded futures and granted options contracts		
i percent of margin requirements applicable to such contracts	<b>3350</b>	
ii Less: equity in proprietary accounts included in liabilities	<b>3360</b>	<b>3370</b>
B. Ten percent (10%) of the market value of commodities which underlie commodity options not traded on a contract market carried long by the applicant or registrant which has value and such value increased adjusted net capital (this charge is limited to the value attributed to such options)		<b>3380</b>
C. Commodity options which are traded on contract markets and carried long in proprietary accounts. Charge is the same as would be applied if applicant or registrant was the grantor of the options (this charge is limited to the value attributed to such options)		<b>3390</b>
17. Five percent (5%) of all unsecured receivables from foreign brokers		36,850 <b>3410</b>
18. Deficiency in collateral for secured demand notes		<b>3420</b>
19. Adjustment to eliminate benefits of consolidation		<b>3430</b>
20. Total charges		6,128,052 <b>3440</b>

**Note: There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**

Net Capital Computation

21. Adjusted net capital (subtract line 20 from line 6)		\$	298,927,511	<b>3500</b>	
22. Net capital required					
A. Risk Based Requirement					
i Amount of Customer Risk					
Maintenance Margin	\$	1,913,341,762	<b>3515</b>		
ii Enter 8% of line 22.A.i			\$	153,067,341	<b>3525</b>
iii Amount of Non-Customer Risk					
Maintenance Margin	\$	262,324,339	<b>3535</b>		
iv Enter 8% of line 22.A.iii			\$	20,985,947	<b>3545</b>
v Enter the sum of 22.A.ii and 22.A.iv			\$	174,053,288	<b>3555</b>
B. Minimum Dollar Amount Requirement			\$	50,000,000	<b>3565</b>
C. Other NFA Requirement			\$	0	<b>3575</b>
D. Enter the greater of lines 22.A.v, 22.B., or 22.C.			\$	174,053,288	<b>3600</b>
23. Excess net capital (line 22 less line 23.E.)			\$	124,874,223	<b>3610</b>

Computation of Early Warning Level

24. Enter the greatest of 110% of line 22.A.v. or 150% of 22.B. or 150% of 22.C.		\$	191,458,617	<b>3620</b>
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This is your early warning capital level. If this amount is greater than the amount on line 21, you must immediately notify your DSRO and the Commission and begin filing monthly financial reports pursuant to section 1.12 of the regulations.

**Note: There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**

Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No:

0000360

**CFTC FORM 1-FR-FCM**  
**STATEMENT OF SEGREGATION REQUIREMENTS AND FUNDS IN SEGREGATION**  
**FOR CUSTOMERS TRADING ON U.S. COMMODITY EXCHANGES**  
**AS OF 12/31/2018**

SEGREGATION REQUIREMENTS (Section 4d(2) of the CEAct)

1. Net ledger balance:			
A. Cash		\$ 3,490,103,759	<b>5000</b>
B. Securities (at market)		463,597,048	<b>5010</b>
2. Net unrealized profit (loss) in open futures contracts traded on a contract market		80,696,787	<b>5020</b>
3. Exchange traded options:			
A. Market value of open option contracts purchased on a contract market		283,610,599	<b>5030</b>
B. Market value of open option contracts granted (sold) on a contract market		(224,533,301)	<b>5040</b>
4. Net equity (deficit) (add lines 1, 2 and 3)		4,093,474,892	<b>5050</b>
5. Add: accounts liquidating to a deficit and accounts with debit balances – gross amount	\$ 1,684,606		<b>5060</b>
Less: amount offset by customer owned securities	(1,526,293)		<b>5070</b>
		158,313	<b>5080</b>
6. Amount required to be segregated (add lines 4 and 5)		\$ 4,093,633,205	<b>5090</b>

FUNDS IN SEGREGATION ACCOUNTS

7. Deposited in segregated funds bank accounts:			
A. Cash		\$ 1,359,973,750	<b>5100</b>
B. Securities representing investments of customers' funds (at market)		79,117,884	<b>5110</b>
C. Securities held for particular customers or options customers in lieu of cash (at market)		435,725,049	<b>5120</b>
8. Margins on deposit with clearing associations of contract markets:			
A. Cash		25,792,784	<b>5130</b>
B. Securities representing investments of customers' funds (at market)		2,311,924,930	<b>5140</b>
C. Securities held for particular customers or options customers in lieu of cash (at market)			<b>5150</b>
9. Net settlement due from (to) clearing organizations of contract markets		(5,213,783)	<b>5160</b>
10. Exchange traded options:			
A. Value of open long option contracts		283,610,599	<b>5170</b>
B. Value of open short options contracts		(224,533,301)	<b>5180</b>
11. Net equities with other FCMs			
A. Net liquidating equity		0	<b>5190</b>
B. Securities representing investments of customers' funds (at market)		0	<b>5200</b>
C. Securities held for particular customers or options customers in lieu of cash (at market)		0	<b>5210</b>
12. Segregated funds on hand (describe: Warehouse receipts)		27,871,999	<b>5215</b>
13. Total amount in segregation (add lines 7 through 12)		\$ 4,294,269,911	<b>5220</b>
14. Excess (deficiency) funds in segregation (subtract line 6 from line 13)		\$ 200,636,706	<b>5230</b>
15. Management Target Amount Excess funds in segregation (unaudited)		\$ 120,000,000	<b>5240</b>
16. Excess (deficiency) funds in segregation over (under) Management Target Amount Excess (unaudited)		\$ 80,636,706	<b>5250</b>

**Note: There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**



Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No:

0000360

**CFTC FORM 1-FR-FCM  
STATEMENT OF SEGREGATION REQUIREMENTS AND FUNDS  
IN SEGREGATION FOR CUSTOMERS' DEALER OPTIONS ACCOUNTS  
AS OF 12/31/2018  
Not Applicable**

1.	Amount required to be segregated in accordance with Commission regulation 32.6	0	5400
2.	Funds in segregated accounts		
	A. Cash	0	5410
	B. Securities (at market)	0	5420
	B. Total	0	5430
3.	Excess (deficiency) funds in segregation (subtract line 2.C from line 1)	\$ 0	5440

**Note.** There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.

Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No: 0000360

**CFTC FORM 1-FR-FCM**  
**STATEMENT OF SECURED AMOUNTS AND FUNDS HELD IN SEPARATE ACCOUNTS**  
**PURSUANT TO COMMISSION REGULATION 30.7**  
**AS OF 12/31/2018**

**FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS**

Amount required to be set aside pursuant to law, rule or regulation of a foreign government or a rule of a self-regulatory organization authorized thereunder		\$	0	5605
1.	Net ledger balance- Foreign Futures and Foreign Option Trading - All Customers			
	A. Cash	\$	248,003,703	5615
	B. Securities (at market)	\$	23,945,117	5617
2.	Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade	\$	6,482,082	5625
3.	Exchange traded options			
	A Market value of open option contracts purchased on a foreign board of trade	\$	3,067,166	5635
	A Market value of open option contracts granted (sold) on a foreign board of trade	\$	(2,174,248)	5637
4.	Net equity (deficit) (add lines 1, 2, and 3)	\$	279,323,820	5645
5.	Accounts liquidating to a deficit and accounts with debit balances- gross amount	\$	0	5651
	Less: amount offset by customer owned securities	\$	0	5652
6.	Amount required to be set aside as the secured amount - Net Liquidating Equity Method (add lines 4 and 5)	\$	279,323,820	5655
7.	Greater of amount required to be set aside to a foreign jurisdiction (above) or line 6	\$	279,323,820	5655

**Note. There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**

Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No: 0000360

**CFTC FORM 1-FR-FCM**  
**STATEMENT OF SECURED AMOUNTS AND FUNDS HELD IN SEPARATE ACCOUNTS**  
**PURSUANT TO COMMISSION REGULATION 30.7**  
**AS OF 12/31/2018**

**FUNDS DEPOSITED IN SEPARATE REGULATION 30.7 ACCOUNTS**

1. Cash in banks				
A. Banks located in the United States		\$	125,391,884	5700
B. Other banks qualified under Regulation 30.7				
Names(s): J.P. Morgan Chase London, J.P. Morgan Chase New Zealand	5710		13,181,182	5720
		\$	138,573,066	5730
2. Securities				
A. In safekeeping with banks located in the United States		\$	63,827,938	5740
B. In safekeeping with other banks qualified under Regulation 30.7				
Names(s):	5750		0	5760
			63,827,938	5770
3. Equities with registered futures commission merchants				
A. Cash		\$	(10,913,078)	5780
B. Securities			41,902,203	5790
C. Unrealized gain (loss) on open future contracts			15,626,564	5800
D. Value of long option contracts			0	5810
E. Value of short option contracts			0	5815
			46,615,689	5820
4. Amounts held by clearing organizations of foreign boards of trade				
Names(s): NZX Exchange	5830			
A. Cash		\$	2,860,040	5840
B. Securities			0	5850
C. Amount due to(from) clearing organization- daily variation			0	5860
D. Value of long option contracts			0	5870
E. Value of short option contracts			0	5875
			2,860,040	5880
5. Amounts held by members of foreign boards of trade				
Name(s) <u>Guide Investamentos, Hencorp Commcor</u>	5890			
<u>Kenanga Deutsche Futures, ADM Investor Services, Int'l</u>				
<u>Societe Generale Capital Canada</u>				
A. Cash		\$	40,997,928	5900
B. Securities			42,819,676	5910
C. Unrealized gain (loss) on open future contracts			(9,807,047)	5920
D. Value of long option contracts			3,067,166	5930
E. Value of short option contracts			(2,174,248)	5935
			74,903,475	5940
6. Accounts with other depositories designated by a foreign board of trade				
Names(s): _____	5950		0	5960
7. Segregated funds on hand (describe)			0	5965
8. Total funds in separate section 30.7 accounts		\$	326,780,208	5970
9. Excess (deficiency) Set Aside Funds for Secured Amount (Subtract line 7 Secured Statement Page 1 from line 8)		\$	47,456,388	5680
10. Management Target Amount for Excess funds in separate 30.7 accounts (unaudited)		\$	20,000,000	5980
11. Excess (deficiency) funds in separate 30.7 accounts over (under) Management Target Excess (unaudited)		\$	27,456,388	5985

**Note. There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**

Name of Company: ADM Investor Services, Inc.

Employer ID No: 37-1075552

NFA ID No:

0000360

**CFTC FORM 1-FR-FCM**  
**STATEMENT OF CLEARED SWAPS CUSTOMER SEGREGATION REQUIREMENTS AND**  
**FUNDS IN CLEARED SWAPS CUSTOMER ACCOUNTS UNDER 4D(F) of CEA**  
**AS OF 12/31/2018**

Clearde Swaps Customer Requirements

1. Net ledger balance:			
A. Cash		\$ (5,141,496)	<b>8500</b>
B. Securities (at market)		0	<b>8510</b>
2. Net unrealized profit (loss) in open cleared swaps derivatives		9,755,250	<b>8520</b>
3. Cleared swaps options			
A. Market value of open cleared swaps option contracts purchased		0	<b>8530</b>
B. Market value of open cleared swaps option contracts granted (sold)		0	<b>8540</b>
4. Net equity (deficit) (add lines 1, 2 and 3)		4,613,754	<b>8550</b>
5. Accounts liquidating to a deficit and accounts with debit balances – gross amount	\$	0	<b>8560</b>
Less: amount offset by customer owned securities		0	<b>8570</b>
6. Amount required to be segregated for cleared swaps cutomers (add lines 4 and 5)		\$ 4,613,754	<b>8590</b>

Funds in Cleared Swaps Customer Segregated Accounts

7. Deposited in cleared swaps customer segregated accounts at banks			
A. Cash		\$ 416,608	<b>8600</b>
B. Securities representing investments of cleared swaps customers' funds (at market)		0	<b>8610</b>
C. Securities held for particular cleared swaps customers in lieu of cash (at market)		0	<b>8620</b>
8. Margins on deposit with derivatives clearing organizations in cleared swaps customer segregated accounts			
A. Cash		14,366,411	<b>8630</b>
B. Securities representing investments of cleared swaps customers' funds (at market)		0	<b>8640</b>
C. Securities held for particular cleared swaps customers in lieu of cash (at market)		0	<b>8650</b>
9. Net settlement due from (to) derivatives clearing organizations		(40,500)	<b>8660</b>
10. Cleared swaps options options			
A. Value of open cleared swaps long option contracts		0	<b>8670</b>
B. Value of open cleared swaps short option contracts		0	<b>8680</b>
11. Net equities with other FCMs			
A. Net liquidating equity		0	<b>8690</b>
B. Securities representing investments of cleared swaps customers' funds (at market)			<b>8700</b>
C. Securities held for particular cleared swaps customers in lieu of cash (at market)			<b>8710</b>
12. Cleared swaps funds on hand (describe: )		0	<b>8715</b>
13. Total amount in cleared swaps customer segregation (add lines 7 through 12)		\$ 14,742,519	<b>8720</b>
14. Excess (deficiency) funds in cleared swaps customer segregation (subtract line 6 from line 13)		\$ 10,128,765	<b>8730</b>
15. Management Target Amount for Excess funds in cleared swaps segregation accounts (unaudited)		\$ 8,000,000	<b>8760</b>
16. Excess (deficiency) funds in cleared swaps customer segregated accounts over (under) Management Target Excess (unaudited)		\$ 2,128,765	<b>8770</b>

**Note: There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing as of December 31, 2018.**