



**ADM Investor  
Services, Inc.**

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**Public Statement Regarding the Anti-Money Laundering Program of ADM Investor Services, Inc.**

The *International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001* ("Title III"), which was signed into law on October 26, 2001, imposed significant new anti-money laundering requirements on all "financial institutions," as so defined under the Bank Secrecy Act ("BSA"), including FCMs such as ADM Investor Services, Inc. ("ADMIS"). In particular, Section 352 of Title III and NFA Compliance Rule 2-9(c) requires all financial institutions to establish anti-money laundering ("AML") programs which, at a minimum, must include internal policies, procedures and controls; a designated compliance officer to oversee day-to-day operations of the program; an ongoing training program for employees; and an independent audit function to test the program.

ADMIS is committed to conducting business in accordance with the highest standards of integrity. Implementing our AML Program is an integral part of that commitment. ADMIS is committed to following all applicable laws and regulations to ensure that our business is not used to facilitate money laundering. All ADMIS employees have a responsibility to follow our AML program, and to abide by all applicable laws and regulations involving anti-money laundering programs. Failure to follow the ADMIS AML policy will have serious consequences for any employee.

The ADMIS AML program was designed to enable appropriate personnel to form a reasonable belief that they know the true identity of each customer; recognize suspicious customers and transactions; and require personnel to report suspicious or unusual activity to appropriate supervisory personnel, including senior management, and to FinCEN when appropriate. Our AML program should also ensure that ADMIS maintains an adequate audit trail to assist law enforcement agencies in any investigation.

The key components of the ADMIS AML program are:

- A. Customer Identification Program**
- B. Detection and Reporting of Suspicious Activity**
- C. Section 314(a) Information Requests**
- D. Section 312 Foreign Private Banking and Correspondent Accounts**
- E. Other Responsibilities**
  - Office of Foreign Assets Control*
  - Section 311 Special Measures*
  - Foreign Bank and Financial Accounts*
  - International Transportation of Currency or Monetary Instruments*
- F. Hiring Qualified Staff**
- G. Recordkeeping**

#### **DESIGNATION OF A COMPLIANCE OFFICER**

ADMIS has appointed its Chief Compliance Officer to oversee the anti-money laundering program. Among other duties with respect to the firm's CIP and suspicious activity reporting, the Chief Compliance Officer:

- Receives reports of suspicious activity from firm personnel;
- Gathers all relevant business information to evaluate and investigate suspicious activity; and
- Determines whether the activity warrants reporting to senior management, and, if authorized to do so, the firm's DSRO or FinCEN.

#### **EMPLOYEE TRAINING PROGRAM**

ADMIS provides ongoing AML education and training for all appropriate personnel. This training program is conducted at least every 12 months and includes training on the firm's policies and procedures, the relevant federal laws and NFA guidance issued in this area.

#### **INDEPENDENT AUDIT FUNCTION**

The adequacy of the ADMIS AML program is tested at least every 12 months. The annual testing is performed by a qualified, independent third party audit service.

The results of the annual review of the AML Program are promptly reported to and reviewed by the chief compliance officer and ADMIS senior management.

The AML Program of ADMIS provides a significant amount of information regarding ADMIS developed policies and procedures, and an evaluation of such. Moreover, the Program identifies and evaluates the resources, human and systems, which ADMIS deploys. Operating in a highly competitive industry as a Futures Commission Merchant, ADMIS diligently keeps this information confidential as it constitutes a critical portion of its competitive advantage.

