Financial Statements And Supplemental Schedules

Cantor Fitzgerald & Co.
Year ended December 31, 2019
With Report of Independent
Registered Public Accounting Firm
(SEC ID. NO. 8-201)
(CFTC ID. NO. 5288)

This report is deemed CONFIDENTIAL in accordance with Rule 17a-5e(3) under the Securities Exchange Act of 1934 and Regulation 1.10(g) under the Commodity Exchange Act. A statement of financial condition, and supplemental report on internal control, bound separately, has been filed with the Securities and Exchange Commission and Commodity Futures Trading Commission simultaneously herewith as a Public Document.

OMB APPROVAL
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UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

ANNUAL AUDITED REPORT
FORM X-17A-5
PART III

SEC FILE NUMBER
8-201

FACING PAGE
Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 01/01/19 (MM/DD/YY) AND ENDING 12/31/19 (MM/DD/YY)

A. REGISTRANT IDENTIFICATION

NAME OF BROKER – DEALER:

Cantor Fitzgerald & Co.

OFFICIAL USE ONLY
FIRM ID. NO.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

110 East 59th Street
(No. and Street)

New York (City) New York (State) 10022 (Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

Kenneth Paulson 212-294-7922
(Area Code – Telephone No.)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT REGISTERED PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Ernst & Young LLP
(Name – if individual, state last, first, middle name)

5 Times Square (Address) New York (City) New York (State) 10036-6530 (Zip Code)

CHECK ONE:

- [X] Certified Public Accountant
- [ ] Public Accountant
- [ ] Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

**Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).*

SEC 1410 (06-02).

AFFIRMATION

I, Kenneth Paulson, affirm that, to the best of my knowledge and belief, the accompanying financial statements and supporting schedules pertaining to Cantor Fitzgerald & Co. (the "Partnership"), as of December 31, 2019, are true and correct. I further affirm that neither the Partnership nor any partner, proprietor, principal officer, or director has any proprietary interest in any account classified solely as that of a customer.

Kenneth Paulson
Chief Financial Officer

Notary Public

CHANTAL M BARRALIS
Notary Public, State of New York
Registration #01BA6364242
Qualified In New York County
Commission Expires Sept. 11, 2021

This report ** contains (check all applicable boxes):

☑ Facing Page
☑ Report of Independent Registered Public Accounting Firm.
☑ Statement of Financial Condition.
☑ Statement of Operations.
☑ Statement of Cash Flows.
☑ Statement of Changes in Partners' Capital.
☑ Statement of Changes in Subordinated Borrowings.
☑ Notes to Financial Statements.
☑ Computation of Net Capital Pursuant to Rule 15c3-1.
☑ Computation for Determination of Customer Accounts Reserve Requirements Pursuant to Rule 15c3-3.
☑ Computation for Determination of PAB Reserve Requirements Pursuant to Rule 15c3-3
☑ Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
☑ Statement of Cleared Swaps Customer Segregation Requirements and Funds in Cleared Swaps Customer Accounts Under 4D(F) of the Commodity Exchange Act
☑ Schedule of Segregation Requirements and Funds in Segregation for Customers Trading on U.S. Commodity Exchanges
☑ Computation of CFTC Minimum Net Capital Requirement
☑ Schedule of Segregation Requirements and Funds in Segregation for Customers' Dealer Options Accounts
☑ Statement of Secured Amounts and Funds Held in Separate Accounts for Foreign Futures and Foreign Options Customers Pursuant to Commission Regulation 30.7
☐ A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
☑ An Oath or Affirmation.
☐ A copy of the SIPC Supplemental Report.
☐ A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.
☑ Supplementary Report of Independent Registered Public Accounting Firm on Internal Control Required by CFTC Regulation 1.16

***For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).*

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Report of Independent Registered Public Accounting Firm

To the Partners and Management of Cantor Fitzgerald & Co.

Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Cantor Fitzgerald & Co. (the "Partnership") as of December 31, 2019, the related statements of operations, cash flows, changes in partners' capital, and changes in subordinated borrowings for the year then ended, and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Partnership at December 31, 2019, and the results of its operations and its cash flows for the year then ended in conformity with U.S. generally accepted accounting principles.

Basis for Opinion

These financial statements are the responsibility of the Partnership's management. Our responsibility is to express an opinion on the Partnership's financial statements 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 Partnership 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are 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 statements, 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 statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis for our opinion.

Supplemental Information

The accompanying information contained in the Supplemental Schedules has been subjected to audit procedures performed in conjunction with the audit of the Partnership's financial statements. Such information is the responsibility of the Partnership's management. Our audit procedures included determining whether the information reconciles to the financial statements 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 Rule 17a-5 under the Securities Exchange Act of 1934 and 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 statements as a whole.

Ernst + Young LLP

We have served as the Partnership's auditor since 2008.

February 28, 2020

Cantor Fitzgerald & Co.
Statement of Financial Condition
December 31, 2019
(In Thousands)

Assets		
Cash and cash equivalents		$ 260,894
Cash and securities segregated under federal and other regulations		186,084
Collateralized agreements:		
Securities purchased under agreements to resell	$ 11,423,700	
Securities borrowed	1,337,498	
		12,761,198
Financial instruments owned (includes $5,496,119 pledged as collateral)		5,719,728
Receivables from broker-dealers, clearing organizations, customers and related broker-dealers		667,574
Receivables from related parties		7,179
Fixed assets, net		5,069
Other assets		55,162
Total assets		$ 19,662,888
Liabilities, Subordinated Borrowings and Partners' Capital		
Financial instruments sold, not yet purchased		$ 2,197,795
Collateralized financings:		
Securities sold under agreements to repurchase	$ 15,571,503	
Securities loaned	731,386	
		16,302,889
Payables to broker-dealers, clearing organizations, customers and related broker-dealers		305,948
Accrued compensation		86,901
Accounts payable and accrued liabilities		40,410
Payables to related parties		15,391
Total liabilities		18,949,334
Commitments and contingencies (Note 6)		
Subordinated borrowings		205,000
Partners' capital:		
General partner		503,468
Limited partner		5,086
Total partners' capital		508,554
Total liabilities, subordinated borrowings and partners' capital		$ 19,662,888

See notes to financial statements

Cantor Fitzgerald & Co.
Statement of Operations
For the Year Ended December 31, 2019
(In Thousands)

Revenues		
Investment banking and advisory services	$	191,519
Principal transactions, net		128,492
Commissions		65,871
Interest income		1,170,593
Other revenue		16,414
Total revenues		1,572,889
Interest expense		1,041,179
Net revenues		531,710
Non-interest expenses		
Compensation and employee benefits		316,901
Fees to related parties		52,924
Communications		39,206
Commissions and floor brokerage		21,600
Occupancy and equipment		18,651
Selling and promotion		16,520
Professional and consulting fees		15,124
Other expenses		12,566
Total non-interest expenses		493,492
Income before benefit from income taxes		38,218
Provision for income taxes		154
Net Income	$	38,064

See notes to financial statements

Cantor Fitzgerald & Co.
Statement of Cash Flows
For the Year Ended December 31, 2019
(In Thousands)

Cash flows from operating activities		
Net income	$	38,064
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation and amortization		2,068
Deferred tax benefit		(2,492)
Impairment of fixed assets		433
(Increase) decrease in operating assets:		
Securities segregated under federal and other regulations		49,075
Securities purchased under agreements to resell		(961,692)
Securities borrowed		(614,364)
Financial instruments owned		141,393
Receivables from broker-dealers, clearing organizations, customers and related broker-dealers		52,469
Receivables from related parties		25
Other assets		(12,936)
Increase (decrease) in operating liabilities:		
Financial instruments sold, not yet purchased		285,416
Securities sold under agreements to repurchase		1,050,084
Securities loaned		300,481
Payables to broker-dealers, clearing organizations, customers and related broker-dealers		(248,330)
Accrued compensation		7,196
Accounts payable and accrued liabilities		(29,227)
Payables to related parties		(14,913)
Net cash provided by operating activities		42,750
Cash flows from investing activities		
Purchases of fixed assets and leasehold improvements		(1,868)
Net cash used in investing activities		(1,868)
Net increase in Cash and cash equivalents and Cash segregated under federal and other regulations		40,882
Cash and cash equivalents and Cash segregated under federal and other regulations, beginning of period		360,447
Cash and cash equivalents and Cash segregated under federal and other regulations, end of period	$	401,329
Supplemental disclosure of cash flow information:		
Cash paid for taxes	$	783
Cash paid for interest	$	17,327
Right-of -use assets and liabilities	$	20,349

See notes to financial statements

Cantor Fitzgerald & Co.
Statement of Changes in Partners' Capital
For the Year Ended December 31, 2019
(In Thousands)

	Cantor Fitzgerald Securities (The General Partner)	CFLP CF&Co. I Holdings, L.P. (The Limited Partner)	Total Partners' Capital
Balance, January 1, 2019	$ 465,785	$ 4,705	$ 470,490
Net income	37,683	381	38,064
Balance, December 31, 2019	$ 503,468	$ 5,086	$ 508,554

See notes to financial statements

Cantor Fitzgerald & Co.
Statement of Changes in Subordinated Borrowings
For the Year Ended December 31, 2019
(In Thousands)

Balance, January 1, 2019	$	205,000
Repayments of subordinated borrowings		–
Proceeds from issuance of subordinated borrowings		–
Balance, December 31, 2019	$	205,000

See notes to financial statements

1. General and Summary of Significant Accounting Policies

Description of Business – Cantor Fitzgerald & Co. (the "Partnership"), which is organized under the laws of the State of New York, is a registered broker-dealer with the Securities and Exchange Commission ("SEC"), and a futures commission merchant ("FCM") registered with the Commodity Futures Trading Commission ("CFTC"). The Partnership's primary activities include providing investment banking and advisory services and trading in equity, exchange-traded funds, corporate, government, mortgage backed and municipal securities, and financial futures. In addition, the Partnership is in the business of clearing for correspondent customers, and is a primary dealer in the United States of America ("U.S.") government securities. The Partnership is owned by Cantor Fitzgerald Securities ("CFS") (94%), the managing general partner, a majority owned subsidiary of Cantor Fitzgerald, L.P. ("CFLP" and together with its subsidiaries, "Cantor") as well as CFLP CF&Co. I Holdings, L.P. (1%), a limited partner, and wholly owned subsidiary of CFLP and CFGM CF&Co Holdings, LLC, LLC (5%), which is a subsidiary of CF Group Management, Inc. ("CFGM"), the managing general partner of CFLP. In exchange for an indemnity from CFS, CFGM by a separate agreement with CFS, has assigned its entire 5% indirect interest in the Partnership to CFS.

Basis of Presentation – The financial statements are presented in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP").

Use of Estimates – Management makes estimates and assumptions that affect the reported amounts of the assets and liabilities, revenues and expenses, and the disclosure of contingent assets and liabilities. Management believes that the estimates utilized in preparing the financial statements are reasonable. Estimates, by their nature, are based on judgment and available information. As such, actual results could differ materially from the estimates included in these financial statements.

Revenue Recognition – The Partnership derives its revenues primarily through fees from investment banking and advisory services, principal transactions from brokerage services, commissions, and interest.

Investment Banking and Advisory Services – Investment banking and advisory services include underwriting public and private offerings of equity/equity-linked and debt securities and financial advisory services in connection with mergers and acquisitions, restructurings and other transactions. Generally, the Partnership's underwriting transactions represent a single performance obligation which is the sale of the customer's securities. Revenue from these activities is recognized at a point in time on the trade-date because the Partnership has a present right to payment for the service performed and the customer has a right to the net cash proceeds.

The Partnership's financial advisory services include various types of transactions and, as a result, revenue recognition is dependent on the type of promised service. Payments received upfront are recognized periodically over the duration of the service or upon the achievement of a milestone. Financial advisory services for mergers and acquisitions often contain success fees that are due upon the completion of a sale or transaction. In these cases, the single performance obligation is the successful completion of the sale or transaction. As a result, revenue is recognized at a point in time when the sale or transaction is completed. In instances where the fees are received upfront, the fee is deferred within the Partnership's statement of financial condition until the satisfaction of the performance obligation. In other cases, the promised service may be satisfied over time. For example, where the service is to provide financial advice on identifying potential transactions, the performance obligation is satisfied over time using a time elapsed methodology as the customer is simultaneously receiving and consuming the promised service. Most of the fees received for financial advisory services are considered variable consideration as the fees are contingent upon a future event (for example, a completion of a transaction) and are excluded from the transaction price until the uncertainty associated with the variable consideration is subsequently resolved, which is expected to occur upon achievement of the specified milestone.

1. General and Summary of Significant Accounting Policies ***(continued)***

As a practical expedient, costs associated with investment banking and advisory transactions are expensed as incurred because contract terms are generally less than one year. Expenses are recorded on a gross basis in the Partnership's statement of operations because the Partnership is acting as a principal in the transaction. Any cost reimbursements are recognized as revenue when the costs are incurred and the reimbursements are due from the customer.

Principal Transactions, net – Principal transactions revenue is derived primarily from matched principal transactions, whereby the Partnership simultaneously agrees to buy securities from one customer and sell them to another customer. Certain trading businesses are allowed to enter into unmatched principal transactions to facilitate a customer's execution needs for transactions initiated by such customers. Revenue earned from principal transactions represent the spread between the buy and sell price of the security, commodity or derivative. Principal transactions revenue and related expenses are recognized on a trade-date basis. Positions held as part of principal transactions are marked to market on a daily basis. Principal transactions revenue is presented net of related transaction expenses.

Commissions – Commissions revenue is derived from securities and commodities, whereby the Partnership connects buyers and sellers in the over-the-counter ("OTC") and exchange markets and assists in the negotiation of the price and other material terms. These transactions result from the provision of service related to executing, settling and clearing transactions for clients. Trade execution and clearing services, when provided together, represent a single performance obligation as the services are not separately identifiable in the context of the contract. Commissions revenue is recognized at a point in time on the trade-date, when the customer obtains control of the asset and can direct the use of, and obtain substantially all of the remaining benefits from the asset. The Partnership records a receivable between the trade-date and settlement date, when payment is received.

Interest Income and Expense – The Partnership recognizes contractual interest on Financial instruments owned and Financial instruments sold, not yet purchased, on an accrual basis as a component of the Interest income and expense, respectively. Interest on derivative trading transactions and dividends are included as part of the fair value of these contracts in Principal transactions, net in the Partnership's statements of operations and are not recognized as a component of Interest income or expense.

The Partnership accounts for short-term and long-term borrowings on an accrual basis with related interest recorded as Interest expense. In addition, the Partnership recognizes interest income related to Securities borrowed and Securities purchased under agreements to resell and interest expense related to the Securities loaned and Securities sold under agreements to repurchase on an accrual basis as a component of the Interest income and expense, respectively.

Other Revenue – Other revenue consist primarily of prime brokerage services, which includes clearing and settling trades as well as providing custodial services. Fees for these services are recognized at a point in time when usage occurs.

Cash and Cash Equivalents – The Partnership considers all highly liquid investments with maturity dates of 90 days or less at the date of acquisition that are not segregated under regulatory requirements to be cash equivalents.

Cash and Securities Segregated Under Federal and Other Regulations – Cash and securities segregated under federal and other regulations are segregated for the protection of customers and for the proprietary accounts of brokers or dealers under the Commodity Exchange Act and Securities Exchange Act of 1934.

1. General and Summary of Significant Accounting Policies *(continued)*

Financial Instruments Owned and Financial Instruments Sold, Not Yet Purchased – Financial instruments owned and Financial instruments sold, not yet purchased are recorded at fair value based on current listed market prices or broker quotes. Realized and unrealized gains and losses are reflected in Principal transactions, net in the Partnership's statement of operations. Financial instruments owned by customers, including those that collateralize margin or other similar transactions, are not reflected in the Partnership's statement of financial condition. Financial instrument transactions of the Partnership and the related principal transactions revenue are recorded on a trade-date basis.

Fair Value – U.S. GAAP defines fair value as the price received to transfer an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date and requires certain disclosures about such fair value measurements.

The guidance establishes a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical asset(s) or liability(ies) (Level 1 measurements) and the lowest priority to unobservable inputs (Level 3 measurements). The three levels of the fair value hierarchy are as follows:

- Level 1 measurements – Unadjusted quoted prices in active markets that are accessible at the measurement date for identical, unrestricted asset(s) or liability(ies).

- Level 2 measurements – Quoted prices in markets that are not active or financial instruments for which all significant inputs are observable, either directly or indirectly.

- Level 3 measurements – Prices or valuations that require inputs that are both significant to the fair value measurement and unobservable.

A financial instrument's level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement.

In determining fair value, the Partnership separates Financial instruments owned and Financial instruments sold, not yet purchased into two categories: cash instruments and derivative contracts.

- Cash Instruments – Cash instruments are generally classified within Level 1 or Level 2 of the fair value hierarchy because they are valued using quoted market prices, broker or dealer quotations, or alternative pricing sources with reasonable levels of price transparency. The types of instruments valued based on quoted market prices in active markets include most U.S. government securities and equities. Such instruments are generally classified within Level 1 of the fair value hierarchy. The Partnership does not adjust the quoted price for such instruments, even in situations where the Partnership holds a large position and a sale could reasonably impact the quoted price. The types of instruments valued based on quoted prices in markets that are not active, broker or dealer quotations, or alternative pricing sources with reasonable levels of price transparency include certain U.S. government securities, agency securities, corporate bonds and municipal obligations. Such instruments are generally classified within Level 2 of the fair value hierarchy.

1. General and Summary of Significant Accounting Policies ***(continued)***

- Derivative Contracts – Derivative contracts can be exchange-traded or OTC. Exchange-traded derivatives typically fall within Level 1 or Level 2 of the fair value hierarchy depending on whether they are deemed to be actively traded or not. The Partnership generally values exchange-traded derivatives using the closing price from the exchange. OTC derivatives typically fall within Level 2 of the fair value hierarchy. The Partnership generally values OTC derivatives using market transactions and other market evidence whenever possible, including market-based inputs to models, broker or dealer quotations or alternative pricing sources with reasonable levels of price transparency. For OTC derivatives that trade in liquid markets, such as generic options, certain futures and To Be Announced agency mortgage backed securities ("TBAs"), model inputs can generally be verified and model selection does not involve significant management judgment. Such instruments are typically classified within Level 2 of the fair value hierarchy.

- Valuation models require a variety of inputs, including contractual terms, market prices, yield curves, credit curves, measures of volatility, prepayment rates, loss severity rates and correlations of such inputs. Inputs to the valuations of level 2 derivatives can be verified to market transactions, broker or dealer quotations or other alternative pricing sources with reasonable levels of price transparency. Consideration is given to the nature of the quotations (e.g., indicative or firm) and the relationship of recent market activity to the prices provided from alternative pricing sources.

Collateralized Agreements and Financings – Collateralized agreements are securities purchased under agreements to resell ("Reverse repurchase agreements") and securities borrowed. Collateralized financings are securities sold under the agreements to repurchase ("Repurchase agreements") and securities loaned. The Partnership enters into these transactions to obtain financing, satisfy cash and securities segregated deposit requirements, and cover short sales.

- Reverse repurchase and Repurchase agreements – Reverse repurchase and Repurchase agreements are recorded at the contractual amount for which the securities will be repurchased or resold, including accrued interest. The Partnership nets certain reverse repurchase agreements and repurchase agreements when a legal right of offset exists under master netting arrangements, which are enforceable by law. It is the policy of the Partnership to obtain possession of collateral with a market value equal to, or in excess of, the principal amount loaned under reverse repurchased agreements. Collateral is valued daily and the Partnership may require counterparties to deposit additional collateral or return collateral pledged when appropriate.

- Securities borrowed and Securities loaned transactions – Securities borrowed and Securities loaned are recorded at the amount of cash collateral advanced or received. The Partnership nets certain securities borrowed and securities loaned transactions when a legal right of offset exists under master netting arrangements, which are enforceable by law. Securities borrowed transactions require the Partnership to deposit cash with the lender. Fees received or paid in connection with these activities are recorded as Interest income or Interest expense, respectively, and are recognized over the life of the transaction. The Partnership monitors the market value of securities borrowed and loaned on a daily basis and obtains or refunds additional collateral as necessary to ensure such transactions are adequately collateralized.

1. General and Summary of Significant Accounting Policies *(continued)*

Receivables from and Payables to Broker-Dealers, Clearing Organizations, Customers and Related Broker-Dealers – Receivables from and Payables to broker-dealers, clearing organizations, customers and related broker-dealers primarily represent principal transactions which have not yet settled. Also included in Receivables from and Payables to broker-dealers, clearing organizations, customers and related broker-dealers is cash deposited with various clearing organizations to conduct ongoing clearance activities, and commissions receivable. Payables to customers also include amounts due on customer margin deposits and free credit balances.

Fixed Assets, net – Fixed assets are recorded at historical cost and depreciated over their estimated economic useful lives, generally three to five years, using the straight-line method. Leasehold improvements are amortized over their estimated economic useful lives or the remaining lease term, whichever is shorter. In accordance with U.S. GAAP guidance, the Partnership capitalizes qualifying computer software costs incurred during the application development stage and amortizes them over an estimated useful life of three years on a straight-line basis.

Leases – The Partnership enters into leasing arrangements in the ordinary course of business as a lessee of office space, data centers and office equipment.

The accounting policies described below were updated pursuant to the adoption of the new U.S. GAAP standard on *Leases* and related amendments on January 1, 2019. These policy updates have been applied prospectively in the Partnership's financial statements from January 1, 2019 onward.

The Partnership determines whether an arrangement is a lease at inception. Right of use ("ROU") lease assets represent the Partnership's right to use an underlying asset for the lease term, and lease liabilities represent the Partnership's obligation to make lease payments arising from the lease. Other than for leases with an initial term of twelve months or less, operating lease ROU assets and liabilities are recognized at commencement date based on the present value of lease payments over the lease term. As most leases do not provide an implicit rate, the Partnership uses an incremental borrowing rate based on the information available at commencement date in determining the present value of lease payments. The operating lease ROU asset also includes any lease payments made and excludes lease incentives. Lease terms may include options to extend or terminate the lease when it is reasonably certain that the Partnership will exercise that option. Lease expense pertaining to operating leases is recognized on a straight-line basis over the lease term.

Income Taxes – Income taxes are accounted for under U.S. GAAP Accounting Standard Codification ("ASC") Topic 740, *Income Taxes*, using the asset and liability method. Deferred tax assets and liabilities are recognized for the future tax consequences attributable to differences between the financial statement carrying amounts of existing assets and liabilities and their respective tax bases. Deferred tax assets and liabilities are measured using enacted tax rates expected to apply to taxable income in the years in which those temporary differences are expected to be recovered or settled. The effect on deferred tax assets and liabilities of a change in tax rates is recognized in income in the period that includes the enactment date. To the extent that it is more likely than not that deferred tax assets will not be recognized, a valuation allowance would be established to offset their benefit.

ASC Topic 740, *Accounting for Uncertainty in Income Taxes*, clarifies the accounting for income taxes by prescribing a "more likely than not" recognition threshold that a tax position is required to meet before being recognized in the financial statements. In addition, the guidance clarifies the measurement of uncertain tax positions, classification of interest and penalties, and requires additional disclosures on tax reserves.

1. General and Summary of Significant Accounting Policies *(continued)*

Compensation Arrangements – CFLP provides awards to certain employees of the Partnership in the form of grant units. Grant units entitle the employees to participate in quarterly distributions of Cantor's income and to receive certain post-termination payments. Grant units are accounted for under U.S. GAAP guidance, which requires that the Partnership record an expense for distributions and for the change in value of the post-termination liability for such awards at each reporting period. Expenses related to partnership awards are reflected as Compensation and employee benefits in the Partnership's statement of operations.

Recently Adopted Accounting Pronouncements

In February 2016, the Financial Accounting Standards Board ("FASB") issued Accounting Standards Update ("ASU") 2016-02, *Leases (Topic 842).* This standard requires lessees to recognize a ROU asset and lease liability for all leases with terms of more than twelve months. Recognition, measurement and presentation of expenses will depend on classification as a finance or operating lease. The amendments also require certain quantitative and qualitative disclosures. Accounting guidance for lessors is mostly unchanged. In July 2018, the FASB issued ASU 2018-10, *Codification Improvements to Topic 842, Leases*, to clarify how to apply certain aspects of the new leases standard. The amendments address the rate implicit in the lease, impairment of the net investment in the lease, lessee reassessment of lease classification, lessor reassessment of lease term and purchase options, variable payments that depend on an index or rate and certain transition adjustments, among other issues. In addition, in July 2018, the FASB issued ASU 2018-11, *Leases (Topic 842), Targeted Improvements*, which provided an additional (and optional) transition method to adopt the new leases standard. Under the new transition method, a reporting entity would initially apply the new lease requirements at the effective date and recognize a cumulative-effect adjustment to the opening balance of retained earnings in the period of adoption; continue to report comparative periods presented in the financial statements in the period of adoption in accordance with legacy U.S. GAAP (i.e., ASC 840, *Leases*); and provide the required disclosures under ASC 840 for all periods presented under legacy U.S. GAAP. Further, ASU 2018-11 contains a practical expedient that allows lessors to avoid separating lease and associated non-lease components within a contract if certain criteria are met. In December 2018, the FASB issued ASU 2018-20, *Leases (Topic 842), Narrow-Scope Improvements for Lessors*, to clarify guidance for lessors on sales taxes and other similar taxes collected from lessees, certain lessor costs and recognition of variable payments for contracts with lease and non-lease components. In March 2019, the FASB issued ASU 2019-01, *Leases (Topic 842), Codification Improvements*, to clarify certain application and transitional disclosure aspects of the new leases standard. The amendments address determination of the fair value of the underlying asset by lessors that are not manufacturers or dealers and clarify interim period transition disclosure requirements, among other issues.

The guidance in ASUs 2016-02, 2018-10, 2018-11 and 2018-20 was effective beginning January 1, 2019, with early adoption permitted; whereas the guidance in ASU 2019-01 was effective beginning January 1, 2020, with early adoption permitted. The Partnership adopted the abovementioned standards on January 1, 2019 using the effective date as the date of initial application. The guidance provides a number of optional practical expedients to be utilized by lessees upon transition. Accordingly, the Partnership elected the 'package of practical expedients,' which permitted the Partnership not to reassess under the new standard its prior conclusions about lease identification, lease classification and initial direct costs. The Partnership did not elect the use-of-hindsight or the practical expedient pertaining to land easements, with the latter not being applicable to the Partnership. The standard also provides practical expedients for an entity's ongoing accounting as a lessee. The Partnership elected the short-term lease recognition exemption for all leases that qualify. This means, for those leases that qualify, the Partnership will not recognize ROU assets and lease liabilities, and this includes not recognizing ROU assets and lease liabilities for existing short-term leases of those assets upon transition. The Partnership also elected the practical expedient to not separate lease and non-lease components for all of leases other than leases of real estate. As a result upon adoption, acting primarily as a lessee, the Partnership recognized approximately $22,233 ROU asset and approximately $25,223 lease liability on its statement of financial condition

1. General and Summary of Significant Accounting Policies *(continued)*

for its real estate and equipment operating leases. The adoption of the guidance did not have an impact on the Partnership's statement of operations, statement of changes in equity and statement of cash flows. See Note 15 – Leases for additional information on the Partnership's leasing arrangements.

New Accounting Pronouncements

In June 2016, the FASB issued ASU No. 2016-13, *Financial Instruments—Credit Losses (Topic 326)—Measurement of Credit Losses on Financial Instruments*, which requires financial assets that are measured at amortized cost to be presented, net of an allowance for credit losses, at the amount expected to be collected over their estimated life. Expected credit losses for newly recognized financial assets, as well as changes to credit losses during the period, are recognized in earnings. For certain purchased financial assets with deterioration in credit quality since origination ("PCD assets"), the initial allowance for expected credit losses will be recorded as an increase to the purchase price. Expected credit losses, including losses on off-balance-sheet exposures such as lending commitments, will be measured based on historical experience, current conditions and reasonable and supportable forecasts that affect the collectability of the reported amount. The new standard became effective for the Partnership beginning January 1, 2020, under a modified retrospective approach, and early adoption is permitted. In April 2019, the FASB issued ASU No. 2019-04, *Codification Improvements to Topic 326, Financial Instruments—Credit Losses, Topic 815, Derivatives and Hedging, and Topic 825, Financial Instruments*. The amendments to ASU No. 2016-13 clarify the scope of the credit losses standard and address guidance related to accrued interest receivable balances, recoveries, variable interest rates and prepayments, among other issues. In addition, in May 2019, the FASB issued ASU No. 2019-05, *Financial Instruments—Credit Losses (Topic 326): Targeted Transition Relief*. The amendments in this ASU allow entities, upon adoption of ASU No. 2016-13, to irrevocably elect the fair value option for financial instruments that were previously carried at amortized cost and are eligible for the fair value option under ASC 825-10, *Financial Instruments: Overall*. In November 2019, the FASB issued ASU No. 2019-11, *Codification Improvements to Topic 326, Financial Instruments—Credit Losses*. The amendments in this ASU require entities to include certain expected recoveries of the amortized cost basis previously written off, or expected to be written off, in the allowance for credit losses for PCD assets; provide transition relief related to troubled debt restructurings; allow entities to exclude accrued interest amounts from certain required disclosures; and clarify the requirements for applying the collateral maintenance practical expedient. The amendments in ASUs No. 2019-04, 2019-05 and 2019-11 are required to be adopted concurrently with the guidance in ASU No. 2016-13. The Partnership adopted the standards on their required effective date beginning January 1, 2020. The adoption of this guidance did not have a material impact on the Partnership's financial statements.

In August 2018, the FASB issued ASU 2018-13, *Fair Value Measurement (Topic 820): Disclosure Framework–Changes to the Disclosure Requirements for Fair Value Measurement*. The guidance is part of the FASB's disclosure framework project, whose objective and primary focus are to improve the effectiveness of disclosures in the notes to financial statements. The ASU eliminates, amends and adds certain disclosure requirements for fair value measurements. The FASB concluded that these changes improve the overall usefulness of the footnote disclosures for financial statement users and reduce cost for preparers. The new standard became effective for the

Partnership beginning January 1, 2020 and early adoption is permitted for eliminated and modified fair value measurement disclosures. Certain disclosures are required to be applied prospectively and other disclosures need to be adopted retrospectively in the period of adoption. As permitted by the transition guidance in the ASU, the Partnership early adopted, eliminated and modified disclosure requirements as of December 31, 2018 and adopted the remaining disclosure requirements effective January 1, 2020. The adoption of this standard did not impact the Partnership's financial statements.

1. General and Summary of Significant Accounting Policies *(continued)*

In December 2019, the FASB issued ASU No. 2019-12, *Income Taxes (Topic 740): Simplifying the Accounting for Income Taxes*. The ASU is part of the FASB's simplification initiative; and it is expected to reduce cost and complexity related to accounting for income taxes by eliminating certain exceptions to the guidance in ASC 740, *Income Taxes* related to the approach for intraperiod tax allocation, the methodology for calculating income taxes in an interim period, the allocation of consolidated income tax expense to separate financial statements of entities not subject to tax and the recognition of deferred tax liabilities for outside basis differences. The new guidance also simplifies aspects of the accounting for franchise taxes and enacted changes in tax laws or rates, and clarifies the accounting for transactions that result in a step-up in the tax basis of goodwill. The new standard will become effective for the Partnership beginning January 1, 2021 and, with certain exceptions, will be applied prospectively. Early adoption is permitted. Management is currently evaluating the impact of the new guidance on the Partnership's financial statements.

2. Fair Value Measurement

The Partnership's Financial instruments owned and Financial instruments sold, not yet purchased consisted of the following (in thousands):

	Financial instruments owned	Financial instruments sold, not yet purchased
As of December 31, 2019		
Agency mortgage backed securities	$ 3,574,819	$ 9,041
U.S. government agencies and other obligations	959,635	370,747
U.S. government treasuries	739,799	1,731,400
Mortgage and other asset backed securities	251,923	—
Equities	78,533	6,573
Corporate bonds	78,168	79,348
Swap agreements	18,288	—
Municipal bonds	15,598	46
Options	2,729	639
Futures	236	1
Total	$ 5,719,728	$ 2,197,795

(In Thousands)

2. Fair Value Measurement *(continued)*

The following tables set forth by level within the fair value hierarchy financial assets and liabilities accounted for at fair value under U.S. GAAP guidance at December 31, 2019:

	Assets at fair value at December 31, 2019				
Description	**Quoted prices in active markets for identical assets (Level 1)**	**Significant observable inputs (Level 2)**	**Significant unobservable inputs (Level 3)**	**Netting and collateral**	**Total**
Financial instruments owned:					
Agency mortgage backed securities	$ –	$ 3,574,819	$ –	$ –	$ 3,574,819
U.S. government agencies and other obligations	–	959,635	–	–	959,635
U.S. government treasuries	739,799	–	–	–	739,799
Mortgage and other asset backed securities	–	251,923	–	–	251,923
Equities	72,586	5,947	–	–	78,533
Corporate bonds	–	78,168	–	–	78,168
Swap agreements	–	18,288	–	–	18,288
Municipal bonds	–	15,598	–	–	15,598
Options	2,729	–	–	–	2,729
Futures	–	236	–	–	236
Total	$ 815,114	$ 4,904,614	$ –	$ –	$ 5,719,728

	Liabilities at fair value at December 31, 2019				
Description	**Quoted prices in active markets for identical assets (Level 1)**	**Significant observable inputs (Level 2)**	**Significant unobservable inputs (Level 3)**	**Netting and collateral**	**Total**
Financial instruments sold, not yet purchased:					
U.S. government treasuries	$ 1,731,400	$ –	$ –	$ –	$ 1,731,400
U.S. government agencies and other obligations	–	370,747	–	–	370,747
Corporate bonds	–	79,348	–	–	79,348
Agency mortgage backed securities	–	9,041	–	–	9,041
Equities	6,552	21	–	–	6,573
Options	639	–	–	–	639
Municipal bonds	–	46	–	–	46
Futures	–	1	–	–	1
Total	$ 1,738,591	$ 459,204	$ –	$ –	$ 2,197,795

2. Fair Value Measurement *(continued)*

Derivative Contracts – The Partnership does not designate any derivative contracts as hedges for accounting purposes. U.S. GAAP requires that an entity recognize all derivative contracts as either assets or liabilities in the statement of financial condition and measure those instruments at fair value. The fair value of all derivative contracts is recorded on a net–by–counterparty basis where a legal right to offset exists under an enforceable netting agreement.

The derivative contracts are recorded as part of Financial instruments owned and Financial instruments sold, not yet purchased in the Partnership's statement of financial condition as follows (in thousands):

	As of December 31, 2019		
Description	**Notional Amount[2]**	**Assets**	**Liabilities**
Options	$ 8,237,753	$ 2,729	$ 639
TBAs[1]	2,309,627	16,339	8,978
Swap agreements	2,602,000	18,288	–
Futures	1,879,762	236	1

(1) The fair value of TBA's is included in Agency mortgage backed securities in the Financial instruments owned and Financial instruments sold, not yet purchased tables above and the fair value hierarchy tables above.

(2) Notional amounts, which represent the sum of gross long and short derivative contracts, provide an indication of the volume of the firm's derivative activity and do not represent anticipated losses.

	As of December 31, 2019		
	Gross Amounts	**Gross Amounts Offset**	**Net Amounts Presented in the Statement of Financial Condition[2]**
Assets			
Swap agreements	$ 18,288	$ –	$ 18,288
TBAs[1]	16,339	–	16,339
Options	2,729	–	2,729
Futures	236	–	236
Total	$ 37,592	$ –	$ 37,592
Liabilities			
TBAs[1]	$ 8,978	$ –	$ 8,978
Options	639	–	639
Futures	1	–	1
Total	$ 9,618	$ –	$ 9,618

[1] The fair value of TBAs is included in Agency mortgage backed securities in the Financial instruments owned and Financial instruments sold, not yet purchased tables and fair value hierarchy tables above.
[2] There were no additional balances in gross amounts not offset as of December 31, 2019.

2. Fair Value Measurement *(continued)*

The change in fair value of these derivative contracts is reported as part of Principal transactions, net in the Partnership's statement of operations. The table below summarizes recognized gains and losses on derivative contracts for the year ended December 31, 2019:

Description		Year Ended December 31, 2019
Swap agreements	$	(64,940)
TBAs		(11,517)
Futures		(6,387)
Options		(2,798)
Loss, net	$	(85,642)

The gains and losses related to these derivatives are generally offset by gains and losses in other securities.

3. Receivables from and Payables to Broker–Dealers, Clearing Organizations, Customers and Related Broker–Dealers

Receivables from and Payables to broker-dealers and clearing organizations primarily represent amounts due on undelivered mortgage backed securities, government securities, equities and corporate bonds, cash on deposit with clearing organizations and receivables from clearing brokers.

At December 31, 2019, Receivables from and Payables to broker-dealers, clearing organizations, customers and related broker-dealers included the following (in thousands):

As of December 31, 2019	Receivables	Payables
Pending trades, net	$ 416,654	$ –
Contract values of fails to deliver/receive	92,652	69,178
Clearing brokers and clearing organizations	77,117	61,543
Receivables/payables from/to customers	25,534	150,096
Accrued commissions receivable, net	1,504	–
Receivables/payables from/to broker-dealers	–	25,131
Other receivables/payables from/to broker-dealers and related broker-dealers	54,113	–
Total	$ 667,574	$ 305,948

As of December 31, 2019, the Partnership had payables to affiliated broker-dealers of $3.5 million (see Note 7 – Related Party Transactions, for additional information related to these payables).

Receivables from and Payables to customers primarily represent open fails to deliver and fails to receive transactions, respectively. Substantially all open fails to deliver and fails to receive transactions as of December 31, 2019 have subsequently settled at the contracted amounts.

Receivables from and Payables to customers also include amounts due on cash transactions.

4. Securities Financing Transactions

The following tables show the gross and net contract amounts of collateralized agreements and collateralized financings at December 31, 2019 (in thousands):

	As of December 31, 2019					
	Assets			Liabilities		
	Securities purchased under agreements to resell	**Securities borrowed**	**Total collateralized agreements**	**Securities sold under agreements to repurchase**	**Securities loaned**	**Total collateralized financings**
Gross amount	$ 21,172,644	$ 1,862,498	$ 23,035,142	$ 25,845,447	$ 731,386	$ 26,576,833
Less: gross amount offsets	9,748,944	525,000	10,273,944	10,273,944	–	10,273,944
Net amount presented in the Partnership's statement of financial condition	11,423,700	1,337,498	12,761,198	15,571,503	731,386	16,302,889
Less: amount not offset in the Partnership's statement of financial condition						
Collateral[1]	11,423,700	1,337,498	12,761,198	15,571,503	731,386	16,302,889
Net amount	$ –	$ –	$ –	$ –	$ –	$ –

[1] Represents amounts which are not permitted to be offset on the Partnership's statement of financial condition in accordance with ASC 210-20 but which provide the Partnership with the right of offset in the event of default.

As of December 31, 2019, the Partnership had securities borrowed transactions of $112.4 million with an affiliate. As of December 31, 2019, the Partnership had securities loaned transactions of $68.1 million with an affiliate. As of December 31, 2019, the Partnership had repurchase agreements of $355.6 million with affiliates. As of December 31, 2019 the Partnership had resale agreements of $23.9 million with affiliates.

4. Securities Financing Transactions *(continued)*

The following table shows collateralized financings by class of collateral pledged and maturity date (in thousands):

	Overnight and continuous	2 to 30 days	31 to 90 days	91 days to 1 year	Greater than 1 year	Total
Securities sold under agreements to repurchase						
U.S. government and agency obligations	$ 5,559,529	$8,953,242	$129,324	$ –	$ –	$14,642,095
Securities backed by commercial real estate	55,180	543	–	23,640	546,586	625,949
Corporate debt securities	48,321	–	–	–	–	48,321
Municipal obligations	10,031	–	403	–	–	10,434
Equities	–	12,302	–	–	–	12,302
Other debt obligations	232,402	–	–	–	–	232,402
Total	$ 5,905,463	$8,966,087	$129,727	$ 23,640	$ 546,586	$15,571,503
Securities loaned						
Equities	731,064	–	–	–	–	731,064
Corporate debt securities	322	–	–	–	–	322
Total	731,386	–	–	–	–	731,386
Total collateralized financings	$ 6,636,849	$8,966,087	$129,727	$ 23,640	$ 546,586	$16,302,889
Gross amount of recognized liabilities for collateralized financings						$26,576,833
Amounts related to agreements not included in offsetting disclosure						$10,273,944

In connection with securities financing transactions, the Partnership accepts collateral (U.S. government and agency obligations, corporate obligations, as well as equity securities) that it is permitted by contract or custom to sell or repledge. Such collateral consisted primarily of securities received from customers and other broker-dealers in connection with both reverse repurchase agreements and securities borrowed transactions. As of December 31, 2019, the gross and net fair value of such collateral received from counterparties was $25.6 billion and $15.4 billion, respectively. As of December 31, 2019, the gross and net fair value of such collateral loaned to counterparties was $29.2 billion and $19.0 billion, respectively. Additionally, a portion of collateral received is used by the Partnership to cover short sales, to obtain financing, and to satisfy deposit requirements at clearing organizations. At December 31, 2019, collateral with fair value of $1.6 billion had been delivered against securities sold short or repledged by the Partnership.

5. Fixed Assets, net

Fixed assets, net consisted of the following (in thousands):

		December 31, 2019
Leasehold improvements and other fixed assets	$	10,236
Computer and communication equipment		4,586
Software, including software development costs		3,192
		18,014
Less: accumulated depreciation and amortization		12,945
Fixed assets, net	$	5,069

Depreciation and amortization expense, excluding software development costs, was $1.3 million for the year ended December 31, 2019, and is included in Occupancy and equipment in the Partnership's statement of operations.

The carrying value of the capitalized software development costs amounted to $2.4 million as of December 31, 2019. Amortization expense related to software development costs totaled $0.8 million for the year ended December 31, 2019, and is included as part of Occupancy and equipment in the Partnership's statement of operations.

6. Commitments, Contingencies and Guarantees

Guarantees – The Partnership is a member of various securities clearing organizations and exchanges. Under the standard membership agreement(s), members are required to guarantee the performance of other members and, accordingly, if another member becomes unable to satisfy its obligations to the clearing organizations or exchange, all other members would be required to meet the shortfall.

In addition, the Partnership has entered into non-financial guarantees on behalf of BGC Partners, Inc. ("BGCP"), a subsidiary of Cantor, for various U.S. and non-U.S. based brokers engaging in interest rate swap transactions with U.S.-based counterparties for regulatory purposes. BGCP is required to indemnify the Partnership for any amounts paid on their behalf pursuant to this arrangement. The Partnership's liability under these arrangements is not quantifiable. However, the potential for the Partnership to be required to make payments under these arrangements is remote. Accordingly, no liability was required to be recorded in the Partnership's statement of financial condition.

Legal Matters – In the ordinary course of business, various legal actions are brought and may be pending against the Partnership. The Partnership is also involved, from time to time, in other reviews, investigations and proceedings by governmental and self-regulatory agencies (both formal and informal) regarding the Partnership's business. Any such actions may result in judgments, settlements, fines, penalties, injunctions or other relief.

In regard to GSE Bond Anti-Trust Litigation, (S.D.N.Y. Civ. Case No. 1:19-cv-01704). Cantor Fitzgerald & Co. was one of sixteen named defendants in a class action asserting an anti-trust cause of action based on alleged price fixing by underwriters of agency bonds. The defendants moved to dismiss the Consolidated Amended Complaint, the motion was denied by the court, and the Partnership subsequently filed an answer denying all substantive allegations. On or about December 15, 2019, a group of twelve of defendants, including the Partnership, reached a settlement with plaintiffs to resolve all claims. These twelve firms are collectively contributing $250.0 million to a settlement fund. The contribution made by each firm is subject to a confidentiality agreement. The Partnership's contribution to the settlement fund was approximately $5.1 million. The twelve firms did not admit to any wrongdoing in connection with the settlement. On December 16, 2019, plaintiffs filed a motion requesting that the Court approve the proposed settlement. A hearing on the motion for preliminary approval took place on January 30, 2020. The

6. Commitments, Contingencies and Guarantees ***(continued)***

Court issued an order on February 3, 2020 preliminarily approving the settlement agreement. Under the terms of the settlement agreement, the settlement amounts are due to Plaintiffs by February 18, 2020. The Court has scheduled a final approval hearing for June 9, 2020.

Employment and Competitor-Related Litigation – From time to time, the Partnership and its affiliates are involved in litigation, claims and arbitrations in the U.S. and internationally, relating to various employment matters, including with respect to termination of employment, hiring of employees currently or previously employed by competitors, terms and conditions of employment and other matters. In light of the competitive nature of the brokerage industry, litigation, claims, and arbitration between competitors regarding employee hiring are not uncommon.

The Partnership is unable to estimate a possible loss or range of loss in connection with specific matters beyond its current accrual and any other amounts disclosed. Management believes that, based on currently available information, the final outcome of these current pending matters will not have a material adverse effect on the Partnership's statement of financial condition, results of operations, or cash flows.

Risks and Uncertainties – The Partnership generates revenue by providing securities trading and brokerage services to institutional customers and by executing, and in some cases, clearing transactions for institutional counterparties. Revenue for these services is transaction based. As a result, the Partnership's revenue could vary based on the transaction volume of the global financial markets. Additionally, the Partnership's financing is sensitive to interest rate fluctuations and could have an impact on the Partnership's overall profitability.

Financing – The Partnership has a commitment to provide a subordinated revolving line of credit of up to $5.0 million to an affiliate. At December 31, 2019, there was an outstanding balance of $5.0 million, which is included in Receivables from related parties in the Partnership's statement of financial condition. The Partnership recognized $0.5 million in interest related to this subordinated borrowing, which is included in Interest income in the Partnership's statement of operations. The scheduled maturity date on the borrowing is July 12, 2020.

At December 31, 2019, in connection with its financing activities, the Partnership had commitments to enter into or extend resale agreements. At December 31, 2019, there were $4.6 billion in resale commitments. At December 31, 2019 there were $2.4 billion in repurchase commitments.

7. Related Party Transactions

The Partnership's Receivables from and Payables to related parties represent uncollateralized advances and amounts for support services provided.

The Partnership provided investment banking services to affiliates in the amount of $3.4 million for the year ended December 31, 2019, which is included in Investment banking and advisory services in the Partnership's statement of operations and the uncollected balances are included in Receivables from related parties in the Partnership's statement of financial condition.

The Partnership provided services to affiliates for the sale of Real Estate Investment Trusts and Delaware Statutory Trusts. For the year ended December 31, 2019, the Partnership charged $5.2 million to affiliates, which is reported in Other revenue and Commissions in the Partnership's statement of operations and the uncollected balances are included in Receivables from related parties in the Partnership's statement of financial condition.

7. Related Party Transactions *(continued)*

The Partnership provides clearing and settlement services for a fee, under contractual agreements, to affiliates. For the year ended December 31, 2019, the Partnership charged $0.3 million to affiliates, which is reported in Other revenue in the Partnership's statement of operations and the uncollected balances are included in Receivables from related parties in the Partnership's statement of financial condition.

The Partnership has a commitment to provide a subordinated revolving line of credit to an affiliate and also has entered into guarantees on behalf of BGCP. See Note 6 – Commitments, Contingencies, and Guarantees for further detail related to these transactions.

Cantor and other affiliates provide the Partnership with administrative services and other support for which they charge the Partnership based on the cost of providing such services. Such support includes allocations for utilization of fixed assets, accounting, treasury, operations, human resources, legal and technology services. Under an Amended and Restated Joint Services Agreement between the Partnership and BGCP, BGCP provides network, data center, server administration support, and other technology services to the Partnership. BGCP charges the Partnership for these services commensurate with the cost of providing these services. For the year ended December 31, 2019, the Partnership was charged $52.9 million by Cantor and BGC affiliates for such services, which is included in Fees to related parties in the Partnership's statement of operations. In addition, for the year ended December 31, 2019, the Partnership was charged $4.9 million for rent allocations, utilities, maintenance and other occupancy related costs which are reported in Occupancy and equipment in the Partnership's statement of operations and the unpaid balances are included in Payables to related parties in the Partnership's statement of financial condition.

An affiliate of the Partnership enters into various agreements with certain of its employees whereby these employees receive forgivable loans. Amortization expense related to these employee loans is charged to the Partnership and included in Compensation and employee benefits in the Partnership's statement of operations and the unpaid balances are included in Payables to related parties in the Partnership's statement of financial condition. The Partnership recorded $30.8 million of compensation expense for the year ended December 31, 2019.

The Partnership has subordinate borrowings with an affiliate. See Note 12 – Subordinated Borrowings for further detail related to these transactions.

8. Grant Units

CFLP provides grant units to certain employees of the Partnership that entitle the employees to participate in quarterly distributions of Cantor's income and to receive post-termination payments equal to the notional value of the grant generally in four equal yearly installments after the employee's termination provided that the employee has not engaged in any competitive activity with the Partnership or its affiliates prior to the date each payment is due. Typically, the grant units vest during the period of requisite service up to four years. Under U.S. GAAP guidance the grant units are re-measured at the end of every reporting period, and accordingly, any changes in the fair value of such post-termination payments are allocated to the Partnership. For the year ended December 31, 2019, the Partnership recognized compensation expense for such awards and earnings on grant units that were held by Partnership employees of $37.9 million, which is included in Compensation and employee benefits in the Partnership's statement of operations and the related grant liability is recorded on CFLP.

9. Regulatory Requirements

As a registered broker-dealer, the Partnership is subject to the SEC's Uniform Net Capital Rule ("Rule 15c3–1"). The Partnership has elected to compute its net capital using the alternative method, which requires the Partnership to maintain minimum net capital equal to the greater of $1.5 million, or 2% of aggregate debit balances included in SEC Customer Protection Rule ("Rule 15c3–3") customer reserve computation, plus excess margin collected on resale agreements, as defined. As a registered FCM, the Partnership is subject to Regulation 1.17 of the CFTC, which requires the Partnership to maintain minimum adjusted net capital equal to the greater of 8% of customer and non–customer risk maintenance margin requirement, or $1.0 million. At December 31, 2019, the Partnership had net capital, as defined, of $370.1 million, which was $368.6 million in excess of its required net capital.

The Partnership is required to perform a computation of the customer reserve requirements pursuant to Rule 15c3–3. As of December 31, 2019, the Partnership segregated qualified securities with a value of $36.4 million into a special reserve account in addition to $135.5 million in cash for the exclusive benefit of customers, which is included in Cash and securities segregated under federal and other regulations in the Partnership's statement of financial condition.

The Partnership is also required to perform a computation of reserve requirements for Proprietary Accounts of Broker-Dealers ("PAB") pursuant to Rule 15c3–3. As of December 31, 2019, the Partnership segregated qualified securities with a value of $10.7 million into a special reserve account for the exclusive benefit of PAB customers.

As an FCM, the Partnership is required to perform computations of the requirements of Section 4d(2) and Regulation 30.7 under the Commodity Exchange Act. As of December 31, 2019, the Partnership had assets segregated, secured and held in separate accounts totaling $5.0 million, all of which was cash and exceeded requirements by $5.0 million.

10. Financial Instruments and Off-Balance Sheet Risk

Credit Risk – Credit risk arises from potential non-performance by counterparties. The Partnership has established policies and procedures to manage the exposure to credit risk. The Partnership maintains a thorough credit approval process to limit exposure to counterparty risk and employ stringent monitoring to control the counterparty risk for the matched principal businesses. The Partnership's account opening and counterparty approval process includes verification of key customer identification, anti-money laundering verification checks and a credit review of financial and operating data. The credit review process includes establishing an internal rating and any other information deemed necessary to make an informed credit decision, which may include financials, correspondence, due diligence calls and a visit to the entity's premises, as necessary.

Financial Instruments with Off–Balance–Sheet Risk – The Partnership enters into TBAs to facilitate customer transactions and provide an economic hedge for the Partnership's trading inventory. The Partnership also enters into swaps and futures contract to provide an economic hedge for the Partnership's trading inventory. The Partnership also enters into option contracts to facilitate customer transactions.

Such transactions may expose the Partnership to significant off–balance sheet risk in the event the collateral is not sufficient to fully cover losses, which customers may incur. In the event the customer fails to satisfy its obligations, the Partnership may be required to purchase or sell the collateral at prevailing market prices in order to fulfill the customer's obligations. The Partnership's customer financing and securities settlement activities may require the Partnership to pledge customer securities as collateral in support of various secured financing sources, such as securities loaned.

10. Financial Instruments and Off-Balance Sheet Risk *(continued)*

Trading Activities – The Partnership's primary activities include securities sales and trading services to institutional clients and other broker-dealers. To facilitate customer transactions, the Partnership will take principal positions in financial instruments, such as government, agency mortgage backed securities, corporate obligations, equities and options facilitation.

Market Risk – In the normal course of business, the Partnership enters into transactions to purchase inventory securities and sell securities not yet purchased, which are recorded as assets and liabilities in the Partnership's unaudited statement of financial condition. Market risk is the potential loss the Partnership may incur as a result of changes in the market or fair value of a particular financial instrument. The Partnership's exposure to market risk is determined by a number of factors, including size, duration, composition and diversification of positions held, the absolute and relative level of interest rates and foreign currency exchange rates, as well as market volatility and liquidity. The Partnership manages market risk by setting and monitoring adherence to risk limits, including hedging, aging, notional and concentration limits.

Operational Risk – In providing a comprehensive array of products and services, the Partnership may be exposed to operational risk. Operational risk may result from, but is not limited to, errors related to transaction processing, breaches of internal control systems and compliance requirements, fraud by employees or persons outside the Partnership or business interruption due to systems failures or other events.

Operational risk may also include breaches of the Partnership's technology and information systems resulting from unauthorized access to confidential information or from internal or external threats, such as cyber attacks. Operational risk also includes potential legal or regulatory actions that could arise as a result of noncompliance with applicable laws and/or regulatory requirements. In the case of an operational event, the Partnership could suffer a financial loss as well as reputational damage.

11. Collateralized Borrowings

The Partnership has a $150.0 million committed, secured bank facility that permits the Partnership to finance a broad array of U.S. fixed income and equity securities. The facility is structured as a 364 day senior secured revolving credit facility involving two banks. The borrowings are guaranteed by CFLP. The facility is used on a periodic basis to finance inventory. The facility is set to mature on April 30, 2020. There were no borrowings outstanding under the facility at December 31, 2019. The interest rate on this facility is one month LIBOR plus 125 basis points. For the year ended December 31, 2019, the Partnership recorded $1.3 million of fees and interest expense for the use of the facility, which is included in Interest expense in the Partnership's statement of operations.

12. Subordinated Borrowings

During June 2011, the Partnership entered into two subordinated borrowing agreements with CFLP and CFS in the amounts of $1.3 million and $128.7 million, respectively. The rate of interest on both borrowings is three month LIBOR plus 600 basis points, maturing June 15, 2021.

During December 2013, the Partnership entered into an additional subordinated borrowing agreement with CFLP in the amount of $75.0 million. The rate of interest on the borrowing is three month LIBOR plus 600 basis points, maturing December 31, 2021.

For the year ended December 31, 2019, the Partnership recorded $17.3 million of interest expense for the subordinated borrowings, which is included in Interest expense in the Partnership's statement of operations and the unpaid balances are included in Payables to related parties in the Partnership's statement of financial condition. These borrowings are subordinated to the claims of general creditors, approved by FINRA and other regulators, and are included in the Partnership's calculation of net capital and the capital requirements under FINRA Rule 4120.

13. Income Taxes

The components of the income tax expense for the year ended December 31, 2019 are summarized below (in thousands):

	Current	Deferred	Total
Local	$ 2,646	$ (2,492)	$ 154
Total	$ 2,646	$ (2,492)	$ 154

As of December 31, 2019, the Partnership had net deferred tax assets of $7,746, which consists primarily of book-tax differences related to grant units and accrued compensation. The Partnership had an effective tax rate of 0.4%, which is different from the NYC UBT statutory rate of 4.0% due primarily to certain discrete tax adjustments related to the revaluation of deferred taxes recorded in the period and by business income allocated outside of NYC.

The Partnership analyzed its tax positions with respect to applicable income tax issues for open tax years (in each respective jurisdiction) and determined that there were no material tax liabilities as of December 31, 2019. The Partnership recognizes interest and penalties, if any, related to unrecognized tax benefits in Provision for income taxes in the Partnership's statement of operations. As of December 31, 2019, the Partnership did not accrue any interest or penalties. The Partnership is presently under UBT examination for the 2006 through 2010 years. The Partnership is presently not under examination by the United States federal authorities and is no longer subject to examination by US federal and state and local authorities for the years prior to 2016 and 2014, respectively.

The Partnership is taxed as a U.S. partnership. Under applicable federal and state laws, the taxable income or loss of a general partnership is allocated to each partner based upon its ownership interest. Each partner's tax status, in turn, determines the appropriate income tax for its allocated share of taxable income or loss. The Partnership is subject to the Unincorporated Business Tax ("UBT") in New York City ("NYC") for which it records an income tax provision.

14. Revenue from Contracts with Customers

The following table presents the Partnership's total revenues separated between revenue from contracts with customers and other sources of revenue (in thousands):

		Year Ended December 31, 2019
Revenue from contracts with customers:		
Investment banking and advisory services	$	191,519
Commissions		65,871
Other revenue		15,858
Total revenues from contracts with customers		273,248
Other sources of revenue:		
Principal transactions, net		128,492
Interest income		1,170,593
Other revenue		556
Total revenues	$	1,572,889

See Note 1 – General and Summary of Significant Accounting Policies for detailed information on the recognition of the Partnership's revenue from contracts with customers.

Contract Balances – The timing of the Partnership's revenue recognition may differ from the timing of payment by its customers. The Partnership records a receivable when revenue is recognized prior to payment and the Partnership has an unconditional right to payment. Alternatively, when payment precedes the provision of the related services, the Partnership records deferred revenue until the performance obligations are satisfied.

The Partnership had receivables related to revenue from contracts with customers of $1.5 million at December 31, 2019. The Partnership had no impairments related to these receivables during the year ended December 31, 2019.

The Partnership's deferred revenue primarily relates to customers paying advance or billed in advance where the performance obligation has not yet been satisfied. There was no deferred revenue at December 31, 2019.

15. Leases

Contract Costs – The Partnership capitalizes costs to fulfill contracts associated with different lines of its business where the revenue is recognized at a point in time and the costs are determined to be recoverable. Capitalized costs to fulfill a contract are recognized at the point in time that the related revenue is recognized. At December 31, 2019, there were no capitalized costs recorded to fulfill a contract.

The Partnership, acting as a lessee, has operating leases primarily relating to office space and office equipment. The leases have remaining lease terms of 0.5 years to 8.0 years, some of which include options to extend the leases in 1 to 5 year increments for up to 20 years. Renewal periods are included in the lease term only when renewal is reasonably certain, which is a high threshold and requires management to apply judgment to determine the appropriate lease term. Certain leases also include periods covered by an option to terminate the lease if the Partnership is reasonably certain not to exercise the termination option. The Partnership recognizes lease expense for its operating leases on a straight-line basis over the lease term and variable lease expense not included in the lease payment measurement is recognized as incurred. All leases were classified as operating leases as of December 31, 2019.

15. Leases *(continued)*

Pursuant to the accounting policy election, leases with an initial term of twelve months or less are not recognized on the balance sheet.

ASC 842, *Leases* requires the Partnership to make certain assumptions and judgements in applying the guidance, including determining whether an arrangement includes a lease, determining the term of a lease when the contract has renewal or cancelation provisions, and determining the discount rate.

The Partnership determines whether an arrangement is or includes a lease at contract inception by evaluating whether the contract conveys the right to the control the use of an identified asset for a period of time in exchange for consideration. If the Partnership has the right to obtain substantially all of the economic benefits from, and can direct the use of, the identified asset for a period of time, the Partnership accounts for the identified asset as a lease. The Partnership has elected the practical expedient to not separate lease and non-lease components for all leases other than real estate leases. The primary non-lease component that is combined with a lease component is operating expenses such as utilities, maintenance or management fees.

As the rate implicit in the lease is not usually available, the Partnership used an incremental borrowing rate ("IBR") based on the information available at the adoption date of the new leases standard in determining the present value of lease payments for existing leases. The Partnership elected to use a portfolio approach to IBR, applying corporate bond rates to the leases. The Partnership calculated the appropriate rates with reference to the lease term and lease currency. The Partnership will use information available at the lease commencement date to determine the discount rate for any new leases.

The Partnership subleases certain real estate to third parties. The value of these commitments is not material to the Partnership's financial statements.

As of December 31, 2019 the Partnership does not have any leases that have not yet commenced but that create significant rights and obligations.

Supplemental information related to the Partnership's operating leases is as follows (in thousands):

	Classification in Statement of Financial Condition		**As of December 31, 2019**
Assets			
Operating lease right-of-use-assets	Other assets	$	20,349
Liabilities			
Operating lease liabilities	Accounts payable and accrued liabilities	$	23,255

	As of December 31, 2019
Weighted-average remaining lease term	
Operating leases (years)	6
Weighted-average discount rate	
Operating leases	6.0%

15. Leases *(continued)*

The components of lease expense are as follows (in thousands):

	Classification in Statement of Operations	Year Ended December 31, 2019
Operating lease cost	Occupancy and equipment	$ 4,941

The following table shows the Partnership's maturity analysis of its operating lease liabilities (in thousands):

Years Ending December 31,	Operating Leases
2020	$ 5,076
2021	4,720
2022	4,276
2023	3,362
2024	3,178
Thereafter	7,677
Total lease payments	28,289
Less: Interest	5,034
Present value of lease liabilities	$ 23,255

The following table shows cash flow information related to lease liabilities (in thousands):

	Year Ended December 31, 2019
Cash paid for obligations included in the measurement of lease liabilities	$ 5,058

16. Subsequent Events

The Partnership has evaluated subsequent events through the date the financial statements were issued. There have been no additional material subsequent events that would require recognition in these financial statements or disclosure in the notes to the financial statements.

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Supplementary Report of Independent Registered Public Accounting Firm on Internal Control Required by CFTC Regulation 1.16

The Partners and Management of Cantor Fitzgerald & Co.

In planning and performing our audit of the financial statements of Cantor Fitzgerald & Co. (the Partnership) as of and for the year ended December 31, 2019, in accordance with the standards of the Public Company Accounting Oversight Board (United States), we considered its internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Partnership's internal control. Accordingly, we do not express an opinion on the effectiveness of the Partnership's internal control.

Also, as required by Regulation 1.16 of the Commodity Futures Trading Commission (CFTC), we have made a study of the practices and procedures followed by the Partnership, including consideration of control activities for safeguarding customer and firm assets. This study included tests of such practices and procedures that we considered relevant to the objectives stated in Regulation 1.16 in making the following:

1. The periodic computations of minimum financial requirements pursuant to Regulation 1.17
2. The daily computations of the segregation requirements of Section 4d(a)(2) of the Commodity Exchange Act and the regulations thereunder, and the segregation of funds based on such computations
3. The daily computations of the foreign futures and foreign options secured amount requirements pursuant to Regulation 30.7 of the CFTC

The management of the Partnership is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls, and of the practices and procedures referred to in the preceding paragraph, and to assess whether those practices and procedures can be expected to achieve the CFTC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Partnership has responsibility are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Regulation 1.16(d)(2) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A deficiency in internal control over financial reporting exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those responsible for oversight of the Partnership's financial reporting.

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A material weakness is a deficiency, or combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the Partnership's annual or interim financial statements will not be prevented or detected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and was not designed to identify all deficiencies in internal control that might be deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control and control activities for safeguarding customer and firm assets that we consider to be material weaknesses, as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the CFTC to be adequate for their purposes in accordance with the Commodity Exchange Act and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Partnership's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2019, to meet the CFTC's objectives.

This report is intended solely for the information and use of the Partners, management, the CFTC, Financial Industry Regulatory Authority, other regulatory agencies that rely on Regulation 1.16 of the CFTC in their regulation of registered futures commission merchants, and is not intended to be and should not be used by anyone other than these specified parties.

Ernst & Young LLP

February 28, 2020

Supplemental Schedules

Cantor Fitzgerald & Co.

Computation of Net Capital (Alternative Method) for Brokers and Dealers Pursuant to Rule 15c3–1 Under the Securities Exchange Act of 1934

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
Ownership equity and additions to:		
Regulatory capital:		
Partners' capital	$	508,554
Liabilities subordinated to claims of general creditors allowable in computation of net capital		205,000
Total equity and additions to equity		713,554
Deductions and/or charges:		
Non–allowable assets:		
Receivables from related parties		7,179
Fixed assets, net		5,069
Financial instruments owned		33,751
Receivables from broker-dealers, clearing organizations, customers and related broker-dealers		2,232
Other assets		55,162
Total non-allowable assets		103,393
Aged fails to deliver		883
Commodities future contracts		4,574
Other deductions and charges		63,136
Total deductions and/or charges		171,986
Net capital before haircuts on securities positions		541,568
Haircuts on securities positions:		
U.S. and Canadian government obligations		126,654
State and municipal government obligations		1,035
Corporate obligations		23,746
Stocks and warrants		15,472
Other securities		4,517
Total haircuts		171,424
Net capital		370,144
Less minimum net capital required to be maintained (the greater of $1,500 or 2% of aggregate debits or 8% of customer and non-customer risk maintenance margin requirement)		1,500
Excess net capital	$	368,644

There are no material differences between this audited computation of net capital and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing amended February 26, 2020.

Cantor Fitzgerald & Co.

Computation for Determination of Customer Accounts Reserve Requirements for Brokers and Dealers Pursuant to Rule 15c3–3 Under the Securities Exchange Act of 1934

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
Credit balances		
Free credit balances and other credit balances in customers' security accounts	$	122,622
Monies borrowed collateralized by securities carried for the accounts of customers		-
Monies payable against securities loaned		-
Customers' securities failed to receive		7,538
Credit balances in firm accounts that are attributable to principal sales to customers		8,244
Market value of short securities and credits (not to be offset by longs or by debits) in all suspense accounts over 30 calendar days		2,605
Total credit items		141,009
Debit balances		
Debit balances in customers' cash and margin accounts, excluding unsecured accounts and accounts doubtful of collection		15,276
Securities borrowed to effectuate short sales by customers and securities borrowed to make delivery on customers' securities failed to deliver		2,070
Fails to deliver of customers' securities not older than 30 calendar days		30,914
Margin required and on deposit with the Options Clearing Corporation for all option contracts written of purchased		-
Aggregate debit items		48,260
Less 3% of aggregate debit items		1,448
Total 15c3–3 debits		46,812
Reserve computation		
Excess of total credits over debits	$	94,196
The value of the cash and securities held on deposit in reserve bank accounts at December 31, 2019		171,850
Amount of withdrawal on January 03, 2020		(36,378)
New amount in reserve bank account on January 03, 2020	$	135,472

There are no material differences between this audited computation for determination of customer accounts reserve requirements and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended on February 26, 2020.

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Cantor Fitzgerald & Co.
Computation for Determination of PAB
Reserve Requirements for Brokers and Dealers Pursuant to Rule 15c3-3
Under the Securities Exchange Act of 1934

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
Credit balances		
Free credit balances and other credit balances in proprietary accounts of broker-dealers ("PAB")	$	5,647
Monies payable against PAB securities loaned		42
Credit balance in firm accounts which are attributable to principal sales		150
Total PAB credits		5,839
Debit balances		
Debit balances in PAB excluding unsecured accounts and accounts doubtful of collection		-
Total PAB debits		-
Reserve computation		
Excess of total PAB credits over total PAB debits		5,839
Total PAB reserve requirement	$	5,839
The value of the securities held on deposit in PAB reserve bank account at December 31, 2019	$	10,674
Amount of deposit on January 03, 2020		48
New amount in PAB reserve bank account on January 03, 2020	$	10,722

There are no material differences between this audited computation for determination of PAB reserve requirements and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended on February 26, 2020.

Cantor Fitzgerald & Co.

Information Relating to the Possession or Control Requirements for Brokers and Dealers Pursuant to Rule 15c3–3 Under the Securities Exchange Act of 1934

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
State the market value and the number of items.		
1. Customers' fully paid securities and excess margin securities not in the Partnership's possession or control as of December 31, 2019 for which instructions to reduce to possession or control had been issued as of December 31, 2019 but for which the required action was not taken by the Partnership within the time frames specified under Rule 15c3–3.	$	–
Number of items		–
2. Customers' fully paid securities and excess margin securities for which instructions to reduce to possession or control had not been issued as of December 31, 2019, excluding items arising from "temporary lags which result from normal business operations" as permitted under Rule 15c3–3.	$	–
Number of items		–

There are no material differences between this audited information relating to the possession or control requirements and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.

Cantor Fitzgerald & Co.

Computation of CFTC Minimum Net Capital Requirement

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
Net Capital Required		
A. Risk - based requirement		
Amount of customer risk maintenance margin requirement	$	–
8% of customer risk maintenance margin requirement		–
Amount of non-customer risk maintenance margin requirement	$	8,368
8% of non-customer risk maintenance margin requirement		669
Minimum dollar amount requirement	$	1,000
Minimum CFTC net capital requirement	$	1,000

There are no material differences between this audited information relating to the computation of CFTC minimum net capital and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.

Cantor Fitzgerald & Co.

Statement of Cleared Swaps Customer Segregation Requirements and Funds in Cleared Swaps Customer Accounts Under 4D(F) of the Commodity Exchange Act

December 31, 2019

(In Thousands)

		Amended FOCUS Filed February 26, 2020
Cleared OTC Derivatives Customer Requirements		
Net ledger balance		
Cash	$	–
Securities (at market)		–
Net unrealized profit (loss) in open cleared swaps		–
Cleared swaps options		–
Market value of open cleared swaps option contracts purchased		–
Market value of open cleared swaps option contracts (sold)		–
Net equity (deficit)		–
Accounts liquidating to a deficit and accounts with debit balances		–
Amount required to be segregated for cleared swaps customers		–
Funds in Cleared Swaps Customer Segregated Accounts		
Deposited in cleared swaps customer segregated accounts at banks		
Cash		–
Securities representing investments of cleared swaps customers' funds (at market)		–
Securities held for particular cleared swaps customers in lieu of cash (at market)		–
Margins on deposit with derivatives clearing organizations in cleared swaps customer segregated accounts		
Cash		–
Securities representing investments of cleared swaps customers' funds (at market)		–
Securities held for particular cleared swaps customers in lieu of cash (at market)		–
Net settlement from (to) derivatives clearing organizations		–
Cleared swap options		
Value of open cleared swaps long option contracts		–
Value of open cleared swaps short option contracts		–
Net equities with other FCMs		–
Net liquidating entity		–
Securities representing investments of cleared swaps customers' funds (at market)		–
Securities held for particular cleared swaps customers in lieu of cash (at market)		–
Cleared swaps customer funds on hand		–
Total amount in cleared swaps customer segregation		–
Excess (deficiency) funds in segregation	$	–

There are no material differences between this audited statement of cleared swaps customer segregation requirements and funds in cleared swaps customer accounts and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.

Cantor Fitzgerald & Co.

Schedule of Segregation Requirements and Funds in Segregation for Customers Trading on U.S. Commodity Exchanges

December 31, 2019

(In Thousands)

	Amended Part II FOCUS Filed February 26, 2020
Segregation requirements	
Net ledger balances	
Cash	$ –
Securities (at market value)	–
Net unrealized profit (loss) on open futures contracts traded on a contract market	–
Exchange traded options:	
Add: Market value of open option contracts purchased on contract market	–
Deduct: Market value of open option contracts granted (sold) on contract market	–
Net equity and amount required to be segregated	–
Funds on deposit in segregation	
Deposited in segregated funds bank accounts:	
Cash	4,970
Securities held for particular customers or option customers in lieu of cash (at market value)	–
Margins on deposit with clearing organizations of contract markets:	
Cash	–
Securities held for particular customers or option customers in lieu of cash (at market value)	–
Settlement due from (to) clearing organizations of contract markets	–
Exchange traded options:	
Add: Unrealized receivable for contracts purchased on contract markets	–
Deduct: Unrealized obligations for contracts granted (sold)	–
Net equities with other FCMs	–
Total amount in segregation	4,970
Excess funds in segregation	$ 4,970

There are no material differences between this audited schedule of segregation requirements and funds in segregation for customers trading on U.S. commodity exchanges and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.

Cantor Fitzgerald & Co.

Schedule of Segregation Requirements and Funds in Segregation for Customers' Dealer Options Accounts

December 31, 2019

(In Thousands)

		Amended Part II FOCUS Filed February 26, 2020
Amount required to be segregated in accordance with commission regulated 32.6		$ –
Funds in segregated accounts		
Cash	$ –	
Securities (at market)	–	
Total		–
Excess (deficiency) funds in segregation		$ –

There are no material differences between this audited schedule of segregation requirements and funds in segregation for customers' dealer options accounts and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.

Cantor Fitzgerald & Co

Statement of Secured Amounts and Funds Held in Separate Accounts for
Foreign Futures and Foreign Options Customers
Pursuant To Commission Regulation 30.7

December 31, 2019

(In Thousands)

1.	Amount to be set aside in separate section 30.7 accounts	$ –
2.	Total funds in separate section 30.7 accounts	$ –
3.	Excess (deficiency) - (subtract line 1 from line 2)	$ –

There are no material differences between this audited statement of secured amounts and funds held in separate accounts pursuant to commission regulation 30.7 and the corresponding computation included in the Partnership's unaudited December 31, 2019 amended Part II FOCUS filing, amended February 26, 2020.