



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

December 18, 2024

Molly Strader Fruit  
VP & Corporate Controller  
Archer-Daniels-Midland Co  
77 West Wacker Drive  
Suite 4600  
Chicago, IL 60601

**Re: Archer-Daniels-Midland Co**  
**Form 10-K for Fiscal Year Ended December 31, 2023**  
**File No. 001-00044**

Dear Molly Strader Fruit:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Manufacturing