

Commodity Futures Trading Commission  
CEA CASES

**NAME:** JOHN E. CRITTENTON

**DOCKET NUMBER:** STIPULATION 41

**DATE:** SEPTEMBER 8, 1959

**DOCUMENT TYPE:** STIPULATION OF COMPLIANCE

Stipulation of Compliance under the Commodity Exchange Act

The undersigned John E. Crittenton, a member of the Chicago Board of Trade and a registered floor broker under the Commodity Exchange Act, has been advised by the Commodity Exchange Authority of an investigation of certain transactions in rye futures made by him on the Chicago Board of Trade on February 16, 17, 18, 20, 24, 25, 26, 27, 1959, and March 2, 3, 4, 5, 9, 10, 11, 12, 13, 16, 17, 18, 19, 20, 1959. The facts concerning those transactions are at follows:

The said John E. Crittenton on each of the above dates executed one or more trades between his several personal accounts carried with different clearing members of the Chicago Board of Trade. In total, on the above-named dates there were 59 such trades involving 420,000 bushels of rye in the March, May, July, and September 1959 futures.

The attached schedule given the detail of the trades.

The undersigned carried accounts with several clearing members, and all such accounts were in a deficit status. When time was available, either during or after market hours, he would transfer trades between clearing firms for the purpose of evening up those positions he did not wish to carry overnight, or to establish spread positions. In no instance did he indicate on his cards or to the clearing members the nature of these transactions.

At times transfers were made at prices different from those of the trades then open in his account and thus debit balances with certain

clearing members were reduced. Necessarily, offsetting losses were established with other clearing members. In other instances the trades themselves established a profit on one clearing member's books and an offsetting loss with another clearing member.

The Commodity Exchange Authority has advised the undersigned that in its opinion the transactions above-described are in violation of certain provisions of the Commodity Exchange Act and the rules and regulations promulgated thereunder, particularly that portion of the set relating to fictitious trades.

During the investigation it was learned that the undersigned in connection with trades made pursuant to orders received from various clearing members had rewritten his trading cards before submitting them to the clearing members concerned and had failed to retain the original trading cards for the period specified in the act and regulations. The Commodity Exchange Authority has advised him that in its opinion failure to retain the original trading cards for a period of five years constitutes a violation of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

No complaint with respect to such violations has been issued and the said John E. Crittenton is desirous of disposing of this matter by entering into a stipulation, as authorized by the Rules of Practice under the Commodity Exchange Act (17 CFR, 0.0-0.28).

Section 0.4(a) of the Rules of Practice provides that at any time prior to the issuance of a complaint in any proceeding, the Secretary of Agriculture may, in his discretion, enter into a stipulation with a prospective respondent whereby the latter admits the material facts and agrees to discontinue the acts or practices which are intended to be set up as violative of the act.

John E. Crittenton stipulates that the above statements regarding his trading are true, and he agrees to desist from all such practices in the future and to comply fully with the requirements of the act and the regulations of the secretary of Agriculture, and specifically to refrain from executing fictitious trades, and to retain records as required by the act and regulations.

The undersigned has been informed that the Commodity Exchange Authority plans to publicize the facts contained in this document in order that floor brokers, futures commission merchants, and all other users of the futures markets may be advised of the views of the Commodity Exchange Authority relating to matters of the type covered herein.

/s/ John E. Crittenton

John E. Crittenton

Date: September 8, 1959

Witness: G. Edward Piala

Witness: Samuel F. Gordon

Schedule of Rye Futures Trades Carded by John E. Crittenton to Adjust Positions in his Personal Accounts

Date	Quantity	Future	Price	Purchased for Crittenton's Account at:	Sold for Crittenton's Account at:
1959	(000)				
Feb. 16	5	July	120 3/4	Becker Brokerage Co.	E. M. Combs & Son
" 17	10	March	137 1/4	H. Corman & Co.	E. M. Combs & Son
" 17	5	May	133 1/2	Baggot & Morrison	Becker Brokerage Co.
" 17	10	May	133 1/2	H. Corman & Co.	Becker Brokerage Co.
" 18	5	May	133 7/8	E. M. Combs & Son	H. Corman & Co.
" 20	10	March	137 1/4	H. Corman & Co.	Becker Brokerage Co.
" 20	5	May	132 3/4	E. M. Combs & Son	H. Corman & Co.
" 24	10	May	132	E. M. Combs & Son	H. Corman & Co.
" 24	5	July	118	H. Corman & Co.	E. M. Combs & Son
" 25	10	March	138 1/2	Baggot & Morrison	H. Corman & Co.
" 25	5	March	138 5/8	H. Corman & Co.	E. M. Combs & Son
" 25	5	July	118	Baggot & Morrison	H. Corman & Co.
" 26	15	March	139	H. Corman & Co.	Baggot & Morrison
" 26	10	July	118	H. Corman & Co.	E. M. Combs & Son
" 27	20	May	135 3/4	H. Corman & Co.	Becker Brokerage Co.
" 27	5	May	119 1/4	Becker Brokerage Co.	H. Corman & Co.
" 27	20	Sept.	117 1/2	Becker Brokerage Co.	H. Corman & Co.
Mar. 2	5	March	139 3/4	E. M. Combs & Son	H. Corman & Co.
" 2	5	March	140 1/4	H. Corman & Co.	E. M. Combs & Son
" 2	10	May	136	Becker Brokerage Co.	E. M. Combs & Son
" 2	5	July	118 3/4	Becker Brokerage Co.	H. Corman & Co.
" 2	5	Sept.	118 1/8	H. Corman & Co.	E. M. Combs & Son
" 3	10	May	135 1/4	Becker Brokerage Co.	H. Corman & Co.
" 4	5	May	135 7/8	Baggot & Morrison	Hagerty Grain Co.
" 4	5	July	119 1/8	H. Corman & Co.	E. M. Combs & Son
" 5	10	May	135 7/8	E. M. Combs & Son	Baggot & Morrison
" 5	5	May	135 7/8	M. Corman & Co.	Baggot & Morrison
" 5	5	May	136	Baggot & Morrison	Hagerty Grain Co.
" 9	5	March	140 1/2	E. M. Combs & Son	H. Corman & Co.
" 9	5	May	137	H. Corman & Co.	E. M. Combs & Son

Date				Purchased for Crittenton's Account at:	Sold for Crittenton's Account at:
1959	Quantity (000)	Future	Price		
" 9	15	July	120 1/4	Baggot & Morrison	H. Corman & Co.
" 10	5	July	120 1/2	E. M. Combs & Son	H. Corman & Co.
" 10	5	July	120 5/8	H. Corman & Co.	Baggot & Morrison
" 11	5	May	136 7/8	E. M. Combs & Son	H. Corman & Co.
" 11	5	July	120 1/4	E. M. Combs & Son	Baggot & Morrison
" 11	5	July	120 1/2	Baggot & Morrison	H. Corman & Co.
" 11	5	July	120 1/2	Becker Brokerage Co.	H. Corman & Co.

See original document-page 4

Date				Purchased for Crittenton's Account at:	Sold for Crittenton's Account at:
1959	Quantity (000)	Future	Price		
Mar. 12	5	May	137 1/4	Baggot & Morrison	Becker Brokerage Co.
" 12	5	May	137 3/4	H. Corman & Co.	Becker Brokerage Co.
" 12	10	July	120 5/8	E. M. Combs & Son	H. Corman & Co.
" 12	15	July	120 7/8	H. Corman & Co.	Baggott & Morrison
" 13	10	March	143	Hagerty Grain Co.	Becker Brokerage Co.
" 13	5	March	143 1/2	Becker Brokerage Co.	Baggot & Morrison
" 13	5	Sept.	117 1/2	Becker Brokerage Co.	H. Corman & Co.
" 16	5	May	138 3/4	E. M. Combs & Son	H. Corman & Co.
" 16	5	May	139 1/2	Becker Brokerage Co.	H. Corman & Co.
" 16	5	July	122 5//8	Hagerty Grain Co.	H. Corman & Co.
" 16	10	July	123 1/2	E. M. Combs & Son	H. Corman & Co.
" 16	5	July	123 3/4	Baggot & Morrison	H. Corman & Co.
" 17	5	March	144 1/2	Baggot & Morrison	H. Corman & Co.
" 17	5	July	123	E. H. Combs & Son	Becker Brokerage Co.
" 18	5	May	139 1/2	H. Corman & Co.	Baggot & Morrison
" 18	5	May	139 1/2	H. Corman & Co.	Becker Brokerage Co.
" 19	10	March	145 1/4	Baggot & Morrison	H. Corman & Co.
" 19	5	March	138 1/4	Baggot & Morrison	H. Corman & Co.
" 19	5	Sept.	119 1/4	H. Corman & Co.	Baggot & Morrison
" 20	5	May	139	H. Corman & Co.	Becker Brokerage Co.
" 20	5	Bay	139 1/2	H. Corman & Co.	Becker Brokerage Co.
" 20	5	Sept.	119 3/8	Baggot & Morrison	E. M. Combs & Son

**LOAD-DATE:** June 16, 2008

