

Commodity Futures Trading Commission  
CEA CASES

**NAME:** T. C. HENDERSON & CO., INC., AND GEORGE E. MILLER

**DOCKET NUMBER:** STIPULATION 100

**DATE:** APRIL 1, 1966

**DOCUMENT TYPE:** STIPULATION OF COMPLIANCE

UNITED STATES DEPARTMENT OF AGRICULTURE  
BEFORE THE SECRETARY OF AGRICULTURE

In re: T. C. Henderson & Co., Inc., and George E. Miller

Stipulation of Compliance Under the Commodity Exchange Act No. 100

The Secretary of Agriculture has reason to believe that T. C. Henderson & Co., Inc., and George E. Miller have violated the provisions of the Commodity Exchange Act (7 U.S.C., Chapter 1) and the regulations of the Secretary of Agriculture promulgated thereunder. No complaint with respect to such violations has been issued and T. C. Henderson & Co., Inc., and George E. Miller are desirous of disposing of this matter by entering into a stipulation of compliance as authorized by section 0.4(a) of the Rules of Practice under the Commodity Exchange Act (17 CFR, 0.0-0.28). Therefore, T. C. Henderson & Co., Inc., and George E. Miller stipulate the following facts are true:

(1) T. C. Henderson & Co., Inc., is now and was at all times mentioned herein a registered futures commission merchant under the Commodity Exchange Act with an office and principal place of business at Sixth and Grand Avenue, Des Moines, Iowa.

(2) George E. Miller is now and was at all times mentioned herein an employee of T. C. Henderson & Co., Inc.

(3) The acts and practices on the part of T. C. Henderson & Co., Inc., hereinafter described were carried out by George E. Miller in his capacity as an employee of T. C. Henderson & Co., Inc., and acting for T. C. Henderson & Co., Inc.

(4) On February 18, 1965, T. C. Henderson & Co., Inc., purchased 200,000 bushels of November soybean futures for the account of a customer who at the time of such purchase held a short November soybean futures position of 450,000 bushels, 300,000 of which were acquired on February 9, 1965, and 150,000 on February 17, 1965. Although T. C. Henderson & Co., Inc., did not receive specific close-out instructions from the customer, it failed to apply the purchase against the oldest portion of the previously held short position but instead applied 150,000 bushels of such purchase to offset the short position entered into on February 17, 1965, and only 50,000 bushels to offset a portion of the short position entered into on February 9, 1965.

T. C. Henderson & Co., Inc., and George E. Miller agree to desist from such acts and practices in the future. They further understand and agree that this stipulation shall be admissible as evidence of such acts and practices in any future proceeding based upon acts or practices other than those referred to herein which may

be brought by the Secretary of Agriculture against either of them under the provisions of the said act. They also understand that it is the practice of the

Commodity Exchange Authority to make stipulations of compliance a matter of public record.

Done at [ILLEGIBLE TEXT] this

1st day of April, 1966

T. C. HENDERSON & CO., INC.

By: [SEE SIGNATURE IN ORIGINAL]

[SEE SIGNATURE IN ORIGINAL]

George E. Miller

Witnessed by:

[SEE SIGNATURE IN ORIGINAL]

[SEE SIGNATURE IN ORIGINAL]

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

