

UNITED STATES OF AMERICA
Before the
COMMODITY FUTURES TRADING COMMISSION

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In the Matter of	:	CFTC DOCKET NO. 01-06
	:	
VINCENT COPPOLA	:	COMPLAINT AND NOTICE OF
29 Lombard Drive	:	HEARING PURSUANT TO
West Caldwell, New Jersey 07748	:	SECTIONS 6(c) AND 6(d) OF
	:	THE COMMODITY EXCHANGE
and	:	ACT
	:	
TIMOTHY MURPHY	:	
97 Shadow Lane	:	
New Rochelle, New York 10801	:	
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The Commodity Futures Trading Commission (the "Commission") has received information from its staff which tends to show, and the Commission's Division of Enforcement (the "Division") alleges, that:

I. SUMMARY

1. From September 27, 1999 through October 5, 1999, Vincent Coppola ("Coppola") and from September 28, 1999 through October 5, 1999, Timothy Murphy ("Murphy") fraudulently executed trades in the gold options ring of the Commodity Exchange, Inc. ("COMEX"), a Division of the New York Mercantile Exchange by knowingly or recklessly trading ahead of executable customer orders on the same side of the market and by changing prices on executed orders to the detriment of their customers and the customers of other members trading opposite them.

2. By knowingly or recklessly trading ahead and engaging in illegal price changes, Coppola and Murphy violated the Commodity Exchange Act, as amended ("the Act") and the Regulations promulgated thereunder. By engaging in fraudulent price changes, they also traded

noncompetitively. In addition, Coppola and Murphy willfully aided and abetted the fraudulent price change violations of each other and other COMEX members and profited for their own accounts at the expense of the opposite members' customers.

3. In addition, by failing to record required trading information on their trading cards, Coppola and Murphy violated the recordkeeping requirements of the Act and Regulations.

II. RESPONDENT

4. VINCENT COPPOLA, who resides at 29 Lombard Drive, West Caldwell, New Jersey 07006, has been a dual trading member of the COMEX since March 1993. At all times relevant to this matter, Coppola has been registered with the Commission as a floor broker pursuant to Sections 4e and 4f of the Act, 7 U.S.C. §§ 6e and 6f (1994) and was employed by Pell Brothers Trading, a floor brokerage company. Coppola executed orders for Pell customers and traded for his personal account, primarily in the gold options ring on COMEX.

5. TIMOTHY MURPHY, who resides at 97 Shadow Lane, New Rochelle, New York 10801, has been a dual trading member of the COMEX since 1982 and predominantly traded silver futures contracts. At all times relevant to this matter, Murphy has been registered with the Commission as a floor broker and was a dual trader in gold options who filled customer orders for FIC Commodities Corp.

III. FACTS

6. From at least September 27, 1999 through October 8, 1999, Coppola was a floor broker on COMEX in the gold options ring, where he traded on behalf of customers and for his personal account.

7. From at least September 28, 1999 through October 8, 1999, Murphy was a floor broker on COMEX in the gold options ring, where he traded on behalf of customers and for his personal account.

8. During September 27 through October 8, 1999 (“the relevant period”), gold options contracts were traded on COMEX, a duly designated contract market for the trading of gold options pursuant to Section 5 of the Act, 7 U.S.C. § 7 (1994).

9. All orders to make and the making of contracts of sale of commodities for future delivery and options on such contracts, are or may have been used for 1) hedging any transaction in interstate commerce in such commodity or the by-products thereof, or 2) determining the price basis of any such transaction in interstate commerce in such commodity, or 3) delivering any such commodity sold, shipped, or received in interstate commerce for the fulfillment of such futures contracts, pursuant to Section 4c(a) of the Act, 7 U.S.C. §6c(a) (1994).

Description of Illegal Trading Practices

Trading Ahead

10. On at least seven and three occasions, respectively, Coppola and Murphy knowingly or recklessly traded gold call options for their personal accounts while holding executable customer orders on the same side of the market. These trades were at better prices than the trades that filled the customer orders. Coppola engaged in trading ahead violations with respect to the trade sequences identified in Appendix A as Trade Nos. 1, 3, 5, 8, 14, 18, and 19. Murphy engaged in trading ahead violations with respect to Trade Nos. 10, 11, and 15 of Appendix A. The transactions described in Paragraphs 11 and 12 are typical and illustrative of this scheme.

11. As an example of his trading ahead, on September 27, 1999, Coppola sold 3 December 1999 \$270 gold call options at a premium of \$17.50 for his own account. While executing that

trade, he held an executable customer limit order to sell 2 December 1999 \$270 gold call options at a premium of \$13.80 or better, which he filled at \$16.50. A “limit” order is an order to buy or sell a stated amount of gold options contracts at a specified premium price, or at a better price, if obtainable. Thus, the customer received a worse price than Coppola. (This trade is identified in Appendix A as Trade No. 1).

12. As an example of his trading ahead, on September 28, 1999, Murphy sold 1 December 1999 \$300 gold call option at a premium of \$11.00 for his own account. While executing that trade, he held customer market orders to sell 4 December 1999 \$300 gold calls, which he filled at \$10.00. Thus, the customer received a worse price than Murphy. (This trade is identified in Appendix A as Trade No. 11).

Price Change Transactions

13. Coppola and Murphy executed trades to fill customer orders opposite other COMEX members who were trading for their personal accounts. On at least four and eight occasions, respectively, Coppola and Murphy changed the prices on these trades to a worse price for their customers and better prices for the opposite member trading for his personal account. Coppola engaged in price changes on trades to fill his customer orders with respect to Trade Nos. 2, 6, 7 and 20, as identified in Appendix A. Murphy changed prices on trades to a worse price for customers in Trade Nos. 13, 16, 17, 21, 22, 23, 24, and 26. The transactions described in paragraphs 14 and 15 are typical and illustrative of this scheme.

14. As an example of his price change transactions, on September 27, 1999, Coppola received a customer order to sell 10 April 1999 \$280 gold call options at a limit price of \$10.00. Coppola sold 10 April 1999 \$280 gold call options at a premium of \$12.00 to fill the customer order to another COMEX member who was trading for his own account. Coppola changed the

price on the order ticket from a price of \$12.00 to \$10.00, and the COMEX member changed the price on his trading card. Thus, the customer received a lower sale price than the original price executed on the sale, and the COMEX member paid a lower price for his purchase. (This trade is identified in Appendix A as Trade No. 2).

15. As an example of his price change transactions, on September 28, 1999, Murphy received a customer order to sell 11 December 1999 \$285 gold call options at the market. Murphy sold the gold call options at a premium price of \$20.00 to another COMEX member who was trading for his own account. Both Murphy and the COMEX member originally recorded the trade at a price of \$20.00. Murphy and the COMEX member changed the price on their trading cards and Murphy changed the order ticket from a premium of \$20.00 to \$18.00. Thus, the customer received a lower sale price than the original price received on the execution of the sale, and the COMEX member paid a lower price for his purchase. (This trade is identified in Appendix A as Trade No. 13).

16. As a result of Coppola's and Murphy's conduct, customers were deprived of the better original price obtained on these transactions and did not receive competitive execution of their orders.

Aiding and Abetting Price Change Transactions

17. During the relevant period, Coppola and Murphy traded opposite each other and other COMEX floor members who executed gold call options trades on behalf of customers. Coppola and Murphy changed prices on trades executed for their personal accounts to their benefit and to the detriment of customers on the opposite sides of these trades. On three occasions, Coppola changed the prices on trades that he executed for his personal account opposite Murphy who was trading on behalf of customers. Coppola, on three other occasions, and Murphy, on one

occasion, changed the prices on trades that they executed opposite other COMEX members who were trading on behalf of customers. In each transaction, Coppola and Murphy received a better price for their personal accounts than the original execution price for the customer. Coppola willfully aided and abetted Murphy's illegal price change with respect to trade sequence Nos. 16, 17, and 21 in Appendix A, and another COMEX member's illegal price change with respect to the trades identified in Appendix A as Trade Nos. 4, 12, and 25. Murphy willfully aided and abetted the illegal price change of another COMEX member in the trade identified as Trade No. 9 in Appendix A.

18. As a result of this conduct, customers were defrauded and deprived of the competitive execution of their orders.

Record Keeping Violations

19. Coppola's and Murphy's trading cards lacked required trading information including: (a) his name or identification, and (b) the date, hour or minute of the transaction. In other instances, Coppola and Murphy failed to cross out unused lines on their trading cards, and Coppola failed to (a) record some of his trades and inserted trades (i) out of sequence, (ii) at the bottom of his cards following the lined section or (iii) after lines above the inserted trade had been crossed out.

IV. VIOLATIONS OF THE ACT AND REGULATIONS

COUNT ONE

VIOLATIONS OF SECTION 4c(b) OF THE ACT, 7 U.S.C. § 6c(b) (1994) AND COMMISSION REGULATION 33.10(a) and (c), 17 C.F.R. §33.10(a) and (c) (2000): FRAUD IN CONNECTION WITH OPTIONS TRANSACTIONS

20. Paragraphs 1 through 19 are realleged and incorporated herein by reference.

21. During the relevant period, Coppola and Murphy directly violated Section 4c(b) of the Act, 7 U.S.C. §6c(b) (1994), and Commission Regulation 33.10(a) and (c), 17 C.F.R. §33.10(a) and (c) (2000), and willfully aided and abetted other COMEX members' violations, pursuant to Section 13(a) of the Act, 7 U.S.C. §13c(a) (1994). Coppola and Murphy committed such violations by directly or indirectly cheating, defrauding or deceiving or attempting to cheat, defraud or deceive other persons in connection with offers to enter into, the entry into or the confirmation of the execution of gold call option transactions, as set forth below:

22. Coppola is directly liable for Trade Nos. 1, 2, 3, 5, 6, 7, 8, 14, 18, 19, and 20 identified in Appendix A; and Coppola is liable for willfully aiding and abetting another COMEX member's violations of §4c(b) of the Act, 7 U.S.C. §6c(b) (1994), and Regulation §33.10(a) and (c), 17 C.F.R. §33.10(a) and (c) (2000), pursuant to Section 13(a) of the Act, 7 U.S.C. §13a(c) (1994), for Trade Nos. 4,12, 16, 17, 21, and 25 as identified in Appendix A.

23. Murphy is directly liable for Trade Nos. 10, 11, 13, 15, 16, 17, 21, 22, 23, 24, and 26 identified in Appendix A; and Murphy is liable for willfully aiding and abetting another COMEX member's violations of §4c(b) of the Act, 7 U.S.C. §6c(b) (1994), and Regulation §33.10(a) and (c), 17 C.F.R. §33.10(a) and (c) (2000), pursuant to Section 13(a) of the Act, 7 U.S.C. §13a(c) (1994), for Trade No. 9 as identified in Appendix A.

24. Each and every transaction for which Coppola and Murphy is directly or indirectly liable for cheating, defrauding or deceiving or attempting to cheat, defraud or deceive, as described in paragraphs 22 and 23 above, is alleged as a separate and distinct violation of Section 4c(b) of the Act, 7 U.S.C. §6c(b) (1994), and Commission Regulation 33.10(a) and (c), 17 C.F.R. §33.10(a) and (c) (2000).

COUNT TWO

**VIOLATIONS OF SECTION 4c(a)(A) OF THE ACT, 7 U.S.C. § 6c(a)(A) (1994):
FICTITIOUS SALES**

25. Paragraphs 1 through 24 are realleged and incorporated herein by reference.

26. During the relevant period, Coppola and Murphy illegally changed or caused the changing of prices on gold call option trades, thereby engaging in fictitious sales. Such actions by Coppola and Murphy removed the execution of their customers' orders from the competition of the open market and forced prices upon his customers selected by Coppola, Murphy, and the opposite members.

27. Therefore, Coppola and Murphy violated Section 4c(a)(A) of the Act, 7 U.S.C. §6c(a)(A) (1994), in that Coppola and Murphy offered to enter into, entered into or confirmed the execution of fictitious sale transactions involving options on gold contracts for future delivery.

28. Coppola is liable, directly or indirectly, for failing to execute trades competitively for Trade Nos. 2, 4, 6, 7, 12, 16, 17, 20, 21, and 25 as identified in Appendix A in accordance with paragraph 26 above.

29. Murphy is liable, directly or indirectly, for failing to execute trades competitively for Trade Nos. 9, 13, 16, 17, 21, 22, 23, 24, and 26 as identified in Appendix A in accordance with paragraph 26 above.

30. Each and every transaction in which Coppola and Murphy are liable for failing to execute trades competitively, as described in paragraphs 28 and 29 above, is alleged as a separate and distinct violation of Section 4c(a)(A) of the Act, 7 U.S.C. §6c(a)(A) (1994).

COUNT THREE

**VIOLATIONS OF SECTION 4c(a)(B) OF THE ACT, 7 U.S.C. § 6c(a)(B) (1994):
REPORTING, REGISTERING OR RECORDING OF PRICES WHICH
ARE NOT TRUE OR BONA FIDE**

31. Paragraphs 1 through 30 are realleged and incorporated herein by reference.
32. During the relevant period, Coppola and Murphy, by a process other than open and competitive methods, illegally changed or caused the changing of prices on gold call option trades. Such acts were done with the intent to avoid the reporting, registration or recording of prices, which were the true and bona fide prices for the transactions.
33. Coppola and Murphy violated Section 4c(a)(B) of the Act, 7 U.S.C. §6c(a)(B) (1994), by offering to enter into, entering into, or confirming the execution of transactions involving options on gold contracts for future delivery which willfully caused the reporting, registration, or recording of a price which was not a true and bona fide price for the gold option transaction.
34. Coppola is liable for reporting, registering, and recording non bona fide prices with respect to Trade Nos. 2, 4, 6, 7, 12, 16, 17, 20, 21, and 25, as identified in Appendix A in accordance with paragraph 32 above.
35. Murphy is liable for reporting, registering, and recording non bona fide prices with respect to Trade Nos. 9, 13, 16, 17, 21, 22, 23, 24, and 26 as identified in Appendix A in accordance with paragraph 32 above.
36. Each and every transaction in which Coppola and Murphy are liable for causing prices to be reported, registered, or recorded which were not true and bona fide prices, as described in paragraphs 34 and 35 above, is alleged as a separate and distinct violation of Section 4c(a)(B) of the Act, 7 U.S.C. §6c(a)(B) (1994).

COUNT FOUR

VIOLATIONS OF COMMISSION REGULATION 33.10(b), 17 C.F.R. § 33.10(b) (2000): CREATING FALSE REPORTS

37. Paragraphs 1 through 36 are realleged and incorporated herein by reference.
38. During the relevant period, Coppola and Murphy illegally changed or caused the changing of prices on executed gold call options trades creating a false report or statement or caused a false record to be entered.
39. Coppola and Murphy violated Commission Regulation §33.10(b), 17 C.F.R. §33.10(b) (2000), by causing the reporting or entering of a price creating or causing to create a false report or statement.
40. Coppola is liable for creating a false report or statement with respect to Trade Nos. 2, 4, 6, 7, 12, 16, 17, 20, 21, and 25, as identified in Appendix A in accordance with paragraph 38 above.
41. Murphy is liable for creating a false report or statement with respect to Trade Nos. 9, 13, 16, 17, 21, 22, 23, 24, and 26 as identified in Appendix A in accordance with paragraph 38 above.
42. Each and every transaction in which Coppola and Murphy are liable for causing false prices to be reported or entered as described in paragraphs 40 and 41 above is alleged as a separate and distinct violation of Commission Regulation §33.10(b), 17 C.F.R. §33.10(b) (2000).

COUNT FIVE

VIOLATIONS OF COMMISSION REGULATIONS 1.38, 17 C.F.R. §1.38 (2000): NONCOMPETITIVE TRADING

43. Paragraphs 1 through 42 are realleged and incorporated herein by reference.

44. During the relevant period, Coppola and Murphy violated Commission Regulation 1.38, 17 C.F.R. §1.38 (2000), by failing to execute all purchases and sales of COMEX gold options openly and competitively by open outcry or by other equally open and competitive methods. Coppola and Murphy caused the changing of prices to their customers' gold call option trades to their detriment and to the benefit of the opposite member's personal account. Coppola and Murphy also caused the changing of prices on gold call option trades executed with other COMEX members on behalf of customers where the opposite broker's customers were assigned a worse price for their trades than originally recorded and Coppola and Murphy received better prices for their personal accounts.

45. Coppola is liable for Trade Nos. 2, 4, 6, 7, 12, 16, 17, 20, 21, and 25 as identified in Appendix A in accordance with paragraph 44 above.

46. Murphy is liable for Trade Nos. 9, 13, 16, 17, 21, 22, 23, 24, and 26 as identified in Appendix A in accordance with paragraph 44 above.

47. Each and every transaction in which Coppola and Murphy are liable for failing to execute all gold options trades openly and competitively by open outcry or by other equally open and competitive methods, as described in paragraphs 45 and 46 above, is alleged as a separate and distinct violation of Commission Regulation 1.38, 17 C.F.R. §1.38 (2000).

COUNT SIX

VIOLATIONS OF SECTION 4g OF THE ACT, 7 U.S.C. § 6g (1994), AND REGULATION 1.35 (d), 17 C.F.R. §1.35(d) (2000): THE MAKING AND RETENTION OF CERTAIN BOOKS AND RECORDS

48. Paragraphs 1 through 47 are realleged and incorporated herein by reference.

49. During the relevant period, Coppola and Murphy failed to record required trading information on their trading cards concerning the purchase and sale of gold call options executed

in the COMEX gold options ring identified in Appendix B and C to this complaint. In numerous instances, Coppola failed to record his identity, the dates of his transactions and the hours of his transactions. Coppola also failed to cross out unused lines on his trading cards, inserted trade information on crossed-out lines and recorded trades below the preprinted lines at the bottom of a trading card. Murphy failed to record his identity, the dates and times of his transactions, and failed to cross out unused lines. .

50. The failure to complete all required information is a violation of Section 4g of the Act, 7 U.S.C. §6g (1994), and Commission Regulation §1.35(d), 17 C.F.R. §1.35(d) (2000).

51. Each and every transaction for which Coppola and Murphy failed to record required trading information on their trading cards, as described in paragraph 49 above, is alleged as a separate and distinct violation of Section 4g of the Act, 7 U.S.C. §6g (1994), and Commission Regulation §1.35(d), 17 C.F.R. §1.35(d) (2000).

V.

By reason of the foregoing allegations, the Commission deems it necessary and appropriate, pursuant to its responsibilities under the Act, to institute public administrative proceedings to determine whether the allegations set forth in Sections I - IV above are true and, if so, whether an appropriate order should be entered in accordance with Sections 6(c) and 6(d), of the Act, 7 U.S.C. §§9 and 13(b)(1994);

(A) Directing that Coppola and Murphy cease and desist from violating the provisions of the Act and Regulations found to have been violated;

(B) Suspending for a period of six months or revoking the registrations of Coppola and Murphy as floor brokers;

(C) Prohibiting Coppola and Murphy from trading on or subject to the rules of any contract market and requiring all contract markets to refuse them all trading privileges thereon or for such period as may be specified in the Order or until further notice of the Commission why the registration of such person should not be suspended or revoked;

(D) Assessing Coppola and Murphy each a civil monetary penalty not to exceed \$110,000 for each violation of the Act or Regulations or triple the monetary gain to Coppola and Murphy for each violation; and

(E) Requiring restitution to customers of damages proximately caused by violations of Coppola and Murphy.

VI.

WHEREFORE IT IS ORDERED that a public hearing for the purpose of taking evidence on the allegations set forth in Sections I, II, III and IV above be held before an Administrative Law Judge under the Act (“Commission’s Rules”), 17 C.F.R. §10.1 et seq., in New York City, at a time and place to be set as provided by Section 10.61 of the Commission’s Rules, 17 C.F.R. §10.61 (2000), and that all post-hearing procedures shall be conducted pursuant to Sections 10.81-10.107 of the Rules 17 C.F.R. §§ 10.81-10.107 (2000).

IT IS FURTHER ORDERED that the Respondents shall file an Answer to the allegations contained in this Complaint within twenty (20) days after service pursuant to Section 10.23 of the Commission’s Rules, 17 C.F.R. § 10.23 (2000), and shall serve two copies of such Answer and of any documents filed in these proceedings upon Charles J. Sgro, Eastern Regional Counsel, Commodity Futures Trading Commission, 1 World Trade Center, Suite 3747, New York, New York 10048-0202. If either of the Respondent fails to file the required Answer, or fails to appear at a hearing after being duly notified, the Respondent(s) shall be deemed in

default and the proceedings may be determined against him upon consideration of the Complaint, the allegations of which shall be deemed to be true.

IT IS FURTHER ORDERED that this Complaint and Notice of Hearing shall be served on the Respondents personally or by registered or certified mail, pursuant to Section 10.22 of the Commission Rules, 17 C.F.R. § 10.22 (2000).

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecutorial functions in this or any factually related proceedings will be permitted to participate or advise in the decision in this matter except as a witness or counsel in a proceeding held pursuant to notice.

By the Commission on January 10, 2001.

Jean Webb
Secretary to the Commission
Commodity Futures Trading Commission

APPENDIX A

	DATE	BUYER	CTI	QUANTITY & CONTRACT	STRIKE	PRICE	SELLER	CTI
1	9/27/99	7740	1	3 Dec	270 Call	17.50	COP	1
		7740	1	2 Dec	270 Call	16.50	COP	4
2	9/27/99	6187	1	10 Apr	280 Call	10.00	COP	4
3	9/27/99	7740	1	10 Dec	280 Call	9.00	COP	1
		7740	1	15 Dec	280 Call	7.00	COP	4
		7740	1	4 Dec	280 Call	7.50	COP	4
4	9/28/99	COP	1	9 Jun	320 Call	5.00	516	4
5	9/28/99	6149	4	3 Dec	330 Call	3.00	COP	1
		6149	1	5 Dec	330 Call	2.00	COP	4
6	9/28/99	516	1	20 Dec	290 Call	12.00	COP	4
7	9/28/99	7375	1	20 Dec	290 Call	12.00	COP	4
8	9/28/99	7375	1	5 Dec	300 Call	10.50	COP	1
		7534	1	7 Dec	300 Call	10.00	COP	4
9	9/28/99	6149	4	5 Dec	320 Call	8.00	TIM	1
10	9/28/99	6149	4	5 Dec	320 Call	8.00	TIM	1
		6101	1	5 Dec	320 Call	3.50	TIM	4
11	9/28/99	7375	1	1 Dec	300 Call	11.00	TIM	1
		6101	1	4 Dec	300 Call	10.00	TIM	4
12	9/28/99	516	4	12 Dec	265 Call	42.00	COP	1
13	9/28/99	6149	1	11 Dec	285 Call	18.00	TIM	4
14	9/28/99	6210	1	1 Dec	300 Call	14.00	COP	1
		6210	1	1 Dec	300 Call	13.00	COP	4
15	9/28/99	7375	1	1 Dec	300 Call	14.00	TIM	1

		6008	1	5 Dec	300 Call	13.00	TIM	4
		6149	1	5 Dec	300 Call	13.00	TIM	4
16	9/28/99	COP	1	11 Feb	310 Call	10.00	TIM	4
17	9/28/99	COP	1	10 Dec	300 Call	22.00	TIM	4
		6149	1	15 Dec	300 Call	22.00	TIM	4
18	9/28/99	7797	2	3 Dec	310 Call	11.00	COP	1
		7862	1	2 Dec	310 Call	11.00	COP	1
		5199	1	3 Dec	310 Call	10.00	COP	4
19	9/29/99	7739	1	1 Dec	300 Call	19.50	COP	1
		7739	1	1 Dec	300 Call	17.00	COP	4
20	9/29/99	7739	1	1 Dec	300 Call	17.00	COP	4
21	9/29/99	COP	1	1 Dec	320 Call	9.00	TIM	4
22	9/30/99	TIM	4	10 Dec	330 Call	6.00	7375	1
23	10/1/99	TIM	4	20 Jun	400 Call	5.00	6149	1
24	10/1/99	6149	1	14 Dec	320 Call	8.00	TIM	4
25	10/5/99	COP	1	4 Feb	330 Call	18.00	516	4
26	10/5/99	7780	1	2 Feb	400 Call	9.00	TIM	4

APPENDIX B

Coppola Recordkeeping Violations

DATE	CARD NUMBER	Section 1.35(d)(4)(i) LACKING MEMBER'S NAME	Section 1.35(d)(1) MISSING DATE	Section 1.35(d)(1) NO HOUR INDICATED	Section 1.35(d)(2) UNUSED LINES NOT CROSSED OUT	OTHER VIOLATIONS
9/27/99	DO-00152727			X		
9/27/99	DO-00152728- DO-00152730		X			
9/27/99	DO-00152731		X		X	
9/27/99	DO-00152732		X			
9/27/99	DO-00152733		X			
9/27/99	DO-00152734		X		X	Trades inserted after crossed out lines.
9/27/99	DO-00152735		X			
9/27/99	DO-00152736	X	X			
9/27/99	DO-00152737		X			
9/27/99	DO-00152738		X		X	
9/27/99	DO-00152739		X			
9/27/99	DO-00152740		X		X	
9/27/99	DO-00152741		X		X	
9/27/99	DO-00152742- DO-00152748		X			
9/27/99	DO-00152749		X			
9/27/99	DO-00152750		X			Trades inserted after crossed out lines.
9/27/99	DO-00152651		X			
9/27/99	DO-00152652		X			
9/27/99	DO-00152653		X			Trades inserted as cross- trades
9/27/99	DO-00152654		X		X	
9/27/99	DO-00152724- DO-00152730		X			
9/28/99	DO-00152655- DO-00152657		X			
9/28/99	DO-00152658		X			
9/28/99	DO-00152659		X			
9/28/99	DO-00152660		X			
9/28/99	DO-00152661		X			
9/28/99	DO-00152662- DO-00152664		X		X	
9/28/99	DO-00152665- DO-00152669		X			
9/28/99	DO-00152670		X			
9/28/99	DO-00152671- DO-00152673		X			

9/28/99	DO-00152674	X			
9/28/99	DO-00152675	X			
9/28/99	DO-00152676	X			
9/28/99	DO-00152677	X			
9/28/99	DO-00152678	X			
9/28/99	DO-00152679	X		X	
9/28/99	DO-00152680	X			
9/28/99	DO-00152681	X			
9/28/99	DO-00152682	X	X	X	No trades recorded
	DO-00152683-				
9/28/99	DO-00152685	X			
9/28/99	DO-00152686	X		X	
9/28/99	DO-00152687	X			
	DO-00152688-				
9/28/99	DO-00152692	X			
9/28/99	DO-00152693	X		X	
9/28/99	DO-00152694	X	X	X	No trades recorded
	DO-00152695-				
9/28/99	DO-00152697	X			
9/28/99	DO-00152699	X			
					trades inserted after cross-out
9/28/99	DO-00152700	X			
	DO-00197401-				
9/28/99	DO-00197402	X		X	
9/28/99	DO-00197403	X			
9/29/99	DO-00197404			X	
9/29/99	DO-00197406	X			
9/29/99	DO-00197407	X			
9/29/99	DO-00197408	X			
	DO-00197409-				
9/29/99	DO-00197412	X			
9/29/99	DO-00197413	X		X	
9/29/99	DO-00197414	X			
9/29/99	DO-00197415	X			
9/29/99	DO-00197416	X			
	DO-00197417-				
9/29/99	DO-00197425	X			
9/29/99	DO-00197426	X			
9/29/99	DO-00197427	X			
9/29/99	DO-00197428	X			
9/30/99	DO-00197433	X			
					Trades inserted after cross-out
9/30/99	DO-00197434	X			
					Trades inserted after cross-out
9/30/99	DO-00197435	X			
10/4/99	DO-00152752	X			
10/5/99	DO-00152756	X			
10/5/99	DO-00152757	X			

10/5/99	DO-00152760	X	X
	DO-00152761-		
10/5/99	DO-00152762	X	
10/5/99	DO-00152763	X	
10/6/99	DO-00152765		X
10/6/99	DO-00152769	X	
10/6/99	DO-00152773	X	
10/7/99	DO-00152774	X	
10/6/99	DO-00152777	X	
10/7/99	DO-00152786	X	
10/7/99	DO-00152787	X	
	DO-00152791-		
10/7/99	DO-00152793	X	
	DO-00152794-		
10/7/99	DO-00152795	X	
10/7/99	DO-00152796	X	
10/7/99	DO-00152798	X	
10/8/99	DO-00152807	X	
10/8/99	DO-00152814	X	
10/8/99	DO-00152815	X	

APPENDIX C

Murphy Recordkeeping Violations

	Section 1.35(d)(4)(i)	Section 1.35(d)(1)	Section 1.35(d)(1)	Section 1.35(d)(1)	Section 1.35(d)(2)	Section 1.35(d)(2)
					UNUSED LINES NOT CROSSED OUT	LINES SKIPPED
DATE	CARD NUMBER	LACKING MEMBER NAME	MISSING DATE	NO HOUR INDICATED	NO MINUTE TIMES	
9/28/99	FP-00015117		X	X		
9/28/99	FP-00015118		X	X		
9/28/99	FP-00015119		X	X		X
9/28/99	FP-00015122	X	X	X		X
9/28/99	FP-00015123			X		X
9/28/99	FP-00015124	X	X	X		X
9/28/99	FP-00015125	X	X	X		X
9/28/99	FP-00015126			X		
9/28/99	FP-00015127	X	X	X		X
9/28/99	FP-00015128	X	X	X		X
9/28/99	FP-00015129		X	X	X	
9/28/99	FP-00015131	X	X		X	X
9/28/99	FP-00015132		X	X		
9/28/99	FP-00015133		X			X
9/28/99	FP-00015134		X			
9/28/99	FP-00015135		X	X		
9/28/99	FP-00015136		X	X		
9/28/99	FP-00015137		X	X	X	
9/28/99	FP-00015139					X
9/28/99	FP-00015141		X	X		X
9/28/99	FP-00015142	X	X			
9/28/99	FP-00015143		X			
9/28/99	FP-00015144		X	X		X
9/28/99	FP-00015146				X	X
9/28/99	FP-00015147					X
9/28/99	FP-00015148		X	X		
9/28/99	FP-00015149		X			
9/28/99	FP-00015150		X			
9/28/99	FP-00015151			X	X	X
9/28/99	FP-00015152		X		X	
9/28/99	FP-00015153		X	X	X	X
9/28/99	FP-00015154		X	X		
9/28/99	FP-00015155	X	X	X	X	X
9/28/99	FP-00015156		X	X		
9/28/99	FP-00015157		X			
9/28/99	FP-00015158		X			
9/28/99	FP-00015159		X		X	

9/28/99 FP-00015160		X			
9/29/99 FP-00015161			X	X	X
9/29/99 FP-00015162		X	X	X	
9/29/99 FP-00015163	X	X	X	X	X
9/29/99 FP-00015164		X	X	X	X
9/29/99 FP-00015165	X	X	X		X
9/29/99 FP-00015166		X	X		
9/29/99 FP-00015167		X	X		
9/29/99 FP-00015168		X			X
9/29/99 FP-00015169		X			
9/29/99 FP-00015170	X	X	X		
9/29/99 FP-00015171		X	X	X	X
9/29/99 FP-00015172		X	X		
9/29/99 FP-00015173	X	X	X		X
9/29/99 FP-00015174		X	X	X	
9/29/99 FP-00015175		X	X		
9/29/99 FP-00015176		X	X		
9/29/99 FP-00015177		X	X		X
9/29/99 FP-00015178		X	X		
9/29/99 FP-00015179		X	X		
9/29/99 FP-00015180		X	X		
9/29/99 FP-00015181		X	X		X
9/29/99 FP-00015182		X			
9/29/99 FP-00015183		X	X		
9/29/99 FP-00015184		X			X
9/29/99 FP-00015185		X			
9/29/99 FP-00015186		X			
9/29/99 FP-00015187		X			
9/29/99 FP-00015188		X			X
9/30/99 DO-00115502		X	X	X	X
9/30/99 DO-00115503		X			X
9/30/99 DO-00115504		X			
9/30/99 DO-00115505		X			
9/30/99 DO-00115506		X			
9/30/99 DO-00115507		X			
9/30/99 DO-00115508	X	X			
9/30/99 DO-00115509		X	X		X
9/30/99 DO-00115510		X	X		
9/30/99 DO-00115511		X	X		
9/30/99 DO-00115512		X	X		
9/30/99 DO-00115513		X	X		X
9/30/99 DO-00115514		X	X		
9/30/99 DO-00115515		X	X		X
9/30/99 DO-00115516		X	X		
9/30/99 DO-00115517		X			
9/30/99 DO-00115518		X	X		
9/30/99 DO-00115519		X	X		X
9/30/99 DO-00115520		X			

9/30/99 DO-00115521	X			
9/30/99 DO-00115522	X			
9/30/99 DO-00115523	X	X		
9/30/99 DO-00115524	X			
9/30/99 DO-00115525	X			X
9/30/99 DO-00115526	X			X
9/30/99 DO-00115527	X			X
9/30/99 DO-00115528	X		X	X
9/30/99 DO-00115529	X	X		
9/30/99 DO-00115530	X	X	X	X
9/30/99 DO-00115531	X			
9/30/99 DO-00115532	X			
9/30/99 DO-00115533	X			
9/30/99 DO-00115534	X			
9/30/99 DO-00115535	X			
9/30/99 DO-00115536	X			X
9/30/99 DO-00115537	X	X		
9/30/99 DO-00115538	X			
9/30/99 DO-00115539	X	X		
9/30/99 DO-00115540	X			X
9/30/99 DO-00115541	X			X
9/30/99 DO-00115542	X			
9/30/99 DO-00115543	X			
9/30/99 DO-00115544	X			X
10/1/99 FP-00015189	X		X	
10/1/99 FP-00015190	X	X	X	X
10/1/99 FP-00015191	X			
10/1/99 DO-00115551	X			X
10/1/99 DO-00115552	X	X		
10/1/99 DO-00115553	X			
10/1/99 DO-00115554	X			X
10/1/99 DO-00115555	X		X	
10/1/99 DO-00115556	X	X		
10/1/99 DO-00115557	X	X		X
10/1/99 DO-00115558	X			
10/1/99 DO-00115559	X		X	X
10/1/99 DO-00115560	X			X
10/1/99 DO-00115561	X	X		
10/1/99 DO-00115562	X			
10/1/99 DO-00115563	X			
10/1/99 DO-00115564	X			X
10/1/99 DO-00115565	X	X		
10/1/99 DO-00115566	X			
10/1/99 DO-00115567	X	X		
10/1/99 DO-00115568	X	X		
10/1/99 DO-00115569	X	X		X
10/1/99 DO-00115570	X	X	X	
10/1/99 DO-00115571	X	X		X

10/1/99 DO-00115572		X			X
10/1/99 DO-00115573		X			
10/1/99 DO-00115574		X			
10/1/99 DO-00115575		X			
10/1/99 DO-00115576		X			
10/1/99 DO-00115577		X	X		
10/1/99 DO-00115578		X			
10/1/99 DO-00115579		X			
10/1/99 DO-00115580		X			
10/4/99 DO-00115601		X			
10/4/99 DO-00115602		X	X		
10/4/99 DO-00115603	X	X	X		
10/4/99 DO-00115604		X	X		
10/4/99 DO-00115605	X	X	X		X
10/4/99 DO-00115606		X	X	X	X
10/4/99 DO-00115607		X	X		X
10/4/99 DO-00115608		X	X		
10/4/99 DO-00115609		X			X
10/4/99 DO-00115610		X	X		
10/4/99 DO-00115611		X	X		X
10/4/99 DO-00115612	X	X	X	X	
10/4/99 DO-00115613		X			
10/4/99 DO-00115614		X	X		
10/4/99 DO-00115615		X	X		
10/4/99 DO-00115616		X	X		
10/4/99 DO-00115617		X			
10/4/99 DO-00115618		X	X		X
10/4/99 DO-00115619		X	X		
10/4/99 DO-00115620		X			
10/4/99 DO-00115621		X			X
10/4/99 DO-00115622		X			
10/4/99 DO-00115623		X	X		
10/4/99 DO-00115624		X			
10/4/99 DO-00115625		X	X		
10/4/99 DO-00115626		X			
10/4/99 DO-00115627		X	X		
10/4/99 DO-00115628		X			
10/4/99 DO-00115629		X			
10/4/99 DO-00115630		X			
10/4/99 DO-00115631		X	X		
10/4/99 DO-00115632		X			
10/4/99 DO-00115633		X			
10/4/99 DO-00115634		X	X		X
10/4/99 DO-00115635		X			
10/4/99 DO-00115636		X			
10/4/99 DO-00115637		X			
10/4/99 DO-00115638		X			
10/4/99 DO-00115639		X	X		X

10/4/99 DO-00115640		X	X		
10/4/99 DO-00115641		X			X
10/4/99 DO-00115642		X			
10/4/99 DO-00115643		X	X		
10/4/99 DO-00115644		X			
10/4/99 DO-00115645		X			
10/4/99 DO-00115646		X			X
10/4/99 DO-00115647		X			X
10/4/99 DO-00115648		X			
10/4/99 DO-00115649		X			
10/5/99 DO-00115651		X			X
10/5/99 DO-00115652	X	X	X		X
10/5/99 DO-00115653		X		X	
10/5/99 DO-00115654		X			
10/5/99 DO-00115655		X			
10/5/99 DO-00115656		X			
10/5/99 DO-00115657		X	X		
10/5/99 DO-00115658		X	X	X	
10/5/99 DO-00115659		X			
10/5/99 DO-00115660		X	X	X	
10/5/99 DO-00115661		X		X	
10/5/99 DO-00115662		X	X	X	
10/5/99 DO-00115663		X			X
10/5/99 DO-00115664		X			
10/5/99 DO-00115665		X	X		
10/5/99 DO-00115666		X			
10/5/99 DO-00115667		X			
10/5/99 DO-00115668		X	X		
10/5/99 DO-00115669	X	X	X		X
10/5/99 DO-00115670		X	X		
10/5/99 DO-00115671		X	X	X	
10/5/99 DO-00115672		X	X		
10/5/99 DO-00115673		X	X		
10/5/99 DO-00115674		X	X		
10/5/99 DO-00115675		X	X		
10/5/99 DO-00115676		X	X		
10/5/99 DO-00115677		X	X	X	
10/5/99 DO-00115678		X		X	
10/5/99 DO-00115679		X			
10/5/99 DO-00115680		X	X		
10/5/99 DO-00115681		X			
10/5/99 DO-00115682		X	X	X	X
10/5/99 DO-00115683		X			
10/5/99 DO-00115684		X			
10/5/99 DO-00115685	X	X	X		X
10/5/99 DO-00115686	X	X	X		
10/5/99 DO-00115687		X	X		X
10/5/99 DO-00115688		X			

10/5/99 DO-00115689	X	X		
10/5/99 DO-00115690	X			
10/5/99 DO-00115691	X			
10/6/99 DO-00112593	X			
10/6/99 DO-00112594	X			
10/6/99 DO-00112595	X	X		
10/6/99 DO-00112596	X			
10/6/99 DO-00112597	X	X		
10/6/99 DO-00112598	X			
10/6/99 DO-00112599	X			
10/6/99 DO-00112600	X			
10/6/99 DO-00115651	X	X		
10/6/99 DO-00115652	X			X
10/6/99 DO-00115653	X			
10/6/99 DO-00115654	X			X
10/6/99 DO-00115655	X			
10/6/99 DO-00115656	X			
10/6/99 DO-00115657	X	X		X
10/6/99 DO-00115658	X			
10/6/99 DO-00115659	X			
10/6/99 DO-00115660	X			X
10/6/99 DO-00115661	X			
10/6/99 DO-00115662	X	X		X
10/6/99 FP-00015192	X			
10/6/99 FP-00015193	X	X		
10/6/99 FP-00015194	X			
10/6/99 FP-00015195	X	X		X
10/7/99 DO-00115663	X			X
10/7/99 DO-00115664	X	X		
10/7/99 DO-00115665	X	X		
10/7/99 DO-00115666	X	X	X	
10/7/99 DO-00115667	X			
10/7/99 DO-00115668	X			
10/7/99 DO-00115669	X			
10/7/99 DO-00115670	X	X		
10/7/99 DO-00115671	X	X	X	
10/7/99 DO-00115672	X	X		
10/7/99 DO-00115673	X	X		
10/7/99 DO-00115674	X			X
10/7/99 DO-00115675	X	X		
10/7/99 DO-00115676	X			
10/7/99 DO-00115677	X	X		X
10/7/99 DO-00115678	X	X		
10/7/99 DO-00115679	X			X
10/7/99 DO-00115680	X	X		X
10/7/99 DO-00115681	X	X		X
10/7/99 DO-00115682	X			X
10/7/99 DO-00115683	X	X		

10/7/99 DO-00115684	X	X		
10/7/99 DO-00115685	X	X		
10/7/99 DO-00115686	X	X	X	X
10/7/99 DO-00115687	X			
10/7/99 DO-00115688	X			X
10/7/99 DO-00115689	X			
10/7/99 DO-00115690	X	X		
10/7/99 DO-00115691	X	X		X
10/7/99 DO-00115692	X			
10/7/99 DO-00115693	X			
10/7/99 DO-00115694	X	X		
10/8/99 DO-00115695	X			
10/8/99 DO-00115696	X	X		
10/8/99 DO-00115697	X			
10/8/99 DO-00115698	X	X		
10/8/99 DO-00115699	X		line E-I	
10/8/99 DO-00115700	X	X		X
10/8/99 DO-00115701	X	X	line D	X
10/8/99 DO-00115702	X	X	line G	
10/8/99 DO-00115703	X			
10/8/99 DO-00115704	X			
10/8/99 DO-00115705	X		lines C & D	X
10/8/99 DO-00115706	X	X		X
10/8/99 DO-00115707	X	X		
10/8/99 DO-00115708	X	X		X
10/8/99 DO-00115709	X	X	lines A & B	
10/8/99 DO-00115710	X	X		X
10/8/99 DO-00115711	X			
10/8/99 DO-00115712	X			
10/8/99 DO-00115713	X	X		
10/8/99 DO-00115714	X			
10/8/99 DO-00115715	X			