

Commodity Futures Trading Commission  
CEA CASES

**NAME:** LOUIS ROMOFF

**CITATION:** 29 Agric. Dec. 676

**DOCKET NUMBER:** 166

**DATE:** JUNE 12, 1970

**DOCUMENT TYPE:** DECISION AND ORDER

(No. 13,224)

*In re* Louis ROMOFF. CEA Docket No. 166. Decided June 12, 1970.

**Reporting requirements -- Denial of trading privileges -- Stipulation**

Respondent consented to the issuance of an order requiring him to cease and desist from failing to file required reports with the Commodity Exchange Authority and directing all the contract markets to refuse all trading privileges to him for a period of 30 days.

*Earl L. Saunders* for Commodity Exchange Authority.

*Webster & Creamer*, Beverly Hills, Cal., for respondent.

*Decision by Thomas J. Flavin, Judicial Officer*

**PRELIMINARY STATEMENT**

This is an administrative proceeding under the Commodity Exchange Act (7 U.S.C. Chapter 1, 1964 ed., as amended, Supp. IV, 1969), in which the respondent is charged with failing and refusing to submit required reports concerning commodity futures transactions, in violation of section 4i of the Act (7 U.S.C. 6i, Supp. IV, 1969), and the applicable regulations thereunder.

No hearing has been held with respect to this proceeding. The respondent has submitted a stipulation under section 0.4(b) of the rules of practice (17 CFR 0.4(b)) in which he (1) admits the facts hereinafter set forth in paragraphs 1 through 3 of the Findings of Fact, (2) admits, for the purposes of this proceeding and for such purposes only, the facts hereinafter set forth in paragraphs 4 through 6 of the Findings of Fact, (3) waives the report of the Hearing Examiner, and (4) consents to the entry of the order contained herein.

**FINDINGS OF FACT**

1. The respondent, Louis Romoff, is an individual whose business address is 3026 East Vernon, Los Angeles, California 90058.
2. The Chicago Mercantile Exchange is now, and was at all times material herein, a duly designated contract market under the Commodity Exchange Act.
3. (a) On each day during the period from September 1 through October 8, 1969, the respondent held open contract positions in live beef cattle futures on the Chicago Mercantile Exchange of 25 or more contracts in a single future.  
(b) On each day during the periods from September 24 through October 30, 1969, and from November 7 through November 11, 1969, the respondent held open contract positions in frozen pork belly futures on the Chicago Mercantile Exchange of 25 or more contracts in a single future.  
(c) By reason of such positions, the respondent was in reporting status, and was required to report to the Commodity Exchange Authority (1) with respect to

all transactions executed and all open contract positions held for his account in all live beef cattle futures on all boards of trade during the period from September 1 through October 8, 1969, (2) with respect to all transactions executed and all open contract positions held for his account in all frozen pork belly futures on all boards of trade during the periods from September 24 through October 30, 1969, and from November 7 through November 11, 1969, and (3) with respect to all such transactions by reason of which the respondent's positions were reduced below reporting levels, as provided in section 4i of the Commodity Exchange Act (7 U.S.C. 6i, Supp. IV, 1969), and sections 15.01, 15.02, 15.03, 18.00, 18.01 and 18.03 of the regulations thereunder (17 CFR 15.01, 15.02, 15.03, 18.00, 18.01 and 18.03).

4. On September 3 and 10, 1969, while the respondent was in reporting status as described in paragraph 3 above, and on October 9, 1969, when the respondent's positions in live beef cattle futures were reduced below the reporting level, transactions in such futures on the Chicago Mercantile Exchange were executed for his account, but the respondent failed and refused to submit reports to the Commodity Exchange Authority with respect to such transactions as required under the aforesaid provisions of the Commodity Exchange Act and regulations.

5. On September 24, 25, 26, and 30, 1969, October 1, 2, 3, 13, 20, 21, 22, 24, 27, 28, 29 and 30, 1969, and November 7 and 11, 1969, while the respondent was in reporting status as described in paragraph 3 above, and on October 31, 1969, when the respondent's positions in frozen pork belly futures were reduced below the reporting level, transactions in such futures on the Chicago Mercantile Exchange were executed for his account, but the respondent failed and refused to submit reports to the Commodity Exchange Authority with respect to such transactions, as required under the aforesaid provisions of the Commodity Exchange Act and regulations.

6. Between June 25, 1968 and August 14, 1969, the Commodity Exchange Authority found it necessary to communicate with the respondent on numerous occasions because of his failure to transmit reports. On September 24, 1969, the Administrator of the Commodity Exchange Authority addressed a letter to the respondent calling attention to his delinquencies in submitting reports, and advising the respondent that he should file all required reports on or before October 10, 1969, and warning him that continued failure to file such reports could result in the institution of administrative proceedings directed toward the denial of trading privileges on all contract markets. Notwithstanding such letter, no reports were filed. In the circumstances, the respondent was aware of his obligations under the Commodity Exchange Act and regulations with respect to the filing of reports.

#### **CONCLUSIONS**

By reason of the facts set forth in the Findings of Fact, it is concluded that, as charged in the complaint, the respondent violated section 4i of the Commodity Exchange Act and sections 15.01, 15.02, 15.03, 18.00, 18.01 and 18.03 of the regulations thereunder. The complainant states that the administrative officials of the Commodity Exchange Authority have carefully considered the stipulation submitted by the respondent. The administrative officials believe that the prompt entry of the proposed order would constitute a satisfactory disposition of this case, serve the public interest and effectuate the purposes of the Act. The complainant recommends, therefore, that the stipulation be accepted and the proposed order be issued. It is concluded that the complainant's recommendation should be adopted.

#### **ORDER**

(a) The respondent, Louis Romoff, shall cease and desist from failing to file, in accordance with the Commodity Exchange Act and the regulations thereunder, such reports as he is required to file under such act and regulations.

(b) The respondent, Louis Romoff, is prohibited from trading on or subject to the rules of any contract market for a period of 30 days, and all contract markets shall refuse all trading privileges to the respondent during this period, such prohibition and refusal to apply to all trading done and all positions held by the respondent, directly or indirectly.

The cease and desist provisions of this order, set forth in subparagraph (a) above, shall become effective upon the date of service of this order upon the respondent. The period of the denial of trading privileges to the respondent, specified in subparagraph (b) above, shall become effective on the thirtieth day after the date of entry of this order.

**LOAD-DATE:** June 10, 2008

