

Commodity Futures Trading Commission  
CEA CASES

**NAME:** BATES GRAIN COMPANY

**DOCKET NUMBER:** STIPULATION 68

**DATE:** OCTOBER 23, 1964

**DOCUMENT TYPE:** STIPULATION OF COMPLIANCE

UNITED STATES DEPARTMENT OF AGRICULTURE

BEFORE THE SECRETARY OF AGRICULTURE

In re: Bates Grain Company

Stipulation of Compliance under the Commodity Exchange Act No. 68

The Secretary of Agriculture has reason to believe that Bates Grain Company has 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 Bates Grain Company is desirous of disposing of the 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, Bates Grain Company stipulates the following facts are true:

(1) Bates Grain Company is and was at all times mentioned herein a Missouri corporation and a registered futures commission merchant under the Commodity Exchange Act with an office and principal place of business at 1400 Board of Trade Building, Kansas City 5, Missouri.

(2) During the period January 2, 1964, through June 4, 1964, Bates Grain Company had on its books an account for Uhlmann & Co., Inc., in which were carried trades in Kansas City wheat futures which had been made for the sole purpose of paying commissions to Bates Grain Company in exchange for business which Bates Grain Company had given to Uhlmann & Co., Inc., on other exchanges.

(3) During the aforementioned period, instructions were given by Uhlmann & Co., Inc., to various members of the Kansas City Board of Trade for them to make purchases and sales of Kansas City wheat futures. In accordance with such instructions, purchases and sales of 2,155,000 bushels of Kansas City wheat futures were made for the account of Uhlmann & Co., Inc., and were given up to Bates Grain Company for clearance to be carried on the books of Bates Grain Company. The Secretary of Agriculture has advised Bates Grain Company that such trades were, or were of the character of wash trades, and as such were in violation of section 4c(A) of the Commodity Exchange Act.

The said Bates Grain Company agrees to desist from such acts and practices in the future. It further understands and agrees that this stipulation shall be admissible as evidence of such acts and practices in any future proceeding based upon transactions

other than those referred to herein which may hereafter be brought by the Secretary of Agriculture against it under the provisions of the said act. It also understands that it is the practice of the Commodity Exchange Authority to make stipulations of compliance a matter of public record.

Done at Kansas City, Missouri, this 23rd day of October 1964

BATES GRAIN COMPANY

By [SEE SIGNATURE IN ORIGINAL]  
President

Witnesses:

[SEE SIGNATURE IN ORIGINAL]

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

