

Commodity Futures Trading Commission
CEA CASES

NAME: WALTER E. CAHILL

DOCKET NUMBER: STIPULATION 114

DATE: DECEMBER 7, 1970

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UNITED STATES DEPARTMENT OF AGRICULTURE

BEFORE THE SECRETARY OF AGRICULTURE

In re: Walter E. Cahill

Stipulation of Compliance Under the Commodity Exchange Act No. 114

The Secretary of Agriculture has reason to believe that Walter E. Cahill 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 (17 CFR, Chapter 1). No complaint with respect to such violations has been issued and the said Walter E. Cahill 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, Part 0). Therefore, the said Walter E. Cahill for the purposes of this stipulation of compliance and administrative proceedings under the Commodity Exchange Act and for such purposes only, stipulates the following facts are true:

(1) Walter E. Cahill an individual whose address is Rm. 2174, 141 W. Jackson Blvd., Chicago, Illinois 60606 is now and was at all times material herein a registered floor broker under the Commodity Exchange Act and a member of the Chicago Mercantile Exchange, a duly designated contract market under the Commodity Exchange Act.

(2) The futures transactions hereinafter referred to relate to pork belly futures contracts on the Chicago Mercantile Exchange. Each of such contracts called for the delivery of 30,000 pounds of pork bellies. Such contracts could have been used for hedging transactions in interstate commerce in pork bellies, or for determining

the price basis of transactions in interstate commerce in pork bellies, or for delivering pork bellies, sold, shipped, or received in interstate commerce.

(3) On February 12, 1969, Walter E. Cahill made an apparent February/March, spread transaction in pork belly futures with another floor broker. Fifteen February pork bellies were bought at 33.60 for the accounts of customers of Bache & Co. and fifteen March pork bellies were sold at the same price for the personal account of Walter E. Cahill at Henner Brothers. In making this apparent spread transaction, Walter E. Cahill indirectly took the opposite side of customers' orders calling for the purchase of fifteen contracts of the February future at the market.

On February 14, 1969, Walter E. Cahill acting for the account of a customer of a Maduff & Sons, noncompetitively and without prior consent took the opposite side of an order for the purchase of two contracts of March pork bellies and allocated such contracts to the account of another floor broker. In connection with this transaction Walter E. Cahill prepared records purporting to show that the transaction was made with the other floor broker.

The Commodity Exchange Authority has advised Walter E. Cahill that his actions as described above, were in violation of section(s) 4b and 4g of the Commodity Exchange Act and section(s) 1.35 and 1.38 of the regulations under the Commodity Exchange Act.

The said Walter E. Cahill agrees to desist from such acts and practices in the future. He further understands and agrees that this stipulation, which the Secretary of Agriculture is accepting only as to the acts and practices set forth above, shall be admissible as evidence of such acts and practices in any future proceeding based upon acts or practices occurring subsequent to the date of his signing of this stipulation of compliance which may be brought against him by the Secretary of Agriculture under the provisions of the said Act. He also understands that it is the practice of the Commodity Exchange Authority to issue press releases on stipulations of compliance and to make them a matter of public record.

Done at Chicago, Illinois

this 7th day of Dec. 1970

[SEE SIGNATURE IN ORIGINAL]

Witnessed by:

[SEE SIGNATURE IN ORIGINAL]

[SEE SIGNATURE IN ORIGINAL]

LOAD-DATE: June 16, 2008

