In re: The Siegel Trading Co., Inc. Joseph E. Siegel, and Alvin C. Winograd

Stipulation of Compliance under the Commodity Exchange Act No. 64

The Secretary of Agriculture has reason to believe that The Siegel Trading Co., Inc., Joseph E. Siegel, and Alvin C. Winograd 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 The Siegel Trading Co., Inc., Joseph E. Siegel, and Alvin C. Winograd are 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, The Siegel Trading Co., Inc., Joseph E. Siegel, and Alvin C. Winograd stipulate the following facts are true:

(1) The Siegel Trading Co., Inc., is and was at all times mentioned herein an Illinois corporation and a registered futures commission merchant under the Commodity Exchange Act with an office and principal place of business at 110 North Franklin Street, Chicago 6, Illinois.

(2) Joseph E. Siegel and Alvin C. Winograd are and were at all times mentioned herein president and secretary, respectively, of The Siegel Trading Co., Inc.

(3) The acts and practices on the part of The Siegel Trading Co., Inc., hereinafter described were directed and carried out under the supervision and control of respondents Joseph E. Siegel and Alvin C. Winograd in their capacities as president and secretary, respectively, of The Siegel Trading Co., Inc.

(4) As of December 10, 1963, The Siegel Trading Co., Inc., had failed to compute and keep a record as of the close of the market on each of 23 business days from November 5 through December 9, 1963, showing the amount of money, security, and property owing or accruing to its customers which it was required to have in segregated account for such customers in order to comply with the requirements of section 4d(2) of the Commodity Exchange Act. Previous failures to compute and keep such records were discussed with Joseph E. Siegel and Alvin C. Winograd by CEA accountants at various times, and continuing failures were called to the attention of Joseph E. Siegel and The Siegel Trading Co., Inc., by the Act Administrator in a letter dated October 18, 1963.

The Siegel Trading Co., Inc., Joseph E. Siegel, and Alvin C. Winograd 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 in addition to those referred to herein which may be brought by the Secretary of Agriculture against any 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 Chicago, Illinois, this 10th day of January 1964

THE SIEGEL TRADING CO., INC.

By /s/ Joseph E. Siegel, President

/s/ Joseph E. Siegel

Joseph E. Siegel

/s/ Alvin C. Winograd

Alvin C. Winograd

Witnesses:

/s/ Roger E. Harper

/s/ G. Edward Piala

LOAD-DATE: June 16, 2008