

APPROVAL # 44

CHAPTER 946

Notes

Page 17 line 3 printed and
enclosed copies read "exceed"
"said book reads" "exceeds"

Compared by Halloran, McGowan, N. O. E.

APPROVED

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30-DAY BILL

BUDGET REPORT ON BILLS

Session Year: 19 64

SENATE

Introduced by:

ASSEMBLY

Pr:

Mr. Campbell

Pr: 5654

Int:

Int: 2807

General Municipal-New Article 18,
Law: Education, General City, Local Sections:
Finance, Mental Hygiene, Penal, Second Class Cities, Town and Village
Division of the Budget recommendation on the above bill:

Approve: _____ Veto: _____ No Objection: _____ No Recommendation: X

1. Subject and Purpose: To provide a uniform code of ethics for all municipal officers and employees of all municipal governmental bodies outside of the City of New York.

2. Summary of provisions:

(a) Every officer or employee of a municipality would have to disclose publicly the nature and extent of any interest he may have with respect to any contract with a particular person, firm, corporation or association.

(b) Officers and employees empowered to negotiate or approve contracts of expenditures of a municipality would be prohibited from having an interest in a municipal contract if the contract would provide a benefit to themselves either directly or through a company or firm which employs them. Such interest is specifically defined and exceptions are specifically drawn.

(c) Contracts willfully entered into by or with a municipality in which there is an interest prohibited by this bill, would be null and void. The municipal officer would be guilty of a misdemeanor.

(d) Municipalities would be authorized to adopt a code of ethics setting forth standards of conduct expected of their employees and officers, but no provision could conflict with the provisions of this article.

(e) The board of supervisors of a county and the governing board of a city, town or village could establish a board of ethics to render advisory opinions to municipal officers and employees.

3. Prior legislative history: This appears to be new legislation.

4. Arguments in support:

(a) This bill would eliminate conflicting statutes and consolidate into a single statute provisions relating to conflict of interest. At the present time, transactions permitted in one jurisdictions are illegal in another.

(b) By specifically defining what constitutes a conflict and what does not, both the municipality and the employee would be protected.

Date: _____ Examiner: _____

Disposition:

Chapter No:

1 Veto No.



STATE OF NEW YORK
DEPARTMENT OF AUDIT AND CONTROL
ALBANY

ARTHUR LEVITT
STATE COMPTROLLER

IN REPLYING REFER TO

M E M O R A N D U M

RE

AN ACT

To amend the general municipal law, education law, general city law, local finance law, mental hygiene law, penal law, second class cities law, town law and village law, in relation to conflicts of interest of municipal officers and employees

STATUTES AFFECTED:

Adds new Article 18 to the General Municipal Law as recodification of specific provisions of sections 2129(1), 2130(4), Education Law; 3, General City Law; 60.10(a, b), Local Finance Law; 190-h, Mental Hygiene Law; 1868, Penal Law; 19, Second Class Cities Law; 29(2), 64(1), Town Law; 89(8, 20), Village Law.

The following sections would be repealed and replaced and made unnecessary by enactment of the foregoing Article 18: 412, County Law; 1617, Education Law; 88, General Municipal Law; 60.20, Local Finance Law; 147, 186-a, 186-b, 186-c, Social Welfare Law; 104, Town Law; 128(5), 332, Village Law.

Local laws, charters, ordinances, resolutions, rules and regulations, to the extent that they are inconsistent with Article 18, are superseded.

SUMMARY:

Other than for the City of New York, the bill provides a single, uniform and specific rule of law for all municipal officers and employees in relation to conflicts of interest. In addition,

- a. Seventy-eight various and often conflicting laws are consolidated into one statute.
- b. Inconsistencies, permitting transactions in one municipality denounced as offenses in another, are eliminated.
- c. The proposal has application to units of government heretofore unaffected by statute law.
- d. Prohibited "interests" are carefully defined, so as to focus upon officers and employees who may control or influence a transaction from both ends.

- e. The proposed law recognizes the harshness and futility of condemning purely technical and minimal interests.
- f. The proposal makes exceptions which are in the public interest and are subjected to safeguards and controls.
- g. Full and open disclosure of specific interests, direct or indirect, is required to insure official and public awareness so that appropriate action may be taken as circumstances may require.
- h. Willful violations of the proposed statute are made misdemeanors.
- i. The promulgation of local codes of ethics is authorized to supplement or implement but not to supersede the general law.
- j. Boards of ethics are also authorized to provide advice and opinions upon request.
- k. Every public officer and employee would be provided with the statute and any code of ethics adopted in accordance therewith.

PURPOSE:

The purposes of the proposal are stated in full in bill section one. Such purposes may be summarized as follows:

- a. To define specific areas of conflict of interest.
- b. To prescribe a clear and reasonable rule for business and professional transactions with municipalities.
- c. To protect the public from municipal contracts influenced by avaricious officers.
- d. To protect innocent public officers from unwarranted assaults on their integrity.
- e. To encourage each municipality to adopt an appropriate code of ethics to supplement this proposed statute.

OTHER SPONSORS OF PROPOSAL:

A Comptroller's Committee on Conflicts of Interest, which convened in June 1962, assisted in the formulation of policies and principles of this proposal. Committee members who participated are identified on an appended list.

In addition, suggestions were elicited from major organizations representing local officials, from research organizations and foundations, from taxpayers' groups and chambers of commerce.

EFFECTIVE DATE:

September 1, 1964.

Comptroller's Committee on Conflicts of Interest

Mrs. Katherine T. King, Former President
Business & Professional Women's Clubs of
New York State, Inc.

Mr. Matthew L. Lifflander
Associate Counsel
The Hertz Corporation

Mr. Franklin R. Little
President and Publisher
Northern New York Publishing Company

Mrs. John A. Muntz, Former President
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Committee

Mr. Craig M. Smith, Director
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Mrs. Adele B. Tunick, President
United Parents Association of New York
City, Inc.



STATE OF NEW YORK
DEPARTMENT OF AUDIT AND CONTROL
ALBANY

ARTHUR LEVITT
STATE COMPTROLLER

April 2, 1964

IN REPLYING REFER TO

REPORT TO THE GOVERNOR ON LEGISLATION

TO: Hon. Sol Neil Corbin, Counsel to the Governor

RE: Assembly Intro. 2807, Pr. 5654; Introduced by Mr. Campbell

RECOMMENDATION: Approval

STATUTES INVOLVED: Adds new Article 18 to the General Municipal Law as recodification of specific provisions of Sections 2129(1), 2130(4), Education Law; 3, General City Law; 60.10(a,b), Local Finance Law; 190-h, Mental Hygiene Law; 1868, Penal Law; 19, Second Class Cities Law; 29(2), 64(1), Town Law; 89(8, 20), Village Law.

The following sections would be repealed and replaced and made unnecessary by enactment of the foregoing Article 18: 412, County Law; 1617, Education Law; 88, General Municipal Law; 60.20, Local Finance Law; 147, 186-a, 186-b, 186-c, Social Welfare Law; 104, 176(31), Town Law; 128(5), 332, Village Law.

Local laws, charters, ordinances, resolutions, rules and regulations, to the extent that they are inconsistent with Article 18, are superseded.

EFFECTIVE DATE: September 1, 1964

DISCUSSION:

Purpose of bill: The purposes of the proposal are stated in full in bill section one. Such purposes may be summarized as follows:

- a. To define specific areas of conflict of interest.
- b. To prescribe a clear and reasonable rule for business and professional transactions with municipalities.
- c. To protect the public from municipal contracts influenced by avaricious officers.
- d. To protect innocent public officers from unwarranted assaults on their integrity.
- e. To encourage each municipality to adopt an appropriate code of ethics to supplement this proposed statute.

April 2, 1964

- f. To curtail the volume of incidents of wholly technical and minimal conflicts of interest that do not represent venal arrangements but which nevertheless must be documented in official reports and reported in newspapers.

Summary of provisions: Other than for the City of New York, the bill provides a single, uniform and specific rule of law for all municipal officers and employees in relation to conflicts of interest. In addition,

- a. Seventy-eight various and often conflicting laws are consolidated into one statute. (Reference - Exhibit 1).
- b. Inconsistencies, permitting transactions in one municipality denounced as offenses in another, are eliminated. (Reference - Exhibit 2)
- c. The proposal has application to units of government heretofore unaffected by statute law. (Reference - §800(4))
- d. Prohibited "interests" are carefully defined, so as to focus upon officers and employees who may control or influence a transaction from both ends. (Reference - §801)
- e. The proposed law recognizes the harshness and futility of condemning purely technical and minimal interests and makes exceptions that are in the public interest and which are subjected to safeguards and controls. (Reference - §802). Generally such exceptions appear in current law with limited applications, however, to certain types of municipalities.
- f. Full and open disclosure of specific interests, direct or indirect, is required to insure official and public awareness so that appropriate action may be taken as circumstances may require. (Reference - §803)
- g. Willful violations of the proposed statute are made misdemeanors. (Reference - §805). A contract willfully entered into in violation of the article is null, void and unenforceable. (Reference - §804; existing provisions of current law)
- h. The promulgation of local codes of ethics is authorized to supplement or implement but not to supersede the general law. (Reference - §806)
- i. Boards of ethics are also authorized to provide advice and opinions upon request. (Reference - §808)
- j. Every public officer and employee would be provided with the statute and any code of ethics adopted in accordance therewith. (Reference - §807)

It is important to note that, under this bill, a municipal officer or employee is not deemed to have a prohibited conflict of interest in a business or professional transaction with his municipality unless two factors converge. To oversimplify: (1) he must have a substantial official connection with effecting the transaction (§801); and (2) he must have a substantial private connection with effecting the transaction, or be able to gain financially from it in his employment (§802.1b).

April 2, 1964

The requirement that these factors converge overcomes the harsh, inflexible rule of the common law - the supposed rule that no officer may have any interest in any contract with his municipality, whether he has anything to do with effecting the transaction or not. (See staff studies referred to below).

Prior legislative history of bill and similar proposals: There is no prior history of any effort to consolidate and make uniform the various provisions of law relative to interest in contracts, conflicts of interest and ethical conduct. To the contrary, each legislative session is marked with efforts to make piecemeal amendments of widely scattered laws that generally make additional exceptions for the benefit of particular professional groups in particular jurisdictions or types of municipalities.

A previous staff study of the subject was made by this Department in 1957 (copy attached, with later supplement) but no legislation was introduced until the present year.

The proliferation of law, without any consistent pattern, has contributed to a general misunderstanding or lack of comprehension by local officials of legal boundaries and has been one of the compelling reasons for the subject proposal.

Known position of others: A Comptroller's Committee on Conflicts of Interest, which convened in June 1962, assisted in the formulation of policies and principles of this proposal. Committee members who participated are identified on an appended list.

In addition, suggestions were elicited from major organizations representing local officials, from research organizations and foundations, from taxpayers' groups and chambers of commerce and interested state departments. An objection has been raised as to designating willful violations of this proposal as a misdemeanor. Such objection has no validity in view of the present provisions of Sections 1866 and 1868 of the Penal Law.

The bill was passed unanimously by both the Senate and Assembly.

ARTHUR LEVITT
State Comptroller

By



Alfred W. Haight
First Deputy Comptroller

HAC:pl

STATE DEPARTMENT OF CIVIL SERVICE

April 7, 1964

ASSEMBLY

Int. 2807

Pr. 5654

Introduced by Mr. Campbell

RECOMMENDATION:

No recommendation

STATUTES INVOLVED:

General Municipal Law Art. 18, §§ 800 through 803 (new) and various other laws

EFFECTIVE DATE:

September 1, 1964

DISCUSSION:

This bill would enact a single uniform statute dealing with conflicts of interest of municipal officers and employees replacing a variety of provisions on this subject now scattered throughout various laws which are appropriately amended or repealed by this measure.

This bill does not affect the administration of the Civil Service Law. We do not have sufficient experience in connection with the subjects dealt with in this proposal to be able to form an opinion as to the adequacy and merits of this bill.



Mary Goode Krone
President

Enclosure

4-2857

MEMORANDUM FOR THE GOVERNOR, RELATIVE TO ASSEMBLY BILL INT. NO. 2807, PRINT NO. 5654, INTRODUCED BY MR. CAMPBELL AND ENTITLED "AN ACT TO AMEND THE GENERAL MUNICIPAL LAW, EDUCATION LAW, GENERAL CITY LAW, LOCAL FINANCE LAW, MENTAL HYGIENE LAW, PENAL LAW, SECOND CLASS CITIES LAW, TOWN LAW AND VILLAGE LAW, IN RELATION TO CONFLICTS OF INTEREST OF MUNICIPAL OFFICERS AND EMPLOYEES."

Unfortunately, this office did not have adequate opportunity to study this bill before it reached your office. The pressure of the many legislative problems did not enable us to do so.

Since, however, we have given it more careful consideration, we are fully convinced that the bill in its present form is unworkable for school districts. This Department is in complete agreement with the motivation of the bill; that is, we believe that it would be valuable for boards of education of school districts to have a code of ethics set down specifically in the law so that board members would be familiar with areas of violations. However, this Department is of the opinion that there are periphery areas where no actual conflict of interest is involved which are contained in this bill.

Further, there are many procedures apparently which are placed into the bill to take care of municipalities other than school districts which would make it difficult, if not impossible, for administration purposes if the bill is to be applied to school districts.

The definition of conflict of interest should not be so all-embracing that it would make it impossible for outstanding

citizens to serve on boards of education. We think, for instance, that under the terms of this bill no banker would be willing to serve and there are other persons in business life who would be equally involved.

In its present form we are satisfied that it would do more harm than good to the successful operation of the public school system. We urge therefore that the bill be vetoed so that then the Department can sit down with the Department of Audit and Control and other persons interested.

We are convinced that the present difficulties in the bill could be straightened out, but we do not think that they can be straightened through later amendments.

The bill, as far as school districts are concerned, is unworkable in its present form.

Consideration should also be given to a separate bill for school districts. School districts are part of the State system of education with the Commissioner of Education and the Regents as the top of the apex. The acts of a board of education are subject to the appellate jurisdiction of the Commissioner of Education. They are entirely different from the municipalities. The enforcement of a code of ethics has for a century and a half been vested in the Commissioner of Education and there has been little or no criticism of his control over 150 years. Of course, the Regents themselves

or the Commissioner could enact a code without resort to the Legislature. All this should be studied before the adoption of this bill which has many ambiguous features, which if a violation occurs subjects the board member or "employee" of a school district to a misdemeanor.

Some of our specific objections are as follows:

1. Section 800, subdivision 3 (and many other places of the bill) includes employees along with officers. This is not supported by any of the court decisions here involved, such as the famous Town of Russia case and others, all of which referred to acts of officers, rather than employees.

2. The same subdivision 3 goes even further and speaks of an employee of the school district who is also an employee of a firm, partnership or association (not even an officer of such organization). In addition, the holding of "any" stock by an officer or employee is included in the definition of "interest".

3. "Municipality" is defined to include, in addition to school districts, public libraries, county vocational boards and cooperative boards. This is a novel expansion of the concept, and needs further study, especially in relation to public libraries.

4. The bill still excepts New York City and the New York City School District, as well as the five counties and other

agencies in New York City. If this is to be an all encompassing statute, the exclusion of such a large segment of operations seems unjustified.

5. In the language of the definition of "municipal officer or employee", there is included any officer or employee "paid from county funds". This would include the district superintendent of schools in some cases, etc., etc.

6. In Section 801, which is the operating section, not only municipal officers or employees are included, who have the power to make a contract, but also anybody who has the power or duty to prepare a contract. This obviously would include all stenographers, clerks, the attorney, or anybody else whose interest obviously is only mechanical. Likewise included is anybody who has the right or duty to audit bills or claims under the contract--all of which is a baseless expansion of the concept.

7. The last sentence of Section 801 supposedly would authorize dual employment, but in view of all the other language, it is not quite clear just how far this exemption goes.

8. In the reference to designation of a bank (Section 802, subdivision 1), the phrase "or adjoining district" is omitted, thus greatly tightening the provision for school districts.

9. The bill repeals Section 1617 of the Education Law, which presently authorizes the insertion of notices in newspapers. It might be supposed that this is covered by Section 802, subdivision 1, paragraph c, which speaks of the designation

of an official newspaper. School districts, of course, do not do so and, consequently, the liberalization as to newspapers presently contained in Section 1716 is lost for school districts.

10. Paragraph f of subdivision 2 of proposed Section 802, excepts from the operation of the bill contracts where the total consideration, when added to the aggregate amount of all consideration payable under contracts to the same person during the fiscal year, does not exceed the sum of \$100. In the experience of this Department, relating to school districts, this is much too tight.

11. Section 804 would make all contracts contrary to this article, if willfully entered into "null, void and wholly unenforceable". In view of the uncertainty as to what is or is not covered by this, this sounds pretty stringent.

12. Probably the worst feature of the bill is that any violation of the article is made a misdemeanor. Even though the violation for this purpose must be "willfully and knowingly", it is much too difficult to interpret this bill in all its ramifications to be sure that some of these things may not turn out to be violations.

Under this provision any person in his right mind would refuse to serve as school district officer and maybe even as employee.

13. The bill contains a provision about a county board of ethics. Again the question is "Which county?". Over half our central school districts are located in more than one county; there are at least 60 districts in three counties, and at least 15 districts in four counties. Here we are asking for 2, 3 or 4 conflicting determinations. The board is to render "advisory opinions" on all these questions.

14. Subdivision 3 of Section 808 authorizes cities, towns or villages, to establish their own local board of ethics. School districts have not been given such power, even though, as indicated in 13. above, there is much more reason to give them their own board than the municipal units.

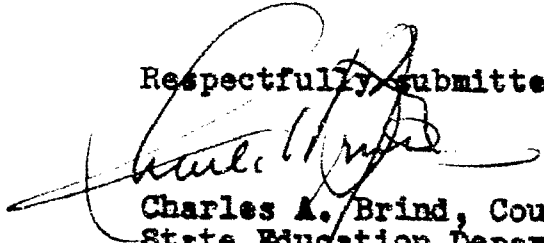
15. Penal Law, Section 1868 is amended by saying that it shall not apply to officers and employees subject to this new article. Under the circumstances, it will be almost impossible to ascertain what Section 1868 is supposed to mean if the bill is enacted. Again, it must be kept in mind that if a person guesses wrong, he has committed a misdemeanor.

16. Section 13 of the bill provides that this article is supposed to supersede any local law, charter, ordinance, resolution, rule or regulation of any school district, to the extent that they are inconsistent with the new article. Again, a wrong guess results in a misdemeanor.

-7-

It is urged that the bill be vetoed for further study.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Charles A. Brind", is written over the typed name.

Charles A. Brind, Counsel
State Education Department

April 8, 1964

A-2807

MEMORANDUM TO MR. CORBIN

April 13, 1964

FROM: Kent H. Brown,
Counsel, Pub. Ser. Com.

RE: Assembly Intro. 2807, Pr. 5654

BY: Mr. Campbell

AN ACT
to amend the general municipal law, education
law, general city law, local finance law,
mental hygiene law, penal law, second class
cities law, town law and village law, in
relation to conflicts of interest of muni-
cipal officers and employees

* * *

PSC has no objection to the approval of the instant
measure - though we cannot refrain from expressing some regret
that verbiage such as that contained in the declaration of
policy and purpose should be permanently ingrained in our statute
books.


We note the import of § 802 (bill p. 5-8) subd. 2c,
providing municipal officials with an exemption from the charge
of conflict of interest should they have "an interest" in a
contract for the furnishing of public utility services to the

2.

municipality where we fix or regulate the rates and charges.

As a practical matter in most instances we do fix and regulate such charges. We do not do so in every instance, however.

Municipalities and public utility corporations may contract for utility services at rates other than those prescribed by tariffs on file with us. See e.g. Public Service Law, § 66, subd. 12.



FAR ASSOCIATION OF NASSAU COUNTY
Mineola, New York
LEGISLATION AND LAW COMMITTEE

April 8, 1964

A. Intro. 2807
Print 2831, 4805, 5654

LAW AND SECTION REFERRED TO: GENERAL MUNICIPAL LAW
New Article 18

SUMMARY OF PURPOSE OF BILL: To amend the general municipal law, general city law, and other pertinent laws in relation to conflicts of interest of municipal officers and employees.

Effective date of bill: September 1, 1964

RECOMMENDATION: APPROVAL

This bill is step in the right direction. Further progress is looked forward to. For example, the provision of sect. 803, par 1, once a disclosure is made by an officer or employee with respect to an interest in one contract, he need not make further disclosures for the remainder of the fiscal year with respect to additional contracts with the same party; appears to have no justification. But on the whole this legislation is approved.

Respectfully, submitted,

DAVID ROMANOFF, chairman

Report prepared by
committee as a unit

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RAYMOND J. COTHREN, Albany
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Counsel

April 2, 1964

Hon. Sol Neil Corbin
Executive Chamber
State Capitol
Albany 1, New York

Re: A.I. 2807 A.P. 2831, 5654 by Mr. Campbell

Dear Mr. Corbin:

The Conference of Mayors approved this bill. We recommend that such bill be signed by the Governor.

Comptroller Levitt's Office prepared this bill after conducting a series of hearings throughout the state to determine whether or not such a bill was necessary. This writer attended two of such hearings. At one hearing, more than 200 city, village, town and county officials were present. At the other meeting about 50 local officials were present.

The press covered the meeting and indicated that there were many abuses relating to conflict of interest because of a lack of understanding of the law by local officials and not because of any attempt to defraud the taxpayers.

This bill clearly defines the law and enables local officials to understand what they can and what they cannot do when dealing with local government.

The drafters of this bill sought to provide a bill which would clearly define the trouble spots as actual experience indicated from thousands of audits.

Hon. Sol Neil Corbin
Page Two
April 2, 1964

Re: A.I. 3807 A.P. 3831, 5654 by Mr. Campbell

We understand that there are those who oppose the bill because of the "loop-holes" therein. These are the same people who have done little to offer assistance to solve the problem over the years. Their "loop-hole seeking" emanates from a conclusion that local officials are inherently thieves and that greater efforts must be made to stop the crookedness in local government. It is to be noted that these same people fail to stress that many of their arguments would apply to the present law.

Comptroller Levitt's bill was drawn after a tremendous public relations campaign which stressed the fact that he was trying to help local officials help their taxpayers and themselves in the proper administration of local government.

The Republican Party in the Legislature recognized that this bill had merit and passed it unanimously.

We stress the public relations in the memorandum and not the text of the law for we seek to anticipate opposition which we believe is unwarranted and which, we sincerely believe will mislead the Governor.

The press have named this bill the "Ethics Bill for Local Officials." We believe it would have an adverse effect upon local officials and the taxpayers if the Governor vetoed this ethics bill after stressing the need for an ethics bill for state officials.

There is no need to describe the legal effect of the Campbell bill. It was drawn so that it could be clearly understood.

The purpose of our memorandum is to express the local officials concept of the bill and the history of its development. We pray that the Governor will recognize that this bill was drawn by men acquainted with the facts. We hope that the bill will not be vetoed because of a series of far fetched examples of possible frauds which are based upon the premise that local officials are inherently thieves.

Sincerely,



RAYMOND J. COTHRAN
Executive Director

THE
ASSOCIATION OF TOWNS
OF THE
STATE OF NEW YORK

Office of the Executive Secretary

91 State Street
Albany, N. Y.

12207

WILLIAM K. SANFORD
Executive Secretary

April 2, 1964

His Excellency Nelson A. Rockefeller
Executive Chamber
Albany, New York

Memorandum in relation to
Assembly Bill Int. 2807, Pr. 5654
By Mr. Campbell

Sir:

Subject bill was prepared by the Department of Audit and Control after extensive study and years of ruling on questions of conflict of interest. Hearings on the problem were held by the Department throughout the State. It is sought by this bill to clarify and define existing conflict of interest common law, to eliminate the overlapping and conflicting provisions of present statutes and the confusion caused by the present necessity to interpret vague provisions.

We approve the purpose and intent of this bill. Undoubtedly, some will criticize particular provisions of it as being not perfect. Where such imperfections are established they can be clarified or amended another year. In the meantime, this Association favors approval of this bill as being in the best interests of its municipal officers of State and of its citizens.

Respectfully submitted

William K. Sanford

WILLIAM K. SANFORD
Executive Secretary

WKS:U:m11

NEW YORK STATE
SCHOOL BOARDS ASSOCIATION, INC.

111 Washington Avenue - Albany, New York 12224

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April 15, 1964

The Honorable Sol Neil Corbin
Counsel to the Governor
Executive Chamber
The Capitol
Albany, New York 12224

Dear Mr. Corbin:

There is before the Governor AI 2807, AP 5654 by Mr. Campbell, which would amend the general municipal law, education law, general city law, local finance law, mental hygiene law, penal law, second class cities law, town law and village law, in relation to conflicts of interest of municipal officers and employees.

This Association's Executive Committee considered the above measure in its original form and recommended approval of the principle which the bill stands for. The committee did not give blanket approval to all the provisions of the bill.

Later, on amendment, further consideration was given by the Executive Committee and, although the amendments were of such a nature as to improve the bill, it did not receive the full approval of the committee.

Since this measure became a 30-day bill it has been studied further. We have had the opportunity to review two long opposing memoranda prepared by the State Education Department and the Office for Local Government.

It is our belief that altogether too many questions remained unanswered, that there are vast areas of ambiguity in the bill, that the measure is capable of much misinterpretation and that the net result of these deficiencies would be detrimental to the interests of the general public.

We earnestly urge that the memoranda referred to above be most carefully studied before action is taken.

There is no question but that this bill is a meritorious attempt to resolve some difficult problems.

The Honorable Sol Neil Corbin

April 15, 1964

The avenue of doubt is so wide that we believe this bill should be vetoed but at the same time a study should be instituted whereby all parties concerned could sit down together to consider it instead of reacting separately to features, good and bad, which are in this measure.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Everett".

EVERETT R. DYER
Executive Director

ERD:L