C-103-13

Corporation Counsel

Seattle, December 15, 1914.

Honorable Hiram C. Gill,
Mayor of The City of Seattle,
City Hall,
Seattle.

Dear Sir:

This department, pursuant to charter and custom, herewith transmits its statement of the business transacted therein from the first day of December, 1913 to the first day of December, 1914.

A - MATTERS RELATING TO PUBLIC UTILITIES:

1. BURDEN OF PROOF IN RATE CASES:

In State ex rel. Seattle v. Public Service Commission, 76 Wash. 492, the Supreme Court held that where a public service corporation files with the State Commission a new schedule increasing its present rates or charges, the burden of proving such increased rates unreasonable is upon the City or person challenging the same and that upon the failure to carry the burden, such increased rates go into effect automatically. We think this decision is unsound both in law and upon principle. But regardless of our view, it is now the law of the state. Under the law and practice before the United States Interstate Commerce Commission, where a schedule increasing rates is filed and their reasonableness denied, the burden is upon the company seeking such increase to show by competent evidence the fairness of such increase. We have prepared an amendment to the law and shall ask the Legislature to follow the United States law and place such burden where it logically belongs.

This should be in files of Corporation Counsel Mail 9-12-49

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2. THE STRAP HANGING CASE:

The State Commission has never entered any order relating to the overcrowding of street cars or attempted in any way to do so. The City of Seattle adopted an ordinance seeking to prevent such overcrowded condition and minimize the evils thereof. In the case of Seattle Electric Company v. City, 78 Wash. 203, the court held that the City has no power or control over this subject. This is an important opinion for the obvious reason that it strips the City of the right of local self-government in all such and germane matters, and in lieu thereof the City and its people are subject to the control of "carpet bag" rule. Whenever any evils or inconveniences relating to such or similar matters arise in the City, then relief can only be secured by resorting to the State Commission. The City grants the franchises under which the public service corporation has any right whatever to occupy its streets, and yet under the doctrine as announced in this decision, the City is bereft of all real control of the very company whose utility is permitted to occupy such highways.

3. SALE OF TICKETS ON CARS:

The City, for the convenience of the public, required the Seattle Electric Company to sell tickets to its patrons upon its cars. The company has stoutly resisted this demand in many ways. It has dragged the City into all the courts, both federal and state. The State Commission, after hearing, made an order requiring the company to sell tickets on the cars. Thereupon the company appealed to the Superior Court, secured an order reversing the Commission and the City has appealed the case to the Supreme Court which has not yet rendered its opinion. The reasonableness and convenience of the request to sell tickets on cars is obvious. This is one out of many luminous examples of the usual attitude

not only of this, but other public service corporations in serving the public. There seems to be an "irrepressible conflict" between the desire of the company to make all it can and furnish a minimum of service on the one hand, and the desire of the people, on the other hand, to secure a maximum of service at the lowest cost.

4. EXTENSIONS:

Several sections of the city have, for some time last past, justly demanded street car extensions and service. The company has at all times refused to provide such service. It has crouched and crawled behind its shield of usual pretensions. The State Commission, upon the opinion of the Attorney General, held that it is without power to compel extensions. The City has appealed the case. The City also appealed from a decision of the Superior Court in another case which held that the City is without power to compel such extensions. Both cases are now in the Supreme Court, but without awaiting the opinions therein, we have prepared a bill which seeks relief for such districts and we trust the Legislature will adopt it. This anomolous situation is both aggravating and instructive. The franchises granted to the street car and other public service corporations by Seattle, in common with those granted in other American cities, form one of the darkest and most damning chapters of our American municipal life. These franchise grants stand as a monument of disgrace, stupidity, incompetency, corruption, fraud and dishonesty. There is not even a syllable of reserve power or control relating to extensions - - no power whatever under which the City is given the reserved right to compel reasonable or any extensions whatever.

5. LAKE BURIEN CAR LINE:

Many enterprising men, whose interests are bound up with, and who contribute materially to, the prosperity and progress

of Seattle, made a gift of this line valued at about $125,000., to the City. The operation of that portion outside of the city has more than paid for itself. It runs through a fine district and will develope it. That such growth will contribute greatly to the prosperity of Seattle and all her business and other interests is obvious. Yet, despite these and other facts, some one thinks he has discovered that the City is illegally using the public money in the operation of that portion beyond its limits and an action was begun by the State to enjoin certain city officials from so using the public funds. It may be only a strange coincidence that the time of such discovery and action was just before the meeting of the Legislature and at a time when the public press, by concerted movement in editorial and paid advertisements, is making vicious assaults against the City light plant and other municipally owned utilities. It is obvious that the stage is set and the drama written. This is another striking example of the control of local affairs under the "carpet bag" or bureaucratic theory of government. The operation of this line is obviously of local concern. It is clearly local in character. These matters of a peculiarly local nature and concern, in a very luminous way, show the folly and fallacy of "carpet bag" government. Of what possible concern is it to citizens of the state, living four hundred miles east of the mountains, whether we operate a car line or not outside the city limits. What possible interest can they have in such or similar matters? In no way are the public morals or health involved. We use our own and not their money.

6. SEATTLE, RENTON & SOUTHERN RAILWAY COMPANY.

We have such a mountain of litigation in all the courts with this company and its receivers that I shall only brief-

ly refer thereto.

(a) The right of the City to condemn its car line was sustained in the State Supreme Court and the case is now pending in the United States Supreme Court;

(b) The suit, in which the City condemned its right of way, was appealed by the receivers to the State Supreme Court;

(c) The case involving the City's right to revoke and forfeit the franchise of the company was decided in favor of the company by the federal court;

(d) The Company has been collecting, in violation of the law, exorbitant charges from boys carrying packages on the cars. We shall ask the City Council for authority to begin proper proceedings bevore the State Commission to prevent such practice.

(e) Increase of rates.

The receivers applied to the State Commission for its order to charge five cents in each of two zones or ten cents within the city limits, instead of the present five cents. Upon a hearing, the Commission denied the application. The receivers then dragged the City and Commission into the Federal Court, which denied their application for a temporary injunction. The case is pending therein upon the merits.

In view of the fact that the Council has voted to submit at the March election the offer of the receivers to sell the road to the City for $1,500,000., some of the facts established upon such hearing before the State Commission are herein set forth as follows:

Actual cash invested in all the property of the company from the beginning to June 30, 1914:

Inside the city	$ 895,160.29	
Outside the city	124,904.16	
		$ 1,020,064.45

Cost of reproducing property less depreciation, or present value of all said property:

Inside the city	$ 855,490.00	
Outside the city	104,465.00	
		$ 959,955.00

Cost of reproduction of all properties:

Inside the city	$ 1,035,509.00
Outside the city	135,718.00

Total reproduction cost, new, under present conditions, $ 1,171,227.00

For 1912 81% of all gross receipts used to pay all expenses.

For 1913 86% of all gross receipts used to pay all expenses.

For 1914 (first six months) 84½% of all gross receipts used to pay all expenses.

Present estimated value of all real estate including all rights of way: (Inside the city) $ 228,685.00

Total cost of all right of way and lands both inside and outside the city $ 12,642.00

A large portion of the rights of way inside the city limits and valued at the above $228,685.00 have been quit claimed by the Company to the City of Seattle. All of the foregoing figures were given to the Public Service Commission at said hearing by Mr. Burroughs, the State Engineer for the Commission, and in his report, among other things he says:

> "The average annual net earnings for the years 1913 and 1914 will be approximately $41,000. From this amount the investors must derive the interest upon their investment, after setting aside a replacement annuity to maintain the investment itself. Such annuity has been calculated at $29,644.90, leaving less than $12,000. available for interest upon the investment. This would be sufficient to pay 6 per cent. upon an investment of only $200,000. . . . . Applying this percentage, the average annual operating expense for this period is $216,721.26, making the net earnings $12,266.19, or less than enough to cover the replacement annuity which should be provided by the portion of the line within the city."

Clearly, all of the foregoing decisions relating to the control of public utilities show that the tendency of our courts is to extend the jurisdiction and power of, and resolve all doubts in favor of the Public Service Commission, and to divest cities of the first class of any local power of control relative thereto.

7. HEARINGS BEFORE STATE COMMISSION:

There are now pending before the State Commission the following several very important hearings:

(a) To determine the present valuation of all the properties of the Seattle Lighting Company;

(b) To ascertain and establish reasonable rates, practices and customs of the said company;

(c) To determine the valuation of all the properties in the City of the Puget Sound Traction, Light & Power Company;

(d) To inquire into and establish reasonable rates and customs of said company;

(e) To determine the question of the over-crowding of the street cars, and to provide a reasonable schedule of said last named company;

(f) To determine the valuation of all the properties of the telephone company with the city;

(g) To fix reasonable charges for service and prescribe reasonable practices and customs for said company.

All the foregoing, and other lines of litigation with the Public Service Corporations, which is so extensive and varied in character, conclusively shows that the public seldom secure or enjoy their rights and reasonable service except by the constant use of the legal shot gun; only after very long and costly litigation in all the courts, both Federal and State, do we finally reach any conclusion. It is obvious that the work of this office relating only to the public utility matters is many times larger than ever in the history of the City.

B - OTHER GENERAL SUBJECTS.

1. INTEREST CASES.

In the Grant Smith case against the City, 74 Wash. 438, the City pleaded an offset of about $48,000., accrued interest on said bonds, which it claimed was unlawfully paid, and the Supreme Court sustained such contention. The contractor thereupon took the case to the United States Supreme Court and last week that court dismissed the case for lack of jurisdiction, so that the matter is finally settled.

Pursuant to said decisions, this department has already begun one hundred forty-five (145) cases, involving about a quarter of a million dollars, and has about sixty-five (65) cases yet to be commenced, involving about fifty thousand dollars more, which we are seeking to recover as accrued interest unlawfully paid in various improvements.

The importance and magnitude of all this litigation are obvious. It has brought to this department a very large mass

of new and unexpected litigation.

2. POLICE COURT:

The amount of the work in the police court remains about the same. The number of cases actually tried from December 1, 1913 to December 1, 1914 is 13,262, and the amount of fines and forfeitures is $54,231.60. I herewith send you a fuller report of the City Attorney.

So far as informed, the work of this court and the City Attorney have been quite satisfactory. I have received but one complaint about the conduct of cases by the City Attorney and inquiry showed that this was not at all serious. The treatment and attitude of the City toward at least one-fourth of all the persons who come before this court is wrong anduunwise. For recommendations, I refer you to my former reports of 1912 and 1913.

3. FINANCES:

On several occasions the City has found it necessary to make temporary loans from one fund to another in order to meet emergencies. There has been some criticism, unjust and otherwise, of such action by some critics whose motives and interests were not entirely unselfish or Christian. Some of the banks and their "go betweens" have indulged in severe criticism. We have had lying idle in the banks at various times from four to six million dollars, drawing the generous rate of two per cent. (2%) interest, and, when the City has found it necessary to use some of such idle and unused funds and make temporary loans thereof for lawful purposes, the city officials have been met with the charge that they are unlawfully diverting such funds and that they should not do so but go to the banks or other sources, secure loans and pay six or eight per cent. interest thereon instead of using such idle funds. This department has rendered several opinions relative to

the legal right of the City to use such idle funds when necessary. In an opinion to the City Comptroller relative to the right of the City to use such idle moneys, among other things, I used the following language:

> "Surely good business and public policy require the City to use portions of such money whenever it is wise to do so, and is to the welfare of the taxpayers in general. By making the temporary loan in question no fund will be imperiled, the credit of the city will not be impaired in any way and several thousands of dollars will be saved the general taxpayers of the city. In the absence of any express provision enjoining the city from making such a loan under the facts in this case, and in view of the considerations of public policy and welfare, all doubt, if any exists at all, should be resolved in favor of the City possessing such power."

So long as I am at the head of the Legal Department, I shall continue in all my opinions to advise the City that it has the legal right to continue such practice unless the Supreme Court of this state shall hold to the contrary.

The decisions of the courts of this state during the last year, show a marked tendency to mulch the general fund of the City and make it pay a larger proportion of the cost of public improvements and especially condemnation assessments.

4. OLD AND UNLAWFUL ASSESSMENTS:

Several old assessment rolls have heretofore been held void by the Supreme Court and the cloud upon the title of the properties affected thereby has never been removed by any action of the City Council. Some of these go back as far as 1890. This department is often called upon with reference to such matter. Several persons have brought suits against the City to quiet the title to their property and, of course, the City has no defense. Some persons may pay the City such unlawful assessments rather than begin action. We think, however, that the costs against the City perhaps exceed such unlawful collections. In some cases where

the courts have held such assessments invalid, the equities may be with the City but this is of no avail under the cold forms of our legal system. The City should not by inaction or refusal drive each of such property owners to begin an action to clear their property of the cloud of such void assessments.

Where the uncollected assessments are void by reason of the court's decision, or for any other reason, the Council should pass an ordinance clearing such properties of such cloud.

5. EMINENT DOMAIN:

It is admitted by students of the subject that much injustice and inequity flow from the application of our present system of condemnation work;

(a) We have a hearing before the jury, and later and at another time, before the Eminent Domain Commissioners, we have another hearing covering very much the same ground. This system brings the property owner into court at least twice. Such a division and parcelling out of duties to two distinct tribunals is obviously illogical and unsound and does not work out well in actual practice. All such duties should be lodged in and performed by a single tribunal composed of three or more persons who are well equipped and specially trained for such work and before whom both hearings as now provided by law should be consolidated into one hearing without a jury, and instead of haling the property owner into court twice, bring him in once and have all questions as to both damages and benefits and condemnation assessments passed upon in the one hearing, reserving the right of an appeal to the Superior Court for hearing before a jury;

(b) Under the present Eminent Domain law, the property owner is required to pay all his condemnation assessment within

sixty (60) days from the date of the Treasurer's notice. It is a matter of general knowledge that the demands made upon the property owner by such a system, even in times of prosperity, work great hardships and often disaster. Of course, in times of panic and financial depression, such a system strikes them still harder. This immediate plan system should be entirely abolished and in lieu thereof, the Legislature should adopt a scheme similar to the bond plan as provided for in our local improvement Act of 1911, under which the property owner may pay his assessments in annual instalments with reasonable rate of interest, covering a period of several years;

(c) The present rate of interest upon delinquent assessments is exorbitant and too high. The law should be amended by lowering such rate to a point consistent with the efficient and practical administration of the collection of such assessments. Experience and study should determine what such a rate is and the Legislature should adopt it.

(d) The time of publication on non-residents should be reduced from sixty (60) to at least thirty (30) days. Under the present system, it takes too long to reach a final determination.

The present system is defective in all of the respects above mentioned and a general revision along the above and other similar lines should obviously be made. This department, for more than a year last past has been studying and fashioning amendments to the present law embodying all of the foregoing ideas and will present them to the coming Legislature and urge their adoption.

6. GENERAL WORK AND POLICY OF THIS OFFICE:

A comparison of the work of this department for the year now closing with former years, clearly shows that the volume, magnitude, and importance thereof, have greatly increased. The success and efficiency, or the lack of it, of this department, is not to be measured by mere words, but by the actual facts and examination thereof, as shown by this report.

The scope of the duties of this department are quite limited in character. Primarily, they are legal, and matters of policy are generally lodged in other departments. If it can be said to be a matter of policy at all, this department uniformly pursues the rule of resolving all doubts in the construction of the City Charter in favor of the right of first class cities to govern themselves. The obvious intention of the framers of the Constitution, as shown by Sections 10 and 11 of Article XI, and of the Legislature in the "Direct Amendment Act", Sections 7504-6 of Rem. & Bal, and the "Enabling Act", Section 7507 of Rem. & Bal., is to grant and secure to cities of the first class "complete local self-government in municipal affairs".

It is familiar and well-settled law that it is not only the duty of public officials in such cities, but also of the courts, to resolve all doubts and presumptions in favor of the validity of any charter provision or other legislative enactment.

State v. Somerville, 67 Wash. 638.

It is, however, clearly my LEGAL duty to invoke and apply the foregoing rule; but even in the absence of such a rule, I shall continue, so far as it is in my power to do so, to resolve such doubts in favor of the extension rather than the limitation of the Home Rule theory. I shall continue to enlarge the legal life of the city rather than to dwarf or wither it by technical or narrow construction.

Inasmuch as the Legislature has, in some respects, narrowed the orbit within which the principle of Home Rule may operate, and as the Supreme Court has in some of its earlier decisions, gradually clipped the wings of Municipal Home Rule, I am very strongly disposed to resolve all reasonable doubts in favor of the right and power of the people of such cities to manage their own local affairs in the manner which to them seems the best suited for their own local and peculiar needs and conditions.

"Carpet Bag" forms of government, or bureaucratic administration of government powers or functions, are distasteful to the Anglo-Saxon mind, and wherever a conflict arises between the right of local self-government and the "carpet Bag" idea, it is the duty of public officials to resolve all such doubt in favor of the former principle.

OTHER GENERAL SUBJECTS.

On December 1, 1913, the date of the last annual report, the following suits were pending and undisposed of in this department:

Condemnation suits, original proceedings,	50
Condemnation suits, supplementary proceedings,	14
Damages for personal injuries,	33
Damages to property,	67
Damages other than damages to property and personal injuries,	5
Actions to set aside and restrain collections of assessments,	10
Appeals from assessments levied by City Council,	5
Injunction suits,	14
Mandamus proceedings,	7
Miscellaneous proceedings,	41
Suits to quiet title,	6
Suits to recover over against contractors, owners of property or franchises on account of personal injury judgments paid by city,	5
Total - - - -	257

Since November 30, 1913, the following suits and proceedings have been commenced in which the city was a party in interest:

Condemnation suits, original proceedings,	31
Condemnation suits, supplementary proceedings,	24
Damages for personal injuries,	21
Damages to property,	30
Damages other than damages to property and personal injuries,	6
Actions to set aside and restrain collection of assessments,	2
Appeals from assessments levied by City Council,	14
Injunction Suits,	17
Mandamus proceedings,	13
Miscellaneous suits,	135
Suits to quiet title,	7
Suits to recover over against contractors, owners of property or franchises on account of personal injury judgments paid by the City	0
TOTAL - - - - - -	300
Actions pending on November 30, 1913	257
Total actions pending during period of this report -	557

The following is a statement of actions ended since December 1, 1913, and those still pending on November 30, 1914:

	Ended	Still Pending
Condemnation suits, original proceedings,	32	49
Condemnation suits, supplementary proceedings,	26	22
Damages for personal injuries,	31	23
Damages to property,	46	51
Damages other than damages to property and personal injuries,	7	4
Actions to set aside and restrain collection of assessments,	4	8
	136	157

Carried forward --------	136	157
Appeals from assessments levied by City Council	11	8
Injunction Suits,	10	21
Mandamus proceedings,	16	4
Miscellaneous proceedings,	31	145
Suits to quiet title,	5	8
Suits to recover over against contractors, owners of property or franchises on account of personal injury judgments paid by the City,	0	5
TOTAL	209	348

PERSONAL INJURY CLAIMS.

	Number	Amount Involved.
Claims for personal injuries pending November 30, 1913,	210	$ 859,957.17
Claims for personal injuries filed from November 30, 1913 to November 30, 1914,	118	293,703.26
TOTAL ----	328	$1,153,660.43
Claims for personal injuries disposed of from November 30, 1913 to November 30, 1914,	94	339,674.15
Total personal injury claims pending November 30, 1914,	234	813,986.28

PERSONAL INJURY ACTIONS

Pending November 30, 1913,	33	226,150.43
Commenced since November 30, 1913,	21	168,476.00
	54	$394,626.43
Tried and concluded to December 1, 1914,	31	$244,988.00
Actions pending November 30, 1914,	23	$149,638.43

Of the 31 cases tried since November 30, 1913, 13 cases involving $146,738.00 resulted in decisions favorable to

City, and in the remaining cases, judgments were given against the City amounting to $13,795. The City resisted successfully 94.4% of the amount sued for in the personal injury cases tried.

DAMAGE TO PROPERTY.

	Number	Amount
Suits pending November 30, 1913	67	$536,195.00
Commenced since November 30, 1913	30	258,230.00
TOTAL covering period of this report --	97	794,425.00
Tried and concluded to December 1, 1914,	46	273,136.82
Pending November 30, 1914,	51	$521,288.18

Of the forty-six cases tried since November 30, 1913, seventeen cases involving $129,801.20 resulted in decisions favorable to the City, and in the remaining cases, involving $143,335.62, judgments were given against the city amounting to $25,575.69. The City resisted successfully 90.6% of the amount sued for in the actions for damages to property.

The cases involving damages to property arise through the breaking of watermains, defective sewers, defective streets or sidewalks, changes of grade, slide cases resulting from street grades, and numerous other causes arising out of the extension of various local improvements.

DAMAGES OTHER THAN DAMAGES TO PROPERTY AND PERSONAL INJURIES:

	Number	Amount
Pending November 30, 1913,	5	$ 8,528.00
Commenced since November 30, 1913	6	1,894.00
TOTAL - - - - - - - -	11	10,422.00
Tried and concluded to November 30,1913	7	3,470.00
Pending November 30, 1913	4	$ 6,952.00

The seven cases tried resulted in judgments for the City.

EMINENT DOMAIN.

Since November 30, 1913, thirty-two actions to condemn land for street, park, and other municipal purposes have been tried and concluded. The principal actions tried are as follows:

Beacon Avenue,

Fairview Avenue North,

Fairview Avenue North, regrade,

Genesee Street,

California Way,

Tenth Avenue Northeast,

West Seventieth Street,

East Fir Street,

TOTAL amount of verdicts rendered in condemnation suits tried from December 1, 1913, to November 30, 1914, $ 291,829.44

The principal condemnation suits now pending in this department are:

Empire Way,

East Marginal Way,

Yesler Way,

and the condemnation of the Seattle, Renton & Southern Railway System for a municipal car line.

During the period of this report 3369 personal services were made in condemnation cases, of which 2646 personal services were made by this office at a total cost to the City of approximately $1,500.00. Had these services been made by the Sheriff of the County at a minimum cost of 80 cents per service, it would have cost the city $2,116.

MISCELLANEOUS CASES.

Of seventy-seven miscellaneous actions tried and concluded during the period of this report, sixty-four cases resulted in decisions favorable to the city. These actions comprise injunction, mandamus, assessment roll appeals, quiet title, and numerous other actions not involving a monetary recovery against the City.

There are now pending actions commenced by the city against the Great Northern Railway Company, et al., for $450,000., damages to the Public Library caused by the railway tunnel, and one hundred three actions against various street contractors for the recovery of money erroneously paid to them as interest upon bonds for local improvements, amounting to $250,128.94.

On November 30, 1914, there were pending in the Supreme Court twenty-six appealed cases. Of thirty-one cases decided by the Supreme Court during the period of this report in which the City was a party, nineteen resulted in decisions favorable to us.

POLICE COURT.

Cases disposed of from December 1, 1913 to November 30, 1914, - - - - -	13,262
Fines and forfeitures during said period	$54,231.60

During the period of this report, one hundred eighty-six written legal opinions were rendered to the heads of the various departments of The City of Seattle.

This report is only a general resume of the work of the department, and is not at all complete in matters of detail, but it does show the general scope, nature, amount and magnitude of the legal business of the City.

The general routine of this department, the 'phone communications, and waiting upon the large and constant stream of citizens who pour in every day, we make no record of; all of this, and many other matters that might be mentioned are all a very necessary part of the work of the department.

Respectfully submitted,

JAMES E. BRADFORD,

Corporation Counsel.

Corporation Counsel

Seattle, December 30, 1914.

Mr. James E. Bradford,

Corporation Counsel,

S e a t t l e.

Dear sir:

I beg to submit the following report of the municipal court from December 1, 1913 to December 1, 1914 inclusive:

Total cases tried - - - - - - - - 13,262

Total fines and forfeitures - - - - - - - - $54,231.60

In the month of July, the City derived $6,371.40 in fines and forfeitures owing to Judge Gordon's endeavor to stop speeding of automobiles and motor cycles by heavy fines. His system of heavy fining has resulted in lessening speeding and each month from that time on shows a lessening of fines.

An endeavor has been made by the Chief of Police to avoid frivolous arrests but I wish to state that there is plenty of room for improvement. It is a fact that a number of these frivolous cases which often result in dismissal by the Police Judge take up more time than cases of more importance.

We are enforcing the health ordinances, weights and measures ordinances and false advertising ordinances to the very best of our ability and I feel that the record in these more important cases during the past year has been a good one.

Owing to the fact that I am often called upon to meet points of law with very short notice, I would recommend that the City Attorney's office at the City Hall be furnished with a set of the Washington Digest. The County has furnished the Police Judge with a set of Washington Reports but has failed or refused

to furnish him with the Digest. The lack of that set of books often causes me embarrassment and is an annoyance to the main office owing to the fact that I am compelled to ask the court for a recess in order that I may telephone Mr. McClinton or some other member of the office to furnish me citations which I need.

Yours very truly,

W. F. Kemp Reynolds

WFVR/M

City Attorney.