Book Reviews

North Carolina Law Review

BOOK REVIEWS

The Contempt Power. By Ronald L. Goldfarb. New York: Columbia University Press, 1963. Pp. 366. $7.50.

In five chapters, requiring just over 300 pages, the author examines the many facets of a major feature of our legal system. This feature is Government's power to coerce the cooperation of the Individual and to punish his recalcitrance in matters of State. Supporting scholarship—in the form of footnotes, tables of statutes, cases, treatises, and an index—brings the volume to 366 pages.

Written for lawyer and layman alike, in a "style between specialty and catholicity," the book should prove quite useful as a reference work. For the practitioner it offers within reasonable compass an initial insight into the vagaries of the contempt power which can then, if necessary, be pursued with greater specificity in the more technical legal literature. For judge and legislator seeking light on the growing reach of the power, the volume provides a helpful overview from twin vantage points of historical usage and current practice. For those of a reform bent with respect to the contempt power, the book is especially helpful for both its judicious attitude toward, and its suggestions for, procedural and substantive change.

At the editing level one notes a few blemishes which, although minor, are perhaps surprising in a book published by a major University Press. The absence of blue-pencil treatment of the split infinitive is doubtless intentional; better form has had to yield the field to well-nigh universal practice. But "inferrible"[1] should have caught a keen editorial eye, as should "the principle reason";[2] the same is true of the incorrect use of "effect"[3] and "devise,"[4] and of the "witnesses duty to testify."[5] More serious—and more debatable—are a start-stop-start-again procedure in the development of certain ideas, which gives a jerkiness to the "flow" of the book, and the inclusion of some recommendations in the analytical chapters while others appear in the concluding chapter. Whether these fea-

[1] GOLDFARB, THE CONTEMPT POWER 74 (1963).
[2] *Id.* at 193.
[3] *Id.* at 75, 288.
[4] *Id.* at 279.
[5] *Id.* at 110.

tures should have been "edited out" is difficult to say in the absence of attempted rewrite; as they stand, they produce at once some redundancy and the necessity for considerable cross-referencing.

Fly-specking apart, the volume under review is both readable and worth reading. Appropriately enough, the first chapter sketches the history of the contempt power. The heritage is fully acceptable, for the "powers of contempt which are now exercised in the United States originally were adopted from English common law."[6] Yet withal there is the paradox that a concept which finds its rise in the divine right of Kings has such a hold "in a government which was conceived to establish the sovereignty of men."[7] This paradox is similar to that anachronism of governmental immunity from suit, which survives because in a far different political climate it was reasonable to posit that the King could do no wrong. Nor, as the author stresses, is it easy to reconcile some aspects of the contempt power with "American notions about the separation of governmental powers . . . ."[8] Yet a Nation which has so successfully explained away the anomaly of judicial lawmaking while holding to Montesquieu's principles should not have great difficulty with this inconsistency.

Despite the many varieties of the contempt power which have evolved, largely around contempt of court, "only two dichotomies have been uniformly accepted and are still applied today. They are the civil-criminal division, and the direct-indirect distinction."[9] In consequence, the author devotes Chapter II to an analysis of these two major classifications. Actually, however, the analytical division is a three-fold one, for as the author observes, "indirect contempt cases arising out of press publications have a history and significance which warrant singular mention."[10] Indeed, it is with respect to constructive contempt that courts of this country receive their best rating at the hands of analyst Goldfarb. Here, "as contrasted with all other contempt cases, American courts seem to be less impressed or guided by historical precedent and practices than with deciding some realistic rule by which vital, competing interests can best be harnessed."[11]

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[6] *Id.* at 45.
[7] *Ibid.*
[8] *Id.* at 36.
[9] *Id.* at 47.
[10] *Id.* at 77.
[11] *Id.* at 99-100.

Contrasting the English and American rules on press control by the courts, the author comes to the following well-articulated conclusion:

> I suggest that there is sound reason for discouraging, by use of the contempt power, the dissemination by mass media of information which might later be used as evidence at trial. This would be a rationally connected means to a legitimate end—protecting the evidentiary rules of judicial proceedings. There is serious question, on the other hand, about the value of carrying this rule any farther. Editorial opinion-venturing, criticism, description, these aspects of the journalism of law are invaluable and certainly outweigh any claims for abstract judicial purity which may be offered in defense of the broad application of the constructive contempt rule.[12]

Patently enough, the American rule is the product largely of active intervention on the part of the Supreme Court of the United States, first in interpretation of the federal statute controlling federal-court contempt power and secondly in interpretation of the free press guaranty beginning with *Bridges v. California*.[13] General judicial effort with the direct-indirect and civil-criminal classifications scarcely merits a passing mark, in the opinion of the author.

Discussion of the varieties of the contempt power is followed by a chapter on the extension of the power to governmental bodies other than legislatures and courts. Briefly considered are executive officers, grand juries, referees, and notaries public; the great portion of the chapter is devoted to administrative agencies. Despite the fact that, historically, contempt was actually neither judicial nor legislative, but executive in origin, direct contempt power is not an inherent feature of these governmental bodies. Although the problems encountered by them, and for which they might employ this power, are similar to those experienced by legislative assemblies and judicial tribunals, they must depend for the power upon statutory grant. While such authority has gone unchallenged in the case of some of these bodies, notably the notary public, both due-process and separation-of-powers doctrines have created problems for others, specifically the administrative agency.

One possible solution developed by the author employs analogical reasoning to conclude that, for example, the grand jury is but an arm of the court and that, as a further instance, the administra-

[12] *Id.* at 89.
[13] 314 U.S. 252 (1941).

tive tribunal is engaging in a quasi-judicial capacity. A bolder approach would be the position "that the power is neither judicial nor legislative but truly administrative,"[14] a power essential to any governmental body charged with responsibility for the formulation or enforcement of law.

Despite these possible avenues for overcoming constitutional objections, the author favors restriction of the direct contempt power to those agencies of government now possessed of it. On the other hand, cognizant of the broader need for some method of compulsion, he outlines with particularity how he would strengthen the hand of both grand jury and administrative agency by streamlining the mechanisms for court enforcement of their contempt citations. This is one instance of the author's anticipation of his concluding chapter, wherein he formulates his recommendations for modification of present contempt practices with respect to all forms of governmental action.

Accounting for a full one-third of the book is the chapter on "Limitations on the Contempt Power." These are primarily various constitutional limitations, found largely in the first, fourth, fifth, sixth, seventh, eighth, and tenth amendments to the Constitution of the United States. The author's coverage at this point must perforce be substantial; "Few legal devices find conflict within the pages of our constitution with the ubiquity of the contempt power."[15] Only with respect to the conflict between federal and state powers does the contempt power enter but indirectly and infrequently.

The many procedural guaranties vouchsafed by the fifth, sixth, seventh, and eighth amendments receive careful attention as regards their bearing upon contemporary use of the contempt power. "The most glaring and disputed denial of civil liberties which is featured under current contempt procedures is the denial of the right of an accused to have a trial by jury."[16] Even Mr. Justice Black "has found no fault with summary procedures for civil contempts, though he has suggested that all criminal contempts be tried by a jury."[17] What alleviation there has been has come by way of congressional legislation. The author is equally dissatisfied with the failure of

[14] GOLDFARB, *op. cit. supra* note 1, at 138.
[15] *Id.* at 162.
[16] *Id.* at 168-69.
[17] *Id.* at 175.

judicial interpretation of the fifth and eighth amendments to rid our law of the anomaly of a proceeding where one and the same person acts as judge, prosecutor, jury and sentencer; of the predicament of the contemnor "who, not knowing which way to turn"[18] in the labyrinth of double jeopardy and self-incrimination, "elects to stand still";[19] and of contempt fines and sentences which in magnitude have all the earmarks of harshness when judged in context.

Sandwiched in between discussion of the contempt power and the various procedural guaranties is that of the constitutional clash between power and limitation under the first and fourth amendments (with bill of attainder tossed in for completeness). In the reviewer's judgment this section[20] is perhaps the best in the volume and well repays study for the inclusiveness of its coverage and the incisiveness of its analysis.

The concluding chapter of the book under review, appropriately enough, is devoted to the policy question of the proper place to be accorded the contempt power in our legal system. Identifying four choices, the author rejects the two extremes of full retention and complete abolition of the power. In previous chapters he has found it impossible to reconcile with accepted concepts of individual liberty the full contempt power as it has developed in this country. On the other hand, convinced that the major arms of government must be able to force compliance with public processes, the author finds a continuing role for such a power. But he would severely limit the congressional contempt power (although saving Congress's investigating power); he would essentially eliminate the civil contempt power; he would have done with the doctrine of contempt by publication; and he would subject the remaining criminal contempt power to full procedural due process, including jury trial. "Contempt should be strictly construed to be what it has historically been —a criminal wrong to government manifested through an act of disrespect or disobedience."[21]

In place of civil contempt the author would perfect such powers of execution as garnishment, levy, and attachment as a preventive against defeat of proper court orders. Physical disorders he would handle through a summary power of physical control and expulsion;

[18] *Id.* at 250.
[19] *Ibid.*
[20] *Id.* at 185-230.
[21] *Id.* at 292.

such can be justifiably said to be "truly inherent in any legitimate working government body."[22] Those contempts now classified as criminal (and some aggravated contempts now called civil but bearing earmarks of the criminal), other than those concerned with physical disorder, he would govern by a statute defining the offense of "misdemeanor to government." The suggested statute is sketched[23] without any attempt at technical draftsmanship. A short discussion of the statute's applicability to contempts of Congress, courts, and administrative bodies concludes this final chapter.

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The Morality of Law. By Lon L. Fuller. New Haven and London: Yale University Press. 1964. Pp. 202. $5.00.

When the editor handed me this book and asked me to look it over to see if it was worth reviewing, my answer was, "Anything by Lon Fuller is worth reviewing." Reading the book confirmed the opinion.

Jurisprudential books on law and morals usually examine the relationship between law and moral principles which may exist apart from the law. Professor Fuller, formerly of Duke Law School and now at Harvard Law School, in this book expounds something quite different. He is concerned primarily with what he calls "the internal morality of law," that is, with requirements which the law itself must meet. Otherwise put, there are moral requirements binding on men which the law may further. These Fuller calls the external morality of law. There are also moral requirements binding on the law itself if it is to be good law. These he calls the internal morality of law. The latter are the principal subject of the book.

Professor Fuller first distinguishes moralities of duty and of aspiration. The first consist of those moral principles so basic to the existence of a society that they can be and are successfully made into legal rules. Usually they are phrased as prohibitions: do not kill, do not steal, do not assault another. Beyond these are morali-

[22] *Id.* at 305.
[23] *Id.* at 302.

ties of aspiration, which lead men toward the goal of the highest good which can be achieved. These are not reducible to legal rules. "There is no way by which the law can compel a man to live up to the excellences of which he is capable."[1] The author asks us to imagine a moral scale, beginning at the bottom with the most obvious demands of social living and extending upward to humanity's highest aspirations. Somewhere along the scale is a dividing line where duty ends and the challenge of excellence begins. Translated into terms of law making, there is a point where legal requirement can no longer successfully be made, since men cannot be compelled to aspire. Just where the dividing line is to be drawn is a subject of moral argument. If the line is drawn too high, rigid obligation may stifle experiment and inspiration. If drawn too low, necessary requirements may give way to individual moral opinions.

The internal morality of the law, according to Professor Fuller, is largely morality of aspiration. In his second chapter he lays down eight requirements of this internal morality. They are as follows: (1) Generality. That is, there must be rules, rather than separate treatment for each individual case. (2) Promulgation. The law must be made known. (3) Prospective nature. Laws should not be retroactive. (4) Clarity. Laws should be comprehensible to those affected. (5) Uncontradictory nature. Laws should not command and forbid the same thing. (6) Possibility. Laws should not require the impossible. (7) Constancy through time. Laws should not be changed too often. (8) Congruence between official action and declared rule. Those who administer the law should abide by it.

At first glance most of these principles look like nothing more than familiar requirements of good legal craftsmanship. It is in the discussion of each that Professor Fuller shows that he is dealing with matters going far beyond the obvious. For example, in his discussion of the principle that law should not command the impossible, he takes up laws imposing strict criminal liability in such fields as economic regulation. Under these laws a person may be convicted although he acted with an innocent intent. Fuller points out that such laws serve the convenience of the prosecutor; all he must prove is conduct which does not coincide with the legal re-

[1] FULLER, THE MORALITY OF LAW 9 (1964).

quirement; he escapes the difficult job of proving intent or fault. Injustice is supposed to be avoided by selective enforcement, which means that the prosecutor will go after the real villains, not those who innocently engage in conduct which does not square with the law. This justification does not appeal to Professor Fuller. This reviewer agrees with him, but finds it a little hard to see that strict criminal liability is an illustration of law commanding the impossible, unless the author's idea is that there are so many economic regulations that no one as a practical matter can know and obey them all.

Professor Fuller's eight requirements do not, at first blush, seem to be moral in nature, but appear to be requirements of excellence rather than morality. Even bearing in mind that aspiration toward excellence constitutes the upper level of Fuller's moral scale, is all excellence, including technical excellence, to be equated with morality? However, further reflection indicates that the eight requirements do have a moral content, even when "moral" is regarded in the usual sense as pertaining to right and wrong. For example, the first requirement, that of generality, which calls for legal rules rather than separate treatment of individual cases, prevents discrimination among individuals where their merits are the same, and such discrimination is felt to be wrong morally. Indeed, the feeling that such discrimination is wrong furnishes much of the moral urge behind the movement against race discrimination. The fourth requirement, clarity, to the draftsman of a statute may be simply an exaction of good craftsmanship, but the person subjected to the statute readily senses that he has been wronged if he has been deliberately subjected to legal requirements so unclear that he cannot tell what they are.

In his third chapter, Professor Fuller considers various views of the nature of law in comparison with his own. He adds his definition of law to the voluminous collection of definitions which milleniums of juristic thought have produced. According to Fuller, "law is the enterprise of subjecting human conduct to the governance of rules."[2] He treats law as an activity. This fits in with his eight requirements for governing the activity.

In this chapter Professor Fuller makes a lengthy attack on the views of H. L. A. Hart in his book, *The Concept of Law,* published

[2] *Id.* at 106.

in 1961. A familiar device of legal scholars is to select some other legal scholar and vigorously assault his position. People are interested in conflict, and dispute adds zest to exposition. Of course, this device is not limited to legal scholars. We recall the story of the two newspapers which engaged in a long and acrimonious controversy over something or other. It turned out that both newspapers were edited by the same man, who had written not only the opposing views of each paper but also the vituperative attacks on them by the other paper. It was a promotional device to sell both papers. The reviewer is not suggesting that authors Fuller and Hart are one and the same man, nor that Fuller's disagreement with Hart is a sales device. Scholarly books on jurisprudence are not written with sales in mind. Legal writers with an eye on the market are more likely to turn out books like *Anatomy of a Murder*.[3] Nor is Fuller's attack vituperative. The sedate quarreling of learned men can be carried on with the highest respect for each other. Fuller prefaces his disagreement with Hart by calling the latter's book "a contribution to the literature of jurisprudence such as we have not had in a long time."[4] But he adds that he is in virtually complete disagreement with the fundamental analysis of the concept of law expressed in Hart's book. Fuller's main attack is on Hart's "rule of recognition," which Fuller explains as a rule recognizing some agency as having the final say as to what shall be considered law. Fuller raises many objections. He argues that if the rule of recognition means that anything called law by the recognized lawgiver is law, then the citizen may be worse off than a gunman's victim. "If a gunman says, 'Your money or your life,' it is certainly expected that if I give him my money, he will spare my life. If he accepts my purse and then shoots me down, I should suppose his conduct would not only be condemned by moralists, but also by right-thinking highwaymen."[5] Professor Fuller thinks there are tacit limitations on those who exercise power.

In his fourth chapter, on the substantive aims of law, Fuller discusses the relation between the internal morality of law and the external aims to be achieved by law. He makes the point that to achieve the best of legal objectives requires internally good law. As he frequently does, he uses here an analogy. "A conscientious

[3] VOELKER, ANATOMY OF A MURDER (1958).
[4] FULLER, *op. cit. supra* note 1, at 133.
[5] *Id.* at 139.

carpenter, who has learned his trade well and keeps his tools sharp,"[6] can as well devote himself to building a hangout for thieves as to building an orphans' asylum, but it still takes a good carpenter to erect a good asylum.

In this chapter Fuller reasons that the internal morality of the law requires a view as to the nature of man. To embark on the enterprise of subjecting human conduct to rules implies commitment to the view that man is or can become a responsible agent. Fuller vigorously refutes the modern notion, conceived as scientific by some doctrinaire schools of social scientists, that man is not a free and responsible agent making choices by an act of will, but that what he does is determined by conditions. Fuller thinks that this is partial truth pushed beyond its proper limits, and that it is encouraging indifference to decay in the concept of responsibility. The reviewer concurs. This deterministic view is not science but an idea relished by some social scientists. Since it holds that responsibility is unscientific, the inevitable effect is to diminish or destroy the feeling of responsibility on the part of the people to the extent that it is accepted. Such social scientists might well reflect on their own responsibility for the consequences of their doctrine.

In an appendix, Professor Fuller uses a familiar pedagogical device. Instead of telling he asks. He sets forth a hypothetical country in which the Purple Shirts take over the government. Although the country and the regime are supposed to be imaginary, they bear a remarkable resemblance to Germany under the Nazis. The regime is overthrown. The problem is what action, if any, should be taken against persons who paid off grudges by reporting to the Purple Shirt regime forbidden activities of their neighbors. Five recommendations are made, one by each of five deputies of the Minister of Justice. The reader is asked which of the five recommendations he would adopt if he were the Minister. Professor Fuller gives no hint of his answer. He puts his readers to work.

The above cannot qualify as an outline of Fuller's book. It is rather a sketch of salient features. The book is based on lectures given as part of a lecture series at Yale University in 1963. Professors of Jurisprudence accumulate many ideas and materials in

[6] *Id.* at 155-56.

their notes. When they come to give lectures and write books these ideas and materials are put in, even if they have to be squeezed in. The result is that when a book is produced it is likely to be more of a panorama of the author's thoughts than a closely knit presentation. Professor Fuller's book gave this reviewer such an impression. This is not intended as an adverse criticism; the idea is simply to let the reader know what to expect. The great value of the book is that it enables the reader to follow the keen mind of the author as he reflects on many important matters jurisprudential. Hopefully, the reader will be stimulated to some thoughts of his own on these matters. This kind of process can be illustrated from the last three pages of Fuller's fourth chapter. Fuller found in H.L.A. Hart's book, *The Concept of Law,* the view that " 'the proper end of human activity is survival.' "[7] This stimulated a reaction by Fuller. In dissenting he pointed to the remark of Thomas Aquinas that "if the highest aim of a captain were to preserve his ship, he would keep it in port forever."[8] Fuller endeavors to do better than Hart did in selecting a principle infusing all human aspiration. He finds it "in the objective of maintaining communication with our fellows."[9] This stimulated a reaction by the reviewer. Fuller did better than Hart, but not well enough. In supporting his stand, Fuller states that if in the future man survives his own powers of self destruction, it will be because he can communicate and reach understanding with his fellows. Quite true. But if he does destroy himself that will be for the same reason. Individuals unable to communicate with others never could have produced the hydrogen bomb. Maintaining communication with our fellows is a means to many ends, good and bad.

If neither Hart nor Fuller is right, then what is the object of humanity's upward reach, or, in Fuller's language, of man's morality of aspiration? Religious juristic writers have said that humanity's goal is God.[10] With such a goal humanity reaches toward truth and goodness that are infinite, and therefore not fully attainable. But in reaching man grows in the nature of that which he seeks. When he abandons this quest and substitutes some fully

[7] *Id.* at 185.
[8] *Ibid.* The words quoted are Fuller's.
[9] *Ibid.*
[10] *E.g.,* Miltner, *Law and Morals,* 10 NOTRE DAME LAW. 1, 10 (1934).

understandable goal of his own devising, his objective becomes insufficient and attainment produces frustration.

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When the Cheering Stopped. By Gene Smith. New York: William Morrow and Co., 1964. Pp. 307. $5.95

Mr. Smith presents in this volume a highly detailed account of the last years of Woodrow Wilson. His description reads almost like a novel, and the reader feels himself being cast along on the crest of events that made the presidency of Wilson a period of controversy among students of political science and American history. The major portion of the book deals with the period after Wilson's second marriage. Smith gives the reader a feeling of participation in America's involvement in World War I, Wilson's triumphant trip to Europe following the war, and the many conferences that led to the drafting of the Charter of the League of Nations.

We then follow the infighting as Wilson tried to convince the Senate to ratify the treaty. We watch the tragedy of the President's declining health as he traveled across the country attempting to sell the League of Nations to the American people. Following the seizure that disabled him, we return with Wilson to Washington and watch the valiant fight his wife waged to protect him from political enemies and the outside world. Many may claim that the second Mrs. Wilson served as President for the final fifteen months of her husband's second term. But for all practical purposes, we would have to conclude that the office was virtually vacant. Wilson was unable to perform the myriad of duties that keep the President working at an almost inhuman pace. Efforts were made to keep the government operating, but only the most important of the major issues were brought to Wilson's attention. He was shielded by his wife from as much of the harsh reality of the Presidency as was possible.

Unfortunately, the major impression left with the reader of this book is that of a pathetic figure. Wilson is shown in a role similar to that of a Shakespearean tragic hero. His cause appears to be hopeless, and we are tempted to damn him as a fool because of the

stubbornness he exhibits in refusing to compromise on the provisions of the treaty that would carry the United States into the League of Nations if it could win the approval of the Senate. The pathetic image depresses the reader even further as he watches the President slowly dying in the midst of a self-delusion in which he may have felt himself healthy enough to run for a third term.

But this is not an accurate picture of the Woodrow Wilson who was first elected to our highest office in 1912. He was a vigorous man. He was also one of the most idealistic of our Presidents. It was not until our entry into the United Nations following World War II that we even appeared to be taking the first steps toward the world of peace that he envisioned. Perhaps he was too idealistic. But in his lifetime, Wilson was the epitome of what many people wish all political leaders were.

The most provocative message that emerges from Smith's description of Woodrow Wilson is one that the author may not have consciously intended. At the time of Wilson's disability, virtually everyone, including Vice-President Thomas R. Marshall, was kept in the dark about the true nature of the President's illness. Smith mentions that:

> Marshall appeared terrified by the turn of events and was bitter at the doctors who were keeping the situation a mystery from him. He said that it would be at best a tragedy for him to assume the duties of President and an equal tragedy for the American people, that he knew many men who knew more about the affairs of the government than he . . . .[1]

This clearly outlines the gaping void in our federal statutes concerning presidential succession and inability, a void that was discussed at the time of President Eisenhower's heart attack and that has been mentioned more recently as a result of the assassination of President Kennedy.

Marshall was a Vice-President in the old tradition, one who was added to the ticket simply to balance it and to win needed electoral support for the presidential candidate. But there was no guideline to follow, even if Wilson's Cabinet had wanted to establish Marshall in the Presidency. And, what is even more frightening, there is still no formal policy to be followed in the event of presidential disability.

[1] SMITH, WHEN THE CHEERING STOPPED 98 (1964).

It is reassuring to know that President Eisenhower had worked out an informal agreement with Richard Nixon, and that the late President Kennedy had done the same with Lyndon Johnson. How much more satisfying it would be if a formal policy were incorporated into our federal statutes so that the United States could never again be subjected to the lack of direction that occurred during the last fifteen months of Wilson's administration.

Last August, the Senate Judiciary Committee presented a report concerning presidential succession and disability to the Senate. The Committee stated in that report:

> The final success of any constitutional arrangement to secure continuity in cases of inability must depend upon public opinion and their [the President and Vice-President's] possession of a sense of "constitutional morality." Without such a feeling of responsibility there can be no absolute guarantee against usurpation. No mechanical or procedural solution will provide a complete answer if one assumes hypothetical cases in which most of the parties are rogues and in which no sense of constitutional propriety exists. It seems necessary that an attitude be adopted that presumes that we shall always be dealing with "reasonable men" at the highest governmental level.[2]

This Senate Committee was called for the passage of legislation that would protect us from the void that occurred in the Wilson administration. It recognized that in a society existing within the scope of our advanced arms technology, we would be flirting with international disaster if such a void were allowed to exist, if only for a short period of time. The report of the Committee members, as indicated above, called for the Senate, and their fellow Americans, to set aside partisan political considerations in favor of a view that sees our political leaders as Americans first and power seekers second. It is reminiscent of the very optimistic, idealistic view of rational man that was so strongly advocated by Woodrow Wilson himself. The need is clear. Mr. Smith's book has helped bring it into much sharper focus.

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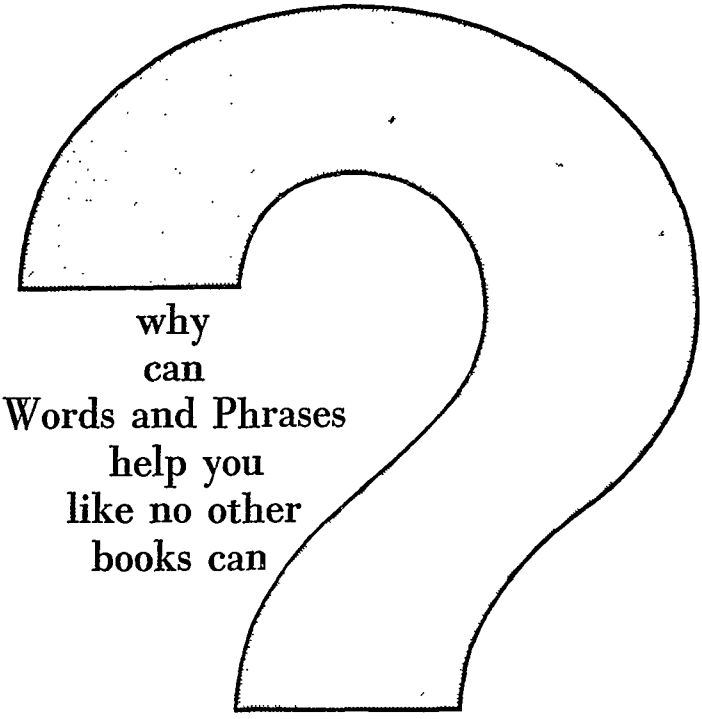
[2] SENATE COMM. ON THE JUDICIARY, *Presidential Inability and Vacancies in the Office of the Vice-President,* S. REP. No. 1382, 88th Cong., 2d Sess. 11 (1964).



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