Notes

Introduction


Chapter One


2. “Raytheon’s Proposed Cost Savings Options for Consideration by the Massachusetts Legislature,” company presentation March 1995. Raytheon later indicated that because of federal tax law changes and lower earnings, it saved less than $21 million a year.


8. Separately, the Massachusetts Taxpayers Foundation (which consists of several hundred companies) issued a paper saying the state was high cost. (John J. Gould and John Gill, “Should Raytheon Get Tax Cuts?” Lawrence Eagle-Tribune, September 10, 1995.) And the Beacon Hill Institute at Suffolk University, a conservative think tank, issued its own study arguing for applying SSF to all companies, not just manufacturers. (Beacon Hill Institute, “Corporate Tax Proposal Would Mean New Jobs, Higher Wages for Mass. Workers,” October 3, 1995.) Phil Primack, “Raytheon Spends $$ to Win Big State Tax Breaks,” Boston Herald, January 17, 1996.


10. The Boston Federal Reserve’s senior economist and a widely recognized expert on state corporate taxes, Robert Tannenwald, was reportedly forbidden by his superiors to testify on SSF. (Joan Vennochi, “Muzzled at the Fed,” Boston Globe, March 8, 1996.)


18. As previously noted, Raytheon later indicated that it received a smaller tax break than it projected. However, the SSF tax cut applied to all defense contractors and all manufacturers.
24. VEDP Opportunity Profile (project log), Bob Gibson (Virginia economic development executive) entry 2/10/99. The Virginia files suggest the company wanted more leverage against Maryland, that Marriott was dissatisfied with Maryland’s early bids and by a lack of personal attention to the deal from Maryland governor Glendening. In early December 1998, Marriott told Virginia that it had asked Maryland to resubmit a new subsidy offer. A week later, an unknown source leaked to the *Washington Post* about new developers involved. (VEDP Opportunity Profile, Ann Broadwater, December 10, 1998 entry.)
25. VEDP memo, Ann Broadwater (manager, Global Business Development) to Bob Gibson, November 6, 1998. Other examples of Virginia’s skepticism: in late 1997, a Fairfax County official told state officials that it “seemed [Marriott was] ‘shopping’ but won’t leave.” (VEDP Opportunity Profile, Ann Broadwater entry, December 5, 1997.) And in a May 1998 meeting with Virginia officials, Marriott “spent a considerable amount of time addressing the rumors regarding whether or not Marriott would seriously consider leaving MD.” (VEDP memo.)


29. Ibid.


33. New York State General Municipal Law, Section 958 (c) as amended in August, 1993. Gov. Cuomo signed the law on August 6, 1993. Under section (C) (iv) an area with “equal to or less than the national average of unemployment” and a labor market that has “experienced or is likely to experience within three years the lesser of a loss of one thousand direct jobs or a dislocation of workers equal to four percent of the employed population of the labor market area” became eligible for zone designation.

36. Jesse Fanciulli, “Incentives for Sykes Toted $312,000,” *Greeley Tribune*, January 6, 2002. *Regional Economic Review—Northern Region*, October 2002, p. 2. Published by Colorado Legislative Council. The $915,000 figure includes land valued at $203,000, a zero-percent-interest loan of $400,000, and other state, county, and city subsidies totaling $312,000; the company was also due an unknown additional amount of state tax credits for locating in an enterprise zone.


50. Although many of the “transplants” were located in heavily unionized states, only those with substantial U.S. ownership became unionized: Mazda in Michigan (because of Ford’s large stake in Mazda), Toyota/GM in California (half-owned by General Motors) and Mitsubishi/Chrysler in Illinois (half-owned by Chrysler).


52. Good Jobs First compilation of transplant subsidy reports. The one early transplant that may not have been heavily subsidized was Toyota/GM in Fremont, California.


54. Some states’ CAPCO rules provide for the state to get a very small cut of profits made on those loans.


57. Ibid.


60. Murphy, “Capital Subsidy Bill Raked.”


71. Kenneth E. Poole et al., Evaluating Business Development Incentives, the National Association of State Development Agencies, W. E. Upjohn Institute for Employment Research, and the Urban Center at Cleveland State University for the U.S. Department of Commerce, EDA Project #99-13794, August 1999; see especially chapter 7, pp. 57–94, at http://www.eda.gov/ImageCache/EDAPublic/documents/pdfdocs/1g3_5febdi_5freport_2epdf/v1/1g3_5febdi_5freport.pdf.

72. Poole et al., Evaluating Business Development Incentives.

74. Ibid.

75. The case was *Bradley Harwood v. Pam McDonough et al.*, Appellate Court of Illinois First District No. 1-02-2714.


77. United Auto Workers interoffice communication, Nat Weinberg to Paul Sifton, September 23, 1953.


82. Ibid.


The William S. Lee Act generates tax credits that may be used to offset up to 50 percent of a company’s state income and/or franchise tax liability.


Despite the massive subsidy, Dell executives admitted that the real issue was proximity to customers: North Carolina is in the middle of the populous East Coast, and Dell had no production in the region. And the state’s Triad area has four interstate highways and Dell moves most of its product by truck. Plus the region has lots of laid-off textile and furniture workers, and a new surge of textile and apparel imports from China starting in 2005 is expected to cause more layoffs in the area.


The Dell deal was rushed through the North Carolina state legislature in a special session that lasted just one day—two days after the November 2004 elections. A Republican state senator proposed a “sunshine” amendment to the deal, a disclosure reform so that taxpayers could see for themselves if Dell is living up to its jobs and production promises. Republicans voted for the sunshine 19 to 1; Democrats voted against 24 to 4. (J. Andrew Curliss, “Dell Takes Offer to Bring Computer Plant, Jobs to Triad; Bill Tried to Open Deal-Makers to Public Accountability,” *Raleigh News & Observer*, November 10, 2004.)


91. The quotes in this paragraph were taken from one and usually more of the following news accounts: David Rice, “Dell Pressed to Avoid 20 Years of N.C. Taxes ‘Shouldn’t You Be Happy with No Revenue?’ ” *Winston-Salem Journal*, January 19, 2005; Richard M. Barron, “Dell Talks Difficult from Start; The Computer Maker Never Backed Down from Its Initial Demands for Incentives from the State to Locate Here,” *Greensboro News & Record*, January 19, 2005; Richard M. Barron and Eric Dyer, “Dell Was Tough from Beginning; Documents Give a Glimpse Inside the Process That Led the Company to the Triad,” *Greensboro News & Record*, January 23, 2005. The state records also reportedly revealed that Governor Easley’s aides produced widely varied estimates of the deal’s effect on state revenues, “from as little as $83 million over 12 years to $886 million over 20 years.” The state’s final public claim was $743 million. (Associated Press, “Records Show Dell Sought No Taxes for New Plant for 20 Years,” January 19, 2005.)

92. Rice, “Dell Pressed to Avoid 20 Years of N.C. Taxes.”


100. Greenwood and Damiani, *Know When to Fold ‘Em*.

101. Ibid.


Chapter Two


The company’s headquarters remained in Dallas after it was acquired in 2004 by Federal Express.


10. Ady, “Discussion,” p. 79.

12. Schmenner (p. 200) makes a convincing case for the value of speed over subsidies. For a $10 million plant, he estimates that a six-month delay in the construction of a road or sewer line would cost the company $2.5 million, almost three times the value of a five-year property tax abatement.


14. According to the Stanford Encyclopedia of Philosophy, using the example of a shrewd prosecutor talking to two separated bank robbers: “The ‘dilemma’ faced by the prisoners here is that, whatever the other does, each is better off confessing than remaining silent. But the outcome obtained when both confess is worse for each than the outcome they would have obtained had both remained silent.” (“Prisoners’ Dilemma” definition at http://plato.stanford.edu/entries/prisoner-dilemma/.)


20. See, for example, Wasylenko, “Taxation and Economic Development.”


36. Ibid., p. 44, F-10.
37. Ibid., p. 15.
39. Ibid.
40. Ibid.
41. Cabela’s IPO prospectus, p. 63.

Chapter Three


5. As detailed in the text that follows, after Fantus performed a “business climate” study in 1975, the accounting firm later known as Grant Thornton issued subsequent studies.

6. This section draws upon Cobb, *The Selling of the South*, chapters 1 and 2.


8. White proposed the Act after much careful legal work, because the state’s constitution, like many others, included prohibitions against public monies aiding private firms or individuals. The state’s supreme court had even struck down a local bond deal for a garment plant a few years before. Besides drawing on New Deal rhetoric, White’s bill drafters found a U.S. Supreme Court precedent: a decision upholding North Dakota’s system of state-sponsored banks, grain elevators, and warehouses. Creating employment was a legitimate way to serve the general welfare, North Dakota had successfully argued. Ibid., pp. 13–14.

9. Ibid., p. 42.

10. Ibid., p. 40.

11. Ibid., p. 63.

12. Ibid., p. 58.


may be “cookie-cutter” products that are recycled by consultants from state to state. The president of the National Association of State Development Agencies spoke in 2004 of an unnamed consultant who delivered a $400,000 study to a state—but forgot to change the name of the client state from a previous job. (Miles Friedman, workshop presentation, National Conference of State Legislatures, July 20, 2004.)


27. “Former Archenemy of New York City Gets $280,000 Job,” *Wall Street Journal*, June 10, 1977, p. 10. A copy of the study could not be obtained, but in his 1979 book *The Last Entrepreneurs* Robert Goodman describes its recommendations. The Fantus study called for a non-profit, quasi-public corporation with the power to research, lobby for, and dispense subsidies, with an appointed board composed of at least two-thirds businesspeople. It would have the “ability to make direct loans to private business, share in ownership and risk, issue bonds, and buy, sell, or lease property without cumbersome public hearings or approvals.” Economic development corporations “are insulated more politically than city departments. Elected officials are not as directly responsible for an EDC as they are for a city department.” In other words, Fantus’s solution was more corporate control and less public accountability. (Robert Goodman, *The Last Entrepreneurs: America’s Regional Wars for Jobs and Dollars* [New York: Simon and Schuster, 1979], pp. 19–20.)


31. Ibid. The Fantus/IMA study is also described by Goodman, *Last Entrepreneurs*, pp. 20–21.


35. The Corporation for Enterprise Development et al., Taken for Granted: How Grant Thornton’s Business Climate Index Leads States Astray, November 1986.

36. Corporation for Enterprise Development et al., Taken for Granted, p. 87. Today, there are many competing business climate surveys issued annually; for a sample list, go to http://www.dc-intl.com/RCRatingsGame.cfm.


39. Fantus went through four sets of ownership, and along the way, many of its staff left to work for competitors. Yaseen and his fellow partners sold the firm to Dun & Bradstreet in 1967. According to longtime Fantus executive Robert Ady, its next two owners neglected a valuable asset. D&B clumsily tried to merge Fantus with two unrelated firms it had acquired and then took a hands-off approach. PHH Corporation bought Fantus in 1983, hoping to create synergy with its corporate employee relocation business. But PHH did transactions, not consulting, and the benefits did not appear. In the early 1990s, PHH tried to remodel Fantus into a general-purpose management consultancy, ignoring its unique value. When that experiment failed, neglect followed, causing many Fantus staffers to leave and strengthening its competitors. PHH auctioned Fantus in 1996, and Deloitte & Touche, which had a modest site selection practice based in Chicago that included some former Fantus staffers, bought it. (Robert Ady, “On Being Acquired,” Journal of Management Consulting, May 1997, pp. 16–20.)
40. Many sources speak to the industry's fragmentation. See, for example, “Meet the Gurus of Site Selection,” Corporate Location, March/April 2001.

41. For a website with links to numerous site location consultants, go to http://www.gdi-solutions.com/profsvcs/lists/location_consultants.htm.

42. Ibid. There are also several site location trade magazines; they often blur the lines between infomercials and journalism. Site Selection magazine is perhaps the best-known; it issues the annual Governor's Cup Award for the state that announces the most big deals; it also issues an annual business climate ranking based on a blend of data about new facilities and an opinion survey of executives. The magazine also publishes perhaps the most useful publicly available annual listing of state subsidy programs. Site Selection’s parent, Conway Data, Inc., has a partnership with the International Economic Development Council, the largest professional association of public and private-sector economic developers (http://www.developmentalliance.com), that exemplifies the explosion of web-based data about locations. Expansion Management rates education (2,800 secondary school districts). Area Development publishes various surveys, including an annual site selection corporate survey and an annual inventory of incentives. Plants Sites & Parks offers fairly substantial journalistic content and also conducts an annual survey, which is a blend of quantitative measures and executives' picks. Business Facilities seems to focus more on the nitty-gritty aspects of managing a business when it moves or expands, not just location-choice issues. Corporate Location concentrates on European and other international areas.


56. “Turning Your State Government Relations Department from a Money Pit into a Cash Cow.”

57. Chesser, “On Milking a State’s ‘Cash Cow.’”


59. Ibid.

Chapter Four

1. About 20 more states have given sales a double weighting, so their formulas are 50 percent based on sales and 25 percent each on property and payroll. A few more states have superweighted sales to as much as 80 percent.


7. Ibid.

8. Ibid.


18. DRI/McGraw-Hill had high credibility with legislators because it had accurately forecast the state’s tax revenue in prior years. (State Representative James Marzilli, interview, June 18, 2004.)

19. DRI/McGraw-Hill.

20. Massachusetts Department of Revenue, “Single Sales Factor Tax Cut Summary” (updated June 2003 and subsequently). These figures do not include any spending estimates, which were lumped into the DRI/McGraw Hill numbers. Nor are personal income tax effects estimated. Since the state has lost defense jobs, it has presumably spent additional sums helping the dislocated workers and has lost revenue based on their declining personal incomes. On the other hand, the state has gained mutual fund jobs and revenue from those incomes.


23. This section is based on Jeff McCourt and Greg LeRoy, A Better Deal for Illinois: Improving Economic Development Policy, Good Jobs First, January 2003. It also reflects updated data from state revenue and dislocated worker sources.


28. U.S. Bureau of Labor Statistics. The two economists have since issued two more papers revising their methodology. Their third stab, if applied to Illinois, would still have predicted job gains—but 78 percent fewer. (Mazerov, “The ‘Singles Sales Factor’ Formula.”)


32. Georgia House Bill 1353, 144th General Assembly, 1997–1998 Regular Session, signed by the governor on February 17, 1998. This section is based upon dozens of articles from 2001–2002, most of them by Karen Setze of State Tax Notes and especially Meredith Jordan of the Atlanta Business Chronicle. For her terrific work, Jordan was awarded two “Best in Business” awards by the Society of American Business Editors and Writers, Inc.

33. Charles Walston, “Business Tax Plan Goes to Governor; Supporters Say the Bill Could Pave the Way for General Electric to Move Jobs


36. The actual drafting of the model law was performed by University of Michigan Law School Professor William J. Pierce and his students. (Eugene Corrigan, December 9, 2004 correspondence.)

37. UDITPA’s three factor formula is, of course, more complicated than as I summarize it here. It exempts banks and utilities, for example. It allows states to directly claim income from in-state rents and capital gains. It even allows companies to appeal their tax bill if the three factors do not fairly reflect their business. And it does not try to tell states how to define their tax base; that is, how to define taxable income, or at what rate to tax it. But for the big issue of how to divvy up, or apportion, all other corporate income for a multistate company, it was a major breakthrough. For the text with accompanying commentary, see “Uniform Division of Income for Tax Purposes Act,” drafted by the National Conference of Commissioners on Uniform State Laws and approved at its annual conference, New York, July 8–13, 1957. For additional contemporary interpretation of UDITPA, see also William J. Pierce, “The Uniform Division of Income for State Tax Purposes” in *Taxes*, Vol. 35, No. 10, p. 747 (1957). The MTC’s founding executive director, Eugene Corrigan, also points out that adherence to UDITPA’s
rules was also critical to making taxation uniform (correspondence, December 9, 2004).

38. Transcript of Proceedings in Committee of the Whole, Uniform Allocation and Apportionment Act, Wednesday, August 22, 1956.


40. 15 USCS §§ 381–384.


42. Eugene Corrigan, September 9, 2004 correspondence.


44. Corrigan interview.

45. The *U.S. Steel* case and other attacks on the MTC are recounted by its first executive director, Eugene Corrigan, in the MTC's March 1989 newsletter, *Review*, in a farewell column after his twenty years of work. He concluded: “The increased concern for fairness is a legacy I hope will characterize the MTC and its participating personnel throughout its existence.”

46. See COST's account of its history at http://www.statetax.org/template.cfm?Section=About_COST.

47. Corrigan interview.

48. Corrigan interview and correspondence.


56. These discussions derive from Mazerov, “Closing Three Common Corporate Income Tax Loopholes.”

57. Technically, Massachusetts has a throwback rule, but it is written in an unusual way that makes it easy for companies to avoid. Mazerov, “Closing Three Common Corporate Income Tax Loopholes.”


59. Maryland and New York have enacted the safeguard since Mazerov’s article was published. Five states have no corporate income tax.


Chapter Five


21. Woodward et al.

22. Protecting Public Education from Tax Giveaways to Corporations.


Chapter Six


5. See, for example, the Trust for Public Land’s 2004 election roundup, which found that 75 percent of open space initiatives passed, at http://www.tpl.org/tier3_cd.cfm?content_item_id=17295&folder_id=186, and the Center for Transportation Excellence’s 2004 election summary, which found that 80 percent of transit initiatives succeeded, at http://www.smartgrowthamerica.org/vote04roundup.html.


25. All of these TIF and EZ examples are from Talanker and Davis, *Straying from Good Intentions*.


27. Talanker and Kate Davis, *Straying from Good Intentions*, pp. 15–17.


32. Another study, in the Chicago area (of low-interest industrial revenue bonds or IRBs), found an explicitly adverse effect on workers and entrepreneurs of color. The Illinois Advisory Committee to the U.S. Commission on Civil Rights examined 104 deals. The study found that only 3 of the 104 bonds went to African American-owned firms, one to an Asian-owned firm, and none to Hispanic-owned firms. It wasn’t just an issue of harm to minority entrepreneurs. One-third of the companies’ workforces had a much smaller share of black employees than the region’s labor market; two-thirds had disproportionately low Hispanic employment; and about half had disproportionately small numbers of women workers. Incredibly, in fully one-fifth of the deals, either the recipient company or the bank that bought the IRB had recently violated the federal fair employment rules of the Equal Employment Opportunity Commission. (Illinois Advisory Committee to the U.S. Commission on Civil Rights, Industrial Revenue Bonds: Equal Opportunity in Chicago’s IRB Program? No. 005-907-00183-3, 1986.)


A greyfield or dead mall is one with sales of less than $150 per square foot per year. CNU notes that greyfields tend to be located on suburban arterial streets and are therefore transit-accessible, even transit hubs, whereas thriving malls tend to have “freeway visibility and direct ramp access.” “Greyfields into Goldfields,” CNU and PWC, February 2001, at http://www.cnu.org/cnu_reports/Executive_summary.pdf, p. 3.


43. Ibid.

44. Joe Ortwerth, April 1, 2005 interview.

45. Ibid.


48. This section is informed by the work of Lenny Goldberg, whose arguments are summarized in: “The Empire Has No Clothes: Infrastructure, Sprawl, Local Government Finance, and the Property Tax,” State Tax Notes, October 2, 2000, pp. 899–905.

49. See, for example, Paul G. Lewis and Eliza Barbour, California Cities and the Local Sales Tax, Public Policy Institute of California, 1999. Their survey of all 471 California cities in existence in 1998 found that retail was the most desirable land use for both new development and redevelopment. Despite heavy subsidization of retail, they find that California cities' total revenue from the sales tax is stagnant, given that retail spending per capita grows very slowly, while growing shares of consumer spending—such as services and catalog sales—are not taxed. See also Michael Coleman, “City Budget Impacts of Land Development: The Roots of Fiscalization,” League of California Cities, December 2002.


53. Goldberg, “The Empire Has No Clothes.”
55. Goldberg, “The Empire Has No Clothes,” p. 3.
56. It may also explain why Wal-Mart has rolled out new marketing and philanthropic efforts targeting people of color.
65. 1000 Friends of Wisconsin, *Wisconsin’s Tax Incremental Finance Law: Lending a Hand to Blighted Areas or Turning Cornfields into Parking Lots?* October 1999, online at http://www.1kfriends.org/Publications/Online_Documents/TIF.htm. An addendum to the original posting of the full report included a July 28, 1999 letter sent by Wal-Mart corporate real estate manager Randy Crossno to Sauk County Supervisor Bart Olson, saying: “In response to your question, the answer is simply, yes. We would relocate our existing store to this location regardless of the city’s execution of the TIF request.” (Mattera and Purinton, *Shopping for Subsidies*, footnote 20, p. 63.)


**Chapter Seven**


3. Links to the compilations can be found at http://law.marquette.edu/cgi-bin/site.pl?2130&pageID=1680#sfr.

4. Calculated from the stadium profiles cited in the previous note. The amounts were not adjusted for inflation.


8. This section is based heavily on chapter 1 of *Field of Schemes*.


13. *Field of Schemes*, p. 24. It is not clear how many of the jobs survived the move.


18. Ibid., p. 114.

19. Bruce W. Hamilton and Peter Kahn, “Baltimore’s Camden Yards Ballparks,” in *Sports, Jobs, and Taxes*, pp. 246 and 274. The authors note that a complete cost-benefit analysis would also factor in “public consumption benefits” relating to the presence of the stadiums, but they admit that there is no way of measuring those benefits.


22. The *Forbes* 400 list is published each October in *Forbes* (at this writing, the most recent such issue is October 11, 2004).

23. Links to the various *Forbes* lists can be found at http://www.forbes.com/lists/.


25. Quoted in *Field of Schemes*, p. 45.


27. Quoted in Slater and Jackson, “Ballpark Deal Draws Criticism.”


30. Ibid., pp. 4–5.

31. Ibid., pp. 6–9.

Chapter Eight


4. Revenue calculation by Michael Mazerov, Center for Budget and Policy Priorities.


15. Ibid.


19. McIntyre et al., “State Corporate Income Taxes.” The average corporate income tax rate is computed on a weighted basis.


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26. Ibid.


36. Ibid.

37. Ibid.


39. Interestingly, Bill Gates, Sr., father of the Microsoft cofounder, is an
active crusader for preserving the federal estate tax; he even coauthored a book on the issue, *Wealth and Our Commonwealth*.

40. Robert McIntyre computations from the U.S. Census.
41. Ibid.
44. McIntyre and Nguyen, “Corporate Income Taxes in the Bush Years.”
45. Ibid.

Chapter Nine

1. The law’s formal name is the Emergency Planning and Community Right-to-Know Act of 1986.
6. Though we have educated estimates about the total fifty-state cost of
subsidies, many states still have poor accounting—or no accounting—of their subsidies. That’s because the Government Accounting Standards Board (GASB), the official body that lays out uniform accounting formats that public agencies have to use to satisfy bond investors and the credit ratings agencies, has never mandated a full accounting of tax spending for economic development. The National Association of State Budget Officers has not engaged on the overall issue of tax spending for two decades; see “Tax Expenditure Reporting: Closing the Loophole in State Budget Oversight,” National Association of State Budget Officers, December 1985.


16. Ellwood, “Sputtering Labor Force,” p. 16. Some people may work a little longer. The age at which you get a full Social Security benefit is getting phased back; by 2022, it will be age 67. People with inferior defined contribution pensions may need to supplement their income. And Social Security recipients can now earn all they want before age 69 without losing benefits (after reaching “full retirement age”). However, the average retirement age of 62 to 63 has remained quite steady; more than two thirds of all workers—and more than three fourths of women—have left their jobs by age 65. Even if a few percent more boomers work past age 62, as is projected, there will still be a huge exodus. (Howard N. Fullerton, Jr. and Mitra Toossi, “Labor Force Projections to 2010: Steady Growth and Changing Composition,” *Monthly Labor Review*, U.S. Department of Labor, November 2001. Murray Gendell, “Retirement Age Declines Again in 1990s,” *Monthly Labor Review*, October 2001.)

It’s not just a matter of the quantity of workers who will be available; of equal concern is the quality of their skills and whether those skills match what the economy needs. Even if the total-worker squeeze turns out to be less severe than some people predict, many observers—from differing political perspectives—argue that the skills needed in our economy are changing faster than our ability to supply them. They advocate big increases in education and workforce development efforts. (See, for example, *America’s Choice: High Skills or Low Wages*, report of the Commission on the Skills of the American Workforce, National Center on Education and the Economy, 1990, and writings and statements of people as different as Alan Greenspan and Richard Florida.)

Finally, some observers predict that an increase in immigration will cushion the impact of the boomers’ departures. The rate of immigration into the United States has increased greatly in the last two decades, and traditionally we have attracted many highly skilled immigrants. However, many other countries are lowering their entry barriers to attract high-skill immigrants, whereas the Department of Homeland Security is making entry to the U.S. more difficult in the post–September 11


24. Ibid.
25. Ibid.
27. Ibid.
28. Ibid.