

**ORIGINAL**

Decision No. 75647

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

AL KEITH PLOTKIN, aka  
G. PLOTKIN,

Plaintiff

vs

PACIFIC TELEPHONE,

Defendant

Case No. 8762  
(Filed January 31, 1968)

WALTER PLOTKIN,  
J. E. GIBBONS, and  
RANDALL V. HENDRICKS,

Complainants,

vs

THE PACIFIC TELEPHONE AND  
TELEGRAPH COMPANY,  
a corporation,

Defendant

Case No. 8763  
(Filed January 31, 1968)

GLENN HUBBS, and  
GUY CALE ENTERPRISES,  
served herein as CALIFORNIA GUY,

Complainants,

vs

THE PACIFIC TELEPHONE AND  
TELEGRAPH COMPANY,  
a corporation,

Defendant

Case No. 8764  
(Filed January 31, 1968)

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR

FRANK A. MILANO dba COAST  
TO COAST TURF PUBLICATIONS,

Complainant,

vs.

THE PACIFIC TELEPHONE AND  
TELEGRAPH COMPANY, a  
corporation,

Defendant

Case No. 8765  
(Filed February 2, 1968)

GUY CALE,

Complainant,

vs.

THE PACIFIC TELEPHONE AND  
TELEGRAPH COMPANY,  
a corporation,

Defendant

Case No. 8766  
(Filed February 2, 1968)

Lewis, Gershan & Castillo by Arthur  
Lewis, for complainants in Case  
No. 8763, Case No. 8764, and Case  
No. 8766.

Harry E. Weiss by Marvin L. Klynn, for  
complainant in Case No. 8765.

James E. Green, for complainant in Case  
No. 8762 and interested party in Case  
No. 8763.

Lawler, Felix & Hall, by Richard L.  
Fruin, Jr., and Orville Orr, Jr.,  
for defendant.

Roger Arnebergh, City Attorney, by  
Charles E. Mattson, intervenor.

#### O P I N I O N

The complaints in the above-numbered cases were con-  
solidated pursuant to stipulation and heard before Examiner DeWolf  
at Los Angeles on May 13 and 27, August 12, September 23 and 24,  
1968, and submitted on September 24, 1968, subject to the filing

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/MS \*

of concurrent opening and reply briefs which have been filed.

The complainants allege that they are subscribers and users of telephone service and that they are threatened with disconnection of telephone service by defendant telephone company, and they seek a restraining order directing the defendant to maintain existing telephone service pending a hearing of their complaint and a permanent injunction enjoining and restraining defendant from discontinuing or interfering with their telephone services in the future. Complainants further allege that they have never used the telephone service to violate the law or aid or abet such violations and that they will suffer great and irreparable damage if they are deprived of said telephone service.

Interim relief was ordered for the complainants pending further order as follows: Case No. 8762 by Decision No. 73682, dated February 2, 1968; Case No. 8763 by Decision No. 73706, dated February 6, 1968; Case No. 8764 by Decision No. 73707, dated February 6, 1968; Case No. 8765 by Decision No. 73708, dated February 6, 1968; and Case No. 8766 by Decision No. 73709, dated February 6, 1968.

Defendant's answers in each of the above cases allege that defendant received from the Department of Police of the City of Los Angeles, a copy of an order Re Findings of Probable Cause in the Superior Court in an action signed by Benjamin B. Ostrin, judge pro tempore, and that defendant received copies of the Commission's orders granting interim relief in the above cases. The defendant's answers further allege that defendant

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/hh \*/MS \*

has maintained said telephone service without interruption, and will continue to maintain said telephone service pursuant to said orders granting interim relief. None of the telephones were disconnected.

The City of Los Angeles filed a petition for intervention in each of the above cases and alleges that the Police Department of the City of Los Angeles is a concerned law enforcement agency within the provisions of Decision No. 71797, Appendix "A", Paragraph 4, in Case No. 4930. The petition alleges that the police officers of the Police Department of the City of Los Angeles, acting as authorized officials of a law enforcement agency secured an order, signed by a magistrate, finding that probable cause exists to believe that telephone service furnished each of the complainants herein is used as an instrumentality, directly or indirectly, to violate or to assist in the violation of the law, and that such written findings were issued in an order of the Superior Court of the State of California for the County of Los Angeles, in Case Nos. 922704, 922705, 922706, 922707, and 922708, and that the City, pursuant to the provisions of Decision No. 71797, objects to continuation or restoration of telephone service to complainants herein.

A motion to join General Telephone Company as a party defendant was denied.

All complainants objected to the jurisdiction of the Commission on the ground that the judge pro tempore of the Superior Court who signed and issued the Order Re Finding of Probable Cause was not qualified to do so under the rules set forth in Decision No. 71797 of the Commission. The objections were overruled.

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR

The complainants stipulated with defendant that the telephone company has no knowledge that the telephone service provided is being or has been at any time used as an instrumentality directly or indirectly to violate or to assist in the violation of the law and that the defendant has no knowledge of and no records which will reflect the use made by complainants of the telephone service.

All of the complainants then claimed that they did not have the burden of proving any other facts and rested their cases.

The City intervenor requested the examiner to call one of the complainants in Case No. 8762 to testify to the truth of the allegations in the complaint and for leave to cross-examine. Attorneys for complainants objected and sought relief and immunity under section 1795 of the Public Utilities Code. The attorney for the City questioned the complainant in Case No. 8762 on cross-examination and the same objections and claim of immunity under section 1795 of the Public Utilities Code were made by complainants. After a number of questions and answers on cross-examination in Volume 2 of the transcript pages 86 through 93 - the attorney for the City moved to strike all testimony, questions, and answers which he propounded to complainant in Case No. 8762, from the record for all purposes on the ground that the City did not want to compel the witness to testify. The motion was granted and all testimony of the complainant in Case No. 8762, pages 86 through 93 was stricken from the record for all purposes.

Exhibits Nos. 1, 2, 3, 4, and 5 were received in evidence by stipulation of the parties and contain the stipulation for consolidated cases, copy of Order Re Finding of Probable Cause and

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/hh \*/MS \*

affidavits of police officer Hugh W. Binyon who was present and was cross-examined. The complainants moved to strike portions of the affidavits as being hearsay. The motions to strike were denied.

The police officer testified that he has handled over 150 investigations of "horse race results businesses" over the past five years and gave details how bookmaking operations are conducted in this area. The officer testified that he has been employed by the Police Department for fourteen years, and that he has conducted periodic checking of the various horserace result businesses around the Los Angeles area in order to maintain current information regarding their operations, and that the most recent investigations were during the latter part of October 1967 and January 1968.

The officer testified that these operators have improved their operations by utilizing more sophisticated equipment to facilitate the rapid dissemination of race results, and that the primary method of communication is by use of the telephone. The customers call in and identify by a code designation, name and number or letter for the purpose of expediting service and to protect the anonymity of the caller; operators claim they do not know the identity of their customers. The officer testified that the customers pay cash fees of \$10 to \$25 per week for the service. The officer testified that these operators are called horserace service spots and function with one common source of reference, the National Daily Reporter.

The police officer's testimony describes the operations as follows: The specific order of horses running in particular races is designated by handicap positions; these number references

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - ER/hh \*

are utilized to denote horses wagered upon when bets are recorded. Information is also secured from the Mexican radio station XERB. The general lag in XERB results is about one race (20-40 minutes) depending on where the off times fall in relationship to their half-hour programming; however, most service spots have provided the results within fifteen minutes from off times.

The officer further testified that the rapidity of obtaining race results is a key factor in maintaining gambling interest and stimulating the placing of contemporary wagers by bettors on a race-to-race basis, and that this is true should the bettors win or lose their initial wagers. Winners are induced to try to snowball their investments, while losers are encouraged to try and recoup their losses. Either way, the bookmaker benefits since a bettor's chances of winning decrease in direct proportion to the number of wagers that he places. The rapid results as provided by horse service spots are essential and valuable to illegal gambling otherwise bookmakers and/or bettors would not pay up to \$25 per week for quick information that could be subsequently obtained from 75 cents worth of newsprint.

The officer further testified that the horse service spots operated by each of complainants: (1) dispense information on scratches, jockey changes, post times, results per National Daily Reporter handicap positions, and prices paid, and that he has called some of these numbers and obtained the information; and (2) operate with telephone rotaries, in-codes for customers, claim anonymity for customers, and operate with rapidity in the acquisition and dissemination of information on results. His

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/hh \*/MS \*

opinion that these businesses operate merely to support, assist, and aid or abet illegal horserace bookmaking operations and gambling activities is based upon the foregoing and the excessive charges to their customers for information readily available via radio and the newspapers for a nominal price.

Police department records show that telephone numbers used by complainants frequently appear during bookmaking arrests and investigations and that evidence from recent bookmaking arrests have had telephone numbers 293-6238 and 295-2551 listed for "Service."

The officer's testimony as to the operations of the complainant in Case No. 8762 is summarized as follows:

That he has and uses five-line rotary telephone service with telephone numbers 877-0446-7-8-9 and numbers 984-1717 and 877-2318 and furnishes information about horserace results, prices paid, scratches, and post time information to customers in the manner above described. The officer personally observed this location since 1962 and observed it on October 25, 1967 at 3:00 p.m. with the knowledge and consent of the owner whom he observed answering incoming calls and furnishing horserace results to parties calling. He was furnishing such results by National Daily Reporter handicap position designations, and he was disseminating horserace results, prices paid, and post time information to such customers, which is usable for illegal gambling operations. The officer observed at least five telephones at this location and observed Mr. Plotkin talking into several telephones at one time giving the National Daily Reporter coded information by speaking into one or more telephones. The officer, on January 10, 1968, again verified



C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR

the subscriber, telephone numbers, and equipment used.

The officer's testimony as to the operations of the complainants in Case No. 8763 is summarized as follows:

Complainants have a four-line rotary telephone service with numbers 295-2551-2-3-4 and also number 292-9915 and 295-5215 and a three-line rotary with numbers 293-6238-9-0, and furnish information about horserace results, prices paid, scratches, and post time information to customers in the manner above described.

The officer personally observed this location since 1963, and last observed operations on March 21, 1967 and October 26, 1967, at 3:00 p.m. when at least eleven telephones were in operation, and also a tape recorder device was in use by the telephone. The officer testified that the operator at this location said he had not changed his method of operation over the years and that no changes were anticipated. The officer verified these subscribers and equipment used again on January 10, 1968.

The officer's testimony as to the operations of the complainants in Case No. 8764 is summarized as follows: They have a six-line rotary telephone service with numbers 757-3171-2-3-4-5-6 and telephone number 754-6207 and furnish information about horserace results, prices paid to bettors, scratches, and post time information is given to their customers in the manner above described.

The officer observed the complainant, Glenn Hubbs, conducting business at his location at least on five separate occasions since 1962 in the method heretofore described and on March 29, 1967, and October 31, 1967. The officer testified that

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/hh \*

this complainant stated that his customers paid \$20 to \$25 per week for the racing information by cash or money order. The officer verified the information as to subscribers' telephone numbers and equipment used again on January 10, 1968.

The officer's testimony as to the operations of the complainants in Case No. 8765 is summarized as follows: They have a 29-line multiplex rotary, numbers 469-61681, etc. and a 12-line multiplex rotary, numbers 466-2471, etc. and 469-6938, and furnish information about horserace results, prices paid, scratches, and post time information which is given to customers. These complainants have a complex electronics setup with a capacity to handle a great volume of callers and is the largest among the horse service spots in volume of business.

The officer observed this location since 1962 and watched their equipment and operations on at least ten occasions and was physically present on March 20, 1967 and October 25, 1967, and heard the equipment dispensing information regarding horserace results, and called the phone number to get the information furnished at least a half dozen times. On January 10, 1968, he checked the telephone numbers, equipment, and subscribers, and found that there had been no change.

The officer's testimony as to the operations of the complainants in Case No. 8766 is summarized as follows:

Complainant has a seven-line rotary telephone service with numbers 937-2493 through 9 and 935-2705 and 935-7626 and furnish information about horserace results, prices paid, scratches, and other information as above described. The officer first

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C-8762, C-8763, C-8764  
C-8765, C-8766

observed this operation in 1962 and on twelve occasions since that time, most recently on March 21, 1967, October 27, 1967, and January 10, 1968, the equipment, telephone numbers, and subscribers were again verified and found to be the same.

The questions involved here are:

1. Whether there has been compliance with the tariff rule prescribed by the Commission in Re Communication Facilities, 66 Cal. P.U.C. 675 (Decision No. 71797 in Case No. 4930).
2. Whether the Commission can order discontinuance of complainants' telephone service absent findings that complainants used such service to violate a penal statute or in aiding and abetting the violation of a penal statute.
3. Whether any of the complainants are entitled to immunity under Section 1795 of the Public Utilities Code of California.
4. Whether the discontinuance of complainants' telephone service constitutes a denial of equal protection of law in derogation of the Fourteenth Amendment to the Constitution of the United States.
5. Whether complainants' activities are protected by the First Amendment to the Constitution of the United States.
6. Whether immunity, claimed by the complainant Al Plotkin from penalty or forfeiture, once having attached, can be withdrawn or retroactively denied.

#### Discussion

Not one of the complainants offered to testify in support of the allegations of his complaint or in rebuttal of the evidence by the City.

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 MS \*\*

The evidence presented by the City makes a complete case against each of the complainants, showing that each of the telephones used by the complainants is being used to disseminate horseracing information which is of value only to gamblers and bookmakers, and is against public policy in the State of California.

Complainants object to the jurisdiction on the ground that the Order Re Finding of Probable Cause set forth in Exhibits Nos. 1, 2, 3, 4, and 5 is not signed by a magistrate as required by the rule of the Commission in Appendix A, Decision No. 71797, and that the judge of the Superior Court pro tempore, who signed the order, is not qualified to execute the same, and further that the affidavits in support of the order contain hearsay and are insufficient to support issuance of the order.

The record discloses that requirements of due process have been complied with and that the judge pro tempore did have the power to act and that this Commission can take official notice

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BP/hh \*

of the records of the Superior Court of the State of California for the County of Los Angeles as set forth in the brief of the City as follows:

"In Division 65 of said court, the records show a Special Minute Order, issued by Ralph H. Nutter, Judge, dated December 6, 1967. The Order states that Commissioner Benjamin B. Ostrin is appointed to act as a Judge Pro Tempore on all Petitions pursuant to Decision No. 71797 of the California Public Utilities Commission by the Order of the Presiding Judge. It was pursuant to such Order that the City has proceeded. Rule 244 of the California Rules of Court for the Superior Courts, cited by complainants, is expressly not applicable to the selection of a Court Commissioner to act as a Judge Pro Tempore (See said Rule 244(b)). As a Judge Pro Tempore, appointed by the Presiding Judge, the Commissioner clearly exercised all the authority and power of a Judge of the Superior Court on the matter before him."

Complainants also claim immunity from penalty or forfeiture under section 1795 of the Public Utilities Code on the ground that one of the complainants was called to testify at request of the City on cross-examination and claimed such immunity even though all of his testimony was later stricken from the record. Complainant admits that telephone service is subject to regulation by this Commission, and raises constitutional questions of free speech and the freedoms of the First Amendment to the Constitution. No fines, penalties, or forfeitures are threatened against the complainants herein for their past violations of the law, if any. The order for disconnection of telephone service is a matter of regulation and not a penalty or forfeiture of a vested right.

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 MS \*\*

Complainants assert that no evidence has been adduced to show that they have violated any penal statutes or aided and abetted in such violation, that Decision No. 71797 in Case No. 4930 dated December 30, 1966 is unconstitutional and they contend that the regulations of this Commission here contemplated can only be made where a clear and present danger of serious substantive evil is made to appear and the substantive evil must be extremely serious.

Complainants' narrow construction of Commission jurisdiction is without merit, as the Commission may order disconnection of service when the use of such telephone service is against public policy, such as in the furtherance of bookmaking, an illegal enterprise in this and other states. Kilgore v. General Telephone and Telegraph Co., Decision No. 72782, Case No. 7971, dated July 18, 1967. Writ of Review denied by the Supreme Court of California on October 25, 1967.

In the Kilgore case the Commission said:

"It is not the giving of odds or results that is the cause of our interdiction, but knowingly giving odds and results by means of rapid transmission to persons known to the sender to be using the information for illegal purposes. Such activity distinguishes petitioner's operation from news media. The prohibition of transmission of information as to point spreads, betting

C. 8762, C. 8763, C. 8764,  
C. 8765 & C. 8766 - BR/hh \*

odds soon after the event is clearly related to the suppression of illegal gambling for 'modern bookmaking depends in large measure on the rapid transmission of gambling information ... .'

(HR Rep No. 967, 87th Cong, 1st Sess (1961).) Obviously, petitioner's business is different from a newspaper. We know of no other reason to explain why anyone would pay \$25 per week for petitioner's service when one could buy a 10-cent newspaper.

"It is abundantly clear that the exercise of governmental power to prohibit the uses of public utility facilities in the furtherance of illegal gambling activities is not precluded by the fact that the business activity affected is claimed to be generally within the protection of the First Amendment. (Telephone News System, Inc. v. Illinois Bell Telephone Co., supra, 51 PUR 3d at 42.) In related news dissemination fields First Amendment arguments were also rejected: activities of press associations may be enjoined for violation of the anti-trust laws (Associated Press v. US (1945) 326 US 1, 89 L ed 2013); broadcasting licenses may be denied if the company's past business practices were monopolistic in character (Mansfield Journal Co. v. FCC (DC Cir 1949) 180 F 2d 28), if the broadcaster made misrepresentations in his application for a license (Independent Broadcasting Co. v. FCC (DC Cir 1951) 193 F 2d 900), or if the broadcaster violates standards prescribed by the FCC (NBC v. FCC (1943) 319 US 190, 87 L ed 1344).

"It is not the dissemination of odds and results on sporting events that we are attempting to prevent, nor the rapid transmission of such information. But it is the rapid transmission

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C-8762, C-8763, C-8764  
C-8765, C-8766

of such information to a group of persons who the disseminator knows will put the information to an illegal use. When all these factors coalesce the result is not free speech but improper activity.

(Compare Kelly v. Illinois Bell Telephone Co., supra, with Re Delaware Sports Service, supra.)"

Findings of Fact

1. Complainant in Case No. 8762, Al Keith Plotkin, also known as G. Plotkin, uses seven lines of telephone service at 5700 Whitsett Avenue, North Hollywood, in conducting a horseracing service spot ever since 1962.

2. Complainant was required to answer questions under oath by the Commission after he had claimed immunity and relief from any penalty or forfeiture under Section 1795 of the Public Utilities Code.

3. A motion of the City of Los Angeles to strike the testimony of complainant Al Keith Plotkin subsequent to his claim of immunity was granted.

4. Complainants in Case No. 8763, Walter Plotkin, J. E. Gibbons, and Randall V. Hendricks, use nine lines of telephone service at 4255 Cloverdale Avenue, Baldwin Hills, in conducting a horseracing service spot ever since 1962.

5. Complainants in Case No. 8764, Glenn Hubbs and Guy Cale Enterprises, (served herein as California Guy), use seven lines of telephone service at 621 West Century Boulevard, #2 Los Angeles, in conducting a horseracing service spot ever since 1962.



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C-8762, C-8763, C-8764  
C-8765, C-8766

6. Complainant in Case No. 8765, Frank A. Milano, dba Coast to Coast Turf Publications, uses forty-one lines of telephone service at 5504 Hollywood Boulevard, #204, Hollywood, in conducting a horse-racing service spot ever since 1962.

7. Complainants in Case No. 8766, Guy Cale, W. G. Riley, and Elaine Thomas, use nine lines of telephone service at 268 South Larchmont Boulevard, Hollywood, in conducting a horseracing service spot ever since 1962.

8. Each of the complainants uses his telephone service to collect and disseminate information to customers regarding horseraces, for which complainants receive the sum of \$10 to \$25 per week per customer.

9. The information so furnished is of no monetary value to the general public, but is indispensable to the operations of gamblers and bookmakers. Complainants know that such information is used to further bookmaking and gambling.

10. Each of the complainants is engaged in the business of the rapid transmission of information as to the progress or results of horseraces, or information as to wagers, betting odds, changes in betting odds, post or off times, or jockey changes by use of telephone facilities, to persons known to complainants to be putting such information to an illegal use. Such business encourages the perpetration of an unlawful act, to-wit: bookmaking.

11. It is against the public policy of the State of California to use telephone equipment to knowingly transmit information as to the progress or results of a horserace, or information as to wagers, betting odds, changes in betting odds, post or off times, or jockey

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5/13

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C-8762, C-8763, C-8764  
C-8765, C-8766

changes, to persons known to the disseminator of the information to utilize such information for illegal purposes. Such use encourages the perpetration of an unlawful act, to-wit: bookmaking. *e*

Based on the foregoing findings of fact the Commission concludes that:

1. Complainants' services are not protected by the First or Fourteenth Amendment to the Constitution of the United States or similar provisions in the Constitution of the State of California.

2. The use to which complainants put the facilities of defendant, The Pacific Telephone and Telegraph Company, encourages the perpetration of an unlawful act, namely bookmaking, and which use is contrary to the Public Policy of the State of California.

3. Complainant, Al Keith Plotkin, aka G. Plotkin, in Case No. 8762, was required to testify under oath by the Commission, claimed, was granted immunity from any penalty or forfeiture under Section 1795 of the Public Utilities Code and testified in reliance thereon. The striking of Plotkin's testimony, thereafter, could not and does not work a retroactive cancellation or vacation of such immunity. Complainant is entitled to continuation of his telephone service.

4. The complaints in Cases Nos. 8763, 8764, 8765 and 8766 should be dismissed, the temporary interim relief heretofore granted should be vacated, and defendant should be directed to discontinue service to complainants and remove its telephone facilities from complainants' premises.

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C-8762, C-8763, C-8764  
C-8765, C-8766

O R D E R

IT IS ORDERED that:

1. The temporary interim relief granted by Decision No. 73706, dated February 6, 1968, in Case No. 8763; Decision No. 73707, dated February 6, 1968, in Case No. 8764; Decision No. 73708, dated February 6, 1968, in Case No. 8765; and Decision No. 73709, dated February 6, 1968, in Case No. 8766, is vacated and set aside.

2. Cases Nos. 8763, 8764, 8765 and 8766 are hereby dismissed. ✓

3. The relief requested by the City of Los Angeles, in its petition in intervention in Cases Nos. 8763, 8764, 8765 and 8766 is granted to the extent set forth in Ordering Paragraph No. 4 of this order and in all other respects is denied. ✓

4. The Pacific Telephone and Telegraph Company shall forthwith remove all of its telephone facilities from complainants' premises located at:

4255 Cloverdale Avenue, Baldwin Hills - Case No. 8763  
621 West Century Boulevard, #2, Los Angeles - Case  
No. 8764  
5504 Hollywood Boulevard, #204, Hollywood - Case  
No. 8765  
268 South Larchmont Boulevard, Hollywood - Case  
No. 8766.

5. Decision No. 73682, dated February 2, 1968, granting interim relief to complainant Al Keith Plotkin, aka G. Plotkin, at 5700 Whitsett Avenue, North Hollywood, California, requiring

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C-8762, C-8763, C-8764  
C-8765, C-8766

continuation of telephone service to complainant, is made permanent, subject to defendant's tariff provisions and existing applicable law.

The Secretary of the Commission is directed to cause personal service of this order to be made upon The Pacific Telephone and Telegraph Company and to serve all other parties by mail.

The effective date of this order shall be twenty days after the date hereof.

Dated at San Francisco, California, this 13<sup>th</sup> day  
of MAY, 1969.

William J. ...  
President  
August ...  
John P. ...  
...  
...  
Commissioners