

## Complaint

IN THE MATTER OF  
KEYSTONE WIRE CLOTH COMPANY, ET AL.CONSENT ORDER, ETC., IN REGARD TO THE ALLEGED VIOLATION  
OF SEC. 2(c) OF THE CLAYTON ACT*Docket 7297. Complaint, Nov. 6, 1958—Decision, Apr. 9, 1959*

Consent order requiring a manufacturer of wire cloth with principal place of business in Hanover, Pa., to cease violating Sec. 2(c) of the Clayton Act by paying commissions on sales to the broker who was president and treasurer of the corporate buyer and, with those related to him, owned more than 99% of its common stock; and requiring said buyer and said broker president to cease accepting any brokerage or allowance in lieu thereof in connection with such purchases.

## COMPLAINT

The Federal Trade Commission, having reason to believe that the parties respondent named in the caption hereof, and hereinafter more particularly described, have violated and are now violating the provisions of subsection (c) of Section 2 of the Clayton Act (U.S.C., Title 15, Sec. 13), as amended by the Robinson-Patman Act, approved June 19, 1936, hereby issues its complaint, stating its charges with respect thereto as follows:

PARAGRAPH 1. Respondent Keystone Wire Cloth Company, hereinafter sometimes referred to as the seller respondent, is a corporation, organized, existing and doing business under and by virtue of the laws of the State of Pennsylvania, with its principal office and place of business located at Hanover, Pa. Said respondent is now, and for some time last past has been, engaged in the business of manufacturing, selling and distributing wire cloth, including insect wire screening, with annual gross sales amounting to approximately \$3,500,000.

PAR. 2. Respondent Sherwatt Equipment & Manufacturing Co., Inc., hereinafter sometimes referred to as the buyer respondent, is a corporation, organized, existing and doing business under and by virtue of the laws of the State of New York, with its principal office and place of business located at 47 Murray Street, New York, 7, N.Y.

Respondent Arthur Watts is president and treasurer of said corporation and directs, formulates and controls its policies, acts and practices. It is now, and for sometime last past has been, engaged in the business of both manufacturing wire cloth and in

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buying and reselling wire cloth manufactured by others. Its annual gross sales amount to approximately \$500,000.

PAR. 3. Respondent Arthur Watts, hereinafter sometimes referred to as the broker respondent, is an individual, and is a member of the board of directors and president and treasurer of buyer respondent, owning individually more than 50% of all classes of its stock outstanding and in conjunction with those related to him more than 99% of the common stock and 90% of the preferred stock outstanding. He occupies the same business premises as does the buyer respondent, and acts for and in its behalf in its business dealings. He also acts as broker, agent, or representative for the seller respondent herein in the sale of its wire cloth, his commissions or compensation on sales ranging from 2% to 4% thereof. His business address is 47 Murray Street, New York 7, N.Y.

PAR. 4. In the course and conduct of its business the seller respondent makes substantial sales of its products through the broker respondent to the buyer respondent. On such sales and purchases the broker respondent has been and is now receiving or accepting something of value as a commission, brokerage, or other compensation from the seller respondent, which receipt or acceptance has the same effect as if the buyer respondent had received or accepted such compensation, or an allowance or discount in lieu thereof, and in turn distributed it to the broker respondent.

PAR. 5. Said respondents, directly or indirectly, cause such products, when sold and purchased, to be transported from the state of origin to destinations in another state. There has been at all times mentioned herein a continuous course of trade in commerce, as "commerce" is defined in the Clayton Act, in such products between said respondents.

PAR. 6. The acts and practices of respondents as alleged herein are in violation of subsection (c) of Section 2 of the Clayton Act, as amended by the Robinson-Patman Act.

*Mr. Brockman Horne* for the Commission.

*Lamb & Long*, by *Mr. George P. Lamb*, of Washington, D.C., for Keystone Wire Cloth Company.

*Pofcher, Schluskel & Katcher*, by *Mr. Munroe F. Pofcher*, of New York, N.Y., for Sherwatt Equipment & Manufacturing Company, Inc., and Arthur Watts.

## INITIAL DECISION BY FRANK HIER, HEARING EXAMINER

Pursuant to the provisions of subsection (c) of Section 2 of the Clayton Act (U.S.C., Title 15, Sec. 13), as amended by the Robinson-Patman Act, the Federal Trade Commission on November 6, 1958, issued and subsequently served its complaint in this proceeding against the above-named respondents.

On February 20, 1959, there was submitted to the undersigned hearing examiner an agreement between respondents and counsel supporting the complaint providing for the entry of a consent order. By the terms of said agreement, respondents admit all the jurisdictional facts alleged in the complaint and agree that the record may be taken as if findings of jurisdictional facts had been duly made in accordance with such allegations. By such agreement, respondents waive any further procedural steps before the hearing examiner and the Commission; waive the making of findings of fact and conclusions of law; and waive all of the rights they may have to challenge or contest the validity of the order to cease and desist entered in accordance with this agreement.

Such agreement further provides that it disposes of all of this proceeding as to all parties; that the record on which this initial decision and the decision of the Commission shall be based shall consist solely of the complaint and this agreement; that the latter shall not become a part of the official record unless and until it becomes a part of the decision of the Commission; that the agreement is for settlement purposes only and does not constitute an admission by respondents that they have violated the law as alleged in the complaint; and that the following order to cease and desist may be entered in this proceeding by the Commission without further notice to respondents, and, when so entered, it shall have the same force and effect as if entered after a full hearing, and may be altered, modified, or set aside in the manner provided for other orders; and that the complaint may be used in construing the terms of the order.

The hearing examiner having considered the agreement and proposed order, and being of the opinion that they provide an appropriate basis for settlement and disposition of this proceeding, the agreement is hereby accepted, the following jurisdictional findings made, and the following order issued.

1. Respondent Keystone Wire Cloth Company is a corporation existing and doing business under and by virtue of the laws of

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the State of Pennsylvania, with its office and principal place of business located at Hanover, Pa.

Respondent Sherwatt Equipment & Manufacturing Company, Inc., is a corporation existing and doing business under and by virtue of the laws of the State of New York, with its office and principal place of business located at 47 Murray Street, New York, N.Y.

Respondent Arthur Watts is an individual and is president and treasurer of said Sherwatt Equipment and Manufacturing Company, Inc. He directs, formulates and controls its policies, acts and practices. His business address is 47 Murray Street, New York, N.Y.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents.

## ORDER

*It is ordered,* That respondent Keystone Wire Cloth Company, a corporation, and its officers, directors, representatives, agents or employees, directly or indirectly, or through any corporate or other device, in connection with the sale of wire cloth in commerce, as "commerce" is defined in the Clayton Act, do forthwith cease and desist from:

Paying, granting, or allowing, directly or indirectly, to any buyer, or to anyone acting for or in behalf of, or who is subject to the direct or indirect control of, such buyer, anything of value as a commission, brokerage, or other compensation, or any allowance or discount in lieu thereof, upon or in connection with any sale of its wire cloth to such buyer.

*It is further ordered,* That the respondent Sherwatt Equipment & Manufacturing Company, Inc., a corporation, and its officers, and Arthur Watts, individually and as an officer of said corporation, and respondents' agents, representatives, and employees, directly or indirectly, or through any corporate or other device, in connection with the purchase or sale of wire cloth in commerce, as "commerce" is defined in the Clayton Act, do forthwith cease and desist from:

Receiving or accepting, directly or indirectly, from any seller anything of value as a commission, brokerage or other compensation, or any allowance or discount in lieu thereof, upon or in connection with any purchase of wire cloth by or for the account of respondent Sherwatt Equipment & Manufacturing Company, Inc., or upon any other purchase or sale where either respondents

Sherwatt Equipment & Manufacturing Company, Inc., or Arthur Watts, or both, are the agents, representatives, or other intermediaries acting for or in behalf of, or subject to the direct or indirect control of, the buyer.

DECISION OF THE COMMISSION AND ORDER TO FILE  
REPORT OF COMPLIANCE

Pursuant to Section 3.21 of the Commission's Rules of Practice, the initial decision of the hearing examiner shall, on the 9th day of April 1959, become the decision of the Commission; and, accordingly:

*It is ordered,* That the respondents herein shall, within sixty (60) days after service upon them of this order, file with the Commission a report in writing setting forth in detail the manner and form in which they have complied with the order to cease and desist.

IN THE MATTER OF  
EILER'S FURS

CONSENT ORDER, ETC., IN REGARD TO THE ALLEGED VIOLATION OF THE  
FEDERAL TRADE COMMISSION AND THE FUR PRODUCTS LABELING ACTS

*Docket 7321. Complaint, Dec. 2, 1958—Decision, Apr. 9, 1959*

Consent order requiring a furrier in Huron, S. Dak., to cease violating the Fur Products Labeling Act by failing to comply with labeling and invoicing requirements, and by advertising in newspapers which failed to disclose that certain fur products contained artificially colored fur and to disclose the country of origin of imported furs, and which claimed percentage savings and reductions from regular prices without keeping adequate records as a basis therefor.

*Mr. Floyd Collins* for the Commission.  
Respondents, *pro se*.

INITIAL DECISION BY JOHN B. POINDEXTER, HEARING EXAMINER

On December 2, 1958, the Federal Trade Commission issued a complaint charging Ethel Eilers and William Eilers, individually and as copartners trading as Eilers' Furs, (erroneously referred to in the caption of the complaint as Ethel Eiler and William Eiler, individually and as copartners trading as Eiler's Furs) hereinafter referred to as respondents, with falsely and deceptively misbranding, invoicing and advertising certain of their fur products in violation of the Federal Trade Commission Act and the Fur Products Labeling Act.

After issuance and service of the complaint, the respondents and counsel supporting the complaint entered into an agreement for a consent order. The agreement has been approved by the director and the assistant director of the Bureau of Litigation. The agreement disposes of the matters complained about.

The pertinent provisions of said agreement are as follows: Respondents admit all jurisdictional facts; the complaint may be used in construing the terms of the order; the order shall have the same force and effect as if entered after a full hearing and the said agreement shall not become a part of the official record of the proceeding unless and until it becomes a part of the decision of the Commission; the record herein shall consist solely of the complaint and the agreement; respondents waive the requirement that the decision must contain a statement of find-

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ings of fact and conclusions of law; respondents waive further procedural steps before the hearing examiner and the Commission, and the order may be altered, modified, or set aside in the manner provided by statute for other orders; respondents waive any right to challenge or contest the validity of the order entered in accordance with the agreement and the signing of said agreement is for settlement purposes only and does not constitute an admission by respondents that they have violated the law as alleged in the complaint.

The undersigned hearing examiner having considered the agreement and proposed order and being of the opinion that the acceptance thereof will be in the public interest, hereby accepts such agreement, makes the following jurisdictional findings, and issues the following order:

## JURISDICTIONAL FINDINGS

1. Respondents Ethel Eilers and William Eilers, are individuals and copartners, trading and doing business as Eilers' Furs. Respondents' place of business is located in Huron, S. Dak.

2. The Federal Trade Commission has jurisdiction of the subject matter of this proceeding and of the respondents and the proceeding is in the public interest.

## ORDER

*It is ordered,* That Ethel Eilers and William Eilers, individually and as copartners, trading as Eilers' Furs, or under any other name, and respondents' representatives, agents and employees, directly or through any corporate or other device, in connection with the introduction or manufacture for introduction into commerce, or the sale, advertising or offering for sale in commerce, or the transportation or distribution in commerce, of fur products, or in connection with the sale, manufacture for sale, advertising, offering for sale, transportation or distribution of fur products which have been made in whole or in part of fur which has been shipped and received in commerce, as "commerce," "fur" and "fur product" are defined in the Fur Products Labeling Act, do forthwith cease and desist from:

1. Misbranding fur products by:

A. Failing to affix labels to fur products showing:

(1) The name or names of the animal or animals producing the fur or furs contained in the fur product as set forth in the

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Fur Products Name Guide and as prescribed under the Rules and Regulations;

(2) That the fur product contains or is composed of used fur, when such is the fact;

(3) That the fur product contains or is composed of bleached, dyed or otherwise artificially colored fur, when such is the fact;

(4) That the fur product is composed in whole or in substantial part of paws, tails, bellies or waste fur, when such is the fact;

(5) The name, or other identification issued and registered by the Commission, of one or more persons who manufactured such fur product for introduction into commerce, introduced it into commerce, sold it in commerce, advertised or offered it for sale, in commerce, or transported or distributed it in commerce;

(6) The name of the country of origin of any imported furs contained in a fur product;

(7) The item number or mark assigned to a fur product.

B. Setting forth on labels affixed to fur products:

(1) Information required under Section 4(2) of the Fur Products Labeling Act and the Rules and Regulations promulgated thereunder in abbreviated form;

(2) Information required under Section 4(2) of the Fur Products Labeling Act and the Rules and Regulations promulgated thereunder, mingled with nonrequired information;

(3) Information required under Section 4(2) of the Fur Products Labeling Act and the Rules and Regulations promulgated thereunder in handwriting.

C. Failing to set forth separately on labels attached to fur products composed of two or more sections containing different animal furs the information required under Section 4(2) of the Fur Products Labeling Act and the Rules and Regulations promulgated thereunder with respect to the fur comprising each section.

2. Falsely or deceptively invoicing fur products by:

A. Failing to furnish invoices to purchasers of fur products showing:

(1) The name or names of the animal or animals producing the fur or furs contained in the fur products as set forth in the Fur Products Name Guide and as prescribed under the Rules and Regulations;

(2) That the fur product contains or is composed of used fur, when such is the fact;



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(3) That the fur products contain or are composed of bleached, dyed or otherwise artificially colored fur, when such is the fact;

(4) That the fur product is composed in whole or in substantial part of paws, tails, bellies, or waste fur, when such is the fact;

(5) The name and address of the person issuing such invoice;

(6) The name of the country of origin of any imported furs contained in a fur product.

B. Failing to set forth the term "Dyed Mouton processed Lamb" in the manner required.

3. Falsely or deceptively advertising fur products through the use of any advertisement, representation, public announcement, or notice which is intended to aid, promote or assist, directly or indirectly, in the sale, or offering for sale of fur products, and which:

A. Fails to disclose:

(1) That the fur product contains or is composed of bleached, dyed or otherwise artificially colored fur, when such is the fact;

(2) The name of the country of origin of any imported furs contained in a fur product.

4. Making price claims and representations respecting percentage savings claims or claims that prices are reduced from regular or usual prices unless there are maintained by respondents full and adequate records disclosing the facts upon which such claims or representations are based.

DECISION OF THE COMMISSION AND ORDER TO FILE  
REPORT OF COMPLIANCE

Pursuant to Section 3.21 of the Commission's Rules of Practice, the initial decision of the hearing examiner shall, on the 9th day of April 1959, become the decision of the Commission; and, accordingly:

*It is ordered,* That the respondents Ethel Eilers and William Eilers, individually and as copartners trading as Eilers' Furs (incorrectly identified in the complaint as Ethel Eiler and William Eiler, individually and as copartners trading as Eiler's Furs) shall within sixty (60) days after service upon them of this order, file with the Commission a report in writing setting forth in detail the manner and form in which they have complied with the order to cease and desist.

IN THE MATTER OF  
BAAR & BEARDS, INC.

ORDER, ETC., IN REGARD TO THE ALLEGED VIOLATION OF THE  
FEDERAL TRADE COMMISSION AND THE WOOL PRODUCTS LABELING ACTS

*Docket 6831. Complaint, July 8, 1957—Decision, Apr. 9, 1959*

Order dismissing, for failure to establish a prima facie case and lack of public interest, complaint charging New York City importers with violating the Wool Products Labeling Act by failing to label scarfs and stoles as required.

*Mr. S. F. House* for the Commission.

*Mr. Harry J. Halperin, of Halperin, Natanson, Shivitz, Scholer and Steingut, of New York, N.Y.,* for respondent.

INITIAL DECISION BY LOREN H. LAUGHLIN, HEARING EXAMINER

On motion of respondent to dismiss the complaint because the evidence fails to establish a *prima facie* case against the respondent and for want of public interest, the motion is sustained and therefore this initial decision is issued dismissing the complaint.

This proceeding is one brought pursuant to the provisions of the Federal Trade Commission Act and the Wool Products Labeling Act of 1939. The complaint was filed July 8, 1957, and after service thereof on respondent, answer was filed in due course. Hearings on the Commission's case-in-chief were subsequently held in New York, N.Y., November 12, 1957; in Washington, D.C., May 19, 1958; in St. Louis, Mo., September 2, 1958; and in Kansas City, Mo., September 3, 1958. Thereafter on September 8, 1958, counsel supporting the complaint rested the Commission's case-in-chief subject only to his renewal by motion of certain evidence which was previously offered on the record and rejected by the examiner. This motion, also filed on September 8, was opposed by respondent, and said motion was denied by an order dated September 30, 1958, which also granted a request of respondent to file its proposed motion to dismiss. Such motion to dismiss, together with a supporting brief, was filed October 21, 1958. On October 29, 1958, an answer brief was filed by counsel supporting the complaint. After due consideration of the whole record, the motion to dismiss has been sustained for reasons stated in this decision

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## Decision

The sole contested issue in this case is whether respondent misbranded certain of its wool products, women's stoles and shrugs, by failing to stamp, tag, or label them as required by §4(a)(2) of the Wool Products Labeling Act of 1939 and the Commission's Rules and Regulations promulgated thereunder. Such alleged violations by respondent are set forth in paragraph 3 of the complaint as follows:

Certain of said wool products were misbranded in that they were not stamped, tagged or labeled as required under the provisions of Section 4(a)(2) of said Wool Products Labeling Act of 1939 and the Rules and Regulations promulgated thereunder.

Among and as examples of said misbranded wool products are shrugs which were not stamped, tagged or labeled so as to show the required name or registered identification number as required by said Act and the Rules and Regulations promulgated thereunder, and scarfs and stoles which were not stamped, tagged or labeled so as to show any of the information as required.

Although paragraph 5 of the complaint is only conclusionary in character, since it is also denied, it, too, is set forth. It reads as follows:

The acts and practices as set forth in Paragraph Three constituted misbranding of wool products and were in violation of the Wool Products Labeling Act of 1939 and the Rules and Regulations promulgated thereunder and constituted unfair and deceptive acts and practices and unfair methods of competition within the intent and meaning of the Federal Trade Commission Act.

In paragraphs (3) and (5), respectively, of the answer, respondent denies each and every allegation in said paragraphs 3 and 5 of the complaint. Under Section 7(c) of the Administrative Procedure Act the burden of proof lies upon counsel supporting the complaint as the "proponent of a rule or order" to establish this controverted issue by "reliable, probative, and substantial evidence." The Commission's own Rules of Practice for Adjudicative Proceedings adopted and promulgated in conformity to said Act impose the burden of proof upon counsel supporting the complaint, §3.14(a); require an initial decision to "be based upon a consideration of the whole record and supported by reliable, probative and substantial evidence," §3.21(b); and provide for the admissibility of "(r)levant, material and reliable evidence" and for the rejection of "(i)rrelevant, immaterial, [and] unreliable \* \* \* evidence \* \* \*," §3.14(b). Since the Administrative Procedure Act, §7(c), preserves to every party "the right \* \* \* to conduct such cross-examination as may be required for a full and true disclosure of the facts," much of the evidence proffered in this proceeding was objectionable as hearsay, some

of it being hearsay compounded upon hearsay, or otherwise unfounded, improper, unreliable and insubstantial. Such evidence was therefore rejected by the hearing examiner. Some major items of rejected evidence as well as some which were withdrawn or were not pursued to a point where they became substantial, relevant or probative will now be referred to briefly before the evidence received is discussed since the record is probably more noteworthy for those things it does not contain than for what was received in evidence. The "reasons or basis" for matters rejected are also briefly stated herein although the record more fully discloses the examiner's precise reasons for each rejection, usually after considerable argument and discussion by counsel for the parties.

All allegations of the complaint except those in paragraphs 3 and 5 thereof are expressly admitted by the answer and they are therefore incorporated verbatim in the findings of fact hereinafter made.

While there are 339 pages of record herein and a total of 51 documentary exhibits were identified, the material portions of the record are much less extensive. Much of the transcript is concerned with extensive offers, objections, suggestions and arguments of counsel concerning many disputed matters and long, but necessary, remarks and rulings of the examiner under the conditions presented on procedural and evidentiary matters, many of which were elementary but which seemed new or confusing to counsel supporting the complaint. Several of the identified exhibits were never offered in evidence, and many of those which were received on the premise of primary relevancy, subject to later support and connection by other evidence, were never followed up and have therefore become immaterial. The first two hearings were quite brief and the last two were not long. In summary, only 19 of the 51 exhibits and about 200 pages of the record are evidence which will be considered in passing on the adequacy or inadequacy of the record to establish a *prima facie* case. The record is not orderly and is confusing, hence the major matters eliminated from consideration are now briefly referred to in order that the competent evidence in the record may be better understood.

Some testimonial evidence was presented at each of the four hearings above referred to. It consisted of the testimony of the respondent's secretary, three employees of the Commission,

and four persons connected in some capacity with certain retail stores which were customers of respondent. It should now be stated that there is no attack by respondent upon the general credibility of any of the witnesses. Each of them endeavored to answer all questions put to him or her honestly and frankly and to the best of his or her ability and memory. Much of the testimony, however, is immaterial, and the relevancy, value and weight of much of the testimony is not conceded by respondent. Therefore as to each material matter the evidence has been very carefully considered and weighed by the hearing examiner, both separately and also in connection with all other evidence relating thereto. The substance of each witness' testimony is substantially set forth and discussed later herein.

Counsel supporting the complaint at the first hearing offered certain letters of respondent, Commission's Exhibits 20 to 24, inclusive, which five letters were received in evidence without objection. R. 38-46. These letters were sent in response to letters from the Commission's Division of Wool, Fur and Flammable Fabrics. Such latter letters referred to certain alleged violations of the Wool Act by respondent reported by field investigators to the Division in Washington. They were identified as Commission's Exhibits 25 and 34 to 37, inclusive, it being contended that if admitted, by means of such hearsay latter charges, the said letters written by respondent's employees would be translated and transformed into admissions against respondent's interest. Objections to the offer of Exhibit 25, one of such letters, was sustained. R. 49-52. It was later conceded by counsel supporting the complaint that the hearing examiner in rejecting said exhibit "properly ruled \* \* \* [it to be] \* \* \* self-serving and hearsay." R. 59. He contended, however, that such letters should be received not as proof of the charges but because they, "taken together with the answers [of respondent], constitute an admission against interest." R. 60. He thereupon also offered his Exhibits 34 to 37 in evidence, R. 61-62, which were also rejected. R. 64. In accordance with a reservation made by him at the time the case in chief was rested, counsel supporting the complaint formally by motion reoffered all of such exhibits, and they were again rejected by an order filed October 30, 1958, all of them being self-serving and hearsay. The respondent's letters, Commission's Exhibits 20 to 24, are not admissions against interest and do not support the complaint but rather tend to justify a finding that respondent is cooperative and law abiding.

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Certain physical exhibits, Commission's Exhibits 1 and 4 for identification, respectively a tan shrug and a gray and white shrug, were never connected with respondent. No. 4 was never offered in evidence at all but No. 1 was offered and rejected, R. 10-23, and rejected again when reoffered. R. 131-136. A letter, Commission's Exhibit 39 for identification, which was addressed by the Commission to a Salt Lake City, Utah, store, relating to the said shrug, Exhibit 1, was rejected as hearsay. R. 126. Counsel supporting the complaint admitted that testimony of some representative of the Keith O'Brien store in Salt Lake City, Utah, would be a necessary foundation for the admission of Exhibit 1. R. 20.

There was an attempt to present testimony concerning what was said at a conference between the Commission's project attorney Canavan and Harry J. Halperin, the attorney for respondent some time prior to the filing of the complaint. R. 91-95. At that time Canavan had not authorized or requested any specific investigation of respondent but the matters involved in this proceeding "had been under investigation for sometime previous." In compliance with a request from respondent's said attorney, a conference was held in Canavan's office about October 4, 1956, said attorney and Canavan being the only persons present. Before further inquiry could be made, the examiner commented that he would not receive any such evidence because in his opinion to open the door to what took place between a conference between the two attorneys relating to a possible adjustment or settlement of the controversy was contrary to good law and practice; would tend to destroy the professional confidence which should exist on the part of lawyers dealing with the Commission on behalf of their clients; would be contrary to the Commission's own established practice of encouraging consultations which would lead to stipulated settlements; and would reduce the hearing to a controversy as to the relative credibility of opposing attorneys rather than one to be decided on the merits. After such ruling the attempt to draw out further answers from Canavan, an evidently embarrassed and reluctant witness, was abandoned.

The hearing examiner also rejected incompetent and immaterial opinion evidence as to the absence of any motive on the part of Commission's investigators to falsify any findings in their routine report as to alleged violations of the Wool Act. R. 87-88.

