

## The Other Amendments: Constitutional Amendments That Failed\*

Michael J. Lynch\*\*

*Mr. Lynch explores the status of proposed but unratified amendments to the United States Constitution. He also describes sources available for identifying amendments introduced in Congress—most of which are never proposed for ratification—and includes a bibliography of such sources.*

¶1 My daughter recently asked me an interesting question about the United States Constitution. “According to my history class, the first Congress passed twelve amendments to the Constitution, ten of which were ratified by the states and became the Bill of Rights. What were the other two?”

¶2 Occasionally it is convenient to have a law librarian for a father. I knew the answer was likely to be in the *Constitution of the United States: Analysis and Interpretation*,<sup>1</sup> updated from time to time by the Congressional Research Service of the Library of Congress. The editors of the most recent edition are Johnny Killian and George Costello, but the work is still associated with Professor Edward S. Corwin, the noted constitutional scholar who extended the scope and authority of its commentary fifty years ago.<sup>2</sup> The most recent edition came out in 1992 and is supplemented to 1998—good enough for historical questions. Most of my details about pending amendments come from that source.

¶3 The curious status of the unratified amendments my daughter asked about was in the news a few years ago, for reasons to be disclosed later, but if I saw it mentioned, I never focused on it. I’ve mentioned it to several lawyers and professors who were surprised, so, I suppose, even law librarians may find it fresh.<sup>3</sup>

---

\* © Michael J. Lynch, 2001.

\*\* Director of the Law Library, John Marshall Law School, Atlanta, Georgia.

1. THE CONSTITUTION OF THE UNITED STATES OF AMERICA—ANALYSIS AND INTERPRETATION: ANNOTATIONS OF CASES DECIDED BY THE SUPREME COURT OF THE UNITED STATES TO JUNE 29, 1992 (Johnny H. Killian & George A. Costello eds., 1996) [hereinafter CONSTITUTION OF THE UNITED STATES].

2. THE CONSTITUTION OF THE UNITED STATES OF AMERICA—ANALYSIS AND INTERPRETATION: ANNOTATIONS OF CASES DECIDED BY THE SUPREME COURT OF THE UNITED STATES TO JUNE 30, 1952 (Edward S. Corwin ed., 1953).

3. Needless to say, a number of law review articles and notes consider this oddity. See, e.g., Richard B. Bernstein, *The Sleeper Wakes: The History and Legacy of the Twenty-Seventh Amendment*, 61 *FORDHAM L. REV.* 497 (1992); William W. Van Alstyne, *What Do You Think About the Twenty-Seventh Amendment?* 10 *CONST. COMMENT.* 9 (1993); Christopher M. Kennedy, *Is There a Twenty-Seventh Amendment? The Unconstitutionality of a New 203-Year-Old Amendment*, 26 *J. MARSHALL L. REV.* 977 (1993); Michael Stokes Paulsen, *A General Theory of Article V: The Constitutional Lessons of the Twenty-Seventh Amendment*, 103 *YALE L.J.* 677 (1993).

¶14 The Library of Congress edition of the Constitution has a short section entitled “Proposed Amendments not Ratified by the States.”<sup>4</sup> It confirms that the first Congress proposed twelve amendments to the states, and that of these, Articles III–XII were ratified and became the first ten amendments—the Bill of Rights. Articles I and II were not ratified with the ten, but while the text of Article I is printed with the other proposed, unratified amendments, Article II, strangely, is not.

¶15 Here is Article I:

After the first enumeration [census] required by the first Article of the Constitution, there shall be one Representative for every thirty thousand, until the number shall amount to one hundred, after which the proportion shall be so regulated by Congress that there shall be not less than one hundred Representatives, nor less than one Representative for every forty thousand persons, until the number of Representatives shall amount to two hundred; after which the proportion shall be so regulated by Congress, that there shall be not less than two hundred Representatives, nor more than one Representative for every fifty thousand persons.<sup>5</sup>

¶16 Article II of that 1789 proposal is not found in the listing of unsuccessful amendments because in the 1980s a grassroots campaign arose to promote its much delayed ratification by the states. On May 7, 1992, Michigan became the thirty-eighth state to ratify Article II, originally submitted to the states in 1789, and thus the following provision became the Twenty-seventh Amendment to the Constitution:

No law varying the compensation for the services of the Senators and Representatives shall take effect, until an election of Representatives shall have intervened.

¶17 Surely this is mighty peculiar. An amendment, possibly drafted by James Madison, and proposed by the first Congress, has been ratified after 200 years. Can it be valid?

¶18 Since the Constitution requires a two-thirds vote of both houses of Congress for an amendment to be proposed to the states for ratification,<sup>6</sup> few suggested amendments have reached the states. Far fewer could follow the path of the Twenty-seventh Amendment and still be ratified long after the Congress that proposed them was dead and gone. The Eighteenth Amendment (prohibition) was the first to include a seven-year time limit for ratification by the states.<sup>7</sup> The limit was not included in either the resolution proposing what became the Nineteenth

---

4. CONSTITUTION OF THE UNITED STATES, *supra* note 1, at 47.

5. *Id.* Some discussion of this unsuccessful amendment can be found in AKHIL REED AMAR, THE BILL OF RIGHTS: CREATION AND RECONSTRUCTION 14–17 (1998).

6. U.S. CONST. art. V.

7. “This article shall be inoperative unless it shall have been ratified as an amendment to the Constitution by the legislatures of the several states, as provided in the Constitution, within seven years from the date of the submission hereof to the States by the Congress.” S.J. Res. 17 §3, 65th Cong., 40 Stat. 1050 (1917).

Amendment (woman suffrage)<sup>8</sup> or the one proposing an amendment to give Congress power to regulate child labor.<sup>9</sup> But beginning with the Twentieth Amendment (presidential term), Congress has avoided the problem by including a time limit for ratification in each proposed amendment or in the joint resolution proposing the amendment.<sup>10</sup> In 1921, the Supreme Court approved the power of Congress to attach such time limits in *Dillon v. Gloss*.<sup>11</sup> In dictum, the Court took notice of the puzzle created by amendments without time limits, noting that under one interpretation, “four amendments proposed long ago—two in 1789, one in 1810 and one in 1861—are still pending.”<sup>12</sup> The Court suggested that a rational inference be drawn that ratification must occur within some reasonable time of proposal.

¶9 So far, however, it appears that this view has not affected acceptance of the Twenty-seventh Amendment. In the only case to date, the parties did not question the validity of its ratification, and the court refused to consider an amicus brief raising the issue.<sup>13</sup> The analysis of Article V, relating to mode of amendment, in the Library of Congress edition cites authorities including Harvard law professor Laurence Tribe and the Office of Legal Counsel of the Department of Justice supporting the validity of the ratification.<sup>14</sup>

¶10 In the department of eternal human truths, this history lesson shows that since the beginning of the republic people have been irritated at the power of legislators to raise their own pay. Of course, the amendment took a long time to pass, but then it needed to be ratified by state legislatures whose members raise their own pay from time to time.

¶11 It seems clear that Congress no longer needs a constitutional amendment to regulate employment of children. The other two amendments never ratified, but not barred, are of some limited interest. The Constitution bars any person holding federal office from accepting any title of nobility or other reward “from any King, Prince, or foreign state.”<sup>15</sup> An amendment proposed by Congress in 1810 extended that prohibition to all Americans on penalty of loss of citizenship and prohibition from holding public office:

If any citizen of the United States shall accept, claim, receive or retain any title of nobility or honor, or shall without the consent of Congress, accept and retain any present, pension, office, or emolument of any kind whatever, from any emperor, King, Prince or for-

---

8. H.R.J. Res. 1, 66th Cong., 41 Stat. 362 (1919).

9. H.R.J. Res. 184, 68th Cong., 43 Stat. 670 (1924).

10. *But see* Walter Dellinger, *The Legitimacy of Constitutional Change: Rethinking the Amendment Process*, 97 HARV. L. REV. 386, 408 n.120 (1983) (questioning the validity of a time limit placed in the resolution rather than in the text of the amendment).

11. 256 U.S. 368 (1921).

12. *Id.* at 375.

13. *Boehner v. Anderson*, 809 F. Supp. 138, 139 (D.D.C. 1992).

14. CONSTITUTION OF THE UNITED STATES, *supra* note 1, at 900–03 (citations omitted).

15. U.S. CONST. art. I, § 9, cl. 8.

eign power, such person shall cease to be a citizen of the United States, and shall be incapable of holding any office of trust or profit under them or either of them.<sup>16</sup>

¶12 The striking addition of “emperor” to the prohibited list reflects the rise of Napoleon between the adoption of the Constitution and the proposal of the amendment. This amendment came very close to ratification, and the records of several states are unclear as to their vote. Because the amendment was occasionally printed with the Constitution as if it had been passed,<sup>17</sup> various unorthodox groups have claimed that it was indeed ratified and have used it as an excuse to refuse to obey government officials whom the amendment would have disqualified. I have myself reviewed the early printed session laws of Ohio to inform a zealot as to how many times this putative amendment was printed there. The more absurd position holds that the designation “Esquire” that is sometimes formally attached to the names of lawyers is itself a “title of nobility,” making all laws and other binding directives invalid to the extent lawyers have been involved in their promulgation.

¶13 Titles of nobility are no longer viewed with distaste by any significant number of Americans, and we may expect this proposed amendment to languish forever in its legal limbo. Its chances of revival, however, are far greater than those of the next proposed amendment that remains technically qualified for ratification. I suspect that most Americans would be astonished to learn that on the eve of the Civil War, a two-thirds majority of both houses of Congress, with the explicit approval of President-Elect Lincoln, voted to amend the Constitution to provide permanent protection for slavery.

¶14 On March 2, 1861, one of the final acts of the 36th Congress was a joint resolution to approve a thirteenth amendment to the Constitution:

No amendment shall be made to the Constitution which will authorize or give to Congress the power to abolish or interfere, within any State, with the domestic institutions thereof, including that of persons held to labor or service by the laws of said state.<sup>18</sup>

The strange attempt to create a sort of meta-Constitution beyond the reach of Article V amendment is worthy of note, as is the careful avoidance of the term “slavery.” But the most striking thing about this proposal is what it shows about the relative importance of the Union and of slavery to the politicians of the era. Republicans were so far from being abolitionists that they were willing to accept slavery forever (though some may have intended to return to the subject despite the attempted prohibition on later amendments). Just as significant, the proposal

---

16. 2 Stat. 613 (1810).

17. See Curt E. Conklin, *The Case of the Phantom 13th Amendment: A Historical and Bibliographical Nightmare*, 88 LAW LIBR. J. 121, 122 (1996). Conklin explains that the status of the proposed amendment was uncertain—there was a question as to whether the requisite thirteen states had ratified it—when it was time to print the second compilation of statutes of the United States (the “Bioren edition”) in 1814. Thinking it could do no harm to include the proposal, the editors did so, to the subsequent confusion of susceptible minds.

18. J. Res. 13, 36th Cong., 12 Stat. 251 (1861).

failed because the dominant Southern politicians were not interested in so limited a protection. They had insisted on the extension of slavery to new territories and permanent acceptance of the *Dred Scott* decision by which slaves remained property even when they had been brought to free states by their owners.<sup>19</sup>

¶15 Of course, politicians of every era have much in common. Perhaps many who opposed slavery voted for a proposal they knew would never be ratified in order to place blame for the war they expected. Perhaps they voted to permit slavery to continue because they feared the evil of war more than the evil of slavery. In any event, this is no proud moment in our constitutional history.

¶16 Since that time only three amendments proposed by Congress have failed to be ratified by the states. The 1924 child labor proposal noted earlier specified that Congress should have the power to regulate the labor of persons under the age of eighteen.<sup>20</sup> A recent extremely contentious failure was the Equal Rights Amendment,<sup>21</sup> which formally died on June 30, 1982, after expiration of a controversial extension of the period for ratification.<sup>22</sup> Less widely mourned was an attempt to give full congressional representation to the District of Columbia, which failed in 1985.<sup>23</sup> These amendments are no longer eligible for ratification, and, although the District of Columbia remains disenfranchised, the purposes of the other two have been achieved, by and large, by statutes and reinterpretation of the Constitution.

¶17 It often appears easier to prevent action by Congress than to accomplish it. So it is not surprising that so few amendments have been proposed by the two-thirds majority of both houses required by Article V of the Constitution. In recent years, the better known amendments introduced in Congress have attempted to change the treatment of flag desecration, school prayer, abortion, the balanced budget, and the item veto.

¶18 Consideration of unsuccessfully introduced amendments from the more distant past provides an interesting view of American political history.<sup>24</sup> In 1897, Professor Herman V. Ames published his treatise on the more than 1300 amendments introduced in Congress between 1789 and 1889.<sup>25</sup> In 1929, M. A. Musmanno updated this study, covering the next 1370 amendments introduced in

---

19. *Dred Scott v. Sandford*, 60 U.S. 393 (1856).

20. H.R.J. Res. 184, 68th Cong., 43 Stat. 670 (1924).

21. H.R.J. Res. 208, 92d Cong., 86 Stat. 1523 (1972).

22. H.R.J. Res. 638, 95th Cong., 92 Stat. 3799 (1978) (extending deadline for ratification three years to June 30, 1982).

23. H.R.J. Res. 554, 95th Cong., 92 Stat. 3795 (1978).

24. A forty-year series of proposals for amendments to authorize prohibition of alcoholic beverages preceded the ultimate success of the Eighteenth Amendment in 1917. For a discussion of the unsuccessful proposals to cast light on the development of the issue, see Thomas E. Heard, *Proposed Constitutional Amendments as a Research Tool: The Example of Prohibition*, 84 LAW LIBR. J. 499 (1992).

25. HERMAN V. AMES, *THE PROPOSED AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES DURING THE FIRST CENTURY OF ITS HISTORY* (1897).

Congress.<sup>26</sup> From such compilations interesting insights can emerge. For example, in 1875, several states provided subsidies to parochial schools, and Senator Blaine thought it necessary to introduce a constitutional amendment to prohibit appropriation of public school money by any state to sectarian schools.<sup>27</sup> Supreme Court decisions in this century took a more restrictive view of such state subsidies.<sup>28</sup> Nowadays, many presume that even proposed voucher plans, which make grants for private schooling directly to parents, are unconstitutional without a Blaine amendment.<sup>29</sup>

¶19 The study of unsuccessful amendments also sheds light on the issue of presidential term limits. The Twenty-second Amendment limiting a president to two terms is usually described as motivated by the unpopularity of President Franklin Roosevelt among conservatives, and that unpopularity must have helped get the amendment through the Republican-controlled 80th Congress in 1947.<sup>30</sup> However, it can be determined from the published lists that over two hundred amendments to limit the number of terms a president could serve were introduced between 1789 and the beginning of Franklin Roosevelt's first term in 1932. Since the second Roosevelt was the first president to break the two-term tradition established by Washington, it is less surprising that the reaction pushed this perennial pressure to a breakthrough, regardless of the personal standing of the president who provided the final incentive. The Reagan-inspired amendment proposals of the 1980s to establish a maximum age for the president had no such long history.

¶20 Unfortunately, no surveys like those of Ames and Musmanno that classify unsuccessful amendments by topic and discuss each topic have appeared since their publication. A recent reference work by John R. Vile, *Encyclopedia of Constitutional Amendments, Proposed Amendments, and Amending Issues, 1789–1995*,<sup>31</sup> is organized by topics but does not cite to specific proposals. Vile indicates in his preface that the texts of many proposals cannot be located,<sup>32</sup> a

---

26. M. A. MUSMANNO, PROPOSED AMENDMENTS TO THE CONSTITUTION: A MONOGRAPH ON THE RESOLUTIONS INTRODUCED IN CONGRESS PROPOSING AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES (1929).

27. 4 CONG. REC. 5580 (1876).

28. "New Jersey cannot consistently with the 'establishment of religion' clause of the First Amendment contribute tax-raised funds to the support of an institution which teaches the tenets and faith of any church." *Everson v. Bd. of Educ.*, 330 U.S. 1, 16 (1946).

29. Constitutional law expert Laurence Tribe gives such expectations little support: "Any objection that anyone would have to a voucher program would have to be policy-based and could not rest on legal doctrine. . . . One would have to be awfully clumsy to write voucher legislation that could not pass constitutional scrutiny. . . . As long as it is a program of aid to parents and not aid as a way of funding parochial schools through the back door, then it would be constitutional." *Can Vouchers Hurdle Church-State Wall?* N.Y. TIMES, June 12, 1991, at B5 (quoting Laurence Tribe, professor of law, Harvard Law School). A number of state constitutions, however, include so-called "Blaine Amendments." *E.g.*, N.Y. CONST., art. 11, § 3.

30. H.R.J. Res. 27, 80th Cong., 61 Stat. 959 (1947).

31. JOHN R. VILE, ENCYCLOPEDIA OF CONSTITUTIONAL AMENDMENTS, PROPOSED AMENDMENTS, AND AMENDING ISSUES, 1789–1995 (1996).

32. *Id.* at xi.

proposition supported by Heard.<sup>33</sup> Vile did not include a cumulative list in his encyclopedia because Congress has periodically published chronological lists of the titles and subjects of proposed amendments.<sup>34</sup> The first of these updated the Ames list through July 2, 1926. Thereafter, cumulative lists were published periodically, ultimately covering the period from 1926 through 1963. After 1963, non-cumulative updates were published through 1990. The value that such lists have should justify a reprint of these public domain works which update Ames through a second century, though Vile, in an act of self-denial rare among the compilers of reference works, did not provide such a list as a second volume to his encyclopedia.

¶21 A consideration of the difficulties of the amending process should leave the reader unsurprised that more than 10,000 proposals have led to a mere twenty-seven amendments. The obvious limiting factor is the special majority required in Congress, since only seven amendments have failed to be adopted after being “proposed” in the constitutional sense. In this light, most campaigns for constitutional amendments can be seen as satisfying but ineffectual expressions of serious displeasure with things as they are.

### **Appendix**

#### **Compilations of Constitutional Amendments Introduced in the Congress of the United States**

[Note: Under Article V of the United States Constitution, an amendment is “proposed” when it receives a two-thirds majority in both chambers of Congress. The term “proposed” is used in the titles of the compilations listed below, however, to refer to bills introduced in either chamber, whether or not they ever received the necessary extraordinary majorities required for passage in Congress.]

Ames, Herman V., *The Proposed Amendments to the Constitution of the United States During the First Century of Its History*. Washington, D.C.: U.S. Government Printing Office, 1897. Also published as vol. II of the American Historical Association Annual Report (1896).

A topical essay covering all amendments introduced in Congress through 1889 with a subject index.

*Proposed Amendments to the Constitution of the United States: Introduced in Congress from December 4, 1889 to July 2, 1926*, S. Doc. No. 93, 69th Cong., 1st Sess. Washington, D.C.: U.S. Government Printing Office, 1926. 148 p.

---

33. See Heard, *supra* note 24, at 500. Heard refers to a private collection of photocopies of the unsuccessful proposals which had reached several thousand at the time of publication of his article. That author reports that the collection was not continued. *CIS/Congressional Bills, Resolutions, and Laws* is a microfiche collection which begins with the 73rd Congress (1933–34). There are no current plans to extend its retrospective reach.

34. See *infra* Appendix for a list of these publications.

A simple chronological list of bills introduced with the name of the sponsor, a brief description of the subject, and in some cases information as to the committee to which the bill was referred, or the floor debate. The list begins in the year where Ames's listing ends. The eminent historian Charles C. Tansil is credited with the arrangement ("Arranged, digested, and indexed by Charles C. Tansil," p. [ii]). A subject index provides access.

Musmanno, Michael Angelo, *Proposed Amendments to the Constitution: A Monograph on the Resolutions Introduced in Congress Proposing Amendments to the Constitution of the United States of America*, H. Doc. 551, 70th Cong., 2d Sess. Washington, D.C.: U.S. Government Printing Office, 1929. 253 p.

A topical organization of the proposed amendments concentrating on the period after 1889, but with references to material covered by Ames as well.

*Proposed Amendments to the Constitution of the United States Introduced in Congress from the 69th Congress, 2d Session through the 87th Congress 2d Session, December 6, 1926 to January 3, 1963*, S. Doc. No. 163, 87th Cong., 2d Sess. Washington, D.C.: U.S. Government Printing Office, 1963. 277 p.

The final in a series of cumulative lists updating the Tansil list which ended in 1926. Earlier post-1926 lists were published in 1935, 1941, 1946, 1947, and 1952.

*Proposed Amendments to the Constitution of the United States Introduced in Congress from the 88th Congress, 1st Session through the 90th Congress, 2d Session, January 9, 1963 to January 3, 1969*, S. Doc. No. 91-38, 91st Cong., 2d Sess. Washington, D.C.: U.S. Government Printing Office, 1969.

A listing supplementing the 1963 update to the post-1926 lists.

Davis, Richard, *Proposed Amendments to the Constitution of the United States Introduced in Congress from the 91st Congress, 1st Session through the 98th Congress, 2d Session, January 1969–December 1984*. CRS Report No. 85-36 GOV. Washington, D.C.: Congressional Research Service, Library of Congress, 1985.

A supplement to the 1969 list.

Harris, Daryl B., *Proposed Amendments to the U. S. Constitution: 99th–101st Congress (1985–1990)*. CRS Report No. 92-555 GOV. Washington, D.C.: Congressional Research Service, Library of Congress, 1992. 69 p.

A supplement to the 1984 list.

## Legal Reference Books Review\*

Compiled by Diana C. Jaque\*\* and Lee Neugebauer\*\*\*

### Contents

<i>Congressional Quarterly's Encyclopedia of the U.S. Census</i> . . . . .	313
<i>Encyclopedia of Supreme Court Quotations</i> . . . . .	314
<i>Modern Treaty Law and Practice</i> . . . . .	316
<i>Encyclopedia of Law and Economics</i> . . . . .	317
<i>Make Your Own Living Trust</i> , 4th ed. . . . .	318
<i>Domain Names: How to Choose and Protect a Great Name for Your Website</i> . . . . .	320
<i>Law 101: Everything You Need to Know about the American Legal System</i> . . . . .	322
<i>Encyclopedia of the U.S. Supreme Court</i> . . . . .	323
<i>Civil Rights in the United States</i> . . . . .	325
<i>The Young Lawyer's Jungle Book: A Survival Guide</i> , 2d ed. . . . .	325
<i>Documents on the Laws of War</i> , 3d ed. . . . .	327
<i>International Encyclopedia of Elections</i> . . . . .	328
<i>Paralegal Ethics</i> . . . . .	329
<i>Remedies in International Human Rights Law</i> . . . . .	331
<i>The Rights of War and Peace: Political Thought and the International Order from Grotius to Kant</i> . . . . .	333

### Review Contributors

Kimberly Barskaitiki Information Specialist Michael, Best and Friedrich Milwaukee, Wisconsin <i>The Young Lawyer's Jungle Book: A Survival Guide</i> , 2d ed. . . . .	325
Jean M. Callihan Reference Librarian Marquette University Law Library Milwaukee, Wisconsin <i>Remedies in International Human Rights Law</i> . . . . .	331

---

\* © Diana C. Jaque and Lee Neugebauer, 2001. The books reviewed in this issue were published in late 1999 and early 2000. The editors would like to thank Michelle Boon for her word processing expertise.

\*\* Collection Development/Acquisitions Librarian, University of Southern California Law School, Los Angeles, California.

\*\*\* Reference Librarian, Paul, Hastings, Janofsky and Walker LLP, Los Angeles, California.

- Leah F. Chanin  
Reference Librarian  
Allen Mercer Daniel Library  
Howard University School of Law  
Washington, D.C.  
*Civil Rights in the United States* . . . . . 325  
*Paralegal Ethics* . . . . . 329
- Elizabeth A. Edinger  
Reference Librarian  
University of California School of Law  
Boalt Hall  
Berkeley, California  
*The Rights of War and Peace: Political Thought and the International  
Order from Grotius to Kant.* . . . . . 333
- Shaun Esposito  
Head of Public Services  
Law Library, James E. Rogers College of Law  
University of Arizona  
Tucson, Arizona  
*Encyclopedia of Law and Economics* . . . . . 317
- Kristin Ford  
Legislative Librarian  
Legislative Services Office  
Boise, Idaho  
*International Encyclopedia of Elections* . . . . . 328
- Katherine Hall  
Reference Librarian  
Heafey Law Library  
Santa Clara University School of Law  
Santa Clara, California  
*Documents on the Laws of War, 3d ed.* . . . . . 327
- Lesliediana Jones  
Reference/Government Documents Librarian  
Jacob Burns Law Library  
George Washington University School of Law  
Washington, D.C.  
*Encyclopedia of the U.S. Supreme Court.* . . . . . 323
- Susan Lyons  
Documents/Reference Librarian  
Rutgers Law Library  
Newark, New Jersey  
*Congressional Quarterly's Encyclopedia of the U.S. Census* . . . . . 313
- Nancy McMurrer  
Reference Librarian  
Gallagher Law Library  
University of Washington