

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

MINNESOTA STATE REGULATION

Notice of filing by the Commissioner of Administration

We have received on this date, stamped and filed 2 copies of Rules and Regulations pertaining to the Department of Commerce – Banking
(Agency or Board)

Regulation No. BD 135 (amended)

Subject: Credit Unions

Department of Administration
Publication, Central Services Division
Documents Section
140 Centennial Office Building
St. Paul, Minnesota 55155
Telephone: (612) 296-2874

FILED
RICHARD L. BRUBACHER
Commissioner of Administration

APR 23 1974 3:40 pm

BY Eda Staudenmaier
AUTH. SIGNATURE EJ

Stamped and filed with the Secretary of State 4/23/74

Rev. 9-72

ADMIN 1000

STATE OF MINNESOTA

DEPARTMENT OF COMMERCE (Banking)

Office Memorandum

TO : MIKE MILLER
Special Assistant Attorney General

DATE: Apr. 3, 1974

FROM : CHARLES I. WIKELIUS
Special Assistant Attorney General

SUBJECT: CREDIT UNION RULES AND REGULATIONS

Enclosed are the following documents adopted under the Rule Making Procedures set forth by the Rules and Regulations of the Attorney General:

(a) Regulations as Adopted

(b) Regulations as Proposed

(c) Order of Hearing

(d) Notice of Hearing

(e) Delegation of Authority to Act as Hearing Examiner

(f) Secretary of State's List - Affidavit

(g) Secretary of State's List - Certificate

(h) Affidavit of Mailing

(i) Statement of Need

(j) Findings of Fact

(k) Order Adopting Rules

(l) Certificate of Approval of Commissioner of Commerce

(m) Certificate of Approval of Chairman of Commerce Commission

The last two documents are required by Minnesota Statutes, Section 45.021 (1971) and Minnesota Statutes, Section 52.06, Subd. 1 (1973 Supplement).

ASO
Enc.

FINAL DRAFT

PROPOSED AMENDMENTS AND ADDITIONS TO CREDIT UNION RULES AND REGULATIONS
(Changes or additions of wording are indicated by underline, deletions are indicated by ~~strike-out~~. All other language is the same as it was under prior rules and regulations.)

BD 135 Books, Records and Reports

(a) A credit union shall keep a complete set of books and records and shall keep the Commissioner of Banks advised at all times of the address at which they are maintained. ~~No credit union shall enter into a program of data processing of accounts without prior approval of the Commissioner of Banks.~~ Any credit union receiving record keeping services from another credit union or from a service corporation shall provide the following:

(1) A certificate from the credit union receiving such services, stating that it will comply with the provisions of Section 52.06 of Minnesota Statutes and giving full assurance that the performance of such record keeping services by the other credit union, or the respective Clerical Service Corporation (name of either to be given), will be subject to Banking Division Regulations in the same manner as if such services were being performed by the credit union itself and on its own premises.

(2) A certificate to be furnished by the credit union furnishing such clerical services, or the Clerical Service Corporation, agreeing as to performing such services as outlined in Section 52.06 of Minnesota Statutes that its performance thereof will be subject to regution and examination by the Commissioner of Banks to the same extent as if such services were being performed by the serviced credit union itself on its own premises.

(b) The Supervisory Committee shall file a report in duplicate on forms furnished by the Commissioner of Banks, within 30 days after the date of each semiannual audit.

(c) All cash receipts and assets of the credit union must be kept

intact and not commingled with any other funds under any circumstances.

(d) A credit union shall supply its members with passbooks, showing the current position of shares, deposits and loans. When a statement of account plan is used, the member's official permanent record for transactions shall be the statement of account which will itemize all transactions and which must be issued to each member at least quarterly, unless otherwise approved by the Commissioner of Banks. No credit union shall hold any passbooks or statements of members.

(e) Individual ledger cards. A number shall be assigned to each member in sequence upon his election to membership, and no such number shall ever be reissued to any other member. Each member's assigned number shall appear on his passbook and individual ledger card for shares, deposits and loans. All ledger cards must be kept so that the year can be readily ascertained.

BD 139 Loans

(a) All cancelled notes and mortgages and all pledges must be returned to the borrower.

(b) Real estate mortgages.

(1) Real estate mortgage loans shall be secured by a first lien. No second or subsequent mortgage loans are permitted except when the credit union owns all prior mortgages and there are no other liens.

(2) Appraisal report. The credit committee with the approval of the board of directors may accept the appraisal report of any other person or persons qualified to appraise real estate which shows the estimated value of the land and building separately, and any other required information, but the credit committee must approve all such loans.

(3) Mortgage note. Any standard Minnesota form of real estate mortgage note is acceptable.

(4) Mortgage deed. Any standard Minnesota form is acceptable.

(5) Title. In the case of abstract title property, the loan file should contain the original recorded mortgage and note, the abstract continued to and containing evidence of the usual searches dated at least one day after date of recording mortgage.

In the case of torrens title property the file should contain copy of mortgage and original note either the owner's duplicate certificate of title or the mortgagee's duplicate with memorial of mortgage thereon and registered property certificate (sometimes called certificate of condition of title) continued to at least one day after date of recording of mortgage.

(6) Attorney's opinion. An attorney's opinion, as to the fee title and stating that the credit union mortgage is a first and valid lien on the property or a Title Insurance Policy, is required.

(7) Evidence of adequate insurance to cover mortgage with loss payable clause payable to credit union shall be required for mortages.

(c) Personal loans.

~~(1) Before a loan is refinanced a calculation shall be made of the amount applied on the principal during the immediately preceding 12 months and the 12 months prior to the immediately preceding 12 months. Whichever of these amounts is greater shall be divided into the unpaid balance of the loan. If the number of years~~

~~that would be needed to pay off the loan based on this test is greater than 5, the loan may not be refinanced. Consideration should be given to having the terms of personal loans provide for repayment within five years.~~

(2) A record or index of co-signers' or guarantors' aggregate direct and indirect liability to the credit union shall be maintained, and financial statements are to be taken on the originalloan or on any substantial increases.

(3) All applications on loans paid or refinanced, must be retained for a minimum period of 5 years as a part of the credit union's credit file containing the current loan note and supporting papers.

(4) All unsecured loans of ~~$750~~ $1,500 or more in a credit union of less than $1,000,000 in assets and unsecured loans of ~~$1,500~~ $3,000 or more in credit unions of $1,000,000 or more in assets, shall be supported by signed financial statements of the borrower, co-makers and/or guarantors. Such current financial information is also required on loans which the Commissioner or his examiners considers inadequately secured. The loan application shall show the estimated value of collateral offered at the time a loan is granted.

(5) If a board member or member of a committee has a loan delinquent or criticized, the Commissioner of Banks may require that such director or committee member be removed from his position.

BD 140 Field of Membership - Restrictions. With the exception of residence within a well-defined neighborbood, community, or rural

district, the field of membership shall consist of regularly qualified members who can be reasonably held to have a common bond of occupation or association, together with their spouses and blood or adoptive relatives and excluding the blood relatives of the spouses in each instance.

BD 145 Delinquent Loans

(a) Credit unions shall be required to send an annual schedule of delinquent personal loans to the Commissioner of Banks. This schedule shall list delinquent personal loans according to the following categories: 3 to 6 months delinquent; 6 to 12 months delinquent; 12 or more months delinquent. This schedule shall also show for each delinquent personal loan, the date of loan, date of last principal payment and the original amount of loan. The Commissioner of Banks may require this report more frequently than annually if a need to do so is indicated. The board of directors of the credit union shall study this report carefully.

(b) The reserve requirements shall consist of the following percentages of the total unpaid balances of the delinquent personal loans:

3 to 6 months 10%

6 to 12 months.....25%

12 months or more.....80%

This calculation shall be based on the most recent report required by the Commissioner of Banks or a more recent report prepared at the initiative of the credit union. If the amount in the statutory reserve is inadequate to meet the reserve needs, the Commissioner of Banks may require the credit union to maintain the

amount of the deficiency in a contingency reserve. No net earnings or undivided earnings may be used to pay dividends until the reserve needs have been met in full without the permission of the Commissioner of Banks. At any subsequent time that any or all of the amount in the contingency reserve is not needed to meet the reserve needs, the un-needed amount may be transferred from the contingency reserve into undivided earnings.

~~(c)--A-real-estate-loan-on-which-10-of-12-required-monthly-payments-have-been-made-in-the-12-month-period-preceding-the-report date,-may-be-considered-as-being-current.--This-shall-not-apply-unless-interest,-taxes-and-insurance-are-current.~~

(c) Delinquency on real estate loans shall be calculated on a contractual basis.

~~BD-146-Investments~~

~~(a)--The-Commissioner-of-Banks-shall-make-available-to-credit unions-a-list-of-the-type-of-investments-it-considers-to-be-appropriate-for-credit-unions-to-make.--A-credit-union-is-not-required to-conform-to-this-list;-however,-a-credit-union-which-makes-an-investment-which-is-not-on-this-list-shall-inform-the-Commissioner of-Banks-of-the-fact-it-has-done-so.--A-credit-union-shall-maintain an-itemized-list-of-its-investments-with-the-nature-of-each-clearly identified-together-with-the-income-therefrom.~~

BD 146 Investments - Records. During the period in which investments are carried on a credit union's books, it shall be required that:

(a) Original invoices of bond purchases and sales be retained as a part of the records of a credit union.

(b) A record be maintained of all securities bought and sold

showing date of purchase or sale, interest rate, maturity, par value, description, from whom purchased, to whom sold, selling price and where deposited for safekeeping.

(c) Any investment, other than U. S. Governments direct and/or guaranteed, shall be supported by full credit information at the time of purchase. (Dealer's circular or prospectus.)

(d) Purchase of a security at a price exceeding par is prohibited, unless the credit union shall:

(1) Charge off the premium when the securities are placed on the books; or

(2) Provide, for the regular amortization of the premium paid so that the premium shall be entirely extinguished at or before the maturity of the security and the security (including premium) shall at no intervening date be carried at an amount in excess of that at which the obligor may legally redeem such security; or

(3) Set up a reserve account to amortize the premium, said account to be credited periodically with an amount not less than the amount required for amortization under (2) above.

(4) Accrued interest paid on securities must be charged to Interest Received. Bond commissions and all costs of sales or purchases must be charged to Expense.

(e) Upon the purchase of a security at a price less than par the credit union shall place such security on its books at cost and may provide for the regular accretion of the discount, ratably over the period from purchase to maturity of the security.

BD 148 Insurance

(a) A credit union may establish, operate, or maintain an

insurance agency as a separate corporation or agency within its physical premises.

(b) A credit union may be the policyholder of either a group insurance plan or a sub-group under a master policy plan.

(c) Premiums may be remitted by the credit union to an insurer or the holder of a master policy on behalf of a credit union member provided that said credit union has obtained written authorization from such member.

(d) The credit union may accept reimbursement from the insurer for the actual cost of ministerial tasks performed pertaining to insurance. This reimbursement shall not exceed 10% of gross premiums. The credit union may not accept a commission on the insurance sale.

(e) Where a credit union is engaged in the facilitation of its members' voluntary purchase of types of insurance incidental to the borrowing of money for provident and productive purposes, including but not limited to fire, theft, automobile, life and temporary disability insurance, a member shall be given the elective of purchasing any required insurance from the vendor of his choice, and the members' file shall contain his signed written elective.

(f) If the insurance is cancelled, the unearned premium shall be paid to the member or credited to the member's share or deposit or loan account as the case may be.

BD 149 C.P.A. Audit in Lieu of Examination.

(a) Any C.P.A. audits which the Commissioner of Banks may wish to accept in lieu of examinations must include a balance sheet

examination and the classifying of assets in a manner consistent with state credit union examinations. This C.P.A. report of examination will be submitted on the same forms and in the same manner that state credit union examiners employ.

(b) Any credit union may request prior approval by the Commissioner to submit a C.P.A. audit in lieu of examination. Where such approval is given, the Commissioner shall retain the authority to reject the C.P.A. audit which is submitted if it is inadequate by the standards of the Banking Division.

BD 150-160 Reserved for Future Use.

APPROVED AS TO FORM AND LEGALITY
4-23 19 74
WARREN SPANNAUS, ATTORNEY GENERAL
BY Michael B Miller
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
APR 23 1974 2:30 pm
Arlen I. Erdahl
Secretary of State

FILED
RICHARD L. BRUBACHER
Commissioner of Administration
APR 23 1974 3:40 pm
BY Eda Stenstenmoen
AUTH. SIGNATURE

Bank Div. Ex VII

PROPOSED AMENDMENTS AND ADDITIONS TO CREDIT UNION RULES AND REGULATIONS
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(b) The Supervisory Committee shall file a report in duplicate on forms furnished by the Commissioner of Banks, within 30 days after the date of each semi-annual audit.

(c) All cash receipts and assets of the credit union must be kept intact and not commingled with any other funds under any circumstances.

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(7) Evidence of adequate insurance to cover mortgage with loss payable clause payable to credit union shall be required for mortgages.

(c) Personal loans.

~~(1)--Before-a-loan-is-refinanced-a-calculation-shall-be-made-of-the amount-applied-on-the-principal-during-the-immediately-preceding--12-months and-the-12-months-prior-to-the-immediately-preceding-12-months,--Whichever-of these-amounts-is-greater-shall-be-divided-into-the-unpaid-balance-of-the-loan. If-the-number-of-years-that-would-be-needed-to-pay-off-the-loan-based-on-this test-is-greater-than-5-the-loan-may-not-be-refinanced,--Consideration-should be-given-to-having-the-terms-of-personal-loans-provide-for-repayment-within five-years.~~

~~(2)~~ (1) A record or index of co-signers' or guarantors' aggregate direct and indirect liability to the credit union shall be maintained, and financial statements are to be taken on the original loan or on any substantial increases.

~~(3)~~ (2) All applications on loans paid or refinanced, must be retained for a minimum period of 5 years as a part of the credit union's credit file containing the current loan note and supporting papers.

~~(4)~~ (3) All unsecured loans of ~~$750~~ $1,500 or more in a credit union of less than $1,000,000 in assets and unsecured loans of ~~$1,500~~ $3,000 or more in credit unions of $1,000,000 or more in assets, shall be supported by signed financial statements of the borrower, co-makers and/or guarantors. Such current financial information is also required on loans which the Commissioner or his examiners considers inadequately secured. The loan application shall show the estimated value of collateral offered at the time a loan is granted.

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(b) The reserve requirements shall consist of the following percentages of the total unpaid balances of the delinquent personal loans:

3 to 6 months 10%
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12 months or more 80%

This calculation shall be based on the most recent report required by the Commissioner of Banks or a more recent report prepared at the initiative of the credit union. If the amount in the statutory reserve is inadequate to meet the reserve needs, the Commissioner of Banks may require the credit union to maintain the amount of the deficiency in a contingency reserve. No net earnings or undivided earnings may be used to pay dividends until the reserve needs have been met in full without the permission of the Commissioner of Banks. At any subsequent time that any or all of the amount in the contingency reserve is not needed to meet the reserve needs, the un-needed amount may be transferred from the contingency reserve into undivided earnings.

~~(c)--A-real-estate-loan-on-which-10-of-12-required-monthly-payments-have-been made-in-the-12-month-period-preceding-the-report-date,-may-be-considered-as-being current.--This-shall-not-apply-unless-interest,-taxes-and-insurance-are-current.~~

(c) Delinquency on real estate loans shall be calculated on a contractual basis.

~~BD-146--Investments~~

~~(a)--The-Commissioner-of-Banks-shall-make-available-to-credit-unions-a-list of-the-type-of-investments-it-considers-to-be-appropriate-for-credit-unions-to make:--A-credit-union-is-not-required-to-conform-to-this-list;-however-a-credit union-which-makes-an-investment-which-is-not-on-this-list-shall-inform-the Commissioner-of-Banks-of-the-fact-it-has-done-so.--A-credit-union-shall-maintain an-itemized-list-of-its-investments-with-the-nature-of-each-clearly-identified together-with-the-income-therefrom.~~

BD 146 Investments - Records. During the period in which investments are carried on a credit union's books, it shall be required that:

(a) Original invoices of bond purchases and sales be retained as a part of the records of a credit union.

(b) A record be maintained of all securities bought and sold showing date of purchase or sale, interest rate, maturity, par value, description, from whom purchased, to whom sold, selling price and where deposited for safekeeping.

(c) Any investment, other than U. S. Governments direct and/or guaranteed, shall be supported by full credit information at the time of purchase. (Dealer's circular or prospectus.)

(d) Purchase of a security at a price exceeding par is prohibited, unless the credit union shall:

(1) Charge off the premium when the securities are placed on the books; or,

(2) Provide, for the regular amortization of the premium paid so that the premium shall be entirely extinguished at or before the maturity of the security and the security (including premium) shall at no intervening date be carried at an amount in excess of that at which the obligor may legally redeem such security; or,

(3) Set up a reserve account to amortize the premium, said account to be credited periodically with an amount not less than the amount required for amortization under (2) above.

(4) Accrued interest paid on securities must be charged to Interest Received. Bond commissions and all costs of sales or purchases must be charged to Expense.

(e) Upon the purchase of a security at a price less than par the credit union shall place such security on its books at cost and may provide for the regular accretion of the discount, ratably over the period from purchase to maturity of the security.

BD 148 Insurance

(a) A credit union may establish, operate, or maintain an insurance agency as a separate corporation or agency within its physical premises.

(b) A credit union may be the policy holder of either a group insurance plan or a sub-group under a master policy plan.

(c) Premiums may be remitted by the credit union to an insurer or the holder of a master policy on behalf of a credit union member provided that said credit union has obtained written authorization from such member.

(d) The credit union may accept reimbursement from the insurer for the actual cost of ministerial tasks performed pertaining to insurance. This reimbursement shall not exceed 10% of gross premiums. The credit union may not accept a commission on the insurance sale.

(e) Since the members may now voluntarily purchase types of insurance incidental to the promotion of thrift or the borrowing of money for provident and productive purposes including but not limited to the following types of group or individual insurance such as fire, theft, automobile, life and temporary disability, it is imperative that the member be given the elective of purchasing or not purchasing said insurance and the member's file should indicate

his elective in writing.

(f) If the insurance is cancelled, the unearned premium shall be paid to the member or credited to the member's share or deposit or loan account as the case may be.

BD 149 CPA Audit in Lieu of Examination. Any C.P.A. audits which the Commissioner of Banks may wish to accept in lieu of examinations must consist of a balance sheet examination and the classifying of assets in the manner consistent with state credit union examinations. This C.P.A. report of examination will be submitted on the same forms and in the same manner that state credit union examiners employ.

BD 150-160 Reserved for Future Use.

I N D E X

Introduction of Exhibits.....Pages 3 - 5

Statement of Need..... " 6 - 10

Statements of Witnesses:

John Karschnia, United B/N Credit Union..... " 10 - 15

Don Finn..... " 15

Robert Atkinson, Minneapolis Federal Employees Credit Union..... " 16 - 19

Irvin L. Rubbelke, City and County Credit Union, Saint Paul..... " 20 - 23

John Fandrey, City and County Credit Union, Saint Paul..... " 23

Robert Cassidy, Collegeville Credit Union.... " 24 - 25

Richard Gaworski, C.P.A, Member of Minnesota Society of C.P.A.'s ..... " 25 - 29

STATE OF MINNESOTA
DEPARTMENT OF COMMERCE
BANKING DIVISION

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE STATE BANKING DIVISION GOVERNING CREDIT UNIONS; TO REQUIRE CERTIFICATES WHERE RECORDKEEPING SERVICES ARE EXCHANGED; TO REQUIRE FINANCIAL STATEMENTS FROM CERTAIN PERSONS; TO RESTRICT FIELDS OF OPERATION AND THE CALCULATION OF DELINQUENCY ON REAL ESTATE LOANS; TO REQUIRE CERTAIN INVESTMENT RECORDS; TO REGULATE INSURANCE, AND TO REGULATE C.P.A. AUDITS.	)	TRANSCRIPT OF PROCEEDINGS HEARING JANUARY 9, 1974

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Pursuant to Notice of Hearing issued by Robert A. Mampel, Commissioner of Banks, on November 29, 1973, hearing on the above-entitled matter came on before George A. Beck, duly appointed Hearings Examiner, on Wednesday, January 9, 1974, at 9:30 a.m., in the Department of Commerce Hearing Room, Fifth Floor Metro Square Building, Seventh and Robert Streets, Saint Paul, Minnesota. Present and representing the Banking Division of the Department of Commerce were: Barry R. Greller, Special Assistant Attorney General; Eugene S. Bloomquist, Supervisor of Credit Unions and Supervisor of Savings and Loan Associations; and John P. Gillen, Financial Trust and Systems Analyst. Thirty-nine representatives of various credit unions registered and were present at the hearing.

The following proceedings were had:

EXAMINER BECK: This is a hearing in the matter of the proposed adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

The matter is being heard this morning pursuant to Notice of Hearing signed by Robert A. Mampel, Commissioner of Banks, and dated November 29, 1973.

There will be no smoking in the hearing room during the hearing and when we are in session.

My name is George A. Beck. I am the Hearings Examiner, and I have been appointed by the Commissioner of Banks to preside over the hearing this morning.

I believe there are adequate copies of the proposed Rules and Regulations available for anybody that does not have a copy presently.

The purpose of the hearing this morning is to allow all interested parties to express their views and to present facts bearing upon the proposed rules. All persons wishing to express their views will have an opportunity to do so. If you wish to speak or to give evidence, you may do so. I presume that everyone has already signed the register this morning. When you wish to speak, step forward. If you make a statement--if you have a lengthy statement to make, we would like you to step up to the table here in front of the orange chairs, and make your statement from there. Please, when you begin to testify, again give your name and address and whatever group you represent, if you do represent one. You can be sworn and placed under oath, but it is not required this morning. If you elect to be sworn, that fact may be considered in determining the weight to be given to your testimony. All witnesses making an oral statement subject themselves to questioning by the representatives of the agency--that is the Banking Division. You are subject to questioning by others present this morning only if you consent to being so examined. A refusal to be cross examined may be considered in determining the weight

to be given to your testimony.

If you wish to introduce a written exhibit or some written matter this morning, please present it to our Court Reporter and she will have it marked as an exhibit. You can then explain its contents briefly and offer it as evidence this morning. The hearing, obviously, is being recorded by our Court Reporter, and a transcript will subsequently be made. If you wish to have a copy of the transcript, you can contact the Court Reporter, Miss Delaney. In order to help her this morning, please speak--only one person shall speak at a time; otherwise she cannot record it. Please speak reasonably slowly so that she is able to keep up with the testimony. You will have to answer questions verbally, rather than simply nodding your head. And please spell any technical terms or difficult names.

Please note that anyone who desires, within twenty days of the close of this hearing, may submit written briefs or other material relative to the proposed rules, to the Agency for their consideration. You may submit this matter in addition to whatever presentation you make today.

Mr. Greller, would you note your appearance, please, for the record?

MR. GRELLER: Yes. My name is Barry R. Greller. I am a Special Assistant Attorney General of the State of Minnesota, assigned to the Securities Division. I am representing the Banking Division at this hearing, due to the absence of Charles Wikelius, who is presently fulfilling a military commitment.

EXAMINER BECK: Mr. Bloomquist, would you note your appearance, please?

MR. BLOOMQUIST: Yes. My name is Eugene Bloomquist, and I have a dual title.

I am supervisor for credit unions and supervisor for savings and loan associations for the State of Minnesota. I have been with the Banking Division for some twenty years now, with about--approximately 60% of the time spent examining credit unions and the other 40% of the time on savings associations, industrial loan companies, and state banks.

EXAMINER BECK: Thank you. Mr. Gillen, would you note your appearance, please?

MR. GILLEN: My name is John P. Gillen. My title is Financial Trust and Systems Analyst for the State of Minnesota, Department of Commerce, Banking Division. My principal area of supervision deals with investments for financial institutions and with clerical service companies.

EXAMINER BECK: Thank you.

As indicated on the agenda which was handed out to you prior to opening the hearing, the format that we are going to be following is that first the Agency will introduce certain exhibits that have to be introduced at the hearing. Following that, the Agency will make a statement of need for these rules and regulations, and next the Agency--and I believe primarily Mr. Bloomquist--will be answering whatever questions you have addressed to the content of the proposed rules. Following this, witnesses will be allowed to make statements and to give whatever testimony they wish this morning.

Mr. Greller, do you wish to proceed with the introduction of the exhibits?

MR. GRELLER: Yes. I have a number of exhibits to be introduced by the Agency. These were marked by the Court Reporter prior to the hearing. I will not require or request that the content of each exhibit be read at this time. Banking Division Exhibit I is the Order for Hearing signed by

Robert A. Mampel, Commissioner of Banks. Banking Division Exhibit II is a Notice of Hearing in this matter, stating that a public hearing shall be held on the Fifth Floor of the Metro Square Building, Saint Paul, Minnesota, on the ninth of January, 1974, commencing at 9:30 a.m. Banking Division Exhibit III is the Delegation of Authority to Act as Hearing Examiner, appointing George A. Beck as Hearing Examiner in this matter. Banking Division Exhibit IV is an Affidavit of Eugene Bloomquist, indicating that he obtained a copy from the Secretary of State of the names of all persons who had registered their names for the purpose of obtaining notice of public hearings. Banking Division Exhibit V is the Certificate of the Secretary of State, Arlen I. Erdahl, by Virginia Daniels, indicating that the appended list is accurate--an accurate list as of 10:00 a.m., November 28, 1973. Banking Division Exhibit VI is the Affidavit of Mailing in this matter, signed by Grace Huebener, indicating that she mailed copies of the Notice of Hearing and the Proposed Regulations to all individuals on the appended list. And Banking Division Exhibit VII is a copy of the Proposed Rules which we are considering today. And I am going to offer these as a package. If anyone has any objection at this time--

EXAMINER BECK: You are offering Exhibits I through VII?

MR. GRELLER: Yes.

EXAMINER BECK: They will be received. Why don't we proceed with the statement of need then?

MR. BLOOMQUIST: The statement of need reads as follows:

The Banking Division of the Department of Commerce, State of Minnesota, proposes to adopt and amend rules to implement Chapter 52 of the Laws of Minnesota, 1973 (hereinafter referred to as the "Act). The last time the credit union rules were amended was February 24, 1967.

The need to adopt these proposed rules arises as follows: Banking Division Rule and Regulation 135, Subdivision A, to require certificates where recordkeeping services are exchanged so that the Commissioner of Banks may conduct an examination irrespective of where the records are kept; BD 139, Subdivision C, to eliminate a restricted ruling which has proved to be impractical; BD 139, Subdivision C (3) , to bring existing requirements into line with present economic conditions; BD 140 to update the present language due to new legislation; BD 145, Subdivision C, to be consistent with NCUA (National Credit Union Act) federal share insurance method of calculating delinquency on real estate loans; BD 146 to require credit unions to maintain investment records in the same manner as now asked of state banks; BD 148 to implement the statute provisions pertaining to insurance, the purchase of which was allowed to members of a credit union on a voluntary basis; and, finally, BD 149 to set out the ground rules which are required of a C.P.A. audit in lieu of an examination.

The above-captioned rules are necessary to implement and make effective the provisions and purposes of the Act and to establish objective standards for the purpose of advising those subject to the Act of their rights and obligations thereunder.

And it is signed by Robert A. Mampel, Commissioner of Banks, and this is being entered as Banking Division Exhibit VIII.

MR. GRELLER: Banking Division Exhibit VIII is offered.

EXAMINER BECK: Exhibit VIII will be received.

I believe at this time, if there are questions addressed specifically to an explanation of any of the proposed Rules, that Mr. Bloomquist and the Banking Division will entertain those questions at this time. We would like to wait if you have a separate statement to make. We would like to have that later. Are there any questions at this time?

(No questions forthcoming.)

If not, why don't we proceed to statements by witnesses. We will start first with statements in favor of the Rules and Regulations. And, Mr. Bloomquist, would you like to speak first?

MR. BLOOMQUIST: All right. Statement in favor of Banking Division Rule and Regulation 135:

About 11 years ago, when Electronic Data Processing (EDP)

was a new thing, the examiners at that time really didn't know too much about it. Also, it seems that the EDP services were selling their programs for recordkeeping to credit unions more so than to the other divisions of the financial community. In view of these happenings, the examiners then, just to be on the safe side, made their intentions known that it would be a good idea if credit unions obtain permission from the Commissioner of Banks prior to entering into an EDP program. Hence the rule that is now on the books requiring prior approval by credit unions before entering into a program of data processing.

The examinations over the past four years have shown to the examiners that EDP servicing does produce the proper subsidiary ledger trial balances, audit trail, and other necessary information such as members' quarterly statements, thereby fulfilling all that is needed for an examination. Since EDP does provide the necessary information and data for an examination, it now appears unnecessary that prior approval from the Commissioner of Banks is required of a credit union to enter into an EDP program.

Even though prior approval for data processing would no longer be necessary under the proposed wording for BD 135, a certificate from the credit union receiving such service, and a certificate from the service corporation providing the clerical services will be required to provide the Commissioner of Banks the right to conduct the examination wherever the records are kept if such would be necessary.

And then the statement in favor of BD 139 Loans, (c) Personal Loans (1). The original idea of this regulation was to prevent the member from getting further into debt and encouraging him to get consolidation loans paid off as soon as possible. Commendable as it was, the

member, when faced with refinancing, even though his loan was oftentimes well secured, found that the repayment schedule proved too burdensome under this rule. Therefore, this particular member would then seek refinancing with either some other credit union or some other lender.

In stark contrast to this situation, a new borrower coming on to the books of the same credit union and needing a consolidation loan, which would be oftentimes well secured, could make his loan repayment schedule run for longer than five years and would not be subject to the same rule.

In view of the foregoing examples, we have seen this particular regulation proven unworkable, and so we are now proposing that it be completely stricken from the credit union rules.

And the statement in favor of BD 139 Loans, (c) Personal Loans (3): Income of members has increased considerably since these unsecured loan limits of $750 and $1,500 were written. In view of these increases in personal incomes, it is now proposed that unsecured loans of $1,500 or more in a credit union of less than $1,000,000 in assets, and unsecured loans of $3,000 or more in a credit union of $1,000,000 or more in assets, should be supported by a signed financial statement of the borrower, and/or co-maker and/or guarantor. These new limitations only recognize the change in the economic condition of our society.

And the statement in favor of BD 140: The only change in this particular regulation is adopting the language of the recent legislative act which added the words of "well-defined neighborhood and/or community" as a basis for a field of membership. It also allows adopted relatives of members into the field of membership in any credit union. The restriction of spouses' relatives <u>not</u> being eligible for membership

remains in this new proposed wording.

A statement in favor of BD 145: It is proposed that the rule for a delinquent real estate loan being less than 10 of 12 required monthly payments in the most recent 12-month period be replaced by the calculation for a delinquent real estate loan based on contractual terms only. This change will bring the state-chartered credit unions into conformity with the NCUA (National Credit Union Administration) federal share insurance requirements for calculating a delinquent real estate loan.

And the statement in favor of BD 146 Investments: The old regulation, the way it is worded, with a list of conforming investments not ever being publicized, has proved to be not applicable. Since this is the case, it is now proposed that the previous wording be completely eliminated and a new regulation for recordkeeping be required of credit unions on the same basis as that expected of state banks.

In addition, the proposed new regulation will facilitate the examiner's task and will establish uniform procedures for handling of security premiums and the taking into earnings the accretion of discount in an orderly fashion.

And the statement in favor of BD 148 Insurance: This particular regulation makes mention that a credit union may maintain an insurance agency as a separate business entity on its physical premises. The regulation goes on to spell out what is mentioned in the statutes, and in addition it sets down a limit of no more than 10% of gross premiums for the actual cost of ministerial tasks performed pertaining to insurance. The limitation of 10% of gross premiums for ministerial tasks was arrived at following discussion with key insurance division personnel and members of the credit union industry.

In addition, this new regulation spells out that if a credit union maintains an insurance agency as a separate business entity on its premises, the member's file must indicate his elective in writing if he desires to purchase or not purchase this particular type of insurance thru said insurance agency.

Further, the regulation provides when insurance is cancelled by the member, the unearned premium is to be refunded to him in some manner.

And last, the statement in favor of BD 149: This regulation is proposed pursuant to the authority vested in the Commissioner of Banks by Minnesota Statutes 1973, Section 52.06, to define the qualitative type of audit examination to be performed by CPA's. The wording of this regulation lays out the ground rules for a CPA audit in lieu of an examination. It does not compel the Commissioner of Banks to accept the CPA audit in lieu of an examination.

And that concludes the statements that I have in favor of the proposals.

EXAMINER BECK: Thank you, Mr. Bloomquist. Is there anyone else present who wishes to speak in favor of or in support of the proposed rules? (No response.) If not, is there anyone present who wishes to make a statement in opposition to the proposed rules? (To an individual in the audience who indicated his desire to speak) Would you please step forward?

MR. KARSCHNIA: I am not so much in opposition as I am desirous of a clarification.

EXAMINER BECK: Why don't you state your name, and spell it, give your group, and then proceed?

MR. KARSCHNIA: My name is John Karschnia (K-a-r-s-c-h-n-i-a) and I am with United BN Credit Union. I would like to ask a few questions, if I may,

about BD 148 - Insurance. And I would direct my question then to the Assistant Attorney General, as this would seem to be more of a legal matter.

MR. GRELLER: All right.

MR. KARSCHNIA: Mr. Bloomquist has indicated that the only time that you would have an indication from the member whether he wanted to buy the insurance or did not want to buy the insurance is if an agency was set up. I am looking at this area. It looks like you would still be required to do this even if you had a group insurance or a sub-group insurance. Can you tell me whether I am right or wrong?

MR. GRELLER: Mr. Bloomquist?

MR. BLOOMQUIST: Well, the intent, when it was written, was if a separate business entity of an insurance agency was to be established on the credit union premises, then the member, if he would want to buy insurance from that particular agency, even though the credit union requires hazard insurance on the collateral offered, he would still have the option open to buy the insurance from the agency or not to buy it from the agency. He could still go elsewhere and buy the insurance.

MR. KARSCHNIA: I think this is right. I think he should.

MR. GRELLER: Perhaps I misunderstood the question. Were you referring to group insurance?

MR. KARSCHNIA: We have group insurance, such as it is, to members' group life, where really the credit union is not the agent; where we are just collecting and remitting to CUNA and are not an agent in this area. Are you saying we are an agent when we receive reimbursement?

MR. BLOOMQUIST: Say that again.

MR. KARSCHNIA: We sell members group insurance and deduct the money from

the member's account and remit it to CUNA Mutual. Our only connection is to remit the premiums. Are we an agent because we receive a reimbursement of costs to service this remitment of premiums?

MR. BLOOMQUIST: Because you are providing a facility to handle this insurance premium on behalf of the credit union member, would you be considered an agent?

MR. KARSCHNIA: Right.

MR. BLOOMQUIST: Should we have that--

MR. GRELLER: I guess that is kind of a legal question we cannot really answer.

MR. KARSCHNIA: The whole point is the BD 148 (e), where the regulation says that if you provide insurance and you have insurance available to all your members, you must have an indication in each member's file indicating whether he does want to purchase this insurance or does not want to purchase this insurance. Is this a correct statement or have I interpreted it correctly?

MR. BLOOMQUIST: If a credit union agency is maintaining on--if a credit union agency is maintained on the premises.

MR. KARSCHNIA: Right. You do not know what an agency is? Now can you tell me the penalty of the law if this is not done? I noticed in each paragraph they say a credit union may establish the credit union, may sell--the credit union may sell, the credit union may collect and remit premiums. But then you get into an area and they say the credit union should have a statement from the member indicating whether he wants to buy insurance or does not want to buy insurance. Does that "should" carry a penalty of law?

MR. GRELLER: The regulation, if adopted, would have the force of law and a violation would be the equivalent of a violation of the Banking Laws.

MR. KARSCHNIA: I don't know what the word "should" means.

MR. GRELLER: This will be redrafted, and redrafted as "shall," I believe.

MR. KARSCHNIA: "Shall"?

MR. GRELLER: Right.

MR. KARSCHNIA: And then I would like to talk further against that regulation, because the way I see this regulation if any credit union provides any life insurance or any insurance service for the member, you must have every member sign a statement that they do or do not want any of the insurance services. Is this correct?

MR. BLOOMQUIST: Again, if you have a separate business entity as an insurance agency.

MR. KARSCHNIA: Yes. Then may I ask --

MR. BLOOMQUIST: Everything hinges on that. If you do not have an insurance agency there, as I see it, then you would not have to fool around with this election.

MR. KARSCHNIA: Then when do we have an insurance agency? Do we have an insurance agency when we receive reimbursements of premiums? And, two, it really does not say that in the regulation. There also will be your group insurance premiums and sub-group insurance premiums. I would make the suggestion that if this word "should" were changed to "must," and that it defined the insurance agency and also indicate that it refers only to credit union agencies--

MR. GRELLER: If "insurance agency" were redefined to the "group insurance agency," would you like to speak on that?

MR. KARSCHNIA: Yes. It is my feeling that it is about a physical impossibility to get your members to sign a statement that they do not want to purchase insurance. I do not care to make a statement or to sign anything

that I do not wish to purchase a product. I will only sign a statement that I have agreed to purchase and sign a contract as such. We have four thousand members on the books now who apparently, if we are determined to be an agency, we will have to go back to them and call them in and have them sign a statement that they do not want to purchase these services, and if they refuse to sign it, then we are subject to penalty of law.

EXAMINER BECK: Are there any further questions by the Agency panel to the witness?

MR. BLOOMQUIST: You do understand what we have in mind? What we have in mind is when the member comes in for a loan and you have a separate insurance agency and it handles hazard insurance and requires hazard insurance, that is where the election comes in. He has the choice of purchasing that hazard insurance from your insurance agency or not. He can still go outside to another insurance agency and purchase that hazard insurance for you.

MR. KARSCHNIA: If the whole intent is that, then may I make another suggestion, that we go only to the people that have purchased the insurance and let them know they have the right to go elsewhere. When we go to the negative side, who do not want to sign a statement, then we have administrative problems.

MR. BLOOMQUIST: In addition to hazard insurance, maybe you have credit life and disability insurance. That would be another one--anything connected with the loan where you want protection.

MR. KARSCHNIA: I certainly agree that a person has the right to go anywhere he wants to buy insurance, and that should be made known to him. But you get into a situation where people that do not want to purchase insurance--to require them to sign a statement that they do not want to purchase insurance would be difficult to administer.

MR. BLOOMQUIST: But what I am saying--you are in perfect agreement with that?

MR. KARSCHNIA: Yes, I am.

MR. BLOOMQUIST: As the Special Assistant Attorney General indicated, it has to be redrafted.

MR. GRELLER: If the type of insurance we are talking about was excluded from the scope of the regulation, would you maintain the same objection to the regulation?

MR. KARSCHNIA: I don't know what you mean.

MR. GRELLER: The group insurance we are talking about.

MR. KARSCHNIA: What is "group" insurance? You can have group automobile insurance and still have--if you exclude group automobile insurance, you have a problem.

MR. GRELLER: What would be your view on a strictly disclosure requirement, either a statement that he presented at the time he was entering into a loan transaction or a statement by the person that he had an election to purchase from the credit union agency or another insurer?

MR. KARSCHNIA: I think that is very fine. I think the League has it already.

MR. GRELLER: I have no more questions.

EXAMINER BECK: Are there any questions from anybody in the audience, from this witness? (No questions forthcoming.) If not, thank you very much. (To person in the audience indicating a desire to speak) Give your name, please.

MR. FINN: Don Finn, Minnesota League of Credit Unions. It is just a point of clarification of a statement by the witness and the question of Mr. Bloomquist, as to whether a credit union arranging for a member to

obtain group life insurance is considered an agency. The answer to that would be no. All it is, is a third-party transfer of the premium and seeing that they have the insurance coverage.

EXAMINER BECK: Any comment from the Agency on that?

MR. BLOOMQUIST: No comment.

MR. ATKINSON: Robert Atkinson. I don't want to be repetitious on what Mr. Karschnia talked about before, but nowhere in this regulation, Mr. Bloomquist--and if I may refer to the Attorney General--does this say this is predicated upon the credit union being an agency. My objection to BD 148 is that; plus the fact that in Lines 43, 44, and 45, as I read it--I interpret it that the member has the option of purchasing insurance not only from a different vendor, but whether or not he wants the insurance. And there may be a requirement of the credit union that they have insurance, mainly the fire, theft and automobile liability, and the way this reads, this gives the member the option of buying or not buying the insurance. I believe that it is up to the credit union to require the types of insurance it wants.

If this were re-worded--if you would re-word the whole section, where it is only predicated upon the fact that you may have an agency and can give the member the choice of selecting the vendor, but not giving him the choice of whether or not he wants insurance, then I would go along with it. The way it is written now, I would have to oppose it. This takes the prerogative from the credit union, the way I read it.

MR. GRELLER: When we went through the regulation there, we also noticed the problem, and it was not the intention of the Division to limit the normal freedom of contract between the credit union and the person applying for a loan. The regulation does not intend to do what you said it does and

what appears as it is now drafted.

EXAMINER BECK: Any further comment?

MR. BLOOMQUIST:= I am in complete agreement with what the witness just said.

EXAMINER BECK: Mr. Atkinson, what group do you represent?

MR. ATKINSON: Minneapolis Federal Employees Credit Union.

EXAMINER BECK: Thank you. Are there any further statements by anyone?

MR. ATKINSON: Do you mean just this or the whole?

EXAMINER BECK: We are covering the whole thing.

MR. ATKINSON: I would like then to cover this BD 139 Rule, Subsection (b) (1), on real estate loans. I would like to propose that Subdivision (1) read: A second real estate mortgage is permitted when the outstanding balance on the first real estate mortgage, plus the amount of money to be advanced, total eighty per cent or less of the current appraised value of the property involved.

If I may, I would like to give the reasons for this. Many times we have members come in, who wish to buy a lake property or some large item, where they do not have the collateral for it; however, they have a large equity in their home. And because they have an advantageous interest rate, they do not want to refinance that at a higher rate. Were we to be granted the option of using the equity in the home as a second mortgage, I believe it would be to the advantage of the member and to the credit union, because we would be more fully secured. As long as you follow the rule, which is a guideline the Department has used for years, that the total outstanding money does not exceed 80% of the appraised value of the property, I don't see that there would be a great deal of danger. I am well aware that second mortgages in some areas of the country have been used to the disadvantage of the homeowners, such as the fast-sell salesmen for siding and

so on. With the truth in lending, and if the total value was only 80%, I think it would be doing the member a favor and serving the credit union. If we had someone with a $15,000 equity, and he wanted a loan of $10,000 on lake property, and he did not have sufficient collateral, he is happy to give a second mortgage on the home without sacrificing the rate on his first mortgage. My opinion, and the opinion of our Board, is that it would be a great advantage, and it could be well policed by the examiners, in that the current value--the loan did not exceed 80% of the current value of the property.

MR. GRELLER: Is your comment in this regard in the nature of a petition under Chapter 15, under Rules and Regulations?

MR. ATKINSON: I only attended one other hearing. I don't know the exact procedures. I thought we could present this and present it to the Banking Department.

MR. GRELLER: Perhaps you could discuss it with your attorney. The difficulty is that there has been no public notice as to a change in this particular section. It is not one of the sections proposed to be changed, but we would be happy to take your comment at this time.

MR. ATKINSON: What is the section pertaining to real estate? I thought the whole thing was open for change in the proposed rules and regulations. That is what we were given to understand on the Advisory Council. I thought we could make any proposal and it would be considered.

MR. GRELLER: There is a requirement of a formal proposal under Subdivision 15. BD 139, however, is in here because it is required that the whole section be included.

You can continue.

MR. ATKINSON: This would probably apply to the next one, BD 140. In the

field of membership, which I believe should be deleted from the rules and regulations. I see no reason for having rules and regulations to cover a very explicit concept of the law. The only difference between law and the regulation is the blood relatives and spouses in all instances. I believe we follow this now. My idea is that in the future we may want the statute changed to allow in-laws or blood relatives of spouses. The Federal has already done this. If such legislation were proposed, we would have the added deterrent of having something in conflict with the law in the rules and regulations. I see no reason for the rules and regulations to add a further restriction that is in the law. I think it would be better to leave it to the legislature; otherwise, instead of just changing the law, we would also have to change the rules and regulations.

MR. BLOOMQUIST: Everything you say, Mr. Atkinson, is true. I was unaware that the exclusion of blood relatives being in the rules and regulations tied the statute down, so to speak.

MR. ATKINSON: It is just my opinion that it might. It seems to me that when you go to change the legislation, the legislators will say how about the rules and regulations. I see no reason for having it in there, because it is already in the law. I think there is a connotation that there has been a violation of the law, and I am not aware of that.

EXAMINER BECK: Any further questions of the panel? (No response.) Mr. Atkinson, we have marked your memo as Exhibit A for the record, as far at it can be accepted, as the attorney says.

MR. GRELLER: It can be presented.

EXAMINER BECK: We will receive it in the record. Any further questions, Mr. Atkinson? If not, thank you very much, Mr. Atkinson. Are there any further questions or statements of any nature to be made at this time?

EXAMINER BECK: Yes, sir (to person in audience signifying a desire to speak).

MR. RUBBELKE: Mr. Chairman, I would like to raise an objection.

EXAMINER BECK: Would you state and spell your name, please?

MR. RUBBELKE: Irvin (I-r-v-i-n) L. Rubbelke (R-u-b-b-e-l-k-e), City and County Credit Union, St. Paul. In relation to BD 145 delinquent loans. The method of calculating delinquency on real estate loans shall be on a contractual basis. I understand what you are trying to do is to conform with the Federal law. I want to ask a question whether this is somewhat different than what you are presently applying to standard savings and loans? Is that correct?

MR. BLOOMQUIST: The standard for a delinquent savings and loan association remains the same. It is still 10 of 12 required monthly payments in the most recent 12-month period to be a current loan.

MR. RUBBELKE: Ten payments out of the last twelve is current. If you changed it on the contractual basis, this is a more stringent regulation?

MR. BLOOMQUIST: For credit unions, yes.

MR. RUBBELKE: And I object. It should not be any more stringent than what you apply towards savings and loans. Because actually if a real estate loan is delinquent two payments out of the last ten, I don't see that the statute at the State level should have to be in conformity with the Federal level, because we are State chartered--not Federally chartered. I think it should be applied equally between savings and loans and credit unions.

MR. BLOOMQUIST: Just a little background as far as savings and loan associations are concerned: You might say it is a different ballgame over there, in that savings money in savings and loan associations is all time money,

whereas in a credit union I would--it seems logical to me when a member puts his money into a savings account in a credit union, he does not look upon it as being time money, and to that extent, therefore, I think the reason for gauging a delinquent loan for a savings and loan association would have no bearing on a credit union.

MR. RUBBELKE: Well, Mr. Bloomquist, I think you should consider the security of the loan.

MR. BLOOMQUIST: Yes, I understand your point.

MR. RUBBELKE: And I think the security of a loan would be the same in both instances.

MR. BLOOMQUIST: Well, of course, you do understand that in the National Credit Union Administration for Federally chartered credit unions they gauge a delinquent real estate loan on the basis of a contractual basis.

MR. RUBBELKE: This is true, but they also said that the average life of a mortgage should be five years. I don't agree with that. Just because they say that, you don't have to agree with them.

MR. BLOOMQUIST: I think the points you are making are good points, but I do disagree.

MR. GRELLER: Could I ask a question of the witness?

EXAMINER BECK: Certainly.

MR. GRELLER: Why is it your opinion that the repeal of the present regulation and the passage of the delinquency calculation on a contractual basis would be more stringent?

MR. RUBBELKE: Why would it be more stringent?

MR. GRELLER: Yes.

MR. RUBBELKE: Because if he is delinquent two payments under the terms of the contract--

MR. GRELLER: Are the terms of the contract inalterable?

MR. RUBBELKE: No.

MR. GRELLER: Would it be possible to alter the terms of the contract to conform to this regulation--the regulation that was previously in effect? Could you arrange the contract so that ten of twelve required monthly payments would be sufficient?

MR. RUBBELKE: It never is in terms of the contract--

MR. GRELLER: It cannot be alterable?

MR. RUBBELKE: A delinquency of two payments is not in the terms of the contract. It does happen, and by using the rule they are using for a savings and loan, if he has made ten out of the past twelve, he is considered current and he does not go on the delinquent list.

MR. GRELLER: Is it your opinion that the security is better or the same?

MR. RUBBELKE: It would be identical. All I am saying is that they are trying to comply with the Federal law. I see no need for it.

MR. GRELLER: Would it be possible, as a hypothetical, for a mortgage to be delinquent two payments a year for fifteen years and not be in the state of delinquency?

MR. RUBBELKE: The security would be just as good as if he would miss two out of the last twelve. It would be rare, but it would be possible.

EXAMINER BECK: Mr. Atkinson, did you have further comment?

MR. ATKINSON: I would like to clarify that money deposited in credit unions, shares or deposits, is not demand money. It is time money, the same as the savings and loans. I don't see that differential. I don't think--they are all time money. I do not see that differential at all, or why that would be an influence in giving a discrimination between credit unions and savings and loans. You are changing it to contractual;

however, why is it only for credit unions, when ten out of twelve are still allowed for savings and loans, and they are covered under Federal Savings and Loan Insurance, which is no different than our share insurance? Plus the connotation that ours are demand deposits should be clarified. Ours are time deposits.

MR. BLOOMQUIST: The point you make is correct, but the reason why I brought out in the manner in which I did--it seems to me that a member of a credit union just thinks in those terms.

(Laughter.)

EXAMINER BECK: (Acknowledged indication from witness in audience of his desire to speak) Yes, sir.

MR. FANDREY: I am John Fandrey (F-a-n-d-r-e-y), City and County Employees Credit Union, St. Paul. The Administrator of the NCUA, Mr. Nickerson, has said, and he has been quoted, as to whether there should be two strong chartering agencies, the Federal and the State. I believe that we should not have to follow and fall in line with them because they adopt rules. We are insured. We would have to report our list like they requested. I believe it should be ten out of twelve. Ten out of twelve, on a fifteen-year loan, if you miss two each year, you are thirty payments or two and one-half years behind. You can change those terms and change the mortgage and have an added expense to the member to rewrite the loan and at a higher rate of interest. Are you helping the member? I believe we should help our members, and so a little delinquency in certain cases where there is misfortune, I think we can tolerate. You can drive us to extension agreement, and you do not have a better loan because you have an extension agreement.

EXAMINER BECK: Any questions or comments?

MR. GRELLER: No. Thank you.

EXAMINER BECK: (Addressing witness indicating a desire to speak) Go ahead.

MR. CASSIDY: My name is Mr. Cassidy, and I am from the Collegeville Credit Union. I would like to make one additional comment to Mr. Bloomquist about the impression of the members as to their accounts being demand money in the credit union. I think, to a great extent, this is probably true; that if the credit union has just share accounts the member does anticipate that these are demand. In the same token, the members that I am judging in this regard also feel that their savings--they are so stated in the savings and loans as demand deposits, and they also feel that these are on demand. In their certificates it says they can take out at anytime--these earning daily interest and so forth--just as I thought a demand deposit in a bank was "demand" until your Department informed me that there was a thirty-day notice required, and that it is not a demand deposit at a bank. So the popular impression of people is that a so-called demand deposit is technically on demand even though it is not. And I don't think the whole issue is a reason for the difference in restrictions between the savings and loans and the credit unions.

The distinction should be on delinquency--excuse me--should be on security, as Mr. Rubbelke has indicated. Perhaps there should be some provision that the member could not be two months delinquent out of every year. I don't think the security is necessarily lost from something like this, but certainly it's a loan that is subject to insurance. An extension for these members would cost additional money. It has to be a legal document, and rewriting the loan on different terms would cost a great deal of money for the member.

EXAMINER BECK: Could we have your first name, Mr. Cassidy?

MR. CASSIDY: Robert.

EXAMINER BECK: Thank you. Are there any further statements or questions?

MR. GAWORSKI: Yes, sir. My name is Richard Gaworski (G-a-w-o-r-s-k-i). I am a C.P.A. and a member of the Minnesota Society of C.P.A.'s, and currently serving as vice chairman of the committee on cooperation with banker and other credit grantors. With me this morning is Lyle Tabot, who is also representing the committee.

I would like to address myself to BD 149 C.P.A. Audits in lieu of examination, and essentially speaking on behalf of the proposed change,but suggesting certain clarification of the audit approach and the audit reporting. I think perhaps first of all it should be noted that there are some essential differences between examinations conducted by the State of Minnesota Banking Department and C.P.A. audits. And the examiner's report by the State of Minnesota so indicates on its face that this report should not be considered to be an audit report.

A number of credit unions in Minnesota do have C.P.A. audits, and in some cases this is where the credit union does not--is of a size but does not have an internal audit procedure and looks to the C.P.A. to perhaps fill part of that requirement. Other credit unions, I believe, are considering C.P.A. audits. And, of course, one of the prime considerations is the cost of the audit, together with the cost of on-going examinations by the State Banking Division. It is a heavy cost burden in terms of their own resources and income if they would like to have a C.P.A. audit in addition to the present examination. So I think the--we certainly concur that the State Legislators, in permitting C.P.A. audits in lieu of examinations, in my opinion, is good legislation.

I do, as I say, question the audit approach and audit reporting. I have three comments I would like to make. The first is that the Commissioner of Banks may not wish to accept the C.P.A. audits. Now it seems to me that the term "may wish to accept," and as Mr. Bloomquist points out, does not compel the Commissioner to accept such audits, thus placing the credit union in a position of not really knowing whether such audit is going to be accepted and serve in lieu of the examination, let's say, for that particular year. I would suggest that there be some clarification or that a procedure be provided whereby a credit union can file an application or whatever might be appropriate, so that the credit union would know in advance of a C.P.A. audit whether the audit would serve in lieu of an examination for that particular year.

EXAMINER BECK: Mr. Bloomquist?

MR. GAWORSKI: Do you want me to go on to the second point?

MR. BLOOMQUIST: Yes.

MR. GRELLER: I have no questions.

MR. GAWORSKI: The second point that I have is that the rule--proposed rule further states that the C.P.A. report of examination must be submitted on the same forms and in the same manner that the State credit union examiners employ. And I question the same use of the same form and in the same manner. Again referring to the present examination report which is used by the State Banking Examiners, it indicates that this report should not be considered to be an audit report.

Now, essentially, a C.P.A.'s report would normally include the accountant's certificate, the balance sheet, any footnote disclosures that might be required, and some supplementary data. And it is my opinion that the format of the State Banking Division's report does not really

meet the needs of the C.P.A. audit. I would say that I question whether it is workable as such to fulfill the needs of a C.P.A. audit in lieu of an examination. I would suggest an alternative which might be considered would be that the C.P.A. issue his accountant's report on a balance sheet and any footnotes that might be required, and that these be bound in the forepart of the State examiners' report. And the C.P.A. then could, in addition--let me back up and say that the C.P.A. would then furnish the additional schedules that would be requested and required by the Banking Division to be supplementary, which could be prepared and which the C.P.A. could report on as supplementary information which could be considered. I understand that this approach is somewhat similar to that followed in other states, specifically the State of New York, when a C.P.A. reports on a bank's financial statements. In New York I believe an approach somewhat similar to this is followed to accommodate the reporting process. So I would suggest that an alternative reporting approach be followed here to recognize the distinction between a C.P.A. audit and an examination.

And the third point is one of clarification. The proposed rule says that the examination must consist of a balance sheet examination. And I know that the State examiners' report includes income statement or schedule. And I raise the question as to whether that particular statement--the income statement is intended to be covered by the balance sheet examination or whether it would be omitted--an omitted schedule. It seems that all the remaining schedules relate to the balance sheet will provide supplementary information, except this one schedule.

EXAMINER BECK: Does that complete your comment?

MR. GAWORSKI: Yes, it does.

EXAMINER BECK: Any questions from the Panel?

MR. GRELLER: Would you as an accountant have difficulty complying with the Rule as now stated? Is there something you could not fill out on the Banking Division form, or are you suggesting that your proposal would be more workable?

MR. GAWORSKI: Really both. And I don't think it is sufficient to fulfill the obligations of the C.P.A. I think there should be some alternative to permit the C.P.A. to include his balance sheet and footnotes. The C.P.A., of course, would not address himself at least to some of the schedule information, but he could do so as supplementary information. I would think that some change should be made--and to answer your question specifically, I guess I am speaking not perhaps for the entire Society of C.P.A.'s, but I think it would present practical problems for the Society.

MR. PATZKE: Henry Patzke (P-a-t-z-k-e), Northwest Airlines Credit Union. Would you expect that there would be any material increase in cost of a normal C.P.A. audit to have it also conform to the examination as proposed or with the proposal you make?

MR. GAWORSKI: Well, if the C.P.A. is already performing an audit, of course, to meet the additional reporting requirements--in other words, the completion of additional schedules and audits of those schedules, yes, there would be some increase in the total cost. I think the real cost savings comes into play--and I think that is the intent of the Legislature--that if there could be an elimination of both the present audit and examination--speaking of those credit unions that have an audit--if this could be eliminated, at least in some years, or have some credit unions--whatever is appropriate or whatever is provided and clarified--if there could be an elimination of examination in some years, so as not to have the dual

burden of cost. There would be an incremental cost for the C.P.A., I am sure.

MR. PATZKE: Thank you.

EXAMINER BECK: Thank you, Mr. Gaworski.

Any further statements or questions? (No response.) Is there anything further on behalf of the Agency?

MR. GRELLER: No.

EXAMINER BECK: If not, I want to repeat that any written materials that are sent to the Banking Division within twenty dates of the date of this hearing will be considered by it in connection with these proposed Rules and Regulations.

There being nothing further, this hearing is now adjourned.

(Hearing adjourned at 10:50 a.m.,
January 9, 1974.)

STATE OF MINNESOTA
DEPARTMENT OF COMMERCE
BANKING DIVISION

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE STATE BANKING DIVISION GOVERNING CREDIT UNIONS; TO REQUIRE CERTIFICATES WHERE RECORDKEEPING SERVICES ARE EXCHANGED; TO REQUIRE FINANCIAL STATEMENTS FROM CERTAIN PERSONS; TO RESTRICT FIELDS OF OPERATION AND THE CALCULATION OF DELINQUENCY ON REAL ESTATE LOANS; TO REQUIRE CERTAIN INVESTMENT RECORDS; TO REGULATE INSURANCE, AND TO REGULATE C.P.A. AUDITS.	)	REPORTER'S CERTIFICATE

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I, Cyrilla Delaney, hereby certify that I am an official reporter for the Department of Commerce, State of Minnesota; that I took the proceedings and testimony at the hearing on January 9, 1974, in the above-entitled matter; and that the foregoing transcript is a true and correct transcript of my original shorthand notes, to the best of my ability.

Dated January 14, 1974.

Cyrilla Delaney

Cyrilla Delaney, Reporter
Fifth Floor Metro Square Building
Saint Paul, Minnesota 55101.

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE ROBERT A. MAMPEL
COMMISSIONER OF BANKS

In the Matter of Proposed Rules of the State Banking Division Governing Credit Unions; to Require Certificates where Record-keeping Services are Exchanged; to Require Financial Statements from Certain Persons; to Restrict Fields of Operation in the Calculation of Delinquency and Real Estate Loans; to Require Certain Investment Records; to Regulate Insurance, and to Regulate C.P.A. Audits.

ORDER ADOPTING RULES

The above-entitled matter came on for hearing before the Hearing Examiner, duly appointed by the Commissioner of Banks of the State of Minnesota, on the 9th day of January, 1974, at 9:30 A.M. in the Department of Commerce Hearing Room, Fifth Floor, Metro Square Building, 7th and Robert Streets, Saint Paul, Minnesota, after proper notice required by Minnesota Statutes 1971, Section 15.0412, was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having heard all the testimony, having considered all the evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria, and having confirmed the need for the above-captioned rules.

NOW, THEREFORE, IT IS ORDERED that these rules identified as Minnesota Regulations BD 135, BD 139, BD 140, BD 145, BD 146, BD 148, and BD 149 are adopted this 29th day of March, 1974, pursuant to authority vested in me by Minnesota Statutes, Sections 46.04, 52.06, and 52.141 (1971).

STATE OF MINNESOTA
BANKING DIVISION

ROBERT A. MAMPEL, State
Commissioner of Banks

Bank Div. Ex I

STATE OF MINNESOTA
COUNTY OF RAMSEY

BEFORE ROBERT A MAMPEL
COMMISSIONER OF BANKS

In the matter of the Proposed Adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A.audits.

ORDER FOR HEARING

To effectively implement Minn. Stat. §§52.01 - 52.22 (1971), the Minnesota Commissioner of Banks deems it necessary to consider adoption of the proposed rules captioned above pursuant to the authority vested in me by Minn. Stat. §§46.04, 52.06, and 52.141 (1971).

NOW, THEREFORE, IT IS ORDERED this 28th day of November, 1973, that a public hearing on the proposed rules captioned above be held in the Hearings Room of the Department of Commerce, Fifth Floor, Metro Square Building, 7th and Robert Streets, St. Paul, Minnesota, on January 9, 1974, commencing at 9:30 A M. and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that notice of said hearing he given to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose and all persons who are presently members of the Minnesota Legislature.

STATE OF MINNESOTA
BANKING DIVISION

Robert A Mampel

ROBERT A. MAMPEL
Commissioner of Banks

Bank Div Ex II

STATE OF MINNESOTA
COUNTY OF RAMSEY

BEFORE ROBERT A. MAMPEL
COMMISSIONER OF BANKS

In the matter of the Proposed Adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

NOTICE OF HEARING

Notice is hereby given that a public hearing will be held pursuant to Minn. Stat. Sec. 15.0412, Subd 4, (1971) in the above-entitled matter in the Hearings Room of the Department of Commerce, Fifth Floor, Metro Square Building. 7th and Robert Streets, Saint Paul, Minnesota, on January 9, 1974, commencing at 9:30 A.M., and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard concerning adoption of the proposed rules captioned above by submitting either oral or written data, statements or arguments. Statements or briefs may be submitted without appearing at the hearing.

A copy of the proposed rules is attached hereto.

STATE OF MINNESOTA
BANKING DIVISION

Dated: November 29, 1973

ROBERT A. MAMPEL
Commissioner of Banks

Bank Div. Ex III

STATE OF MINNESOTA
DEPARTMENT OF COMMERCE
DIVISION OF BANKING

In the matter of the Proposed Adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

DELEGATION OF
AUTHORITY TO ACT AS
HEARING EXAMINER

I, Robert A. Mampel, Commissioner of Banks of the State of Minnesota, pursuant to authority granted by Minn. Stat. §15.06(2) (1971) hereby appoint George Beck, Hearing Examiner for the Department of Commerce, to act as Hearing Examiner in the hearing on the proposed rules and regulations for credit unions.

Dated: December 21, 1973

ROBERT A. MAMPEL
Commissioner of Banks

Banking Ex IV

AFFIDAVIT

EUGENE S. BLOOMQUIST, being duly sworn on oath deposes and says:

1) That he is an employee of the Banking Division of the State of Minnesota.

2) That on the 28th day of November, 1973, he went to the Secretary of State's Office for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minn. Stat. Sec. 15.0412. (1971).

3) That on the 28th day of November, 1973, in response to the above request, the Secretary of State provided him with such a list, a copy of which is attached hereto and incorporated by reference.

Further affiant sayeth not.

Eugene S. Bloomquist

Subscribed and sworn to before me
this 28th day of November, 1973.

Deborah R. Lingofelt

Notary Public,
Ramsey County, Minnesota
My Commission expires September 22, 1978.

DEBORAH R. LINGOFELT
Notary Public, Ramsey County, Minn.
My Commission Expires,
September 22, 1978

COMMERCE

BANKING

[illegible] AND REAL ESTATE

Anderson, Chas. A., Am.Natl Ins. Co., P.O. Box 6182, Minneapolis 55424

Dorsey, Owen et al, Mr. W. F. Marquart, 2400 1st Natl Bk Bldg., Mpls. 55402

Franke, Jerome E., 211 Roseville Prof.Center,2233 N Hamline St. Paul 55113

Gordon, Avron L., 304 Title Ins. Bldg., Mpls. 55401

Institutional Tax Services Corp., Attn Irwin Kiman, 236 5th Ave,New York, NY 1000
Keyes, Thomas R.,Security Schools,4940 Viking Dr,Rm.264, Mpls. 55435
Lerner, Alan B., 650 Madison Ave., New York 22, N. Y.

McCombs & Co., Inc., Box 47, Jenkintown, Pa. 19046

McCrady, Norbert A.,Suite 325, 2850 Metro Dr.,Bloomington 55420

Miller, Jerrold T., 1000 Currie Ave., Minneapolis 55403

~~Minnesota Bankers Assn., 315 W.C.C.O. Bldg., Mpls.~~

Minnesota League of Credit Unions, 575 University Ave., St.Paul 55103
Robert L. Smith Co., 422 Pioneer Bldg., St. Paul 55101

Savings & Loan League of Minn. 625 2nd Ave. S., Suite 303, Mpls. 2

[illegible]

State Capitol Credit Union, 95 Sherburne St., St. Paul 55103
Strickland, R.M.,Ford Mtr Credit Co., The American Rd., Dearborn, Mich.48121

Suburban Credit Plan Inc., 1551 W. Larpenteur Ave., St. Paul 55113

CREDIT UNIONS

IBM Rochester Employees Credit Union, 3605 Hwy 52 N., Rochester 55901
Minnesota Association of Cooperatives, ~~2651 University Ave., St. Paul 55114~~
55 Sherburne Ave, St Paul 55103

Minnesota League of Credit Unions, 575 University Ave., St. Paul 55103

Northwest Airlines Credit Union, Mpls-St. Paul Intl. Airport, St. Paul 55111

Red Owl Stores Employees Credit Union - 215 E. Excelsior Ave., Hopkins 55343

State Capitol Credit Union, 95 Sherburne St., St. Paul 55103

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

AM CAMPING ASSN MRS LEACOCK
1235 BRIGHTON SQ
NEW BRIGHTON MN
55112

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY R.S. E.L.M.
1222 FOURTH ST. S.E.
MINNEAPOLIS MN
55414

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARTHOLOW HAROLD E FIRE CHF
2600 109 AVE N W
COON RAPIDS MN
55433

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGGS & MORGAN - B F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

CARPENTER MRS MARY LEE
DOW CHEMICAL 47 BLDG
MIDLAND MICH.
48640

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHAMBERLAIN WARREN D
887 SW 4TH AVE
FARIBAULT MN
55021

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT COMM
230 STATE OFF BLDG
ST PAUL MN
55101

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAVIS HENRY
6301 SHINGLE CREEK
BROOKLYN CTR MN
55429

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

EDINA FIRE D JAMES MCNELLIS
4801 W 50TH ST
EDINA MN
55424

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

EMP HANDICAPPED PERSONS COMM
527 JACKSON RM 227
ST PAUL MN
55101

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EVERETT JERRY NW PETRO ASSN
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1260 NW BANK BLDG
MPLS MN
55402

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FORBES GORDON MINN RRS ASSN
207 UNION DEPOT
ST PAUL MN
55101

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GUSTAFSON MRS D MINN VET MED
24 S 6TH ST
MPLS MN
55402

HARVEY MICHAEL
1390 W M HAHA PKWY
MPLS MN
55409

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

HARTFELDT WILL
415 HAMM BLDG 6TH ST
ST PAUL MN
55102

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUMAN RIGHTS DEPT
60 STATE OFF BLDG
ST PAUL MN
55101

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

KABLE RICHARD W

BETHEL MN
55006

KING,TIMOTHY
3333 OAKLAND AVE S
MPLS MN
55407

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MECCA R.F. NELSON
26 E EXCHANGE ST
ST PAUL MN
55101

MET OPEN SPACE INFOR PROJ
111 E FRANKLIN AVE SO
MPLS MN
55404

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN BD PODIATRY EXAM & REG.
1111 W 2ND ST.
CROOKSTON MN
56716

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN ELECTRICAL ASSN INC
525 SO 7TH
MPLS MN
55415

MINN ENV CONTROL CITIZEN ASN
CENTRAL MANOR 26 E EXCH
ST PAUL MN
55101

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN PUB INT RES DAYTON
2418 UNIV AVE SE
MPLS MN
55414

MINN REP STATE CEN COMM
~~4510 VIKING DR~~ 555 WABASHA
~~MPLS~~ ST PAUL MN
~~55435~~ 55102

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SCH BUS OPERATORS ASSN

FARIBAULT MN
55021

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN ST BD PHAR P G GRUSSING
1965 FORD PKWY
ST PAUL MN
55116

MINN STATE OPTOMETRIC ASSN
333 E HENNEPIN AVE
MPLS MN
55414

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MINN MISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN
56321

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NELSON DONALD E NSP CO
414 NICOLLET AVE
MPLS MN
55401

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
277 W UNIV AVE
ST PAUL MN
55103

O'BRIEN J.DENNIS
1200 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OHMAN W C NATL ELEC CONTRS
608 AM NATL BK
ST PAUL MN
55101

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PETERSEN JOHN W
525 OSBORN BLDG
ST PAUL MN
55102

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PORTER LYLE O

TRACY MN
56175

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

RACHNER MARY JANE
1917 PINEHURST AVE
ST PAUL MN
55116

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

ROCHE T E
5007 FREMONT AVE S
MPLS MN
55419

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SATHRE, HARVEY
77 SHERBURNE
ST PAUL MN
55103

ST PAUL ASSN PLBG HTG MEC
614 AM NATL BK
ST PAUL MN

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHAPS NICHOLAS
100 DAIN TOWER
MPLS MN
55402

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SEARS ROEBUCK & CO
2929 ELLIOT AVE D 703MW
MPLS MN
55401

SENATE COUN OFF J ST MARI
STATE CAPITOL
ST PAUL MN
55101

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SMERIKA WN.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STENSLAND M.E. PRES. MVMA
203 NW 22ND ST.
AUSTIN MN
55912

SUSSEL CO.ATTN:TED SCHWENKER
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VOGEL HOWARD G
814 FLOUR EXCH BLDG
MPLS MN
55415

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

WELLS G W INS FED OF MINN
RT 4 BOX 194
WAYZATA MN
55391

WEST & GOWAN
ATTORNEYS AT LAW
PINE ISLAND MN
55963

WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

WIS FEEDER PIG MARKET CO-

FRANCIS CREEK WI

WYANT CLINTON W ATTY

ATKIN MN
56431

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MERRITT GRANT POLLUTION C
OAK & DELAWARE
MPLS MN
55440

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MN. ASN.C&IND H.D.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MINN AFL-CIO, L O LA SHO
414 AUDITORIUM ST
ST PAUL MN
55102

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN AUTOMOBILE DEALERS A
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

MINN HWYS MANAGEMENT SERVICE
410 HWY BLDG
ST PAUL MN
55101

MINN HOUSING INST N T CAR
7801 METRO PKWY
MPLS MN
55420

MINN PETROLEUM COUNCIL
446 BUILDERS EXCH BLDG
MPLS MN
55402

MINN POULTRY & HATCHERY A
BOX 158
MADELIA MN
56062

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL FEDERATION
7600 PARKLAWN STE 457
MPLS MN
55435

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB AC
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN ASSN WATERSHED DIST'

ADA MN
56510

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

MOOD R BLOOMINGTON HLTH D
10200 PENN SO
BLOOMINGTON MN
55431

NASS GEO V HENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NATL CAR RENTAL ATT D MIT
5501 GREEN VALLEY DR
MPLS MN
55437

NAT'L SOLID WASTES-R. GRASSO
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OCONNELL THOMAS
941 LAUREL
ST PAUL MN
55104

OCONNOR GREEN THOMAS ET A
845 NW BANK BLDG
MPLS MN
55402

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PHILLIPS LEGISLATIVE SERVICE
113 W UNIV AVE
ST PAUL MN
55103

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PULSCHER RBT SPRINGSTED I
813 OSBORN BLDG
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

SIMEON DEVELOP CORP
C/O 1ST STATE BK BLDG
PAYNESVILLE MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHINER JOHN T.
297 GOODRICH AVE
ST PAUL MN
55102

SKELLY OIL CO R R WELLINGTON
PO BOX 436
KANSAS CITY MO

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN
55055

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST MIDWAY-SO.ST ANTH.PK.AS
898 RAYMOND AVE.
ST PAUL MN
55114

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
~~820 MINN BLDG~~ 401 First Fed.
ST PAUL MN Bldg
55101

ZATARGA A E CPA
1800 MIDWEST PLAZA BLDG
MPLS MN
55402

ALLEN CLAUDE H
1200 N W BK BLDG
ST PAUL MN
55101

ALTMAN MILTON H
707 DEGREE OF HONOR BLD
ST PAUL MN
55101

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ARMOUR AND COMPANY
UNION STOCK YARDS
SO ST PAUL MN
55075

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARKER KENT
8100 34TH AVE SO
MPLS MN
55420

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BEST FLANAGAN ET AL
1ST NATL BANK BLDG
MPLS MN
55402

BEUTEL ROBERT
BOX 1205
ST CLOUD MN
56301

BROEKER JOHN M
2850 METRO DR SUITE 513
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COX AND KING
600 BUILDERS EXCH
MPLS MN
55402

CROW WING CO PLANNING & A
COURT HOUSE
BRAINERD MN
56401

DANFORTH & ALLEN
731 NW BANK BLDG
MPLS MN
55402

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DAYTON CHAS SIERRA CLUB
400 ROANOKE
MPLS MN
55402

DIEHL JOHN 26 Kenwood PKWY
~~1100 1ST NAT'L BK BLDG~~
~~MPLS~~ ST PAUL MN
~~55402~~ 55105

DOUGLASS BELL
525 OSBORN BLDG
ST PAUL MN
55102

DOYTON MAURICE, MET SEWER
350 METRO SQ BLDG
ST PAUL MN
55101

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FLETCHER RONALD
7900 XERXES AVE S
MPLS MN
55431

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FURLONG DR JOHN
RT 1
BOVEY MN
55709

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GAS HUT INC
4940 VIKING DR
MINNEAPOLIS MN
55435

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HESS DONALD MIDWEST PLANN
2101 HENN BLDG
MPLS MN
55405

HENN CO WELFARE BRD RM 26
COURT HOUSE
MPLS MN
55415

HILL JIM ASSOC. MILK PROD
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUNT MRS CHAS L MECCA
26 E EXCH CENTRAL MANOR
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGVALSON VERN MN.FARM BU
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JOHNSON M.D. FRUNDT & FRU

BLUE EARTH MN
56013

KANE ANTHONY
176 E FIFTH ST
ST PAUL MN
55101

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KNOWLES, LARRY D
8025 33RD AVE N
CRYSTAL MN
55427

KNUTSON DR KEITH,BIOLOGY
ST CLOUD STATE
ST CLOUD MN
56301

LAKE SUPERIOR INDUSTRIAL
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LAUNDERERS&DRY CLEANERS A
W 1ST NATL BK BLDG
ST PAUL MN
55101

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MANTHEY T J PICKANDS MATHER
2000 UNION COMM BLDG
CLEVELAND OH
44115

MASTOR MATTSON HART ET AL
414 ROANOKE BLDG
MPLS MN
55402

Bank Exam. Ex VI

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the matter of the Proposed Adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

AFFIDAVIT OF MAILING

Joann Hutchens, being first duly sworn, deposes and says:

That on the 30th day of November, 1973, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State as well as to all persons listed on the attached sheet as presently being members of the Minnesota Legislature.

Joann Hutchens

Subscribed and sworn to before me this 30th day of November, 1973.

Deborah R. Lingofelt

DEBORAH R. LINGOFELT
Notary Public, Ramsey County, Mn.
My Commission Expires,
September 22, 1978

MINNESOTA STATE SENATORS

Jerald C. Anderson
Box 503
North Branch, 55056

Norbert Arnold
Route 1 - Box 93
Pengilly, 55775

Robert O. Ashbach
1585 Lake Johanna Blvd.
St. Paul, 55112

Otto T. Bang, Jr.
5200 Duggan Plaza
Edina, 55435

Charles Berg
Choko, 56221

John Bernhagen
Route 1
Hutchinson, 55350

Jerome V. Blatz
11044 Glen Wilding Lane
Bloomington, 55431

Winston W. Borden
514 Grove
Brainerd, 56401

Robert J. Brown
106 W. Wilkin St.
Stillwater, 55082

John C. Chenoweth
1378 Searle Street
St. Paul, 55101

Florian Chmielewski
Sturgeon Lake, 55783

Nicholas D. Coleman
79 Western Avenue No.
St. Paul, 55102

George R. Conzemius
800 West Hoffman
Cannon Falls, 55009

Jack Davies
3424 Edmund Blvd.
Minneapolis, 55406

Ralph R. Doty
4107 Dodge Street
Duluth, 55804

Robert Dunn
708 4th Street So.
Princeton, 55371

Richard W. Fitzsimons
303 E. Prairie Avenue
Warren, 56762

Mel Frederick
414 Clyde Street
West Concord, 55985

Edward J. Gearty
3810 Xerxes Ave. No.
Minneapolis, 55412

Baldy Hansen
100 S.E. First St.
Austin, 55912

Mel Hansen
4505 28th Ave. So.
Minneapolis, 55406

Roger Hanson
Vergas, 56587

Jerome M. Hughes
1978 Payne
St. Paul, 55117

Hubert H. Humphrey III
8116 40th Avenue No.
New Hope, 55427

Carl A. Jensen
209 1st Avenue So.
Sleepy Eye, 56085

J. A. Josefson
310 North Grant
Minneota, 56264

John Keefe
201 Oakwood Road
Hopkins, 55343

Stephen Keefe
3255 Pleasant Ave. So.
Minneapolis, 55408

William G. Kirchner
6830 Newton Avenue So.
Richfield, 55423

Jack I. Kleinbaum
1100 23rd Ave. No.
St. Cloud, 56301

Howard A. Knutson
1907 Wood Lane
Burnsville, 55337

Al Kowalczyk
6016 70th Ave. No.
Brooklyn Park, 55429

Harold G. Kreiger
Route 1
Pine Island, 55963

Lew W. Larson
Mabel, 55954

Roger Laufenburger
Main Street
Lewiston, 55952

Robert B. Lewis
1601 Hillsboro Ave. So.
St. Louis Park, 55426

James Lord
Route 4 - Box 950
Excelsior,

Bill McCutcheon
2238 Edgebrook
St. Paul, 55119

MINNESOTA STATE SENATORS (Continued)

John Milton
4101 E. County Line Road
White Bear Lake, 55110

Roger D. Moe
706 East Third Avenue
Ada, 56510

R. Nelson
3820 Bassett Creek Dr.
Golden Valley, 55422

Robert D. North
1642 Blair Avenue
St. Paul, 55104

Edward G. Novak
1424 Arundel Street
St. Paul, 55117

Harmon T. Ogdahl
5026 Morgan Avenue So.
Minneapolis, 55419

Wayne Olhoft
Herman, 56248

Alec G. Olson
Route 1
Spicer, 56288

Howard D. Olson
Route 3
St. James, 56081

John L. Olson
612 Lake Street
Worthington, 56187

Joseph T. O'Neill
1381 Summit Avenue
St. Paul, 55105

John M. Patton
1007 So. Moore
Blue Earth, 56013

A. J. Perpich
4 Lakeside Drive So.
Eveleth, 55734

George F. Perpich
814 N.E. 5th Avenue
Chisholm, 55719

George S. Pillsbury
1320 Bracketts Point Rd.
Wayzata, 55391

Clarence M. Purfeerst
Route #2
Faribault, 55021

Earl W. Renneke
R.R. 2
LeSueur, 56058

David D. Schaaf
6550 E. River Rd. #215
Fridley, 55432

Ed Schrom
Albany, 56307

Douglas H. Sillers
Route 2
Moorhead, 56560

Sam G. Solon
616 West Third Street
Duluth, 55806

Allan H. Spear
2024 Seabury Avenue
Minneapolis, 55406

J. Robert Stassen
2320 Kraft St.
So. St. Paul, 55075

Eugene Stokowski
2231 Stinson Boulevard
Minneapolis, 55418

Robert J. Tennessen
2564 Upton Avenue So.
Minneapolis, 55405

Stanley N. Thorup
319 104th Lane N.E.
Blaine, 55434

Arnulf Ueland, Jr.
2013 Roe Crest Drive
North Mankato, 56001

Myrton O. Wegener
Bertha, 56437

Gerald L. Willet
207 Mill Road
Park Rapids, 56470

STATE REPRESENTATIVES

James L. Adams
4234 19th Avenue South
Mpls. 55407

Salisbury Adams
60 Myrtlewood Road
Wayzata 55391

Richard A. Andersen
3600 Rice Creek Terrace
New Brighton 55112

Delbert F. Anderson
Route 2 Box 57
Starbuck 56381

Glen H. Anderson
Bellingham 56212

Irvin H. Anderson
909 13th Street
International Falls 56649

Lynn H. Becklin
615 S. Dellwood
Cambridge 55008

Jerome J. Belisle
407 Glenbrook Avenue North
St. Paul 55119

Robert C. Bell
807 Heinell Drive
Roseville 55113

Tony Bennett
1414 Mechanic Avenue
St. Paul 55106

Tom Berg
2112 Newton Avenue South
Mpls. 55402

Linda L. Berglin
2648 10th Avenue South
Mpls. 55407

John S. Biersdorf
409 South Broadway
Owatonna 55060

John F. Boland
2454 Ripley Avenue
St. Paul 55109

Arthur M. Braun
Box 10
Greenbush 56726

Bernard J. Brinkman
Richmond 56368

Arne Carlson
4301 Fremont Avenue South
Mpls. 55409

Bernard O. Carlson
1216 Selmser Avenue
Cloquet 55720

Douglas W. Carlson
Sandstone 55072

Lyndon R. Carlson
5819 Halifax Avenue North
Mpls. 55429

James R. Casserly
1100 Vincent Avenue North
Mpls. 55432

Dave Cleary
8924 16th Avenue
Mpls. 55420

J. B. Clifford
9400 Northwood Pkwy.
New Hope 55427

Joe Connors
1410 Trollhagen Drive
Fridley 55421

Robert Culhane
Route 1
Waterville 56096

David R. Cummiskey
117½ Marshall Street
Mankato 56001

Harold J. Dahl
Box 337
Howard Lake 55349

Frank H. DeGroat
Lake Park 56554

Neil B. Dietrich
2171 Knapp Street
St. Paul 55108

Aubrey W. Dirlam
Route 2
Redwood Falls 56283

A. J. Eckstein
411 S. State
New Ulm 56073

Willis R. Eken
Twin Valley 56584

Stanley A. Enebo
3304 E. 25th Street
Mpls. 55406

Dale E. Erdahl
Route 2 Box 50
Blue Earth 56013

Wendell O. Erickson
Hills 56138

Gilbert Esau
Mountain Lake 56159

Ray W. Faricy
2240 Goodrich Ave.
St. Paul 55105

Robert J. Ferderer
440 E. Hoyt Avenue
St. Paul 55101

David O. Fjoslien
Route 2
Brandon 56315

Gary W. Flakne
4901 11th Avenue So.
Mpls. 55417

Mary M. Forsythe
4605 Edina Boulevard
Edina 55424

Stanley J. Fudro
2322 2nd Str. N.E.
Mpls. 55418

Peter X Fugina
5 Merritt Drive
Virginia 55792

Joseph P. Graba
Route 1 Box 94
Wadena 56482

Joseph P. Graw
10730 W. Bloomington Fwy.
Bloomington 55431

Joan R. Growe
16836 Canterbury Drive
Minnetonka 55343

Thomas M. Hagedorn
Route 2
Truman 56088

Walter R. Hanson
1136 Hague Avenue
St. Paul 55104

Neil S. Haugerud
Preston 55965

O. J. Heinitz
2555 Queensland Lane
Wayzata 55391

Julian Hook
251 Yosemite Circle
Golden Valley 55422

Joel Jacobs
11932 Zion Street
Coon Rapids 55433

Mike Jaros
122 Park Avenue
Duluth 55806

Carl M. Johnson
Route 3 Box 124
St. Peter 56082

Douglas J. Johnson
P. O. Box 14
Cook 55723

John W. Johnson
5101 Irving Avenue So.
Mpls. 55419

Robert W. Johnson
1950 Bayard Avenue
St. Paul 55116

Ralph Jopp
Mayer 55360

Tad Jude
Mound 55364

Phyllis Kahn
100 Malcolm Ave. S.E.
Mpls. 55414

William N. Kelly
East Grand Forks 56721

Ray Kempe
310 Christine Lane
West St. Paul 55118

Walter K. Klaus
Route 1
Farmington 55024

Gerald Knickerbocker
10100 Minnetonka Blvd.
Mpls. 55343

Adolph L. Kvam
25 West Lockerbie
Litchfield 55355

Martin Olav Sabo
3129 E. 22nd Street
Mpls. 55406

Gary Laidig
114 N. 4th Street
Bayport 55003

Calvin R. Larson
316 E. Cherry Avenue
Fergus Falls 56537

Jack H. LaVoy
204 W. Faribault Str.
Duluth 55803

Richard R. Lemke
Route 1
Lake City 55041

Ernest A. Lindstrom
7406 Fremont Ave. So.
Richfield 55423

John C. Lindstrom
415 W. 7th Str.
Willmar 56201

Vincent H. Lombardi
6741 Shadow Lake Drive
Lino Lakes
Hugo 55038

Verne E. Long
Route 1 Box 307
Pipestone 56164

George L. Mann
Route 1
Windom 56101

Ernee M. McArthur
2118 55th Ave.
Brooklyn Center 55430

Paul McCarron
732 82nd Ave. N.E.
Spring Lake Park 55414

M. J. "Mac" McCauley
404 E. Howard Str.
Winona 55987

Bob McEachern
601 N. Walnut
St. Michael 55376

Robert J. McFarlin
4329 Coolidge Ave.
St. Louis Park 55424

Helen E. McMillan
1230 Second Drive
Austin 55912

Richard J. Menke
Route 2
Prior Lake 55372

Darrel R. Miller
Route 1
Pine Island 55963

Melvin J. Miller
Randall 56475

Donald M. Moe
456 Summit Avenue
St. Paul 55102

August B. Mueller
Route 1
Arlington 55307

Willard M. Munger
1121 70th Avenue W.
Duluth 55807

Leonard C. Myrah
Route 2
Spring Grove 55974

Ken Nelson
3100 5th Avenue So.
Mpls. 55408

Thomas W. Newcome
2374 Joy Ave.
White Bear Lake 55110

Joseph T. Niehaus
Route 3
Sauk Centre 56378

Fred C. Norton
701 Fairmount Avenue
St. Paul 55105

Michas M. Ohnstad
Box 55
Stacy 55079

STATE REPRESENTATIVES

William R. Ojala
Box 217
Aurora 55705

Richard J. Parish
2565 Vale Crest Road
Golden Valley 55422

Al Patton
Box 163
Sartell 56377

Raymond Pavlak
817 XX Park Lane
So. St. Paul 55075

Robert L. Pavlak
116 W. Belvidere Str.
St. Paul 55107

James Pehler
~~XXXXXXXXXXXX~~
734 14th Ave. So.
St. Cloud 56301

Harry Peterson
Route 2
Madison 56256

Bradley G. Pieper
804 E. 134th Str.
Burnsville 55337

Ray O. Pleasant
9841 Xerxes Curve
Bloomington 55431

Norman Prahl
Box 8
Keewatin 55753

E. W. Quirin
P. O. Box 6537
Rochester 55901

Thomas H. Resner
3714 3rd Str. N.W.
Rochester

James I. Rice
2220 Vincent Ave. No.
Mpls. 55411

Roy R. Ryan
1085 Thomas Ave.
St. Paul 55104

Douglas St. Onge
Route 4 Box 387
Bemidji 56601

John J. Salchert
2120 Memorial Pkwy.
Mpls. 55412

Donald B. Samuelson
1018 Portland Ave.
Brainerd 56401

John J. Sarna
2837 Ulysses
Mpls. 55418

Henry J. Savelkoul
1100 Cedar
Albert Lea 56007

William H. Schreiber
10001 Zane Ave. No.
Brooklyn Park 55443]

Victor Schulz
Route 1
Goodhue 55027

Rodney N. Searle
Route 1
Waseca 56093

Glen Sherwood
Longville Route
Pine River 56474

Harry A. Sieben, Jr.
1311 W. 17th Street
Hastings 55033

Michael R. Sieben
1535 4th Avenue
Newport 55055

Andrew O. Skaar
Route 1
Thief River Falls 56701

Howard E. Smith
North Lakeshore
Crosby 56441

John J. Spanish
P. O. Box 575
Hibbing 55746

Arlan Stangeland
Route 2
Barnesville 56514

Russell P. Stanton
416 N. 5th
Marshall 56258

James C. Swanson
6827 5th Avenue So.
Richfield 55423

John D. Tomlinson
2232 Conway
St. Paul 55119

James Ulland
Route 6 Box 181
Duluth 55804

Robert E. Vanasek
108 2nd Str. N.E.
New Prague 56071

Bruce F. Vento
1534 Atlantic
St. Paul 55106

Gordon O. Voss
11120 N.E. 7th Str.
Blaine 55434

Charles R. Weaver
830 River Lane
Anoka 55303

Stephen G. Wenzel
Little Falls 56345

Richard E. Wigley
Route 2
Crystal 56055

Neil E. Wohlwend
1314 10th Ave. So.
Moorhead 56560

~~XX~~ Raymond O. Wolcott
4110 Coffman Lane
Mpls. 55406

Bank Div. Ex V

STATE OF MINNESOTA
COUNTY OF RAMSEY

CERTIFICATE

In the matter of the Proposed Adoption of Rules of the State Banking Division governing Credit Unions; to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

I hereby certify that the attached 19 sheets constitute the complete list of persons, associations, and other interested groups who as of 10:00 o clock A .M., this 28th day of November, 1973, have requested pursuant to Minn. Stat. Sec. 15.0412, Subd. 4 (1971), that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

SECRETARY OF STATE
Arlen I. Erdahl

By Virginia Daniels

COMMERCE

BANKING

[illegible] AND REAL ESTATE

Anderson, Chas. A., Am.Natl Ins. Co., P.O. Box 6182, Minneapolis 55424

Dorsey, Owen et al, Mr. W. F. Marquart, 2400 1st Natl Bk Bldg., Mpls. 55402

Franke, Jerome E., 211 Roseville Prof.Center,2233 N Hamline St. Paul 55113

Gordon, Avron L., 304 Title Ins. Bldg., Mpls. 55401

Institutional Tax Services Corp., Attn Irwin Kiman, 236 5th Ave,New York, NY 100
Keyes, Thomas R.,Security Schools,4940 Viking Dr,Rm.264, Mpls. 55435
Lerner, Alan B., 650 Madison Ave., New York 22, N. Y.

McCombs & Co., Inc., Box 47, Jenkintown, Pa. 19046

McCrady, Norbert A.,Suite 325, 2850 Metro Dr.,Bloomington 55420

Miller, Jerrold T., 1000 Currie Ave., Minneapolis 55403

~~[illegible]~~

Minnesota League of Credit Unions, 575 University Ave., St.Paul 55103
Robert L. Smith Co., 422 Pioneer Bldg., St. Paul 55101

Savings & Loan League of Minn. 625 2nd Ave. S., Suite 303, Mpls. 2

State Capitol Credit Union, 95 Sherburne St., St. Paul 55103

Strickland, R.M.,Ford Mtr Credit Co., The American Rd., Dearborn, Mich.48121

Suburban Credit Plan Inc., 1551 W. Larpenteur Ave., St. Paul 55113

CREDIT UNIONS

IBM Rochester Employees Credit Union, 3605 Hwy 52 N., Rochester 55901

Minnesota Association of Cooperatives, ~~2651 University Ave., St. Paul 55114~~ 55 Sherburne Ave, St Paul 55103

*Minnesota League of Credit Unions, 575 University Ave., St. Paul 55103

Northwest Airlines Credit Union, Mpls-St. Paul Intl. Airport, St. Paul 55111

Red Owl Stores Employees Credit Union - 215 E. Excelsior Ave., Hopkins 55343

*State Capitol Credit Union, 95 Sherburne St., St. Paul 55103

* Listed twice.

ALBERT, AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

AM CAMPING ASSN MRS LEACOCK
1235 BRIGHTON SQ
NEW BRIGHTON MN
55112

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY R.S. E.L.M.
1222 FOURTH ST. S.E.
MINNEAPOLIS MN
55414

ASMUSSEN, DENNIS, MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARTHOLOW HAROLD E FIRE CHF
2600 109 AVE N W
COON RAPIDS MN
55433

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGGS & MORGAN - B F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

CARPENTER MRS MARY LEE
DOW CHEMICAL 47 BLDG
MIDLAND MICH.
48640

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHAMBERLAIN WARREN D
887 SW 4TH AVE
FARIBAULT MN
55021

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT COMM
230 STATE OFF BLDG
ST PAUL MN
55101

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAVIS HENRY
6301 SHINGLE CREEK
BROOKLYN CTR MN
55429

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

EDINA FIRE D JAMES MCNELLIS
4801 W 50TH ST
EDINA MN
55424

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

EMP HANDICAPPED PERSONS COMM
527 JACKSON RM 227
ST PAUL MN
55101

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EVERETT JERRY NW PETRO ASSN
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1260 NW BANK BLDG
MPLS MN
55402

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FORBES GORDON MINN RRS ASSN
207 UNION DEPOT
ST PAUL MN
55101

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GUSTAFSON MRS D MINN VET MED
24 S 6TH ST
MPLS MN
55402

HARVEY MICHAEL
1390 W M HAHA PKWY
MPLS MN
55409

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

HARTFELDT WILL
415 HAMM BLDG 6TH ST
ST PAUL MN
55102

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUMAN RIGHTS DEPT
60 STATE OFF BLDG
ST PAUL MN
55101

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

KABLE RICHARD W

BETHEL MN
55006

KING, TIMOTHY
3333 OAKLAND AVE S
MPLS MN
55407

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MECCA R.F. NELSON
26 E EXCHANGE ST
ST PAUL MN
55101

MET OPEN SPACE INFOR PROJ
111 E FRANKLIN AVE SO
MPLS MN
55404

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN BD PODIATRY EXAM & REG.
1111 W 2ND ST.
CROOKSTON MN
56716

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN ELECTRICAL ASSN INC
525 SO 7TH
MPLS MN
55415

MINN ENV CONTROL CITIZEN ASN
CENTRAL MANOR 26 E EXCH
ST PAUL MN
55101

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN PUB INT RES DAYTON
2418 UNIV AVE SE
MPLS MN
55414

MINN REP STATE CEN COMM
~~4900 VIKING DR~~ 555 WABASHA
~~MPLS~~ ST PAUL MN
~~55435~~ 55102

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SCH BUS OPERATORS ASSN

FARIBAULT MN
55021

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN ST BD PHAR P G GRUSSING
1965 FORD PKWY
ST PAUL MN
55116

MINN STATE OPTOMETRIC ASSN
333 E HENNEPIN AVE
MPLS MN
55414

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN
56321

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NELSON DONALD E NSP CO
414 NICOLLET AVE
MPLS MN
55401

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

PETERSEN JOHN W
525 OSBORN BLDG
ST PAUL MN
55102

PORTER LYLE O

TRACY MN
56175

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

MINN WISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NURSING HOME ADMRS BD EXAMRS
277 W UNIV AVE
ST PAUL MN
55103

O'BRIEN J.DENNIS
1200 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OHMAN W C NATL ELEC CONTRS
608 AM NATL BK
ST PAUL MN
55101

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

RACHNER MARY JANE
1917 PINEHURST AVE
ST PAUL MN
55116

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

SAN SIMEON DEVELOP CORP
OLD [illegible]ST STATE BK BLDG
PAY[illegible]SVILLE MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHINER JOHN T.
297 GOODRICH AVE
ST PAUL MN
55102

SKELLY OIL CO R R WELLINGTON
PO BOX 436
KANSAS CITY MO

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN
55055

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST MIDWAY-SO.ST ANTH.PK.AS
898 RAYMOND AVE.
ST PAUL MN
55114

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
~~828 MINN BLDG~~ 401 First Fed. Bldg
ST PAUL MN
55101

ZATARGA A E CPA
1800 MIDWEST PLAZA BLDG
MPLS MN
55402

ALLEN CLAUDE H
1200 N W BK BLDG
ST PAUL MN
55101

ALTMAN MILTON H
707 DEGREE OF HONOR BLD
ST PAUL MN
55101

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ARMOUR AND COMPANY
UNION STOCK YARDS
SO ST PAUL MN
55075

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARKER KENT
8100 34TH AVE SO
MPLS MN
55420

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEMIDJI STATE COLLEGE
PLACEMENT BUR. J.C. BRADY
BEMIDJI MN
56601

BEST FLANAGAN ET AL
1ST NATL BANK BLDG
MPLS MN
55402

BEUTEL ROBERT
BOX 1205
ST CLOUD MN
56301

BROEKER JOHN M
2850 METRO DR SUITE 513
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

✓ BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

✓ BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

✓ CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

✓ CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

✓ CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

✓ CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

✓ CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

✓ COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

✓ COLLIN LAURENCE
RT 2
ISANTI MN
55040

✓ COX AND KING
600 BUILDERS EXCH
MPLS MN
55402

✓ CROW WING CO PLANNING & A
COURT HOUSE
BRAINERD MN
56401

✓ DANFORTH & ALLEN
731 NW BANK BLDG
MPLS MN
55402

✓ DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

✓ DAYTON CHAS SIERRA CLUB
400 ROANOKE
MPLS MN
55402

✓ DIEHL JOHN 26 Kenwood PKWY
~~1100 1ST NATL BK BLDG~~
~~MPLS~~ ST PAUL MN
~~55402~~ 55105

✓ DOUGLASS BELL
525 OSBORN BLDG
ST PAUL MN
55102

✓ DOYTON MAURICE, MET SEWER
350 METRO SQ BLDG
ST PAUL MN
55101

✓ EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

✓ ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

✓ ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FLETCHER RONALD
7900 XERXES AVE S
MPLS MN
55431

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FURLONG DR JOHN
RT 1
BOVEY MN
55709

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GAS HUT INC
4940 VIKING DR
MINNEAPOLIS MN
55435

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HESS DONALD MIDWEST PLANN
2101 HENN BLDG
MPLS MN
55405

HENN CO WELFARE BRD RM 26
COURT HOUSE
MPLS MN
55415

HILL JIM ASSOC.MILK PROD
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COM
RM 109 STATE CAPITOL
ST PAUL MN
55101

✓ HUNT MRS CHAS L MECCA
26 E EXCH CENTRAL MANOR
ST PAUL MN
55101

✓ HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

✓ INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

✓ INGVALSON VERN MN.FARM BU
3110 WOODDALE DR PO 337
OST PAUL MN
55165

✓ IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

✓ JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

✓ JOHNSON M.D. FRUNDT & FRU

BLUE EARTH MN
56013

✓ KANE ANTHONY
176 E FIFTH ST
ST PAUL MN
55101

✓ KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

✓ KNOWLES, LARRY D
8025 33RD AVE N
CRYSTAL MN
55427

✓ KNUTSON DR KEITH,BIOLOGY
ST CLOUD STATE
ST CLOUD MN
56301

✓ LAKE SUPERIOR INDUSTRIAL
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

✓ LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

✓ LAUNDERERS&DRY CLEANERS A
W 1ST NATL BK BLDG
ST PAUL MN
55101

✓ LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

✓ LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

✓ MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

✓ MANTHEY T J PICKANDS MATHER
2000 UNION COMM BLDG
CLEVELAND OH
44115

✓ MASTOR MATTSON HART ET AL
414 ROANOKE BLDG
MPLS MN
55402

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MN. ASN.C&IND H.D.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN HWYS MANAGEMENT SERVICE
410 HWY BLDG
ST PAUL MN
55101

MINN PETROLEUM COUNCIL
446 BUILDERS EXCH BLDG
MPLS MN
55402

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MERRITT GRANT POLLUTION C
OAK & DELAWARE
MPLS MN
55440

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MINN AFL-CIO, L O LA SHO
414 AUDITORIUM ST
ST PAUL MN
55102

MINN AUTOMOBILE DEALERS A
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

MINN HOUSING INST N T CAR
7801 METRO PKWY
MPLS MN
55420

MINN POULTRY & HATCHERY A
BOX 158
MADELIA MN
56062

MINN RETAIL FEDERATION
7600 PARKLAWN STE 457
MPLS MN
55435

MINN SOC CERTIFIED PUB AC
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN ASSN WATERSHED DIST
ADA MN
56510

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

NASS GEO V HENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NAT'L SOLID WASTES-R. GRASSO
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

OCONNELL THOMAS
941 LAUREL
ST PAUL MN
55104

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

PAYNE COL ALVIN

DEGRAFF MN
56233

PHILLIPS LEGISLATIVE SERVICE
113 W UNIV AVE
ST PAUL MN
55103

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

MOOD R BLOOMINGTON HLTH D
10200 PENN SO
BLOOMINGTON MN
55431

NATL CAR RENTAL ATT D MIT
5501 GREEN VALLEY DR
MPLS MN
55437

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OCONNOR GREEN THOMAS ET A
845 NW BANK BLDG
MPLS MN
55402

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PULSCHER RBT SPRINGSTED I
813 OSBORN BLDG
ST PAUL MN
55102

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROCHE T E
5007 FREMONT AVE S
MPLS MN
55419

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SATHRE, HARVEY
77 SHERBURNE
ST PAUL MN
55103

ST PAUL ASSN PLBG HTG MEC
614 AM NATL BK
ST PAUL MN

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHAPS NICHOLAS
100 DAIN TOWER
MPLS MN
55402

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SEARS ROEBUCK & CO
2929 ELLIOT AVE D 703MW
MPLS MN
55401

SENATE COUN OFF J ST MARI
STATE CAPITOL
ST PAUL MN
55101

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SMERIKA WN.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STENSLAND M.E. PRES. MVMA
203 NW 22ND ST.
AUSTIN MN
55912

SUSSEL CO.ATTN:TED SCHWENKER
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VOGEL HOWARD G
814 FLOUR EXCH BLDG
MPLS MN
55415

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

✓WELLS G W INS FED OF MINN
RT 4 BOX 194
WAYZATA MN
55391

✓WEST & GOWAN
ATTORNEYS AT LAW
PINE ISLAND MN
55963

✓WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

✓WIS FEEDER PIG MARKET CO-
FRANCIS CREEK WI

✓WYANT CLINTON W ATTY
ATKIN MN
56431

ADDITIONS TO GENERAL LIST

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	ST	ZIP CODE
BELISLE JON	2040 WILSON #28	ST PAUL	MN	55119
BRIGHAM E M III	RR4	RED WING	MN	55066
GEORGE K GRANSE CO	1477 SELBY AVE	ST PAUL	MN	55104
LOWE DOUG	2701 N LEXINGTON AVE	ROSEKILLE	MN	55113
THOMPSON MESSIAN ET AL	1500 MIDWEST PLAZA BLDG	MPLS	MN	55402
LEAGUE MN MUNIC MC ADDICKS	3300 UNIV AVE SE	MPLS	MN	55414

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	STATE	ZIP CODE
COMMUNITY DESIGN CENTER	410 CEDAR ST	MPLS	MN	55404
MPX SERV GEN RESOURCE COMM	6340 INDUSTRIAL DR	HOPKINS	MN	55343
DAWSON JAMES	265 S LEXINGTON PKWY	ST PAUL	MN	55102
H S FULLER CO	2400 KASOTA AVE	ST PAUL	MN	55108
ERICSON ROGER TIMMONS CO	241 N 1ST AVE	MPLS	MN	55401
SCHULTZ D B MN DIV ON REMTOR	1611 KASOTA BLVD	MPLS	MN	55414
SUPERIOR R L HOWDY GIL INC	2201 25TH AVE S	MPLS	MN	55406

COMMERCE

BANKING

[illegible] AND REAL ESTATE

Anderson, Chas. A., Am.Natl Ins. Co., P.O. Box 6182, Minneapolis 55424

Dorsey, Owen et al, Mr. W. F. Marquart, 2400 1st Natl Bk Bldg., Mpls. 55402

Franke, Jerome E., 211 Roseville Prof.Center,2233 N Hamline St. Paul 55113

Gordon, Avron L., 304 Title Ins. Bldg., Mpls. 55401

Institutional Tax Services Corp., Attn Irwin Kiman, 236 5th Ave,New York, NY 1000
Keyes, Thomas R.,Security Schools,4940 Viking Dr,Rm.264, Mpls. 55435
Lerner, Alan B., 650 Madison Ave., New York 22, N. Y.

McCombs & Co., Inc., Box 47, Jenkintown, Pa. 19046

McCrady, Norbert A.,Suite 325, 2850 Metro Dr.,Bloomington 55420

Miller, Jerrold T., 1000 Currie Ave., Minneapolis 55403

[illegible]

Minnesota League of Credit Unions, 575 University Ave., St.Paul 55103
Robert L. Smith Co., 422 Pioneer Bldg., St. Paul 55101

Savings & Loan League of Minn. 625 2nd Ave. S., Suite 303, Mpls. 2

[illegible]

State Capitol Credit Union, 95 Sherburne St., St. Paul 55103
Strickland, R.M.,Ford Mtr Credit Co., The American Rd., Dearborn, Mich.48121

Suburban Credit Plan Inc., 1551 W. Larpenteur Ave., St. Paul 55113

CREDIT UNIONS

IBM Rochester Employees Credit Union, 3605 Hwy 52 N., Rochester 55901
Minnesota Association of Cooperatives, ~~2651 University Ave., St. Paul 55114~~
55 Sherburne Ave, St Paul 55103

Minnesota League of Credit Unions, 575 University Ave., St. Paul 55103

Northwest Airlines Credit Union, Mpls-St. Paul Intl. Airport, St. Paul 55111

Red Owl Stores Employees Credit Union - 215 E. Excelsior Ave., Hopkins 55343

State Capitol Credit Union, 95 Sherburne St., St. Paul 55103

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

AM CAMPING ASSN MRS LEACOCK
1235 BRIGHTON SQ
NEW BRIGHTON MN
55112

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY R.S. E.L.M.
1222 FOURTH ST. S.E.
MINNEAPOLIS MN
55414

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

ASSOCIATED INDUST OF MPLS
NATIONAL BLDG
MPLS MN
55402

BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
55075

BARTHOLOW HAROLD E FIRE CHF
2600 109 AVE N W
COON RAPIDS MN
55433

BECKLIN ROBERT C
447 N W 4TH
CAMBRIDGE MN
55008

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGGS & MORGAN - B F FRIEL
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BROWN D M GOODRIDGE PUB SCH
IND DIST #561
GOODRIDGE MN
56725

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

CARPENTER MRS MARY LEE
DOW CHEMICAL 47 BLDG
MIDLAND MICH.
48640

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHAMBERLAIN WARREN D
887 SW 4TH AVE
FARIBAULT MN
55021

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT COMM
230 STATE OFF BLDG
ST PAUL MN
55101

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DAVIS HENRY
6301 SHINGLE CREEK
BROOKLYN CTR MN
55429

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

EDINA FIRE D JAMES MCNELLIS
4801 W 50TH ST
EDINA MN
55424

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

EMP HANDICAPPED PERSONS COMM
527 JACKSON RM 227
ST PAUL MN
55101

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EVERETT JERRY NW PETRO ASSN
512 NICOLLET MALL RM917
MPLS MN
55402

FAEGRE & BENSON ATTN LIBR
1260 NW BANK BLDG
MPLS MN
55402

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FORBES GORDON MINN RRS ASSN
207 UNION DEPOT
ST PAUL MN
55101

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

F W WOOLWORTH CO
3316 W 66TH ST
EDINA MN
55424

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GUSTAFSON MRS D MINN VET MED
24 S 6TH ST
MPLS MN
55402

HARVEY MICHAEL
1390 W M HAHA PKWY
MPLS MN
55409

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

HARTFELDT WILL
415 HAMM BLDG 6TH ST
ST PAUL MN
55102

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HULSTRAND ANDERSON & LARSON
PO BOX 130
WILLMAR MN
56201

HUMAN RIGHTS DEPT
60 STATE OFF BLDG
ST PAUL MN
55101

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

KABLE RICHARD W

BETHEL MN
55006

KING,TIMOTHY
3333 OAKLAND AVE S
MPLS MN
55407

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MECCA R.F. NELSON
26 E EXCHANGE ST
ST PAUL MN
55101

MET OPEN SPACE INFOR PROJ
111 E FRANKLIN AVE SO
MPLS MN
55404

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN BD PODIATRY EXAM & REG.
1111 W 2ND ST.
CROOKSTON MN
56716

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN ELECTRICAL ASSN INC
525 SO 7TH
MPLS MN
55415

MINN ENV CONTROL CITIZEN ASN
CENTRAL MANOR 26 E EXCH
ST PAUL MN
55101

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MINN PUB INT RES DAYTON
2418 UNIV AVE SE
MPLS MN
55414

MINN REP STATE CEN COMM
~~4900 VIKING DR~~ 555 WABASHA
~~MPLS~~ ST PAUL MN
~~55435~~ 55102

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN SCH BUS OPERATORS ASSN

FARIBAULT MN
55021

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN ST BD PHAR P G GRUSSING
1965 FORD PKWY
ST PAUL MN
55116

MINN STATE OPTOMETRIC ASSN
333 E HENNEPIN AVE
MPLS MN
55414

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MINN-WISC BOUNDARY AREA COMM
600 2ND ST
HUDS WI
54016

MOONEY, MICHAEL A.
BOX 903, ST.JOHN'S UNIV
COLLEGEVILLE MN
56321

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NELSON DONALD E NSP CO
414 NICOLLET AVE
MPLS MN
55401

NEUMAN RALPH W.
RT 2 BOX 125
EMBARRASS MN
55732

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
277 W UNIV AVE
ST PAUL MN
55103

O'BRIEN J.DENNIS
1200 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OHMAN W C NATL ELEC CONTRS
608 AM NATL BK
ST PAUL MN
55101

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PETERSEN JOHN W
525 OSBORN BLDG
ST PAUL MN
55102

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PORTER LYLE O

TRACY MN
56175

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

RACHNER MARY JANE
1917 PINEHURST AVE
ST PAUL MN
55116

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RAMSEY CO MEDICAL SOCIETY
1500 LOWRY MEDICAL BLDG
ST PAUL MN
55102

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHINER JOHN T.
297 GOODRICH AVE
ST PAUL MN
55102

SKELLY OIL CO R R WELLINGTON
PO BOX 436
KANSAS CITY MO

STATE BD.BARBER EXAMINERS
555 WABASHA
ST PAUL MN
55102

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VILLAGE OF WOODBURY-F.STRONG
561 TOWER DRIVE
NEWPORT MN
55055

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST MIDWAY-SO.ST ANTH.PK.AS
898 RAYMOND AVE.
ST PAUL MN
55114

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
~~820 MINN BLDG~~ 401 First Fed.
ST PAUL MN Bldg
55101

ZATARGA A E CPA
1800 MIDWEST PLAZA BLDG
MPLS MN
55402

ALLEN CLAUDE H
1200 N W BK BLDG
ST PAUL MN
55101

ALTMAN MILTON H
707 DEGREE OF HONOR BLD
ST PAUL MN
55101

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ARMOUR AND COMPANY
UNION STOCK YARDS
SO ST PAUL MN
55075

ARVER JOHN A
2467 COHANCY
ST PAUL MN
55113

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARKER KENT
8100 34TH AVE SO
MPLS MN
55420

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BEMIDJI STATE COLLEGE
PLACEMENT BUR.J.C.BRADY
BEMIDJI MN
56601

BEST FLANAGAN ET AL
1ST NATL BANK BLDG
MPLS MN
55402

BEUTEL ROBERT
BOX 1205
ST CLOUD MN
56301

BROEKER JOHN M
2850 METRO DR SUITE 513
BLOOMINGTON MN
55420

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CENTRAL BUSINESS DATA
BENSON RADIO ARCADE BLD
BENSON MN
56215

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

COLEMAN NICHOLAS D
700 LINWOOD AVE
ST PAUL MN
55105

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COX AND KING
600 BUILDERS EXCH
MPLS MN
55402

CROW WING CO PLANNING & A
COURT HOUSE
BRAINERD MN
56401

DANFORTH & ALLEN
731 NW BANK BLDG
MPLS MN
55402

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DAYTON CHAS SIERRA CLUB
400 ROANOKE
MPLS MN
55402

DIEHL JOHN 26 Kenwood PKWY
~~1100 1ST NATL BK BLDG~~
~~MPLS~~ ST PAUL MN
~~55402~~ 55105

DOUGLASS BELL
525 OSBORN BLDG
ST PAUL MN
55102

DOYTON MAURICE, MET SEWER
350 METRO SQ BLDG
ST PAUL MN
55101

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWALD DOUGLAS MINN HOSP ASSN
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FLETCHER RONALD
7900 XERXES AVE S
MPLS MN
55431

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FURLONG DR JOHN
RT 1
BOVEY MN
55709

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GAS HUT INC
4940 VIKING DR
MINNEAPOLIS MN
55435

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HESS DONALD MIDWEST PLANN
2101 HENN BLDG
MPLS MN
55405

HENN CO WELFARE BRD RM 26
COURT HOUSE
MPLS MN
55415

HILL JIM ASSOC.MILK PROD
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HOUSE ED STANDING SUB COM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HUNT MRS CHAS L MECCA
26 E EXCH CENTRAL MANOR
ST PAUL MN
55101

HUNT JAMES P JR
11470 GALTIER DR
BURNSVILLE MN
55378

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGVALSON VERN MN.FARM BU
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JOHNSON M.D. FRUNDT & FRU

BLUE EARTH MN
56013

KANE ANTHONY
176 E FIFTH ST
ST PAUL MN
55101

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KNOWLES, LARRY D
8025 33RD AVE N
CRYSTAL MN
55427

KNUTSON DR KEITH,BIOLOGY
ST CLOUD STATE
ST CLOUD MN
56301

LAKE SUPERIOR INDUSTRIAL
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LAUNDERERS&DRY CLEANERS A
W 1ST NATL BK BLDG
ST PAUL MN
55101

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MANTHEY T J PICKANDS MATHER
2000 UNION COMM BLDG
CLEVELAND OH
44115

MASTOR MATTSON HART ET AL
414 ROANOKE BLDG
MPLS MN
55402

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MERRITT GRANT POLLUTION C
OAK & DELAWARE
MPLS MN
55440

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MN. ASN.C&IND H.D.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MINN AFL-CIO, L O LA SHO
414 AUDITORIUM ST
ST PAUL MN
55102

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN AUTOMOBILE DEALERS A
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN DENTAL HYGIENISTS
5041 YVONNE TERRACE
MPLS MN
55436

MINN ENV LAW INST INC
PO BOX 15076 COMM STA
MPLS MN
55415

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

MINN HWYS MANAGEMENT SERVICE
410 HWY BLDG
ST PAUL MN
55101

MINN HOUSING INST N T CAR
7801 METRO PKWY
MPLS MN
55420

MINN PETROLEUM COUNCIL
446 BUILDERS EXCH BLDG
MPLS MN,
55402

MINN POULTRY & HATCHERY A
BOX 158
MADELIA MN
56062

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN 55
104

MINN RETAIL FEDERATION
7600 PARKLAWN STE 457
MPLS MN
55435

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN SOC CERTIFIED PUB AC
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE CAPITOL EMP UNION
PO BOX 3215
ST PAUL MN
55165

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN ASSN WATERSHED DIST'

ADA MN
56510

MOFFITT R.C. DIR.ENV.CONTROL
MPLS.CITY HALL RM 301M
MPLS MN
55415

MOOD R BLOOMINGTON HLTH D
10200 PENN SO
BLOOMINGTON MN
55431

NASS GEO V HENN CO GEN HOSP
5TH AND PORTLAND AVE
MPLS MN
55415

NATL CAR RENTAL ATT D MIT
5501 GREEN VALLEY DR
MPLS MN
55437

NAT'L SOLID WASTES-R. GRASSO
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OCONNELL THOMAS
941 LAUREL
ST PAUL MN
55104

OCONNOR GREEN THOMAS ET A
845 NW BANK BLDG
MPLS MN
55402

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PHILLIPS LEGISLATIVE SERVICE
113 W UNIV AVE
ST PAUL MN
55103

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PULSCHER RBT SPRINGSTED I
813 OSBORN BLDG
ST PAUL MN
55102

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROCHE T E
5007 FREMONT AVE S
MPLS MN
55419

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SATHRE, HARVEY
77 SHERBURNE
ST PAUL MN
55103

ST PAUL ASSN PLBG HTG MEC
614 AM NATL BK
ST PAUL MN

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHAPS NICHOLAS
100 DAIN TOWER
MPLS MN
55402

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SEARS ROEBUCK & CO
2929 ELLIOT AVE D 703MW
MPLS MN
55401

SENATE COUN OFF J ST MARI
STATE CAPITOL
ST PAUL MN
55101

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SHELL OIL CO. W.A. ROQUET
ONE SHELL PLAZA BX 2463
HOUSTON TX
77001

SMERIKA WN.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STENSLAND M.E. PRES. MVMA
203 NW 22ND ST.
AUSTIN MN
55912

SUSSEL CO.ATTN:TED SCHWENKER
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

TWIN CITY RETAIL DRUGGIST
2388 UNIV AVE
ST PAUL MN
55104

VAN CLEVE JOHN H
2101 HENN AVE
MPLS MN
55405

VOGEL HOWARD G
814 FLOUR EXCH BLDG
MPLS MN
55415

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

WELLS G W INS FED OF MINN
RT 4 BOX 194
WAYZATA MN
55391

WEST & GOWAN
ATTORNEYS AT LAW
PINE ISLAND MN
55963

WM.MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST.PAUL MN
55105

WIS FEEDER PIG MARKET CO-

FRANCIS CREEK WI

WYANT CLINTON W ATTY

ATKIN MN
56431

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	ST	ZIP CODE
COMMUNITY DESIGN CENTER	1115 E 24th St	MPLS	MN	55404
ENV SERV - GEN RESOURCE COOR	6340 INDUSTRIAL DR	MAPLEWOOD	MN	55109
JOHNSON LANCE J	2651 S LAKEVIEW RD	ST PAUL	MN	55107
L P FULLER CO	2400 KASOTA AVE	ST PAUL	MN	55108
ERICSON ROGER TENNANT CO	701 N LILAC DR	MPLS	MN	55422
BERNERT D R MINN ASSN REALTORS	1821 UNIVERSITY AVE	MPLS	MN	55104
BUETTNER R L HONEYWELL INC	2701 4TH AVE S	MPLS	MN	55408

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	STATE	ZIP CODE
BELISLE JON	2040 WILSON #28	ST PAUL	MN	55119
BRIGHAM E M III	RR4	RED WING	MN	55066
GEORGE K GRANSE CO	1477 SELBY AVE	ST PAUL	MN	55104
LOWE DOUG	2701 N LEXINGTON AVE	ROSEVILLE	MN	55113
THOMPSON MESSIAN Ed AL	1500 MIDWEST PLAZA BLDG	MPLS	MN	55402
LEAGUE MN MUNIC MC ADDICKS	3300 UNIV AVE SE	MPLS	MN	55414

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	ST	ZIP CODE
COMMUNITY DESIGN CENTER	1113 E LAGOON ST	MPLS	MN	55408
NEW GEN-GEN RESOURCE COAL	6340 ENTERPRISE DR	MAHTOMEDI	MN	55115
THOMAS LANGE JR	2851 S LEXINGTON PKWY	ST PAUL	MN	55123
L.D. SHUMAN CO	2400 KASOTA AVE	ST PAUL	MN	55108
BRUCE ROGER TEKLAND CO	201 N LILAC DR	MPLS	MN	55422
RICHARD D. R. NELSON REALTOR	2101 KASOTA BLVD	MPLS	MN	55418
DIRECTOR R.L. HOMEMELT INC	2201 15th AVE S	MPLS	MN	55404

STATE OF MINNESOTA
OFFICE of SECRETARY of STATE

NOTICE of HEARINGS MAILING LABEL SYSTEM

NAME	ADDRESS STREET	CITY	STATE	ZIP CODE
BELISLE JON	2040 WILSON #28	ST PAUL	MN	55119
BRIGHAM E M III	RR4	RED WING	MN	55066
GEORGE K GRANSE CO	1477 SELBY AVE	ST PAUL	MN	55104
LOWE DOUG	2701 N LEXINGTON AVE	ROSEVILLE	MN	55113
THOMPSON HESSIAN Et AL	1500 MIDWEST PLAZA BLDG	MPLS	MN	55402
LEAGUE MN MUNIC MC ADDICKS	3300 UNIV AVE SE	MPLS	MN	5541

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE EDWARD J. DRISCOLL
COMMISSIONER OF COMMERCE

In the Matter of Proposed Rules of the State Banking Division Governing Credit Unions; to Require Certificates where Record-keeping Services are Exchanged; to Require Financial Statements from Certain Persons; to Restrict Fields of Operation in the Calculation of Delinquency and Real Estate Loans; to Require Certain Investment Records; to Regulate Insurance, and to Regulate C.P.A. Audits.

CERTIFICATE
OF
APPROVAL

I, Edward J. Driscoll, Commissioner of Commerce of the State of Minnesota, pursuant to the authority granted by Minnesota Statutes, Section 45.021 (1971), hereby certify my approval of the above-entitled proposed rules and regulations of the State Banking Division governing Credit Unions, as ordered adopted by Commissioner Robert A. Mampel on March 27, 1974.

STATE OF MINNESOTA
COMMERCE COMMISSION



EDWARD J. DRISCOLL
State Commerce Commissioner

Bank Div Ex VIII

STATE OF MINNESOTA
COUNTY OF RAMSEY

BEFORE ROBERT A. MAMPEL
COMMISSIONER OF BANKS

In the matter of Proposed Rules of the State Banking Division governing Credit Unions to require certificates where recordkeeping services are exchanged; to require financial statements from certain persons; to restrict fields of operation and the calculation of delinquency on real estate loans; to require certain investment records; to regulate insurance, and to regulate C.P.A. audits.

STATEMENT OF NEED

The Banking Division of the Department of Commerce, State of Minnesota, proposes to adopt and amend rules to implement Chapter 52 of the Laws of Minnesota, 1973 (hereinafter referred to as the "Act"). The last time the credit union rules were amended was February 24, 1967.

The need to adopt these proposed rules arises as follows: BD 135 (a) to require certificates where recordkeeping services are exchanged so that the Commissioner of Banks may conduct an examination irrespective of where the records are kept; BD 139 (c) to eliminate a restricted ruling which has proved to be impractical; BD 139 (c) (3) to bring existing requirements into line with present economic conditions; BD 140 to update the present language due to new legislation; BD 145 (c) to be consistent with NCUA federal share insurance method of calculating delinquency on real estate loans; BD 146 to require credit unions to maintain investment records in the same manner as now asked of state banks; BD 148 to implement the statute provisions pertaining to insurance, the purchase of which was allowed to members of a credit union on a voluntary basis; and finally BD 149 to set out the ground rules which are required of a C.P.A. audit in lieu of an examination.

The above captioned rules are necessary to implement and make effective the provisions and purposes of the Act and to establish objective standards for the purpose of advising those subject to the Act of their rights and obligations thereunder.

STATE OF MINNESOTA
BANKING DIVISION

ROBERT A. MAMPEL
Commissioner of Banks

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of Proposed Rules of the State Banking Division Governing Credit Unions; to Require Certificates where Record-keeping Services are Exchanged; to Require Financial Statements from Certain Persons; to Restrict Fields of Operation in the Calculation of Delinquency and Real Estate Loans; to Require Certain Investment Records; to Regulate Insurance, and to Regulate C.P.A. Audits.

STATEMENT OF COMPLIANCE WITH MANUAL OF RULE-MAKING PROCEDURES

I, Special Assistant Attorney General Charles I. Wikelius, do hereby declare that I have examined the proposed rules and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.

Charles I. Wikelius
Special Assistant Attorney General

Dated: April 3, 1974

STATE OF MINNESOTA

COUNTY OF RAMSEY

BEFORE ROBERT A. MAMPEL
COMMISSIONER OF BANKS

In the Matter of Proposed Rules of the State Banking Division Governing Credit Unions; to Require Certificates where Record-keeping Services are Exchanged; to Require Financial Statements from Certain Persons; to Restrict Fields of Operation in the Calculation of Delinquency and Real Estate Loans; to Require Certain Investment Records; to Regulate Insurance, and to Regulate C.P.A. Audits.

FINDINGS OF FACT

The above-entitled matter came on for hearing before the Hearing Examiner, duly appointed by the Commissioner of Banks of the State of Minnesota, on the 9th day of January, 1974, at 9:30 A.M. in the Department of Commerce Hearing Room, Fifth Floor, Metro Square Building, 7th and Robert Streets, Saint Paul, Minnesota, after proper notice required by Minnesota Statutes 1971, Section 15.0412, was served upon all persons, associations, and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements, and arguments, having heard all the testimony, having considered all the evidence adduced and upon the records, files, and proceedings herein, I find the following:

1) That electronic Data Processing Services have been shown to state credit union examiners, in examinations over the past four years, to produce the proper subsidiary, ledger trial balances, audit trail, and other information needed for examination. Therefore, the portion of Minn. Reg BD 135 (a) which required that a credit union obtain approval of the Commissioner before using such services is no longer necessary.

That it is necessary that credit unions and service corporations which receive or furnish recordkeeping services to credit unions provide certificates stating the consent of such institutions to be subject to Banking Division Rules and Regulations if

the Commissioner of Banks is to have access to all credit union records when conducting examinations pursuant to his statutory responsibility.

No credible evidence contrary to these findings was adduced at the hearing.

2) That administrative experience has shown that the limitations imposed by Minn. Reg BD 139 (c) (1) were burdensome on credit union members and forced members to seek other sources of credit. Since the regulation was unworkable, it is removed.

That current inflationary economic conditions, including higher personal income of credit union members, demonstrate a need to increase the dollar limit on the size of loans that may be made without security or signed financial statements.

No credible evidence contrary to these findings was adduced at the hearing.

3) That the language of the newly-enacted Minnesota Statutes, Section 52.05 (1973 Supp.), is in conflict with Minn. Reg BD 140. The amendment to BD 140 is necessary to resolve this conflict, and to make the regulation comply with the statute in its current form.

An objection was raised to BD 140, as proposed. It was suggested that this regulation be deleted, since the statute is explicit and the regulation only slightly different from the statute. However, testimony showed that the regulation does serve the purpose of clarifying the eligibility of blood relatives of spouses of members, and I find that the objection is not well taken.

No other evidence contrary to this finding was adduced at the hearing.

4) That the calculation of delinquency on real estate loans by the National Credit Union Administration has been different from that set forth by Minn. Reg BD 145. The amendment to BD 145 makes the regulation conform with the federal requirements and facilitates supervision. Objection was raised to BD 145. It was suggested that this change not be made because the standard it set out was more stringent than that applied to savings and loan associations. However, since savings and loan associations are a different type of financial institution, to which different standards must be applied, I find that the objection is not well taken.

No other evidence contrary to this finding was adduced at the hearing.

5) That administrative experience has proven Minn. Reg BD 146 to be unsuitable, since lists of conforming investments were not publicized. In its place, the regulation is modified to put credit union recordkeeping on the same basis as record-keeping for banks. This will facilitate examination and provide for uniform procedures for the handling of security premiums and the taking into earnings of the accretion of discount.

No credible evidence contrary to this finding was adduced at the hearing.

6) That the Legislature has authorized credit unions to facilitate its members' voluntary purchase of types of insurance. Minnesota Statutes, Section 52.04 (1973 Supp.). The Banking Division has taken administrative notice of the fact that 10% of gross premiums provides the upper limit on actual costs to a credit union of performing ministerial duties pertaining to insurance; furthermore, that the credit union is only allowed to facilitate the voluntary purchase of insurance, and that a written elective is needed to demonstrate that the purchase of insurance is voluntary.

Objections were raised to the wording of the proposed Minn. Reg BD 148 because it indicated that the lender could not require the purchase of insurance pursuant to the granting of credit. The proposed regulation is modified to clarify the fact that the borrower may elect to purchase his insurance from the insurance vendor of his choice.

Objection was also made that this requirement would be difficult to administer. However, I find that the need for proof of the voluntariness of the purchase of insurance outweighs the administrative difficulties involved.

No other evidence contrary to the amended rules was adduced at hearing.

7) That the Banking Division has been directed by the Legislature to define the type of audit to be performed by a Certified Public Accountant in place of an annual examination. Minnesota Statutes, Section 52.06, Subd. 1, (1973 Supplement). Administrative experience has shown that any such audit must include, at a minimum, such information as is reported by state credit union examiners on state report forms.

Objection was made to the proposed Minn. Reg BD 149 on the ground that the audit, as proposed, did not meet the needs of a Certified Public Accountant audit. The proposed rule is modified

to permit a Certified Public Accountant to file his regular report in addition to reports submitted on the same forms and in the same manner as state credit union examiners report.

In addition, it was suggested that it was necessary that a procedure be provided by which advance application could be made to the Commissioner for permission to employ Certified Public Accountant audits. I find that such a procedure is needed to inform credit unions as to whether such an audit may be submitted.

No other evidence contrary to the amended rules was adduced at hearing.

The Banking Division has taken notice of all comments received at the hearing.

STATE OF MINNESOTA
BANKING DIVISION

ROBERT A. MAMPEL
State Commissioner of Banks

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ATTORNEY'S
OFFICE

STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT

FOURTH JUDICIAL DISTRICT

The City of Brooklyn Center, et al,

Plaintiffs,

and

The Village of Burnsville, et al,

Intervenor Plaintiffs,

vs.

The Metropolitan Council and The Metropolitan Sewer Board,

Defendants,

and

The Village of Arden Hills, et al,

Intervenor Defendants,

and

The Village of Afton, et al,

Involuntary Defendants.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR JUDGMENT

Court File No. 690532

This matter came on for hearing before the Undersigned and was heard on December 10, 11, 12, 13, 14, 17 and 18, 1973. Richard J. Schieffer and Terry C. Smith appeared on behalf of the plaintiffs and intervenor plaintiffs. Thomas S. Hay and John D. Levine appeared on behalf of the defendants, Metropolitan Council (Council) and the Metropolitan Sewer Board (Boar!).

On the basis of the testimony, exhibits and all of the other files and records herein, the Court makes the following Findings of Fact, Conclusions of Law and Order for Judgment:

FINDINGS OF FACT

1. On January 1, 1971, the metropolitan disposal system commenced operation and it served then and as well as now certain municipalities located in the counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott and Washington. The Board and Council are responsible for the administration of the metropolitan disposal system, including the adoption of an annual operating budget and the

allocation of the costs of operation, administration, maintenance and debt service of the system among municipalities in the metropolitan area in accordance with Minn. Stat. § 473C.08.

2. Municipalities are allocated costs for their use of the system as well as for unused capacity in the system reserved for future use (reserve capacity).

3. The issues in this suit relate only to the method of allocating debt service costs of reserve capacity, and there is no issue relating to the allocation of costs for use of the system.

4. In early 1971, shortly after operation of the system commenced, the Board and Council realized that there was a problem in allocating reserve capacity and reserve capacity costs to individual municipalities.

5. From early 1971 to July, 1972, extensive and thorough work was done by the Board and Council in evaluating numerous alternative methods for allocating reserve capacity and reserve capacity costs to individual municipalities.

6. Under the system of allocating reserve capacity costs used in 1971 and 1972, numerous difficult and imprecise judgments had to be made by the Board in estimating how much unused capacity should be reserved for each individual municipality. Those judgments involved evaluating such ever fluctuating and imprecise elements as land use, population projections and the like, and involved comparing those ever fluctuating and imprecise plans and projections with the physical characteristics of the pipe in the ground and the total capacity of the treatment works. In the process of allocating reserve capacity costs to each municipality, numerous difficult and imprecise judgments were made with respect to each and every municipality.

7. If the system used in 1971 and 1972 had continued in use, it is clear that corrections or readjustments in the assignments of reserve capacity and reserve capacity costs would have to have been made years after the fact, and there is no practical way to do this; under that system it was clear that the undesirable practice was being followed by some municipalities of charging the current users of the system with the costs of capacity reserved for future users; that system proved to be "regressive" in that some municipalities were allocated very high reserve capacity costs at a time when they were least able

to pay those costs; that system resulted in deferments or the postponement of payment of reserve capacity costs by many municipalities that could not then afford to pay, and there were no assurances that those municipalities which received the deferments would ever be able to repay them, plus the interest which accrued on them (the deferments amounted to a very substantial proportion of the total reserve capacity costs in 1971 and 1972); under that system, there probably would have been a permanent shifting of costs from service area to service area and there was no upper limit as to what any particular service area might have to pay; under that system it is likely that the cost allocation provisions of Minn. Stat. § 473C.08, subd. 5 (metropolitan benefit) would have had to be used in 1973 and on a widespread basis thereafter.

8. In July of 1972, as a result of an extensive and thorough study by a task force of the Board and Council, the Board and Council gave notice to the affected municipalities of meetings to consider the SAC system of reserving unused capacity in treatment works and interceptors and allocating costs related thereto to individual municipalities. The details of the SAC system, as finally adopted, are described in Exhibit A attached hereto and made a part hereof.

9. Between mid-July, 1972 and October 18, 1972, the date on which the SAC system was finally approved, numerous public meetings were held after ample notice to all of the affected municipalities. Those were open meetings where all comments, favorable and unfavorable, were made, recorded and considered. The comments of the affected municipalities did have the effect of changing the proposed SAC system from its original form to the form in which it was ultimately adopted.

10. Under the SAC system of allocation the difficult judgments, depending on ever-fluctuating factors which were made under the old system, were eliminated; the need to correct or readjust cost allocations years after the fact was eliminated; the current costs were allocated to the current users and future costs could easily be allocated to the future users, and were by most municipalities; the impact of the SAC system is progressive in that it allocates reserve capacity costs to municipalities at a time when they are best able to pay; the need for deferments for 1973 was eliminated by the SAC system and deferments probably will not be needed in the future; the need to use metropolitan benefit for 1973 was eliminated by the SAC system and will probably not

be needed in the future; there is no permanent shifting of reserve capacity costs from service area to service area under the SAC system, and no service area will be asked to pay more than the capital costs of facilities located in or serving it.

11. Service Area No. 1, which is where many of the plaintiffs are located, including the lead plaintiff, Brooklyn Center, proposed a method of allocating reserve capacity and the related costs known as D-SAC.

12. D-SAC is virtually identical in concept to the SAC system and the only significant difference is that the plaintiffs, and Brooklyn Center in particular, thought they would have to pay substantially less under D-SAC than SAC. As provided under D-SAC, the municipalities in Service Area No. 1 would have been charged only $170 per SAC unit, and the municipalities in all of the other service areas would have been charged substantially more than that, with the proposal being to charge those municipalities in Service Area No. 4 $610 per SAC unit.

13. There was no indication whatsoever that any municipality had any difficulty in collecting reserve capacity charges allocated to it under the SAC system.

14. The SAC system reserves unused capacity and allocates reserve capacity costs in a fair, reasonable and equitable manner.

15. On December 19, 1973, this Court issued an Order, the terms of which are incorporated herein by reference.

CONCLUSIONS OF LAW

1. The Board is a political subdivision and an agency of the Council established by the Metropolitan Sewer Act, Minn. Stat. Ch. 473C.

2. The powers conferred on the Board and Council under Minn. Stat. § 473C.08, subds. 3, 4 and 8 are primarily legislative in nature.

3. § 473C.08, subds. 3 and 4, do not prescribe a specific "statutory formula" for reserving unused capacity and allocating reserve capacity costs as claimed by plaintiffs, but do set forth general principles of cost allocation to be implemented by the Board and Council.

4. The plaintiffs do not have any vested right under subds. 3 and 4 to require the Board and Council to reserve unused capacity and allocate reserve

capacity costs in the manner used in 1971 and 1972.

5. Under the SAC system, unused capacity is reserved and reserve capacity costs are allocated in a more accurate and reasonable manner than they were in 1971 and 1972.

6. The SAC method of reserving unused capacity and allocating reserve capacity costs is based on factors closely related to the subject matter and is uniform in its application; is not confiscatory in any way; and allocates to each municipality costs which are reasonable and within its ability to collect and pay.

7. The study made by the task force and the Board and Council of alternative methods of allocating reserve capacity and reserve capacity costs, and the procedural steps taken in connection with the adoption of the SAC system were extensive, thorough and reasonable.

8. The SAC system of allocating reserve capacity costs of treatment works implements and is authorized by the provisions of Minn. Stat. § 473C.08, subd. 3, and is reasonable.

9. The SAC system of allocating reserve capacity costs of interceptors implements and is authorized by the provisions of Minn. Stat. § 473C.08, subd. 4 and is reasonable.

10. It appeared to the Board and Council and does appear to this Court that the system used to allocate reserve capacity costs in 1971 and 1972 resulted in increased costs to municipalities and service areas which are now being (and which were in 1969 being) served by the facilities of the Minneapolis-St. Paul Sanitary District or by the facilities of any other municipality or sewer district, which were inequitable. The SAC system eliminated these inequities and as to each of the municipalities or service areas is fair, reasonable and equitable.

11. Even if the SAC system of allocating reserve capacity costs is not authorized by Minn. Stat. § 473C.08, subds. 3 and 4 (although the Court has determined that SAC was so authorized), it is authorized under the provisions of Minn. Stat. § 473C.08, subd. 8 and is fair, reasonable and equitable.

12. On December 19, 1973, this Court issued an Order, the terms of which are incorporated herein by reference.

13. The relief sought by plaintiffs is denied; the counterclaims of defendants are granted and defendants are awarded their costs and disbursements herein.

LET JUDGMENT BE ENTERED ACCORDINGLY.

DATED: February 6, 1979.

BY THE COURT:

Judge of District Court

EXHIBIT E
to Plaintiff's Request for Admission
dated November 15, 1973

TRIAL Ex. N



INSTRUCTIONS AND REPORTING FORMS

RESERVE CAPACITY CHARGE

MONTHLY REPORT MANUAL

EXHIBIT A

INTRODUCTION

The Metropolitan Council and the Metropolitan Sewer Board have adopted a new method for allocation and collection of reserve capacity charges. Through joint studies and hearings with the final adoption in October of 1972, the Service Availability Charge becomes effective January 1, 1973.

This Manual is provided to assist each municipality in the implementation and reporting of the Service Availability Charge. Included in the Manual are policies as adopted by the Metropolitan Council and the Metropolitan Sewer Board, comments and interpretation of the adopted policies, instructions, reporting forms, examples and a model ordinance.

Printed copies of the reporting forms will be sent to each municipality and be submitted monthly. They must be completed and certified by an official of each municipality.

If your municipality has any questions regarding the reserve capacity charges, please call the Metropolitan Sewer Board at 222-8423, Extension 100.

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SECTION I

POLICIES

POLICIES ON THE ALLOCATION OF RESERVE CAPACITY CHARGES

POLICY I.

ANNUAL ALLOCATION BASED ON UNITS. The Sewer Board, in preparing the Operating Budget for 1973 and each year thereafter, will determine the current costs for such year which are attributable to reserve capacity in treatment works and interceptors as provided in Section 8, Subdivisions 3 and 4 of the Metropolitan Sewer Act (MSA Sec. 473C.01 et Seq.). In adopting each Operating Budget, the Board will allocate the total of such costs among the respective local government units in the Metropolitan Area for whom capacity is reserved, for payment as follows:

A. Each local government unit to which the Metropolitan Disposal System is or becomes available for use during the budget year shall pay an amount equal to the Service Availability Charge (SAC) per unit for that budget year times the number of units, or portions thereof, for which a building permit is issued after the date upon which will make available such service; and,

B. Each local government unit shall pay an amount equal to the Service Availability Charge per unit for that budget year times the number of units, or portions thereof, connected directly to or indirectly to the Metropolitan Disposal System during the budget year, less any amount charged for the same units under (A).

Where a local government unit, subject to a charge under paragraph (A) or (B), has territory outside the Metropolitan Sewer Service Region, no charge shall be made for units constructed outside the Region and for which building permits are issued. Where a local government unit, subject to charge under paragraph (A) or (B), has territory in two or more Sewer Service Areas, the territory in each Service Area shall be treated as a separate local government unit for purposes of applying the provisions of paragraphs (A) and (B).

POLICY II.

SERVICE AVAILABILITY CHARGE SCHEDULE. The Service Availability Charge for budget year 1973 shall be $275 per unit. The Service Availability Charge proposed for subsequent years is according to the following schedule:

1974:	$300
1975:	$325
1976:	$350
1977:	$375

POLICY II. (cont'd)

The rate for 1974 and subsequent years shall be subject to review and adjustment according to changes in projections of the current costs of reserve capacity, the number of housing starts, or the number of connections to the Metropolitan Disposal System.

POLICY III.

COMPUTATION OF UNITS. The number of units which are connected, or for which a building permit is issued shall be computed as follows:

A. Single family houses, townhouses and duplex units shall each comprise one unit;

B. Condominiums and apartments shall each comprise 80% of a unit;

C. Mobile homes shall each comprise 80% of a unit;

D. Other buildings and structures shall be assigned one unit for each 100,000 gallons of flow which it is estimated they will discharge, and commercial and industrial building units shall be assigned a minimum of one unit;

E. Public housing units and housing units subsidized under any federal program for low-and-moderate-income housing shall be counted as 75% of the unit equivalent for that type of housing;

F. Units existing or for which building permits were issued prior to January 1, 1973, shall be counted as one-half the unit equivalent for that type of housing, if connected to the Metropolitan Disposal System prior to January 1, 1974, and shall be counted at the full rate thereafter.

The Board will review the assignment of units under items (A), (B), and (C) and may find it necessary to make revisions as new forms of housing are provided. The Board will prescribe more detailed rules.

The computations for new building units shall include a deduction for demolition of existing building units located within the local government unit. Such deductions may be made on a month-to-month basis (new building units less demolished building units) and payment of charges shall be made on the net new building units. Deductions for demolitions are allowed on a cumulative basis over the entire budget year. If, at the close of the budget year, payment for new building exceeds the net of new units less demolitions in that budget year, then a credit for such overpayment shall be made against the charges due in the next year.

POLICY IV.

REPORTING AND PAYMENT. The Sewer Board will prescribe reporting forms which will be required to be filed for each month with payment of charges due for that month, on or before the 10th day of the following month. The charges due for each month will be based upon units connected or started in that month less the demolitions. The first report and payment will relate to January, 1973 and will be due on or before February 10. Municipalities shall retain 1% of the total Service Availability Charges to cover costs of administration.

POLICY V.

USE OF AMOUNTS COLLECTED. Amounts collected to pay current costs of reserve capacity will be transferred to the Metropolitan Council Sewer Bond Fund and used to pay debt service comprising such costs.

SECTION II

INTERPRETATION AND IMPLEMENTATION REGULATIONS

SECTION II

INTERPRETATIONS AND IMPLEMENTATION REGULATIONS

POLICY 1

In 1971 and 1972, municipalities were allocated reserve capacity and current costs of reserve capacity for treatment works and interceptors based on an estimate of the additional annual sewage flow which would come from future development in the municipality, taking into account sewer contracts, pipe design, population projections, and municipal comprehensive plans. For 1973 and succeeding years, the allocation of reserve capacity and of current costs of reserve capacity for treatment works and interceptors among municipalities will be based on annual sewage flow to be discharged from new sewer connections or new building construction commenced in the municipality during the year. In 1973 and succeeding years reserve capacity charges will be based on the amount of reserve capacity which will be used up by new connections, or which will certainly have to be provided in the future for new buildings constructed during the year. The amount of reserved capacity used or which will have to be provided and the amount to be charged for it will be measured upon the issuance of sewer connection and building permits during the year.

Each year capacity is reserved for, and current costs of reserve capacity allocated to, municipalities as outlined above: (1) which are served by and discharging sewage into the Metropolitan Disposal System during the year; or (2) which will be served by and able to discharge sewage into facilities for which the Metropolitan Sewer Board has awarded a construction contract. Municipalities not discharging directly or indirectly into the Metropolitan Disposal System will be allocated reserve capacity and reserve capacity charges only from and after the date the Board awards a construction contract for facilities which will provide sewer service to the municipality.

Any municipality with territory outside a sewer service area will not be allocated reserve capacity or reserve capacity charges for building permits issued for construction in the municipality outside a sewer service area. In cases where a municipality is divided between two or more sewer service areas, the allocation of reserve capacity and reserve capacity charges based on building permits will be applied only in the portion of the municipality and the sewer service area that is served by the Metropolitan Disposal System, or which will be served by it when facilities for which a construction contract has been awarded are completed. New building permits issued by a municipality with respect to any portion of its territory in a sewer service area, which territory is presently not served directly or indirectly by the Metropolitan Disposal System, or where a project is not under construction to provide service, will not be the basis for the allocation of reserve capacity or reserve capacity charges.

POLICY 2

The amount of reserve capacity and reserve capacity charges to be allocated to a municipality for any year will be determined by the annual volume of sewage which it is estimated each new building or sewer connection commenced during the year will contribute to the Metropolitan Disposal System. For each estimated 100,000 gallons of annual sewage volume (a SAC unit) a reservation of capacity and an allocation of reserve capacity charges is made. This represents the basic unit for the allocation of reserve capacity and reserve capacity charges with respect to all types of sewer connections and buildings. For the next five years the amount of reserve capacity charges allocated per SAC unit of annual sewage volume (SAC unit charge) has been established as follows: $275 for 1973; $300 for 1974; $325 for 1975; $350 for 1976; and $375 for 1977. The amount of the allocation and charge will be reviewed each year at the time of the adoption of the Metropolitan Sewer Board Operating Budget.

For 1973 only, reserve capacity charges allocated to a municipality with respect to the connection of building units which existed prior to January 1, 1973, and were served by on-lot disposal systems, will be 50% of the amount charged per SAC unit for that type of building unit had it not existed prior to January 1, 1973.

POLICY 3

As indicated above, for the purpose of the allocation of reserve capacity and reserve capacity charges, the computation of SAC units will be standardized for certain types of buildings, based upon the estimated annual sewage volume for each type, as follows:

A. Each municipality will be allocated and charged one SAC unit for each single family dwelling, one SAC unit per townhouse or duplex dwelling unit, 80% of a SAC unit for each apartment unit (the 80% value is based on the fact that historically apartments discharge less wastewater to the sewer system than a single family dwelling and an analysis indicates that on the average an apartment unit in the metropolitan area discharges an estimated 80% of the flow of a single family dwelling), and 80% of a SAC unit for each mobile home unit (in large mobile home parks, the charge would be based on the number of units to be included in the park for which the building permit was taken out and would be 80% of a SAC unit for each mobile home located in the mobile home park).

B. Municipalities ... reserve capacity and reserve capacity charges for all commercial, institutional and industrial building permits and/or connection permits on the basis of the number of SAC ... l by the facility each year. The minimum capacity reserved for a commercial, institutional and industrial ... ne SAC unit. To the extent possible, allocations for ... institutional buildings will be based on the standard number of SAC units set forth and discussed in the instructions accompanying the reporting forms. All determinations of SAC units for industrial users will be subject to review and verification based on actual flow discharged from the industry after one year of operation to determine if the SAC assignment was accurate. The review will be ... ar after the date of the first discharge into the sewer system.

C. Each municipality's allocation of reserve capacity and reserve capacity charges for public housing will be made on the basis of 75% of the SAC unit for the respective housing type. The reduced SAC unit assignment for public housing is applicable to housing units built by housing ... development authorities or housing units subsidized under any federal, low and moderate income housing program, and is based on the fact that historically the average sewage flows from such housing units are less than the average sewage flows from private single family, duplex, townhouse and apartment units.

The following rules will be applied to determine the applicability of the SAC unit charges for building and connection permits issued by each municipality for which the current costs of reserve capacity are allocated:

A. Building Permit SAC Unit Charges:

1. All building permits issued by a municipality in accordance with its municipal ordinance on or after January 1, 1973 shall be subject to the SAC unit charge.

2. All building permits issued by a municipality for alterations and/or additions to existing buildings will be subject to a SAC unit charge if the addition or alteration will require additional SAC units of reserve capacity. The SAC unit will be determined in the same manner used to determine the SAC units for new buildings.

B. Sewer Connection Permit SAC Unit Charges:

1. All sewer connection permits issued by a municipality under its municipal ordinances for connections to be made on or after January 1, 1973 will be subject to a SAC unit charge except in the following cases:

a. The sewer connection permit is issued for a building for which a SAC unit charge was made at the time the municipality issued the building permit.

b. The sewer connection permit was issued for a building for which a building permit was issued prior to January 1, 1973 and was not served by an on-lot disposal system.

c. The sewer connection permit was issued and the sewer to which the connection was to have been made existed prior to January 1, 1973.

Each month the municipality will report the number of new SAC units for which permits are issued and the number of SAC units for which demolition permits are issued, and charges due for the month will be based on the net new SAC units for which permits are issued. If the number of SAC units authorized to be demolished in any month exceeds the number of new SAC units authorized to be constructed in any month, no payment will be due for that month and the excess number of SAC units authorized to be demolished will be credited against new SAC units authorized to be constructed in a subsequent month.

POLICY 4

The Board will furnish reporting forms that must be filed each month. The Reserve Capacity Report will be due on the 10th day of the month following the reporting period. The prescribed forms are included in the instruction booklet. Each municipality will be required to make a report each month indicating the permit activity in the municipality even though no permits may have been issued. The first Reserve Capacity Monthly Report for January, 1973 will be due on or before February 10, 1973. Each municipality will retain 1% of the reserve capacity charges reported to cover the cost of administration. Each report must be certified by an official of the municipality.

SECTION III

INSTRUCTIONS FOR REPORTING FORMS

SECTION III

INSTRUCTIONS FOR REPORTING FORMS

All local governments will be required to submit each month a report on building and/or connection permits issued by the municipality. The permits will be the basis for determining the SAC units and the reserve capacity charges. This report will be submitted each month beginning in January, 1973, and due on or before the 10th day of the following month. The report will be required each month, whether or not the municipality issued any building or connection permits. The report will be submitted on the attached form (MSB-75) Reserve Capacity Charge Monthly Report. The municipality should be identified on the top line and the month for which the building and connection permits were issued shall be indicated in the space provided. The reporting period will be from the first day of the month through the last day of the month. The first report for January, 1973 should be submitted by February 10, 1973 and should include all building and connection permits issued under the policies covered in this Manual.

ITEM A.

SINGLE FAMILY, DUPLEXES AND TOWNHOUSES. Indicate the number of building permits issued for single family dwellings and/or the number of sewer connection permits issued for single family dwellings connecting to the local sewer system which were previously served by an on-lot disposal system.

ITEM B.

APARTMENTS. Indicate the number of apartment dwelling units for which building permits have been issued and the number of apartment dwelling units for which sewer connection permits have been issued for connection to the local sewer system which were previously served by an on-lot disposal system.

ITEM C.

PUBLIC HOUSING. Report the number of building permits issued for public housing units constructed by Housing and Redevelopment Authority or for any federal subsidized low and moderate income housing facilities. Sewer connection permit spaces are not provided on the form because it is assumed that all public housing units are connected to the local sanitary sewer system.

ITEM D.

MOBILE HOMES. Report the number of spaces for which building permits have been issued for a mobile home park or for individually located single building sites.

ITEM E.

COMMERCIAL AND INSTITUTIONAL. Each commercial and institutional building or connection permit issued requires a separate reporting form. Form MSB-75A must be completed by indicating the occupancy, the address of the facilities, the number of employees, the total square feet and the type of facility or business. Included in this Manual are standard SAC unit determinations for most common types of commercial and institutional building and connection permits. The SAC units for each one of these facilities should be shown in the space entitled, "Basis for Determination of SAC Units". The total number of SAC units reported for Commercial and Institutional will be totaled and inserted in Item E of the Reserve Capacity Monthly Report.

ITEM F.

INDUSTRIAL. The assignment of SAC units for determining the building or sewer connection charges will be based on the completed industrial reporting form MSB-75B. This form must be completed for any industrial or commercial building type not listed in the standard SAC units for Item E, Commercial and Institutional MSB-75A. For all industrial users, Form MSB-75B must be completed by the Company, reviewed and approved by the Sewer Board prior to issuing the building or sewer permit. The number of SAC units will be determined by the estimated wastewater flow to be discharged by the industrial user. This information is required to meet the regulations of the Environmental Protection Agency and the Minnesota Pollution Control Agency in order for the Sewer Board to maintain eligibility to receive grants for construction of wastewater treatment facilities. The Board registers each industrial waste discharger in the metropolitan area and this form will provide identification of, and the first step toward registration of, new industrial users of the Metropolitan Disposal System. On the basis of the completed industrial sewer connection application, an estimate of sewer discharge will be made and the corresponding SAC units will be assigned. The SAC unit assigned will be reviewed one year after the user commences discharge to the sewer to determine if the assignment was proper.

This form must be completed prior to the time that the sewer connection application is made or the building permit is issued by the municipality. The review of this completed form will be the joint effort of the municipality, the industry and the Sewer Board. The completed application will be used for assigning the SAC units and determining the reserve capacity charge.

Item 9 on the industrial sewer connection application provides the method for computing the SAC units and Item 10 provides the method for computing the SAC unit charge which are reported in Item F of the Reserve Capacity Monthly Report.

ITEM G.

DEMOLITION CREDIT. Each municipality will be given credit for any demolition permits issued during the reporting month. The demolitions will be reported on MSD-75C. The computation of credits for demolition permits will be made on the same basis as used to compute SAC units. The demolition credits are totaled and entered in Item G, Reserve Capacity Monthly Report.

ITEM H.

ADMINISTRATIVE FEE. Each municipality retains 1% of the net reserve capacity charges to cover administration costs as indicated in the Reserve Capacity Monthly Report.

CERTIFICATION

Each report should be dated and certified by an official of the local government unit. Certification may be made by City or Village Manager, Administrator, Clerk, Treasurer, etc.

STANDARD SERVICE AVAILABILITY CHARGE (SAC) UNITS FOR VARIOUS COMMERCIAL, PUBLIC, AND INSTITUTIONAL FACILITIES

TYPE OF FACILITY	PARAMETER	SAC UNITS
Arenas	100 seats	1
Automobile Service Center	2 service bays	1
Barber Shop		1
Boarding House	5 beds	1
Bowling Alleys	3 alleys	1
Car Wash		30
Car Wash (self-service)	1 stall	3
Churches	250 seats	1
Cocktail Lounge	25 seats	1
General Office Building	2400 sq. ft. floor space	1
Hospitals	1 bed	1
Laundromats	2 machines	3
Motels and Hotels (assume 2 persons/room)	2 rooms	1
Nursing Home	3 beds	1
Restaurant (drive-in)	9 parking spaces	1
Restaurant (24 hr. service)	6 seats	1
Restaurant (not 24 hr. service)	12 seats	1
Restaurant (with cocktail lounge)	9 seats	1
Retail Stores	3000 sq. ft. floor space	1
Rooming Houses	7 beds	1
Schools (Elementary)	20 students	1

TYPE OF FACILITY	PARAMETER	SAC UNITS
Schools (Secondary)	15 students	1
Service Station (gas pumping only)		2
Service Station (with service center)		8
Service Station (with service center and car wash)		1
Swimming Pools	27 swimmers	1
Theater	75 seats	1
Theater (drive-in)	55 parking spaces	1
Warehouses	14 employees	

The SAC Unit for a facility not included in the above list will be determined by the Metropolitan Sewer Board. A request for SAC Unit determination should be made prior to the issuance of the Building Permit.

SECTION IV

REPORTING FORMS

MSB - 75

RESERVE CAPACITY CHARGE

Monthly Report

Municipality CLEAR RIVER FALLS

Month of JANUARY - 1973

Remit to: Metropolitan Sewer Board
350 Metro Square
Saint Paul, Minnesota 55101

Item	Type of Unit	Building Permit SAC Units	Sewer Connection Permit SAC Units	Unit Charge	Reserve Capacity Charges
A	Single Family House	10	6		
	Duplexes	4	-		
	Townhouses	6	-		
	Total	20		275.00	5,500.00
	Total		6	137.50	825.00
B	Apartments	17	0		
	Total	17		220.00	3,740.00
	Total		0	110.00	
C	Public Housing				
	1. Single Family	15		206.25	3,093.75
	2. Duplexes	0		206.25	
	3. Townhouses	0		206.25	
	4. Apartments	0		165.00	
D	Mobile Homes	5		220.00	1,100.00
			0	110.00	
E	Commercial & Institutional (Per attached Form MSB - 75A)	7		275.00	1,925.00
			0	137.50	
F	Industrial (Per attached Form MSB - 75B)	25		275.00	6,875.00
				137.50	

Total - Reserve Capacity Charges $ 23,058.75

G Demolition Credit (Per attached Form MSB - 75C) $ 6,225.00

Sub-total $ 16,833.75

H Administrative Fee (1% of sub-total) Subtract $ 168.34

I Net Amount Due $ 16,665.41

CERTIFICATION

I certify that the above is true and correct to the best of my knowledge and represents the activities for the month indicated above.

Name K. D. Olson

2/16/73
Date

Title Utilities Manager

E. COMMERCIAL & INSTITUTIONAL

Occupant Holiday Auto Center — S. A. C. Units 3

Address 1100 Main Street

No. of Employees 12 Total Sq.Ft. 8000

Type of Facility: Auto Service Center — Date Permit Issued

Basis for determination of SAC Units: — 1-8-73

6 Service Bays

Occupant Joe's Place — S. A. C. Units 3

Address 1500 Main Street

No. of Employees 18 Total Sq. Ft. 3000

Type of Facility Cocktail Lounge — Date Permit Issued

Basis for determination of SAC Units: — 1-18-73

75 Seats

Occupant Metro "500" — S. A. C. Units 1

Address 2000 Main Street

No. of Employees 3 Total Sq. Ft. 900

Type of Facility Service Station — Date Permit Issued

Basis for determination of SAC Units: — 1-19-73

Gas Pumping Only

Occupant _____ — S. A. C. Units _____

Address _____

Type of Facility _____

Basis for determination of SAC Units: _____ — Date Permit Issued

_____ _____

_____

Total S. A. C. Units 7

Insert Number of Units in Item E Form MSB - 75

MSB — 758 1

F. INDUSTRIAL SEWER CONNECTION APPLICATION

Company name PROFESSIONAL PLATING, INC.

Location address 834 E. LAKE DR.

COTTAGE GROVE, MN. 55168

Mailing address P.O. BOX 5136

CLIFTON, NEW JERSEY 07345

Company Representative JAMES A. KILLOUGH

Title PRESIDENT

Phone number (404) 378-4213

1. Nature of business CONTRACT ELECTROPLATING

2. Projected date for facility start up NOV. 1973

3. Total facility area 20,000 sq. ft.

4. No. of employees 12

5. Operating hours per day 10

6. Operating days per year 250

7. Water supply:

a. Municipal water supply	2,500,000 gal/year
b. Well water supply	-0- gal/year
c. Other (specify)	-0- gal/year
d. Total water supply	2,500,000 gal/year

8. Waste discharge:

a. Sanitary waste discharge	100,000 gal/year
b. Uncontaminated cooling water discharge	1,000,000 gal/year
1.) .... to sanitary sewer 1,000,000 gal year	
2.) .... to storm sewer -0- gal year	
c. Industrial waste discharge	1,400,000 gal/year
d. Total discharge to sanitary sewer (8a−8b1−8c)	2,500,000 gal/year

9. SAC units: $\frac{\text{Total discharge (8d)}}{100{,}000} = \frac{25}{}$ SAC Units

10. SAC Charge:

SAC Units (9) 25 × Unit Charge $275.00 = $6,875.00 SAC Charge

11. Pretreatment: [Refer to Sections 5-5 and 5-6 of the Waste Control Rules and Regulations.] Does the Company plan any in-plant treatment of wastes? YES If yes, describe NEUTRALIZE PH

12. Sampling & Flow Measuring: [Refer to Section 5-9 of the Waste Control Rules and Regulations.] Indicate location of sewer access point and describe flowmeter and means of sampling MANHOLE ON PROPERTY BETWEEN BUILDING & STREET WITH V-NOTCH WEIR & LEVEL RECORDER & SPACE FOR PERIODIC PLACEMENT OF AUTOMATIC SAMPLER. (SKETCH & DETAILED PLANS WILL BE SUBMITTED BY APRIL 1, 1973.)

13. Discharge quality:

Present (Check appropriate box)	Absent	Constituent
X		Solids
X		Organics
X		Acids
X		Caustics
	X	Temperature (Greater than 150°F)
	X	Cadmium
X		Chromium
X		Copper
X		Cyanide
2		Iron
	X	Lead
	X	Mercury
X		Nickel
X		Zinc
	X	Phenols
X		Grease and or oil
X		Solvents
	X	Radioactive wastes

14. Additional information, sketches or descriptions may be attached for the purpose of adequately describing the waste discharge.

CERTIFICATION

This is to certify that PROFESSIONAL PLATING, INC. agrees to comply with the rules and regulations governing connection to and use of the Metropolitan Disposal System.

Company (Signature of official) James M. Fiumara

Date FEB. 21, 1973 Title PRESIDENT

Transmitted by Community COTTAGE GROVE

Signature Robert E. Shaw

Title VILLAGE ENGINEER

Date FEB. 23, 1973

Approved by Metropolitan Sewer Board

Signature Raymond C. Dyer

Title STAFF ENGINEER

Date MARCH 5, 1973

G. DEMOLITION CREDIT

Type of Unit	SAC Units	Unit Credit	Demolition Credit
Single Family House	20		
Duplex	0		
Townhouse	0		
Total	20	275.00	5500.00
Apartments		220.00	
Total		220.00	
Mobile Home Park			
Commercial, Institutional and Industrial			
Address — Type of Facility			
1150 MAIN ST — DAIRY STORE	1		
1200 MAIN ST — MACHINE SHOP	2		
Total SAC Units	3	275.00	725.

Total Demolition Credit (Enter Amount in Item G MSB Form 75) $6,225.

SECTION V

MODEL ORDINANCE

SECTION V

MODEL ORDINANCE

ORDINANCE ESTABLISHING SEWER SERVICE AVAILABILITY AND CONNECTION CHARGE TO PAY RESERVE CAPACITY COSTS OF METROPOLITAN SEWER BOARD

BE IT ORDAINED by the (Village) (City) Council of the (Village) (City) of , Minnesota, as follows:

1. Recitals. The Metropolitan Sewer Board has determined to reserve unused capacity in the metropolitan disposal system each year commencing in 1973 for local government units in which new buildings to be connected to the system and new connections to the system are commenced during such year; and to allocate the debt service costs of such unused capacity for the year among such local government units as provided in the attached Exhibit A. In order for the (Village) (City) to pay such costs allocated to it each year, it will be necessary to establish sewer service availability and connection charges for all buildings to be constructed or connected to the metropolitan disposal system on or after January 1, 1972.

2. Establishment of Charges. For the purpose of paying costs of reserve capacity allocated to the (Village) (City) each year by the Metropolitan Sewer Board, there is hereby established a charge for:

(a) the availability of treatment works and interceptors comprising the metropolitan disposal system; and

(b) connections, direct and indirect, to the metropolitan disposal system.

The charge is imposed on each building or structure in the (Village) (City), and each connection to the metropolitan disposal system directly or through the Village's system, inside any Sewer Service Area established by the Metropolitan Sewer Board, construction of which is commenced on or after January 1, 1973. The charge shall be payable upon the issuance of a building permit or a connection permit, as the case may be, but no charge shall be due upon the issuance of a connection permit if a charge was paid upon issuance of a building permit.

The charge for each building or structure shall be equal to the number of units of sewage volume which it will discharge,

multiplied by $275 for 1973, $300 for 1974, $325 for 1975, $350 for 1976 and $375 for 1977. A unit of sewage volume shall be 100,000 gallons per year and shall be assigned as follows:

(a) Single family houses, townhouses and duplex units shall each comprise one unit;

(b) Condominiums and apartments shall each comprise 80% of a unit;

(c) Mobile homes shall each comprise 80% of a unit;

(d) Other buildings and structures shall be assigned one unit for each 100,000 gallons of flow or part thereof which it is estimated they will discharge;

(e) Public housing units and housing units subsidized under any federal program for low and moderate income housing shall be counted as 75% of the unit equivalent for that type of housing;

(f) Units existing or for which building permits were issued prior to January 1, 1973, shall be counted as one-half the unit equivalent for that type of housing, if connected to the Metropolitan Disposal System prior to January 1, 1974, and shall be counted at the full rate thereafter.

3. The Administration. The (Village) (City) (Manager) (Clerk) shall prepare or revise building permit or sewage connection permit application forms to provide information necessary for the computation of the number of units assignable to the building or structure in question, and shall collect the applicable charge before issuance of a permit. The (Manager) (Clerk) shall make such information available to the Sewer Board upon request. If upon filing a report covering such permit with the Metropolitan Sewer Board, the Board determines that a greater number of units is assignable to the building or structure in question, any additional amount of cost allocated to the (Village) (City) as a result shall be paid by the person or company to whom the permit was granted.

M E M O R A N D U M

Having ruled at the commencement of the trial of this action that the Metropolitan Sewer Board did have the authority to devise methods for allocating reserve capacity costs to the affected municipalities in the seven county area served by the Board, this Court was concerned with the question of the reasonableness or unreasonableness of the method adopted, namely, the so-called SAC method or formula.

Courts cannot interfere with nor set aside actions of legislative bodies of government unless it can be clearly shown that actions of such bodies of government are "arbitrary, capricious or unreasonable". The Metropolitan Council and the Metropolitan Sewer Board, both having been created by the Legislature of the State of Minnesota, are governmental agencies endowed with legislative powers to enable them to carry out their prescribed function. Although it may not agree with the legislative actions of a governmental body, a Court cannot perform the function of the Legislature or, as in the instant case, devise or create a formula of its own to substitute for the legislative act or formula devised by the Metropolitan Sewer Board. Our American doctrine of separation of powers properly prevents interference by one branch of government in the function of another branch of government.

During the trial the Court concluded and so advised counsel that it appeared clear that the actions of the Sewer Board could in no respect be considered to have been "arbitrary or capricious". The challenged SAC formula for the allocation of reserve capacity costs was adopted only after substantial time and effort had been expended by Sewer Board staff experts and others in research and study of the problems involved. The SAC formula was not the creature of a "spur of the moment" decision.

The single remaining issue for determination by the Court in the trial became: Was the SAC formula of the Metropolitan Sewer Board a "reasonable" method of allocating costs for reserve capacity to the affected Municipalities including the Plaintiff City of Brooklyn Cent

In considering the single issue presented to the Court in the trial, it perhaps should be indicated that the formula of the Metropolitan Sewer Board was not being challenged by individual citizens who might be affected by the application of the formula but only by Municipalities affected.

It was apparent from the outset that the problem of reasonably and equitably allocating reserve capacity costs to the affected communities in the seven county area served by the Metropolitan Sewer Board was not a simple one. Projections of population growth and increased need for sewer service over an extended period of years at best could only be considered as calculated guesses. Experience has proved many such projections over the years to be faulty.

The Plaintiffs in challenging the reasonableness of the SAC formula had the burden of proof to persuade the Court that the formula was "Unreasonable". Plaintiffs presented evidence primarily designed to demonstrate that the former method of allocating reserve capacity costs was more desirable. The question that must be decided is not one of desirability or the determination of the relative merits of one system over another, but rather the reasonableness or unreasonableness of the challenged system or formula.

The Plaintiffs have not shown that the newly adopted SAC formula or system of allocating reserve capacity costs to them or to muncipalities generally will unreasonably affect them.

The Court has therefore concluded that the SAC formula adopted by the Metropolitan Sewer Board, an agency of the Metropolitan Council, was "reasonable" and was properly adopted by it under the authority granted to it by the State Legislature.

Other problems raised by certain municipalities prior to and during the course of the trial not directly determined by this Court's decision may have to be resolved by separate actions or by resolution between the parties by negotiation.

Irving C. Iverson, Judge

Dated: February 8, 1974.