foreign service. Anyone who might be interested in applying for a position in Bolivia is advised to communicate with Medical Director B. J. Lloyd, United States Public Health Service, Assistant to the Director, Pan-American Sanitary Bureau, Washington, D. C.

By direction of the Surgeon-General.

C. E. WALLER,
Assistant Surgeon-General, Domestic Quarantine Division.

Concerning Hotel Del Monte appreciation.

Del Monte, May 14, 1937.

Dear Doctor Warnshuis:

It is most gratifying to receive a letter such as yours of May 13 and I wish you to know that I sincerely appreciate the kind expressions contained therein.

I have passed on your words of praise to the Department Heads mentioned in your letter and, naturally, they were all most pleased to know that everything in connection with the California Medical Association went off so successfully.

It was indeed a pleasure to have you all with us, and I hope that you will find it possible to hold another convention here soon.

With many thanks and kindest regards, I am

CARL S. STANLEY, *Manager.*

Hotel Del Monte.

Concerning the impressions of Guest Speakers at Del Monte.

UNIVERSITY OF MICHIGAN: UNIVERSITY HOSPITAL
DEPARTMENT OF OBSTETRICS AND GYNECOLOGY

Ann Arbor, May 14, 1937.

Dr. Frederick C. Warnshuis
450 Sutter Street
San Francisco, California

My dear Doctor Warnshuis:

Now that I am back facing reality again, I have plenty of time to meditate over the delightful meeting at California.

I was certainly impressed with the massive size of the State as well as the California Medical Association. Certainly, you people do things on a big scale.

As I told you just before I left, I am very grateful to the Association for inviting me out and want you to know that I enjoyed every moment of it.

Sincerely,

NORMAN F. MILLER, M. D.

* * *

New York, May 12, 1937.

Dear Doctor Warnshuis:

I shall always remember with satisfaction the warm reception and cordial hospitality extended to me by the California Medical Association on my visit to Del Monte. You have accomplished a great purpose in uniting the medical profession and I congratulate you on the results of your efforts.

Very sincerely yours,

JESSE G. M. BULLOWA, M. D.

62 West Eighty-seventh Street.

Concerning California Medical Association's contribution to Lane Medical Library.

STANFORD UNIVERSITY SCHOOL OF MEDICINE
OFFICE OF THE DEAN

San Francisco, May 17, 1937.

To the California Medical Association:—This acknowledges the receipt of check for $1242.75 as the California Medical Association's contribution to Lane Medical Library for 1937. . . .

We are depending a great deal on such contributions, and it really gives us a chance to do things for doctors throughout the State which otherwise we could not do. The whole staff and the University join me in expressing our thanks.

Very truly yours,

L. R. CHANDLER, M. D., *Dean.*

MEDICAL JURISPRUDENCE†

By HARTLEY F. PEART, ESQ.
San Francisco

Requirements of California Minimum Wage Law as Applied to Professional Offices

In 1913, the California Legislature enacted a statute regulating the employment of women and minors and establishing an industrial welfare commission. This statute has subsequently become known as the "Minimum Wage Law."

After the decision of the United States Supreme Court in *Adkins* vs. *Children's Hospital,* 261 U. S. 525, in which the District of Columbia Minimum Wage Law was held unconstitutional, it was generally assumed that the California Minimum Wage Law was likewise unconstitutional. Last year when the Supreme Court held in *Morehead* vs. *New York,* 298 U. S. 587, that the New York Minimum Wage Law was unconstitutional, it was generally considered that all minimum wage laws, including the California Act, were beyond doubt unconstitutional.

On March 29, 1937, the United States Supreme Court by a five to four decision overruled the *Adkins* case and held that the Washington Minimum Wage Law is constitutional. This case, *West Coast Hotel Co.* vs. *Parish,* 81 L. Ed. 455, has received a vast amount of publicity, particularly in connection with a fundamental governmental issue which is now before the Congress of the United States.

The decision of the Supreme Court upholding the constitutionality of the Washington Minimum Wage Law is particularly significant with respect to the California Minimum Wage Law, because the Washington statute was also enacted in 1913 and in general contains practically the same provisions as are found in the California statute. It must, therefore, be assumed that since March 29, 1937, the California Minimum Wage Law has become a constitutional statute in so far as the constitutional questions considered by the United States Supreme Court in the Washington Minimum Wage Law case are concerned. With respect to the California Act, there is an additional constitutional question which has not received judicial construction as yet (in so far as this particular statute is concerned). The additional problem to which we refer is: Has the Legislature delegated legislative powers to the Industrial Welfare Commission? If the California Supreme Court should ever have this question before it and if it should decide that there has been a delegation of legislative power, the California Minimum Wage Law will, of necessity, be held to be in conflict with the California Constitution. However, considering that the California Minimum Wage Law has been in effect since 1913, it is not likely that an adverse decision with respect to delegation of power will be forthcoming. In any event, the powers granted by the Act to the Industrial Welfare Commission are not limitless and there is some precedent to justify the contention that no delegation of legislative power has been made. For all practical purposes, it is necessary to conclude that the decision of the United States Supreme Court in the Washington Minimum Wage Law removes all major doubts with respect to the constitutionality of the California Minimum Wage Law.

The recent turn of events in this field makes appropriate a consideration of the California Minimum Wage Law and a discussion of the rules and regulations issued by the Industrial Welfare Commission thereunder, particularly in so far as the rules and regulations relate to the medical profession. The California Act creates an industrial welfare commission of five members, at least one of whom shall be a woman. The Commission is given very broad powers. Possibly its most important powers are contained in Section 6 of the Act, which reads as follows:

> The Commission shall have further power after a public hearing had upon its own motion or upon petition, to fix:
> 1. A minimum wage to be paid to women and minors engaged in any occupation, trade or industry in this state which shall not be less than a wage adequate to supply to such women and minors the necessary cost of proper living and to maintain the health and welfare of such women and minors.

† Editor's Note.—This department of CALIFORNIA AND WESTERN MEDICINE, containing copy submitted by Hartley F. Peart, Esq., will contain excerpts from the syllabi of recent decisions and analyses of legal points and procedures of interest to the profession.