

July 21, 1936.

Mr. S. S. Yates, President,
Chicle Development Company,
500 Fifth Avenue,
New York City.

Dear Mr. Yates:

Re: Chicle Investigation Report.

I enclose herewith a copy of my suggested report by the Chicle Development Company to the United States Department of Agriculture; and a copy of my covering letter to Mr. Campbell. Please immediately telephone whether you approve it. I have sent similar copies to our three manufacturers subject to a like request. For I wish to transmit this report to Washington at once. At the same time I will send a copy to Mr. Wharton.

This report is a revision of the first two parts of the report prepared by you. And I have carefully revised it in pursuance of the following principles of policy:

(a) The principle that this report should be made by the Chicle Development Company alone and without reference by name to the three manufacturers represented. (Of course, their representation must be impersonally indicated.) For that Company is the only respondent to the chicle detention proceedings in issue; it is unnecessary and unwise to involve the aforesaid manufacturers by name in these proceedings; and that is especially so as to the Wm. Wrigley Jr. Company.

(b) The principle of strictly confining this report to the only question raised by the government, which is the significant lead contamination of chicle, and to a statement of the fundamental facts of the investigation of such contamination and the resulting remedial action. A statement sufficient to establish the reliable character of this investigation, to disclose the potential source of significant contamination discovered by this investigation; and to indicate that remedial action has been taken effective to remove this source.

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(c) The principle of drawing this report from the point of view that the discovered potential source of such contamination is limited in extent and relatively insignificant in effect. It is highly important not to make this report a basis for government concern with respect to chewing gum manufactured from the chicle in question.

Therefore I have omitted all other analytical data and reference thereto. These data transcend the immediate issue here; they may raise vexatious questions which do not now exist; and we can and will use them for our own constructive service.

We are not yet prepared to submit a further and related report upon the cleaning of the old imported chicle. It is important that this report be scientifically conclusive, for it deals with the manufactured chewing gum. We can determine in the fall when to submit this report and in what form. Presumably the scientific investigation upon which it rests will be then completed.

I leave for Europe on August 8th for return about October 1st.

Cordially yours,

Charles Wesley Dunn

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