able conservancy statutes have clearly obtained contrary re-
sults. The Colorado,12 Minnesota,13 and Ohio14 conservancy
acts have successfully withstood the charge that they dele-
gate legislative power to the courts in the organization of
conservancy districts. However, the Supreme Court of Kan-
sas has held that the Kansas law, for which the Ohio law
served as a model, was unconstitutional because it granted
legislative power to the judiciary.15 These decisions appear
to be rationalized only upon the attitude of the particular ju-
diciary toward the separation of powers doctrine and the ex-
tent to which it believes that the doctrine has gone by the
board, or does not demand rigid adherance in instances where
the judiciary is not encumbered by the added burden and the
public needs will be served. The Indiana Courts have taken
a liberal view toward separation of powers in other situations
and have not required a strict enforcement of the doctrine.16
In view of these precedents it would appear that the court's
power to organize conservancy districts would not constitute
a violation of the separation of powers doctrine in Indiana.

CONTRACTS, SALES AND ASSIGNMENTS

Assignment of Wages. Assignment of wages by employ-
ees for the following additional purposes were validated:11
(1) installment purchase of stock of the employer-company or
its subsidiaries pursuant to a written purchase agreement,
provided that the employee may cancel the agreement at any

cipal cases there annotated was reversed on rehearing. The court
on rehearing held that the judicial establishment of drainage dis-
tricts was not an unconstitutional delegation of legislative power.
Burnett v. Greene, 105 Fla. 35, 144 So. 265 (1932). The delegation
of powers problem is also discussed in Note (1929) 64 A.L.R. 1335.
1921).
16. Town of St. John v. Gerlach, 197 Ind. 289, 150 N.E. 771 (1925)
(disannexation of territory from cities and towns by the judiciary
held not an unconstitutional delegation of legislative power to
the judiciary); Paul v. Town of Walkerton, 150 Ind. 565, 50 N.E.
725 (1898) (held that the circuit court, on appeal, had power to
hear and determine an annexation case de novo, and to render
final judgment, annexing or refusing to annex such territory,
without regard to the result before the board of commissioners);
Note (1930) 69 A.L.R. 266, 269.
(Burns, Supp. 1945) §40-214.
time before completing payments on the stock;\(^2\) (2) deposit in a bank or trust company for the employee's account;\(^3\) (3) payment of premiums on policies of insurance or annuities purchased by the employee on his own life;\(^4\) and (4) assessments or dues on a hospital service, surgical or medical expense plan, or to an employee pension or benefit plan.\(^5\)

**Retail Installment Sales.** The maximum price for goods which may be sold on installments was raised from one thousand five hundred dollars to two thousand five hundred dollars.\(^6\)

A 1935 statute permitted assignment of retail installment contracts only to licensees under that act.\(^7\) Assignment may now be made to a retail seller who was a party to the sale, whether or not he is licensed under the 1935 act.\(^8\)

All persons other than parties to the contract or authorized assignees are prohibited from suing on any retail installment contract.\(^9\)

**Legal Holidays.** The days of city and primary elections are newly-declared legal holidays.\(^10\)

**CORPORATIONS**

**Voting Trusts**—Chapter 46 legalizes voting trust agreements\(^1\) when the purpose of the agreement is lawful.\(^2\) Ob-

2. §1(c)(4).
3. §1(c)(10).
4. §1(c)(11).
5. §1(c)(8).
8. C. 238, §2. By taking advantage of this exception to the licensing statute, retail sellers may accept reassignment of commercial paper from finance companies and thereby control relations with their customers.
9. Ibid.
1. "The current prevailing view toward voting trusts has come to be that they are valid even in the absence of statute". Ballantine, "Corporations" (rev.ed.1946) §184.
2. "The statutes are not intended to preclude the courts from invalidating voting trusts which have no legitimate business pur-