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### Herbert Hoover and the Constitution

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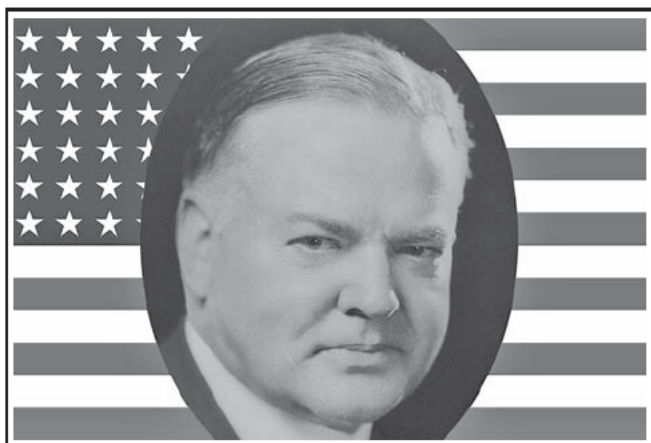
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## Herbert Hoover

JOHN Q. BARRETT

*Herbert Clark Hoover, first an international businessman, a global hero during World War I, and then a cabinet officer under Presidents Harding and Coolidge, was elected president in 1928. The next year, as President Hoover embarked on his progressive agenda for the country, the Roaring Twenties ended, crashingly, in the Great Depression. Hoover responded inadequately, constrained more by his own beliefs in volunteerism than by constitutional limits on his powers. His failure to relieve public suffering overshadowed his presidential accomplishments, including innovative government programs and three Supreme Court appointments.*



## Introduction

Few reputations have risen and fallen like that of Herbert Hoover. By the end of World War I, he was a world hero whom many Americans could not wait to elect president, if only he would run. In 1928, he sought the office (as a Republican), and they did elect him. Less than a year later, the stock market crashed and the Great Depression began. During the rest of Hoover's presidential term, the American public, which had viewed him as a managerial superman, came to conclude that he was not solving and could not solve this calamity. In 1932, the voters rejected him resoundingly. For much of the rest of Hoover's long life, he was a political pariah. And in the years since his death, most have regarded Hoover as among the most failed of failed presidents. Underneath that defining reality, however, his life story, his pre-presidential accomplishments, his views on U.S. constitutional government, and his productivity into old age make his a life worth studying.

Hoover, a descendant of Swiss immigrants, was born on August 10, 1874, in West Branch, Iowa, a Quaker settlement. Nicknamed "Bertie," he was the middle of three children. His father Jesse, a blacksmith who became a businessman and a local politician, died when Herbert was six, leaving the family impoverished. His mother Hulda(h), a Society of Friends minister, raised her children in the strictness of her faith and often put this ministry ahead of their care. When she died soon after her husband, her orphaned children were parceled out to relatives. Herbert moved to an uncle, and six years of hard labor, in Oregon. Some believe that his childhood scarred his personality for life, producing the stiffness, the shyness, and the lack of political skills that, in the crisis of the Great Depression, doomed his presidency.<sup>1</sup>

Hoover's boyhood made him hardworking, self-reliant, and a West-erner. In 1891, he was admitted to Stanford University's first class. He studied geology, became a campus leader, and met Lou Henry, the student whom he later married. After graduating in 1895 (ironically, a time of economic depression), he worked in gold mines and eventually found work as a mining engineer. That position took him to London and eventually to Australia, where his employer struck gold and Hoover became a hard-driving mine manager. He next worked in China, supervising vast mining

operations, and in many other spots across Asia. In 1908, he started his own global mining and engineering firm, achieving business renown and great personal wealth.<sup>2</sup> These experiences shaped Hoover's economic and social outlook. He believed that individual effort, corporate power, business self-regulation, and citizen volunteerism were the proper paths—and for an American, the constitutional paths—to progress.<sup>3</sup>

When World War I began in August 1914, Hoover worked initially in London to provide financial aid and evacuation to two hundred thousand American travelers in Europe. Next, he headed the Commission for Relief in Belgium, administering food aid to civilians who, cut off from supplies by the war and blockades, otherwise would have starved. Through this work, which lasted through 1916, Hoover saved millions and became a global emblem of selflessness, talent, and administrative genius.<sup>4</sup>

In 1917, after the U.S. joined the war, President Wilson recruited Hoover to serve as U.S. food administrator. Exercising vast powers—sometimes without any statutory authorization—Hoover encouraged, directed, and enforced food rationing to free up supplies for U.S. troops fighting in Europe. After the war, Hoover assisted President Wilson at the Paris Peace Conference and then became U.S. relief administrator in Europe. By 1920, his popularity was so great that the Democratic Party and the Republican Party each wanted Hoover to run as its presidential candidate.<sup>5</sup>

Hoover declined to run for president in 1920. Instead, he supported the Republican nominee, Senator Warren G. Harding, who, after his inauguration, appointed Hoover as secretary of commerce. In that position, which he held through Harding's presidency (1921–1923) and most of Calvin Coolidge's (1923–1929), Hoover exercised considerable power and stayed in the public eye. He promoted government regulation of new industries, including aviation and radio, and led government policy regarding business and industry during a time of great economic advances.

When President Coolidge decided not to seek reelection in 1928, Hoover, running for elective office for the first time in his life, finally sought the presidency. Nominated by the Republicans, he campaigned to lead America's "final triumph over poverty." His life story, including business successes and world achievements, was his platform. Benefitting from his reputation, from general prosperity, and probably from public prejudice against the Catholicism of his opponent (Governor Alfred E. Smith of New York), Hoover carried forty out of forty-eight states (with 58 percent of the popular vote), winning 444 electoral votes and the White House.<sup>6</sup>

## Presidency

After taking office in March 1929, President Hoover sought immediately and energetically to complete America's rise to greatness. Through legislation and executive actions, he addressed some of the "uncompleted tasks in government," including greater protections for labor, tax reform, patronage reform, and natural resource conservation. Exercising his constitutional power under Article II, Section 3, he called Congress into a special session on April 15, 1929—the twenty-second special session in U.S. history—to combat distress in the farm economy.<sup>7</sup> By the time the session ended on November 22, 1929, Hoover had obtained a farm bill providing new support for agricultural cooperatives.<sup>8</sup> In its regular session, which began a week later, Congress passed and the president signed one item that had not been finished in the special session: greater tariff protection for industry. That law, the protectionist Hawley-Smoot tariff law of 1930, probably hampered trade during the Great Depression.

President Hoover also focused on crime and law enforcement. In spring 1929, he established a commission, headed by former U.S. Attorney General George W. Wickersham (who had served under President Taft), to identify causes of crime, especially violations of laws enforcing the Eighteenth Amendment prohibition of alcohol, and to make policy recommendations. The Wickersham Commission—officially called the National Commission on Law Observance & Enforcement—investigated public behavior under Prohibition laws and studied police practices in the states. The commission's reports documented the widespread non-enforcement of Prohibition (which Hoover supported, as a candidate in 1928 and throughout his presidency) and abusive police interrogation practices.<sup>9</sup> Although the commission called for more vigorous enforcement of Prohibition, its reports created widespread knowledge of Prohibition's failure, contributing to the ratification of the Twenty-First Amendment in December 1933, repealing the Eighteenth and returning to the states the constitutional power to become "wet." By documenting police abuses, the Wickersham Commission also contributed to expanded judicial interpretations of Fourteenth Amendment limits on such conduct.<sup>10</sup>

Herbert Hoover revered the U.S. and its Constitution. He was not a lawyer, however, so his constitutional knowledge and understanding were not formed by legal education, law practice, or much legal theory. As he described it in a Constitution Day speech early in his post-presidency, he

saw the Constitution as a “working plan” with three core characteristics. The Constitution, he said, (1) preserves “a great Federation of States”; (2) places the States under a system of representative national government; and (3) through the Bill of Rights, protects “the vital principles of the American system of liberty”—and, he added with a trace of self-congratulation, “it does not require a lawyer to interpret those provisions.”<sup>11</sup>

### *Response to the Great Depression*

In October 1929, on Black Tuesday, the U.S. stock market crashed. Hoover, believing that the resulting downturn was an American recession, sought voluntary responses from business and labor. He also called for more public works and other spending by states and cities, rather than by the federal government. U.S. banks began to fail; by 1930, over a thousand banks had suspended operations. Foreclosures rose precipitously, with over a million families losing their homes and farms. In 1931, the Committee for Unemployment Relief issued a report stating that between four and five million Americans had been thrown into unemployment. A believer in the power of the free market and individual initiative, Hoover opposed direct federal relief for suffering Americans. The public perceived this as presidential hard-heartedness—by 1932, camps of homeless people in cities across the nation were known as Hoovervilles—and that view was compounded by the army’s forceful response in 1932 to World War I veterans who marched on Washington seeking benefits. To Hoover, his resistance to the federal “dole” reflected the proper, limited, constitutional role of the federal government.

### *Supreme Court Decisions and Appointments*

In 1932, a Washington, D.C., newspaper headline reported “Docket of Supreme Court Has No Cases of National Import.”<sup>12</sup> Although that was an exaggeration, the Hoover years did not feature Supreme Court decisions as important as those in earlier and later eras. President Hoover did, however, win Court decisions that clarified the breadth of the president’s powers to veto and sign bills into law and to make executive branch appointments. He also appointed notable Supreme Court justices and, indeed, played a small ceremonial role in building the “marble temple” that is the Court’s home today.

In *The Pocket Veto Case*, the new attorney general, William DeWitt Mitchell, who had served as solicitor general under President Coolidge, argued on behalf of the United States on the Hoover administration's eighth day. That May, the Supreme Court decided unanimously that under Article I, Section 7, of the Constitution, the president's power to "pocket-veto" legislation by not signing it after a Congress's adjournment applied not only to the adjournment at the end of a two-year Congress, but also to an adjournment at the end of Congress's first regular session.<sup>13</sup> In other words, the pocket veto could be used during an adjournment midway through a Congress's two-year lifespan.<sup>14</sup>

Three years later, the Hoover administration won another Supreme Court case that clarified a related dimension of a president's constitutional powers in the legislative process. *Edwards v. United States* was a test case designed to make the Supreme Court answer a question that had loomed unresolved over every president.<sup>15</sup> The Court held, again unanimously, that the Constitution did not limit the president's "ten Days (Sundays excepted)" for signing a bill into law to the period before a Congress's final adjournment. A president had all of that time—"ten Days (Sundays excepted)"—to sign a bill into law or veto it, even if the period extended beyond the final adjournment of Congress. This decision spared President Hoover and his successors from the pressured work, which he and each of his predecessors had engaged in, of sitting in the Capitol building as a Congress was about to adjourn, hurriedly reviewing and then signing or vetoing the many bills that the House and Senate typically would pass in those final hours.

Finally, the Supreme Court also ruled in President Hoover's favor in a case concerning the constitutional process by which presidents appoint executive branch officials. In late 1930, Hoover nominated George Otis Smith, longtime director of the U.S. Geological Survey, to head the newly created Federal Power Commission. The Senate confirmed Smith's nomination and so notified the president, who then signed Smith's commission and had it delivered to Smith. The new commission head then took his oath of office and began work. Under Smith's leadership, the Federal Power Commission promptly dismissed its accountant and its solicitor. Outraged, the Senate invoked its rules defining procedures for handling presidential nominations and asked President Hoover to return the Senate resolution consenting to Smith's appointment. Hoover refused, declaring that Smith was duly appointed and that returning the Senate's consent

would give the legislative body an unconstitutional power to encroach on completed presidential appointments. The Senate, employing outside counsel, then began a high-profile test case.<sup>16</sup> In *United States v. Smith*, the Supreme Court held unanimously in favor of the president's authority. According to Senate rules, the Court said, when the Senate notified the president of its confirmation of a nomination, the president was empowered to make a final appointment. The appointment had to occur (as it had in Smith's case) before the Senate notified the president that it was recalling the nomination and reconsidering its vote to confirm.<sup>17</sup>

In addition to winning these decisions clarifying presidential powers, President Hoover, fulfilling one of his important constitutional responsibilities, made three extremely significant appointments to the Supreme Court.<sup>18</sup> In early 1930, following the resignation of Chief Justice (and former president) Taft, Hoover appointed the next chief justice, Charles Evans Hughes.<sup>19</sup> Hughes was a former associate justice, the 1916 Republican presidential candidate (and near winner), and secretary of state from 1921 to 1925. As Hoover's former cabinet colleague and the president's trusted friend, Hughes served on the Court until 1941. He led the Supreme Court during a decade of significant transition. The Hughes Court, first actively hostile to New Deal laws under President Franklin Roosevelt, became a Court of restraint and deference toward the political branches; Hughes became one of the greatest chief justices in history.

Associate Justice Edward T. Sanford died less than one month after Chief Justice Hughes received his commission. To fill the vacancy, President Hoover first nominated John J. Parker of the U.S. Court of Appeals for the Fourth Circuit, but the nominee was rejected by the Senate.<sup>20</sup> Hoover then nominated Philadelphia lawyer Owen J. Roberts, who in 1924 had served as a Teapot Dome special prosecutor, to fill the vacancy. The Senate confirmed Justice Roberts, who served on the Court until he resigned in 1945. Justice Roberts ended up playing a key role as the swing vote in the "Switch in Time that Saved Nine" during the Roosevelt administration, saving FDR's New Deal program (see Chapter 32, "Franklin D. Roosevelt"). He also led the Roberts Commissions, which investigated the Japanese attack on Pearl Harbor and other matters during World War II, leaving an important mark on the country.

In early 1932, following the resignation of Associate Justice Oliver Wendell Holmes Jr., President Hoover made his final appointment to the Court. Responding to the overwhelming consensus of the legal



profession, he selected Benjamin N. Cardozo, then chief judge of the New York Court of Appeals. Justice Cardozo served only six years, but on the Supreme Court, he completed one of the greatest judicial careers in U.S. history.<sup>21</sup>

Hoover's contributions to the Supreme Court also included a ceremonial connection to its edifice. On October 13, 1932, flanked by the justices and many other officials, the president—using a trowel made from mahogany and silver taken from articles once used in the old Supreme Court chamber—placed the first dab of mortar beneath the “A.D. 1932” cornerstone of what would become the Supreme Court building in Washington.<sup>22</sup> When it was completed in 1935, the Court had, for the first time, its own home.

### Post-Presidency

The Great Depression caused the U.S. economy to spiral downward, culminating in one of the worst economic disasters in the nation's history. With it, citizens' morale and confidence in the government sank, along with the public's approval of President Hoover. In November 1932, New York Governor Franklin D. Roosevelt carried forty-two of forty-eight states (with 57 percent of the popular vote), winning 472 electoral votes to President Hoover's 59. Once the world's hero, Hoover had become a rejected leader and a political pariah.

Yet Hoover, age fifty-eight when he left office, never retired or accepted his defeat. Over the next three decades, he worked to attack his critics, to rehabilitate his reputation, to write extensively, and to perform meaningful national and international service. In his first years out of office, Hoover tended to be a combative, partisan critic of FDR and the New Deal.<sup>23</sup> Indeed, Hoover worked aggressively but unsuccessfully behind the scenes to secure the Republican nomination to run against Roosevelt in 1936 and especially in 1940.<sup>24</sup> His messages focused on liberty, freedom, and what he viewed as unconstitutional excesses in national government.

After FDR's time, and as a memories of the Depression became more distant, however, Hoover came to be viewed as an elder statesman. After years of exile from the White House, he was welcomed back by President Harry Truman and they became friends.<sup>25</sup>

In 1946, in something of a reprise of Hoover's World War I-era activities, Truman sent Hoover on a 35,000-mile trip to thirty-eight countries

on five continents, to survey post–World War II conditions, including food shortages and the plight of refugees.<sup>26</sup> Under Truman and again under President Dwight D. Eisenhower, Hoover twice headed commissions that recommended reorganizations of the federal government, which had vastly expanded since his presidency.

### Conclusion

On October 20, 1964, President Hoover, age ninety and then the longest-surviving former president in U.S. history, died in his apartment in New York’s Waldorf Astoria Hotel. His remains are buried in West Branch, Iowa, near the site of his birth and what is today his presidential library and museum.<sup>27</sup> Another towering tribute to Hoover’s memory can be found at Stanford University, in the form of the Hoover Institution on War, Revolution and Peace.<sup>28</sup> This leading academic research center developed from the archive of war-related material that Hoover first collected in Paris in 1919. Herbert Hoover probably formed his constitutional views by self-projection. He, an American from very humble beginnings, rose and flourished in business because of individual freedom and effort. He then functioned in important and historic roles—including as president of the United States—by considering, exercising, and addressing the chief executive’s constitutional place, powers, and limits for almost fifty years. He viewed the U.S. Constitution as empowering individuals and government officials to take the steps he regarded as necessary and wise, and as limiting those who would seek to do otherwise.

### NOTES

1. See generally William E. Leuchtenburg, *Herbert Hoover* (New York: Times Books, Henry Holt & Co., 2009). This chapter relies significantly on this scholarly and elegant book.
2. See generally George H. Nash, *The Life of Herbert Hoover*, vol. 1, *The Engineer, 1874–1914*, vol. 1 (New York: W.W. Norton, 1983).
3. Joan Hoff, “Hoover, Herbert Clark” in *American National Biography* 11 (1999): 151–155. See, for example, Herbert Hoover, *American Individualism* (Garden City, NY: Doubleday, 1922).
4. See generally George H. Nash, *The Life of Herbert Hoover*, vol. 2, *The Humanitarian, 1914–1917* (New York: W.W. Norton, 1988).
5. See generally George H. Nash, *The Life of Herbert Hoover*, vol. 3, *Master of Emergencies, 1917–1918* (New York: W.W. Norton, 1996).

6. Allan J. Lichtman, *Prejudice and the Old Politics: The Presidential Election of 1928* (Chapel Hill: University of North Carolina Press, 1979), cited in Daniel Okrent, *Last Call: The Rise & Fall of Prohibition* (New York: Scribner, 2011), 308.
7. U.S. Const. art. II, § 3. In 1929, the Seventieth Congress, which had been elected in 1926 and had become a lame duck following the 1928 election, adjourned on March 3, the day before President Hoover's inauguration. As a result, absent the calling of a special session, the new Seventy-First Congress would not have met until the first Monday in December, almost nine months later. U.S. Const. art. I, § 4, cl. 2. The Twentieth Amendment, which the states ratified unanimously during Hoover's presidency but which did not take effect until after he had left office, changed Congress's ordinary meeting date to January 3. The amendment also changed the presidential inauguration date from March 4 to January 20. As a result, after a presidential election, the new Congress meets shortly before the new president is inaugurated. U.S. Const., amend. XX, § 2 (effective October 15, 1933); "Next Extra Session of Congress Is 22d," *Washington Post*, February 24, 1929, M14.
8. In the special session, Congress also passed President Hoover's recommended bill providing for a comprehensive 1930 federal census and then automatic reapportionment of House districts using the population data collected. Congress rejected, however, his request to postpone the effective date of new national origin-based immigration quotas.
9. Okrent, *Last Call*, 304–305, 315–316. Hoover emphasized "respect for all law." Noting that the Constitution provides for no presidential role in its amendment, he also believed that a president's duty is to enforce that Constitution as it is and to take no positions on its possible amendment.
10. See, for example, *Ashcraft v. Tennessee*, 322 U.S. 143, 150 n. 5 (1944) (reversing a defendant's criminal conviction because it was based on his confession after thirty-six hours of unconstitutionally coercive police detention and sleep deprivation, and quoting Wickersham Commission findings about secret, illegal "third degree" practices conducted by police in their stations' upstairs and back rooms); *Miranda v. Arizona*, 384 U.S. 436, 445 (1966) ("From extensive factual studies undertaken in the early 1930's, including the famous Wickersham Report to Congress by a Presidential Commission, it is clear that police violence and the 'third degree' flourished at that time"). See also *Stein v. New York*, 346 U.S. 156, 201–202 (1953) (Frankfurter, J., dissenting) ("By its change of direction the Court affords new inducement to police and prosecutors to employ the third degree, whose use the Wickersham Commission found 'widespread' more than thirty years ago and . . . unsparingly condemned").
11. Herbert Hoover, "Meaning of Constitution & Bill of Rights," speech, San Diego, CA, September 17, 1935, [www.constitution.org/cmt/hh/constitution\\_day\\_speech\\_1935.html](http://www.constitution.org/cmt/hh/constitution_day_speech_1935.html).
12. *Washington Post*, September 25, 1932, 11.
13. U.S. Const., art. I, § 7, cl. 2, provides: "Every Bill which shall have passed the House of Representatives and the Senate, shall, before it become a Law, be presented to the President of the United States; If he approve he shall sign it, but if not he shall return it, with his Objections to that House in which it shall have originated, who shall enter the Objections at large on their Journal, and proceed to reconsider it. If after such

Reconsideration two thirds of that House shall agree to pass the Bill, it shall be sent, together with the Objections, to the other House, by which it shall likewise be reconsidered, and if approved by two thirds of that House, it shall become a Law. But in all such Cases the Votes of both Houses shall be determined by yeas and Nays, and the Names of the Persons voting for and against the Bill shall be entered on the Journal of each House respectively. If any Bill shall not be returned by the President within ten Days (Sundays excepted) after it shall have been presented to him, the same shall be a Law, in like Manner as if he had signed it, unless the Congress by their Adjournment prevent its Return, in which Case it shall not be a Law.”

14. The Pocket Veto Case (*The Okanogan, Methow, San Poelis, Nespelem, Colville, and Lake Indian Tribes or Bands of the State of Washington v. United States*), 279 U.S. 655 (1929).
15. *Edwards v. United States*, 286 U.S. 482 (1932).
16. The Senate’s lawyers were former presidential nominee John W. Davis and former Michigan governor Alexander J. Groesbeck. Smith was represented by former U.S. senator George Wharton Pepper. The United States, which took cooperative administrative steps that allowed the Senate to bring the case on the merits was *amicus curiae* on Smith’s side of the dispute; the U.S. lawyers were Attorney General Mitchell, Solicitor General Thomas D. Thacher, and Department of Justice attorney (and future Harvard Law School dean and, decades later, solicitor general) Erwin N. Griswold.
17. *United States v. Smith*, 286 U.S. 6 (1932). In *Smith*, Justice Brandeis’s opinion for the Court tracked the legal opinion on this issue that the attorney general had provided earlier to President Hoover. William D. Mitchell, *Legality of Appointment of Certain Members of the Federal Power Commission*, 36 *Official Opinions of the Attorneys General* 382–388 (January 10, 1931).
18. U.S. Const., art. II, § 2, cl. 2 (the President “shall nominate . . . Judges of the supreme Court”). See generally Henry J. Abraham, *Justices, Presidents & Senators*, 5th ed. (Lanham, MD: Rowman & Littlefield, 2008), 155–162.
19. Merlo J. Pusey, *Charles Evans Hughes*, vol. 2 (New York: Macmillan, 1951), 650–652. A competing account of this event is Frederick Bernays Wiener, “Justice Hughes’ Appointment: The Cotton Story Re-Examined,” *Supreme Court Historical Society* (1981): 78–91. A possible harmonization is James M. Buchanan, “A Note on the ‘Joe Cotton Story,’” *Supreme Court Historical Society* (1981): 92–93.
20. The NAACP, outraged by Parker statements that were hostile to black people voting, and labor unions, and outraged by Parker decisions upholding antilabor injunctions, organized and lobbied successfully to defeat his nomination. Judge Parker continued to serve in the Fourth Circuit until his death in 1958. He was mentioned prominently as a leading candidate, but was not selected, for Supreme Court appointment by Presidents Roosevelt, Truman, and Eisenhower. Judge Parker did, by appointment of President Truman, serve as the U.S. alternate member of the International Military Tribunal in Nuremberg during 1945 and 1946.
21. Andrew L. Kaufman, *Cardozo* (Cambridge, MA: Harvard University Press, 1998), 455–456, 461–465; Andrew L. Kaufman, “Cardozo’s Appointment to the Supreme Court,” *Cardozo Law Review* 1 (1979): 23.

22. "Corner Stone of New Home of Supreme Court of the United States Is Laid," *American Bar Association Journal* 18 (1932): 729 (reporting the use of the trowel by President Hoover, Chief Justice Hughes, and ABA President Guy A. Thompson, and that it was "made of silver and mahogany from old articles long used in the Court's Chamber").
23. See, for example, Herbert Hoover, *The Challenge to Liberty* (New York: Charles Scribner's Sons, 1934).
24. George H. Nash, editor's introduction to *The Crusade Years, 1933–1955: Herbert Hoover's Lost Memoir of the New Deal Era and Its Aftermath* (Stanford, CA: Hoover Institution Press, 2013), xxiii.
25. Nancy Gibbs and Michael Duffy, *The Presidents Club: Inside the World's Most Exclusive Fraternity* (New York: Simon & Shuster, 2012). An online archive is "Hoover & Truman: A Presidential Friendship," a joint project of the Herbert Hoover Presidential Library and the Harry S. Truman Presidential Library, accessed May 27, 2015, [www.trumanlibrary.org/hoover/book.htm](http://www.trumanlibrary.org/hoover/book.htm).
26. Eugene Lyons, *Herbert Hoover: A Biography* (Garden City, NY: Doubleday, 1964), 385–390.
27. The Herbert Hoover Presidential Library and Museum, in West Branch, IA, is a federal government facility administered by the National Archives and Records Administration. The website is [www.hoover.archives.gov](http://www.hoover.archives.gov).
28. See the website of the Hoover Institution, Stanford, CA, and Washington, DC, at [www.hoover.org](http://www.hoover.org).