

cation of Laws', said new section to be known as Section 9 and to follow immediately after Section 8 of said Article, providing for the filing of rules and regulations adopted by any officer, board or commission."

This measure directly affects the State Law Department from which I have received the following opinion :

"This Bill adds a new section to Article 76 of the Annotated Code of Maryland (1939 Edition), title 'Publication of Laws', and it requires, in substance, that every state officer, board or commission empowered with authority to adopt rules and regulations, submit to the Attorney-General for approval, copies of every such rule or regulation heretofore or hereafter adopted. Upon such approval, copies are required to be filed with the Clerk of the Court of Appeals and the Department of Legislative Reference and no rule or regulation hereafter made is to be effective until after compliance with the provisions of this section.

"There are a number of objections to this Bill. In the first place, as has been noted, the body of the Act requires all rules heretofore or hereafter adopted to be submitted to the Attorney-General for approval. The title gives no indication of this provision, it merely stating 'Providing for the filing of rules and regulations adopted by any officer, board or commission'. This provision as to filing is, of course, contained in the Act and there is an additional provision not indicated by the title, requiring approval by the Attorney-General as a prerequisite of filing. Such a discrepancy between the title and the body of the Act may well render it invalid. Assuming, however, the validity of this provision, it should be noted that all regulations, whether heretofore or hereafter adopted, are required to be submitted for approval and this approval is a prerequisite to filing. On the other hand, no regulation hereafter passed becomes law until it is filed and this phraseology leaves open for argument the validity of those regulations heretofore passed and submitted to the Attorney-General under this Bill but not approved or acted upon by him. There seems to be no necessity for leaving this legal question subject to debate.

"Further, it should be noted that the Bill establishes no standards by which the approval of the Attorney-General is to be determined. In other words, is this approval to be based upon the legal sufficiency of the ruling or is it to be based upon the Attorney-General's opinion as to the policy of the rule? If the standard is to