

## The U.S. Territories and Equality

### 1. Introduction

- a. **The** issue that will be addressed is the situation in which the territories of the United States of America are not being accommodated the full benefits of being part of the country, such as being allowed to vote for a shared national leader. As the CNMI is also affected by an outdated law, it also beckons the question of whether or not the people of the U.S. Territories will be predisposed to take part of presidential elections. As citizens of the United States of America, they have the right to choose a leader who will decide and formulate laws that affect the wellbeing of the Commonwealth as a whole.
- b. **What** can also be addressed is the effect of being a seemingly unheard of location in the world/country. The fact that being isolated can greatly affect the accommodations provided in the island: poor healthcare, exorbitant imports, lack of trained professions, underdeveloped equipment, and a strong dependence on the tourism economy and federal funds.

### 2. Literature Review

- a. The Articles will provide insight and background information that will attest to the claims that the essay will state.
  - i. According to the U.S. Supreme Court “Insular Cases” of 1901, it states that the U.S. Territories obtained during the Spanish-American war are subject to limitations in constitutional rights, such as voting, due to being of “alien races” who are unable to understand “Anglo-Saxon Principles.”

- ii. In *“The Insular Cases: The Establishment of a Regime of Political Apartheid”*, written by Judge Juan R. Torruella, he states how the insular cases have started and how it evolved into the currently outdated law today.

### 3. Research Question

- a. Why is it that U.S. Territories are being infantilized and ignored when seemingly small laws can drastically affect the land entirely
  - i. What were the negotiations agreed upon between the United States and the CNMI.
  - ii. If given the opportunity again, will the citizens of territories choose to become a state or become fully independent from the U.S.?
  - iii. In what ways will the CNMI develop if it did achieve statehood?

### 4. Research Methodology

- a. I think that one way to see if the citizens desire independence or not is to survey a number of people of differing ages and groups and ask if divorcing from the United States is a good idea. Then maybe I can look up on how much dependent is the CNMI on the U.S. and make a conclusion on whether or not the CNMI can survive.
  - i. Survey approx. 50 people
    - 1. 25 – Young Adults to Early Forties
    - 2. 25 – “Older” citizens (people who have been on island for 50+ yrs.

### 5. Interest in Topic

- a. One of the many issues that plague the CNMI, other than injustice and LOTS of corruption would be our inability to accept change and seek growth. The CNMI tries its best to stay close to its roots and I want to understand why. With the changing society, I think that the preferred choice of separation from the United States may have changed over the years.

## 6. Persuasive Argument

- a. The CNMI should certainly be aware of the government around them. Whether they like it or not, the United States mainland have the freewill to affect the community without realizing it. Issues like the situation of the CNMI's contract workers has greatly caused a deficit in qualified professionals due to some trouble with statutes and immigration papers. The community may be compared to a small child: present, but not heard. It's up to the people of the CNMI to review the old laws and negotiate with one another in order for our true voices to be heard.

## 7. References

- a. **L. (2015, March 08). U.S. Territories: Last Week Tonight with John Oliver (HBO). Retrieved September 01, 2016, from <https://www.youtube.com/watch?v=CesHr99ezWE>**
- b. **Insular Cases. (n.d.). Retrieved September 01, 2016, from [https://en.wikipedia.org/wiki/Insular\\_Cases](https://en.wikipedia.org/wiki/Insular_Cases)**
- c. **30, 2. A., 3, 2. A., 22, 2. J., 11, 2. A., 8, 2. A., 4, 2. A., . . . By Lana Birbrair '15, March 18, 2014. (n.d.). The Insular Cases: Constitutional experts assess the status of territories acquired in the Spanish–American War (video) - Harvard Law Today. Retrieved September 01, 2016, from**

<http://today.law.harvard.edu/insular-cases-constitutional-experts-assess-status-territories-acquired-spanish-american-war-video/>

- d. Torruella, J. R. (2007). THE INSULAR CASES: THE ESTABLISHMENT OF A REGIME OF POLITICAL APARTHEID. *THE INSULAR CASES: THE ESTABLISHMENT OF A REGIME OF POLITICAL APARTHEID*, 29(2).

Retrieved September 2, 2016, from

[https://www.law.upenn.edu/journals/jil/articles/volume29/issue2/Torruella29U.Pa.J.Int'lL.283\(2007\).pdf](https://www.law.upenn.edu/journals/jil/articles/volume29/issue2/Torruella29U.Pa.J.Int'lL.283(2007).pdf).

e.

#### 8. Tentative Schedule

MON	TUE	WED	THU	FRI
I will begin first by contacting historians, such as Dr. Anne Perez Hattori Guam Historian and Professor in the University of Guam, in hopes that she and the other people I converse with may be able to provide some insight.	Today, I am finalizing the proposal.			
	Then I will begin to do some heavy research myself on the topic and formulate a strong paper that persuades/informs the reader of the hidden problem that is the status of U.S. Territories.			

<p>As I continue writing I will begin to discover many other research methods and resources to comprehensively add to the research paper.</p>				

**Edited Standard Written English Minimum Requirements:**

- End-of-sentence punctuation.** Your work contains no run-on sentences, fragments, misused semi-colons, or comma splices (two independent clauses joined by a comma instead of by a period or a comma and conjunction).
- Verb forms.** Plural singular verbs end with –s; regular past verbs end in –ed; helping verbs are used, etc.
- Verb tense.** You avoided confusing shifts in tense.
- Subject-verb agreement.** Subjects and verbs agree in number in your sentences.
- Pronoun form.** You correctly chose between *me and me, her and her, etc.*
- Pronoun agreement.** Pronouns agree in number with their antecedents.
- Apostrophe and plurals.** You used *apostrophe + s* for possessives and did not confuse the apostrophe with plural nouns.
- Spelling.** (A typo counts as a misspelling).
- Proper sentence sense.** No words are omitted, scrambled, or incomprehensible.

**Other Minimum Requirements:**

- I submitted my essay to Turnitin and reviewed the results.
- I used the rubric for this assignment to revise my work. I estimate my grade to be: 93 I wrote the essay in the person assigned (1st, 2nd, 3rd) I used academic wording and checked for tense consistency.
- I ran the essay through a spelling check.
- I ran the essay through a word count and it meets the minimum word count.
- I attached all required supporting documents (such as photocopies of all sources I cited in this essay) to this checklist.

- Photocopied sources are labeled with the title and author as they appear on my Reference List.
- All cited passages are highlighted on the photocopies.
- A correct heading is included on the first page, with my name, the instructor's name, the course number, and date appearing on the first four lines of the top left side of the page.
- I wrote an original title.
- The title is centered and written between the heading and the first line of the paper.
- My work is typed, double-spaced, and uses Times Roman font in size 12.
- Margins are 1 inch on all four sides.
- I asked at least one other person to proofread the essay.
- I uploaded my assignment on Turnitin and checked for plagiarism errors in my draft before final submission.

Should the CNMI Become a State to the United States of America?

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Northern Marianas College

Dr. K. Bunts-Anderson

EN202, Section 1

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### Abstract

For years, the CNMI has been subject under foreign control. Although its right to self-government have thoroughly used, as promised from the United States, it brings upon the question if the people of the CNMI would want more: becoming an independent nation, or become one of the United States.

As of September 9, 2016, the student researcher has begun gathering information and opinions from the local community as well as experts on field. Surveys and questionnaires are distributed to the public through differing mediums, such as online surveys as well as through an emails inquiring about the Insular Cases of 1901. In addition to the questionnaires, small interviews have been performed to gain information from different perspectives. What is gathered throughout the study are opinions of the people categorized by age, gender, and media influence. The literature obtained about the issue, although not timely, still hold up within the laws to this day.

*Keywords:* Insular Cases of 1901, Northern Mariana Islands

## **Introduction**

The issue that will be addressed is the situation in which the territories of the United States of America are not being accommodated the full benefits of being part of the country, such as being allowed to vote for a shared national leader. As the CNMI is also affected by an outdated law, it also beckons the question of whether or not the people of the U.S. Territories will be predisposed to take part of presidential elections. As citizens of the United States of America, they have the right to choose a leader who will decide and formulate laws that affect the wellbeing of the Commonwealth as a whole. What is also addressed is the effect of being a seemingly unheard of location in the world/country. The fact that being isolated can greatly affect the accommodations provided in the island: poor healthcare, exorbitant imports, lack of trained professions, underdeveloped equipment, and a strong dependence on the tourism economy and federal funds. The questions that will be asked are:

- **In what ways will the CNMI develop if it did achieve statehood?**
- **Why is it that U.S. Territories are being infantilized and ignored when seemingly small laws can drastically affect the land entirely?**
- **If given the opportunity again, will the citizens of territories choose to become a state or become fully independent from the U.S.?**

## **The Process**

In order to gain information on the issue, an extensive amount of questioning would have to be put forth. The research mediums being used would be informal surveys and a few questionnaires. The thoughts, opinions, and the level of political knowledge of the community is essential in regards to the research.

To begin, what is needed is a set of questions that directly inquire a person about their status as a resident within a U.S. territory as it differs from person to person. The diversity of the community allows an in-depth perspective of the struggles of differing ethnic groups with different nationalities. The responses can range from pro-independence and vice versa, depending on their personal views of the statehood of the CNMI. Because one of the main points depends solely on the opinion of the people, it is important to search for people that will provide the most accurate information. So the most correct approach would inquire persons of age that have resided within the community for an extended amount of time. The questions would mostly focus on the information the taker would have to provide as well as fail to provide. The main inquisition would be the “Do you think the CNMI can thrive without the assistance of the United States?”

From what is expected, majority of the younger generation, who have live as ‘Americans’ for most of their lives would think negatively. In addition to the surveys, questionnaires shall be given through small informal interviews. The student research has taken it upon herself to personally question the local community through small informal interviews during day to day routine. In contrary to the younger generation, the older generation may have more hope for they have lived long enough to see the Commonwealth in its prime. Another form of gathering information would be contacting the experts within this field. Reaching out towards historians, lawyers, government officials, and other politicians may help in providing information that pertains the direct issue of the Insular Cases. They would most likely have more experience and more knowledge with this topic. One of the first out-reaches would be a Guam historian from the University of Guam. As the doctor would be the closest expert (distance-wise), it is anticipated that it would be the most convenient to return the information as well. Other experts will

undoubtedly be contacted, however it is not absolute that information will be provided back and in time. To battle this, the student researcher must contact many others in order to response at least some response.

Overall, the data collected from the surveys that is expected to return will most indefinitely be driven by opinion and differing lifestyles and mindsets. And in hopes to further strengthen the claim of the research, experts within the field must be contacted. Gathering information extensively is vital in this study and early instigation is likely.

### **Data Analysis**

The data recovered from the number of informal interviews and surveys have shown results of expected outcomes. Due to the strong reliance to the United States, the citizens of the CNMI have grown accustomed to the lifestyle of being a territory.

The information gained from the surveys have shown that the majority of the younger generation have no confidence towards the independence of the CNMI. The responses to the question “Do you think the CNMI should become an independent nation?” have been mostly answered with a simple “no” due to the CNMI being “too small” or “unprepared” (See Appendix A). It seems that the community have gotten so used to the assistance from the United States that faith in the local government have become lost. It is shown that more than half of the local community believe that the CNMI will not prosper if it were to become an independent. In addition to the surveys the student researcher has verbally distributed small questionnaires to the older community in order to gain the opinion from a different perspective. It is known that the elder community are less known to be influenced by western media. And from all the information gathered from approximately 50 participants from both the surveys and questionnaires, around 74% of the people believe that the CNMI should refrain from seeking

independence from the United States (See Appendix A, Figure 1). Although there was a small percentage that agreed for independence due to their desire to avoid further law restrictions that gaining political status as a state might have. They fear that the requirement to follow more rules and laws may affect their current way of living and culture.

To gain some expert information, the student research has sent some letters to expert within the field. The letters were specifically sent to historians and book writers who also happen to professors within their state's universities. Dr. Sparrow from the University of Texas in Austin, author of the book "*The Insular Cases and the Emergence of American Empire*", has responded how the CNMI would have to "give up its local control" in order to become a state, confirming some of the people hesitance (See Appendix B). The CNMI is more or less used for military advantage. The people Saipan, the capital of the CNMI, though are unafraid to lose some of their political freedom to the United States, as the country has been seen as a large political figure since gaining the island in the Battle of Saipan, in World War II (Hoffman 1950).

### **Literature Review**

The entire issue of the Insular Cases have originated from the Supreme Court's decision on whether or not the territories were subject to the U.S. Constitution. The issue sparked the Supreme Court's attention due to merchant, some import costs that were unwillingly paid (Sparrow 2006). Although the case was mainly directed towards Puerto Rico, it also affected the other territories such as Guam, America Samoa, Northern Mariana Islands, etc... One of the main reasons for the extensive research is to uncover the problems that Insular Cases are blatantly causing as well as the problems the community of the CNMI fails to see.

Due to the size and lack of political power, the CNMI is only to have "partial representation in Congress" meaning they do not have the ability to cast an electoral vote for

U.S. Presidency (Sparrow 2006, See Appendix B). So, in turn, changes in federal law could drastically affect the commonwealth as a whole. One perfect example would be the situation with immigration and contract workers on Saipan. The workforce of the island are predominantly contract workers, who, if contracts are not renewed on time, are forced to leave their lives from the island and are forced to go home. That may be a reason as to why some of the community, even to this day, believe that independence is a better alternative than subjecting to the United States (Willens, H. P., & Siemer, D. C. 1976). It is understandable why many people would have an opposition towards the case laws.

*If those possessions are inhabited by alien races, differing from us in religion, customs, laws, methods of taxation and modes of thought, the administration of government and justice, according to Anglo-Saxon principles, may for a time be impossible; and the question at once arises whether large concessions ought not to be made for a time, that, ultimately, our own theories may be carried out, and the blessings of a free government under the Constitution extended to them. We decline to hold that there is anything in the Constitution to forbid such action. (Downes v. Bidwell 1901 Page 182 U. S. 287)*

The racist syntax portray the United States' old principles that they refuse to deal with "alien races" (Torruella, 2007 Vol 29:2 pa 294 para 2). The "alien exclusion" is prominent within all the cases and it becomes obvious that the cases laws are no longer timely as the United States is constituted by a diverse population (Mendez 2013). This is what the community fails to see as they see the relationship comprehensively as a "self-governing commonwealth in political union with the United States upon termination" (Helfer, M.S. & Willens, H. P. 1975). And this ultimately alters their views of the benefits and detriments statehood may provide.

**Discussion**

Overall, this study has shown that the community of the CNMI have predominantly chosen to stay with the United States, despite the inferior depiction. It is shown that through years of being in a relationship with the country, it still has failed to update their laws to better fit the present. To further this study, it is advisable that a greater sample size to gain a better representation of the general public.

## References

Sparrow, B. H. (2006). *The insular cases and the emergence of American empire*. Univ Pr of Kansas.

**Helfer, M. S., & Willens, H. P. (n.d.). EXPLANATION OF THE COVENANT TO ESTABLISH A COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS IN POLITICAL UNION WITH THE UNITED STATES OF AMERICA [Letter written January 20, 1975 to James E. White Esq.]. Retrieved November 29, 2016, from <http://www.cnmilaw.org/pdf/source/Cov-Explanation.pdf>**

Hoffman, C. W. (1950). *Saipan: The beginning of the end* (No. 6). Historical Division, Headquarters, US Marine Corps.

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Torruella, J. R. (2007). THE INSULAR CASES: THE ESTABLISHMENT OF A REGIME OF POLITICAL APARTHEID. *THE INSULAR CASES: THE ESTABLISHMENT OF A REGIME OF POLITICAL APARTHEID*, 29(2). Retrieved September 2, 2016, from [https://www.law.upenn.edu/journals/jil/articles/volume29/issue2/Torruella29U.Pa.J.Int'lL.283\(2007\).pdf](https://www.law.upenn.edu/journals/jil/articles/volume29/issue2/Torruella29U.Pa.J.Int'lL.283(2007).pdf).

Willens, H. P., & Siemer, D. C. (1976). Constitution of the Northern Mariana Islands: Constitutional Principles and Innovation in a Pacific Setting, The. *Geo. LJ*, 65, 1373.

*Downes v. Bidwell*, 182 U.S. 244, 21 S. Ct. 770, 45 L. Ed. 1088 (1901).



Appendix A

**Survey: Final of U.S. Citizenship & Inequality**

<https://www.surveymonkey.com/r/QL2C662>

**Survey: U.S. Citizenship & Inequality**

<https://www.surveymonkey.com/r/P6ML6HQ>

**Informal interviews taken by student researcher**

As the research was under way, the student researcher had instigated small questionnaires from community. The questionnaires were directed towards the older crowd of the community. The questions can be derived from the surveys as they hold similar characteristics.

Gender	age	General Answer
Male	47	No
Female	59	No
Male	43	Yes
Male	69	Yes
Female	41	No
Female	38	No
Female	35	No
Female	62	Yes
Male	58	No
Male	26	No
Female	27	No
male	35	No
Female	32	No
Female	37	No
Male	43	No
Female	31	No
Female	33	No
Male	54	No

Male	65	No
Male	26	No
Female	47	No
Male	63	Yes
Female	42	No
Female	58	Yes
Female	46	No
Female	45	No
Female	58	No
Male	52	Yes
Female	34	No
Male	34	No
Male	35	Yes
Female	19	Yes
Female	67	Yes
Male	65	Yes
Female	66	Yes

*Table 1: Community Interviews, Should the CNMI Become Independent?*

## Appendix B

### Letter to Editors

Dear Mr. Sparrow,

I am a student from the Northern Marianas College from the island of Saipan. I am currently doing some research for my English class about the Insular Cases of 1901.

As a resident in one the territories, I would greatly appreciate it if you were to provide some of your expertise in this field to me. The subject seems to be unheard of within the CNMI, so I am hoping that you might be able to help me in enlightening my community. My paper revolves around the injustice of the this system and the community's opinion on whether the community should remain a republic, move forward towards statehood or move away to become to independent.

When you are available, will you please answer this questionnaire that I have provided for you? At most, it will take about 10-15 minutes.

1. Can you include/explain some reasons as to why the U.S. Government has continued to ignore an outdated set of laws (The Insular Cases)?
2. Are there any plans to update the law? If so, what were some actions taken?
3. What do you think are the pros and cons of becoming a state?
4. What is your opinion on the Insular Cases?

I hope that I am able hear a reply from you soon!

Thank You!

Sincerely,

Pauline Salazar

### Response

Dear Ms. Salazar,

For your first question, I would say that the US government has **upheld** an outdated set of case law: the Insular Cases. Recent US Supreme Court decisions on Puerto Rico and American Samoa point to this. The US citizens of the territories continue to be US citizens with only partial representation in Congress (a non-voting delegate) and no vote in the Electoral College for the US president. The reasons I see as threefold: economic, military, and cultural. The US government responds to the interests of American companies; it wants to be able to use the islands militarily with few restrictions (Guam esp., formerly Puerto Rico, and, if it wanted, some of the smaller Marianas islands--look at the text of the CNMI's 1975 Commonwealth Agreement--for bases, training areas, or proving grounds; and most Americans in the states see Puerto Ricans, Virgin Islanders, Samoans, Chamorros, etc. as people "not like us"—with different ethnicities, traditions, etc.

2. The Insular Cases are case law, but not Congressional law (or territorial law). So they could be overruled or ignored. It would take new policies and decisions by the lower US courts (including territorial courts) for the Insular Cases to be overturned, whether explicitly or effectively.

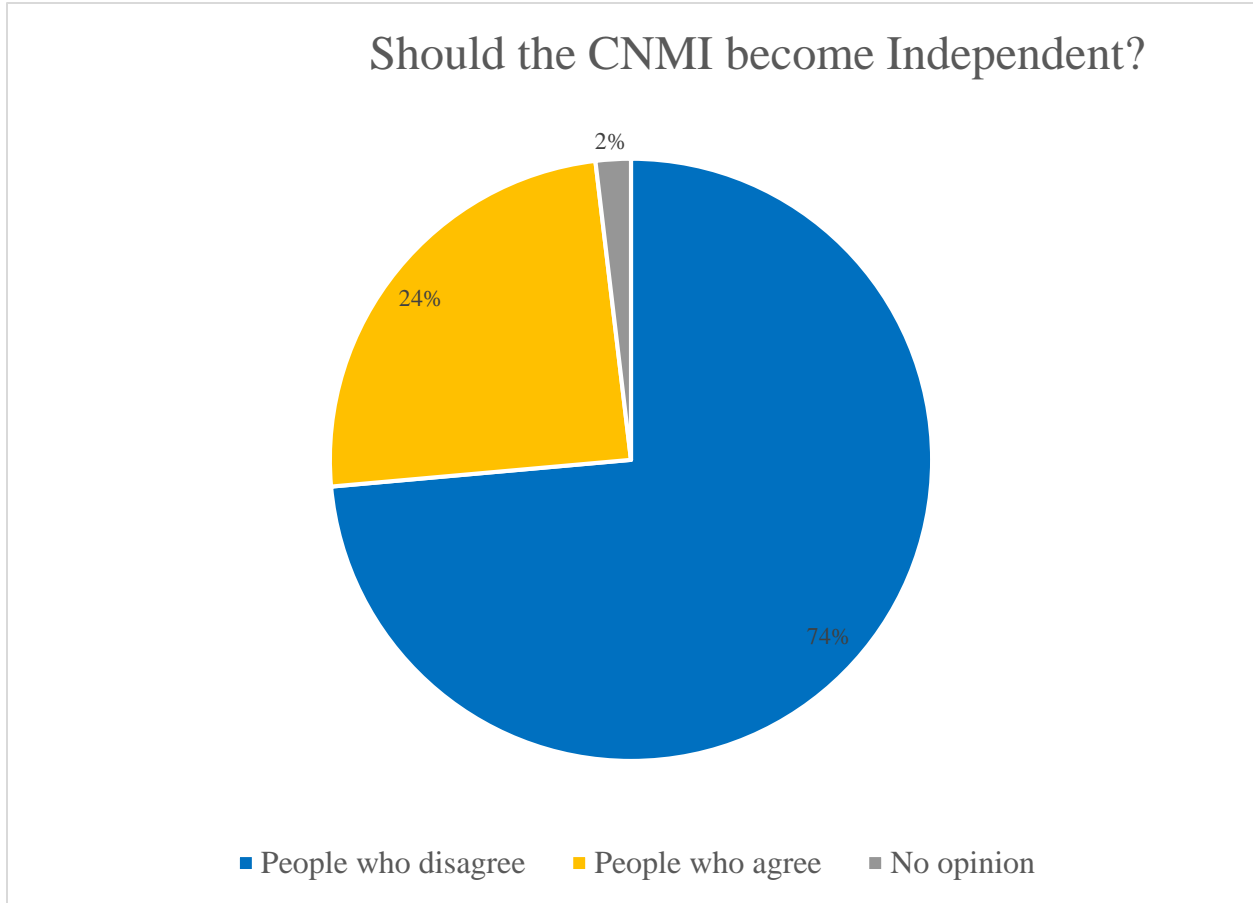
3. States do not get USGov subsidies, cannot control their borders insofar as citizens from other states have full rights and privileges. So the CNMI would give up some of its local control. Also, the CNMI would lose any special arrangement with the US Government that it currently has. The pros are that the CNMI would have full political representation, the same welfare payments, the same minimum wage, etc.

4. I have given my opinion in answer to No. 1: I think they are outdated, and based on colonial principles—see the analysis in my Insular Cases book. This is not to say that those in the US territories would necessarily want to be states.

Good luck with your research!

Bartholomew Sparrow  
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512.232.7207 (office)  
512-47101061 (fax)  
<http://links.utexas.edu/crcvzxc>

**Figures**



*Figure 1: Derived from the results of the interviews and surveys from Appendix A*

Reading Notes to fill out when reading course and outside reading materials for assignment

Note Taking Sheet: Reading # \_\_1\_\_

Name: Pauline Salazar

\_\_\_\_\_Course  
ENCOURSE NAME: EN202\_\_\_\_\_Section 1\_\_\_\_\_

With many sources to read and evaluate, you need a way to keep track of the material you may use in your research paper. You need to record where you have looked, what you have found, and how to find each piece of information again (this is for your bibliography).

Directions: Fill in the information below, and keep with all of your resources. This will help you when it is time to write both your outline, paper, and annotated bibliography.

1. Author' s Name: Juan R. Torre
2. Author' s Credentials (Press Release)
3. Publisher [or title of organization]: Saipan Tribune
4. Heading of Section [title of reading]: THE INSULAR CASES: THE ESTABLISHMENT OF A REGIME OF POLITICAL APARTHEID
5. Year Written: 2007
6. Pages: 65
7. Website URL: University of Pennsylvania Journal of International Law

<b>Main Ideas/Points</b>	<b>Important Quotations</b>	<b>Supporting Details</b>	<b>Relevance to Your Assignment</b>
<ul style="list-style-type: none"> <li>•The Supreme Court needs to take action and pay more attention to an outdated set of cases laws</li> </ul>	<p>“The Supreme Court, as it did with Plessy, must step forward to correct the wrong it created by sanctioning the Insular Cases and their progeny. The continued vitality of these cases represents a constitutional antediluvian anachronism that has created a de jure and de facto condition of political apartheid for the U.S. citizens that reside in Puerto Rico and the other territories.”</p>	<p>The Insular cases affect the colonials of Puerto Rico and the Territories quite greatly.</p>	<p>The Insular Cases affect the Territories such as the CNMI.</p>
<b>Main Ideas/Points</b>	<b>Important Quotations</b>	<b>Supporting Details</b>	<b>Relevance to Your Assignment</b>

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In this article, is it possible that any of the authors might have a bias about the subject matter? Yes\_\_\_ provide examples if needed.

“I will elaborate on this thesis in support of my contention that the linkage between politics and constitutional law is clearly apparent in the history and outcome of the Supreme Court's decisions in the Insular Cases<sup>4</sup> and their progeny.” (Page 284 para 3)

Is the article timely or a bit outdated ? Timely, still in effect

Was it published in a reputable source? Yes.

It is academic source.

Other important information : reading on the many other Insular Cases are needed.





Reading Notes to fill out when reading course and outside reading materials for assignment

Note Taking Sheet: Reading #   2  

Name: Pauline Salazar

\_\_\_\_\_Course  
ENCOURSE NAME: EN202\_\_\_\_\_Section 1\_\_\_\_\_

With many sources to read and evaluate, you need a way to keep track of the material you may use in your research paper. You need to record where you have looked, what you have found, and how to find each piece of information again (this is for your bibliography).

Directions: Fill in the information below, and keep with all of your resources. This will help you when it is time to write both your outline, paper, and annotated bibliography.

1. Author' s Name: Michael S. Helfer
2. Author' s Credentials (Government Agreement)
3. Publisher [or title of organization]: WILMER, CUTLER & PICKERING
4. Heading of Section [title of reading]: EXPLANATION OF THE COVENANT TO ESTABLISH A COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS IN POLITICAL UNION WITH THE UNITED STATES OF AMERICA
5. Year Written: 1975
6. Pages: 28
7. Website URL: <http://www.cnmilaw.org/pdf/source/Cov-Explanation.pdf>

<b>Main Ideas/Points</b>	<b>Important Quotations</b>	<b>Supporting Details</b>	<b>Relevance to Your Assignment</b>
<ul style="list-style-type: none"> <li>• the Northern Mariana Islands will establish itself as a commonwealth.</li> </ul>	<p>“The purpose of this Covenant is to establish a Commonwealth of the Northern Mariana Islands. A "Commonwealth" is a selfgover&amp;ing political entity which is closely attached to another, larger political unit, such as a nation. “</p>	<p>The CNMI as agreed and formulated the agreement with the USA for protection, rights, and citizenship, for the price of land for the US military.</p>	<p>Benefits and aggrements are needed to portray why the CNMI wished to become a commonwealth instead.</p>
<b>Main Ideas/Points</b>	<b>Important Quotations</b>	<b>Supporting Details</b>	<b>Relevance to Your Assignment</b>

<p>The US will use the CNMI for military grounds</p>	<p>“Further, the United States will have specific responsibility for the foreign affairs and defense of the Northern Mariana Islands.”</p>	<p>The CNMI must also follow the way of the American flag</p>	<p>Provides insight as to why and what the US agreed to give for land</p>
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In this article, is it possible that any of the authors might have a bias about the subject matter? Yes\_\_\_ provide examples if needed.

no

Is the article timely or a bit outdated ? Timely, still in effect

Was it published in a reputable source? Yes.

It is academic source.

Other important information: author for the agreement needs to be researched

Reading Notes to fill out when reading course and outside reading materials for assignment

Note Taking Sheet: Reading # \_\_3\_\_

Name: Pauline Salazar

\_\_\_\_\_Course  
ENCOURSE NAME: EN202\_\_\_\_\_Section 1\_\_\_\_\_

With many sources to read and evaluate, you need a way to keep track of the material you may use in your research paper. You need to record where you have looked, what you have found, and how to find each piece of information again (this is for your bibliography).

Directions: Fill in the information below, and keep with all of your resources. This will help you when it is time to write both your outline, paper, and annotated bibliography.

1. Author' s Name: PR51ST
2. Author' s Credentials (Website powered by people)
3. Publisher [or title of organization]: PR51ST
5. Year Written: 2015
6. Pages: 1
7. Website URL: <http://www.pr51st.com/what-are-the-insular-cases/>

<b>Main Ideas/Points</b>	<b>Important Quotations</b>	<b>Supporting Details</b>	<b>Relevance to Your Assignment</b>
Explains the different insular cases and how they started	The first of the Insular Cases was about oranges. Downes vs. Bidwell held that since the Constitution did not apply the U.S. could make laws in its territories that would be unconstitutional in the States.	The situation began due to the differences in the rights and constitutional laws differing between Puerto Rico and the US	Puerto Rico, like the CNMI, is a territory and is affected the same way

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In this article, is it possible that any of the authors might have a bias about the subject matter? Yes\_\_\_ provide examples if needed.

no

Is the article timely or a bit outdated ? Timely

Was it published in a reputable source? No

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