

proposed land transaction -- should be made public in advance of its execution. A full public disclosure of this kind, combined with the normal equity powers of the courts, can provide an additional measure of protection for the members of the corporation.

Moreover, it may be that the organization and powers of the corporation are so uniquely governmental in nature that -- at least for some purposes -- the corporation itself will be subject to the provisions of the due process and equal protection clauses, incorporated in Sections 4 and 7 of the Bill of Rights of the Trust Territory. 1/ The Supreme Court has held that the management of a private company town can amount to state action such as to invoke the 14th Amendment. 2/ The concept has also been extended to a privately owned shopping center, 3/ a park nominally owned by private trustees, but maintained by public employees after "a tradition of municipal control had become firmly established," 4/ and a coffee shop leased from a municipal parking authority 5/.

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1/ 1 T.T.C. §§ 4, 7.

2/ Marsh v. Alabama, 326 U.S. 501 (1946).

3/ Food Employees Local 590 v. Logan Valley Plaza, Inc., 391 U.S. 308 (1968).

4/ Evans v. Newton, 382 U.S. 296, 301 (1966).

5/ Burton v. Wilmington Parking Authority, 365 U.S. 715 (1961).