

### *Abstract From the Proceedings*

Before The Board of Governors of the State Bar of Oklahoma on March 29, 1930, for the Disbarment of George Ramsey and Edgar A. DeMeules.

INFORMATION OF ALBERT T. PATRICK AGAINST GEORGE RAMSEY AND EDGAR A. DeMEULES. (Filed March 29, 1930).

SUBJECT: Response of Albert T. Patrick to your request for information.

To The Honorable, The Board of Governors of the State Bar of Oklahoma, Commerce Exchange Building, Oklahoma City, Oklahoma.

Gentlemen:

Responding to your resolution of March 22, which was received by me March 24, notifying me to appear before you on March 29, 1930, and to introduce and submit to you such evidence as I may have in support of my statements respecting your honorable body, contained in my letter of February 28, 1930, to the Clerk of the Supreme Court of Oklahoma, which resolution directed a copy thereof to be furnished to the Clerks of the Supreme Courts of the State of Oklahoma and of the United States, to whom I am accordingly sending copies hereof, and as an act of courtesy to the Supreme Court of the State of Oklahoma, which referred my said letter to its Clerk to you for your consideration, and to afford you an opportunity to purge your own organization of unworthy members, I now undertake to give you such information as I have at hand, and which I think will be sufficient for your declared purpose of ridding your Board of its undesirable member, namely Edgar A. De Meules, Governor from the State at large and Vice-President of the State Bar, and also your undesirable attorney, namely George Ramsey, law partner of said De Meules, both of Tulsa.

In this connection please understand that I am not appearing before your Board as a party litigant, or counsel, or to ask personal relief of any kind from your Board. I offered to make and sustain charges in the Supreme Court of Oklahoma, which has my confidence, and did not make, and do not now make, any offer to make or sustain any charges before your Board, for I consider each member of the Board of Governors disqualified by interest to consider any charges I might make against any of its members or officers, and particularly against said Ramsey and De Meules, and for the reasons I shall now relate, I cannot be expected to have any confidence in your fairness

or honesty of purpose until and unless you shall take certain steps to rid yourself of them, but as I consider the honor and dignity of the people of the State of Oklahoma, the State Supreme Court, the State Bar, and each of its Governors to be seriously impugned and in question by the acts of said Ramsey and De Meules, I conceive it to be a public duty to formulate to you the facts about them as commonly known, which I will now do as follows:

Edgar A. De Meules enrolled in the law school of the University of Michigan in Ann Arbor September 20, 1901, and continued as a student there until the close of the regular session in 1903. He did not graduate from the University, but took just the two years work. During that time he gave his home address as No. 905 Bluff Street, Dubuque, Iowa. De Meules did not return to the University because during the Summer session he embezzled and stole from his employer, who trusted him, a large sum of money, for which he was adjudged guilty by a competent Court upon his confession, which facts were brought to the attention of the University which debarred him as a student, and were of common knowledge among his fellow students at Ann Arbor, among whom were John B. Means, and John A. Haver, attorneys, and M. B. Flesher, Director of the United States census, all of Tulsa, and a lawyer by the name of Degroot, and another by the name of King, both of Muskogee.

About 1905 De Meules came to Oklahoma, residing at Muskogee, and was admitted to the Bar of the Indian Territory upon his false and fraudulent representation that he had never been convicted of a felony, as I was so informed by W. A. Ledbetter, a lawyer of Oklahoma City, who was then Chairman of the Bar Commission, and to whom such false representations were made, in consequence of which admission he was subsequently admitted to the Bar of the Supreme Court of Oklahoma. These facts were also known to Carl C. McGee, now editor of the Oklahoma City Times, and to Colonel Robert B. Douglas, then editor of a Muskogee newspaper, now living in Tulsa, both of whom lived in Muskogee at said time and saw a certified copy of De Meules conviction, which had been obtained by someone there and published.

About eight years ago James A. Veasey, the attorney at Tulsa, at De Meules' request, requested the faculty of said University to erase from its record the fact that he was a convict, so that he might qualify for a university degree, which Veasey accordingly did under the most favorable circumstances, but which the Faculty flatly refused.

If De Meules had reformed and become a good citizen I am quite sure that his conviction would be regarded as immaterial, but unfortunately his subsequent history, hereinafter stated in part, leaves no other conclusion but that he did not reform, and that his character is that of a confirmed and habitual thief and vicious person. De Meules has had every opportunity to reform and lead an honest life, but he has not done so. He became general attorney for the Midland Valley Railroad Company at Muskogee, but was discharged for misconduct and disloyalty to his client and his superior, A. W. Lefeber, General Manager of said road.

While De Meules was attorney for the Midland Valley, B. B. Blakeney, a lawyer, then of Muskogee, and now of Oklahoma City, obtained judgment in the District Court of Osage County against the Midland Valley Railroad Company for about \$75,000.00, based in part upon a written instrument which was in evidence as an exhibit and among the files of the papers in said court, which De Meules procured to be stolen from the files and a document of a different character substituted therefor, and as to which De Meules assigned error in the judgment, on appeal therefrom to the Supreme Court.

De Meules was succeeded as General Attorney for said railroad by a lawyer of high character by the name of McCain, who examined the files of his client in said case and found among them a carbon copy of a letter written by De Meules to his assistant attorney at Pawhuska, directing him to substitute the harmless document in the court files for the stolen exhibit aforesaid, the copy of which letter Mr. McCain then showed to B. B. Blakeney and stated that he would also show De Meules such carbon copy and tell him that Blakeney had seen it and that he would then suggest to De Meules to go to Manager Lefeber and confess to him the stealing of such exhibit and the substitution above stated and to request Lefeber for the sake of De Meules' wife and children, who were loved by Lefeber and his wife, to instruct McCain to abandon said fraudulent assignments of error and to permit said judgment to be affirmed by the Supreme Court, which said McCain then did, and upon such confession and plea for mercy Manager Lefeber that night instructed McCain to abandon said fraudulent assignments of error, which instructions McCain then communicated to Blakeney, and said assignments were abandoned and consequently said judgment was affirmed by the Supreme Court. I will advert to this matter later on.

De Meules then came to Tulsa and George

Ramsey procured him to be named as State Bar Commissioner for the Fifth Supreme Court District. In 1921 I returned to Tulsa from Texas and made application to the Supreme Court of Oklahoma for admission to its Bar on motion as an attorney from Texas. The Clerk of the Supreme Court wrote me that my papers were in fine shape, and suggested that I take them to De Meules who would endorse his approval thereon, and thereupon the State Chairman would file a recommendation for my admission, upon which an order would be entered by the Supreme Court for my admission without waiting for the State Bar Commission to meet.

Not knowing De Meules personally or by reputation I secured the recommendation of several bankers and prominent citizens and lawyers of Tulsa, and presented said letter and recommendations in person to De Meules, and I told him at that time, as I had stated in my application, that I had been stricken from the rolls of the Bar of New York solely in consequence of a conviction of murder in New York, which conviction had been without any proper proof of guilt or a fair trial and that I had been convicted and kept in prison 12 years by the expenditure of over three and one-half millions of dollars, as to which the disbaring Court had refused me a hearing, and that I had been subsequently pardoned which removed any statutory objection to my readmission in New York, but that I could not be readmitted because lawyers in New York were required to live and maintain offices there for six months prior to admission and to declare their intention of permanently residing there.

De Meules then stated that he did not desire to take upon himself the express and apparent responsibility for my admission, but requested me to leave the papers with him and assured me that he would see to it that I was duly admitted, and that I might go about my business as a lawyer, and not to give any further attention to the matter until I was notified to appear before the Court and be sworn, and that my attendance would not be required or be necessary before the Bar Commission, and I, therefore, upon such representation, entrusted said De Meules with the matter of my admission.

De Meules then falsely stated to Preston C. West, President of the Oklahoma State Bar, and others that my character had been inquired into by the disbaring court as an independent fact from my conviction, in consequence of which I had been disbarred, and, without any further notice to me, he falsely stated to the Bar Commission in session that I had been disbarred in New

York, after such hearing, and that my admission was also in consequence opposed by Judge West as President of the State Bar and others, notwithstanding my pardon, and he further suggested that my case was too notorious for the State Bar to have me as a member, regardless of good character, and at the same time De Meules kept or suppressed from the Commission the written recommendations of the local lawyers, bankers and citizens I had given him as aforesaid, and when I later called his attention thereto, he denied the same, falsely claiming that he had filed them with the Secretary of the Bar Commission, and he thereafter did so file same.

I then learned that De Meules had been convicted of a felony in another state and had been fraudulently admitted to the Oklahoma Bar and had stolen the exhibit from the files of the District Court, as aforesaid, and I then went to Muskogee and called upon Manager Lefebber and stated to him such information, and he said it was true that he had discharged De Meules for dishonesty and disloyalty, and that he disliked him, that it was also true that nevertheless he and his wife were very fond of the wife and children of De Meules, who had lived next door to Lefebber at Muskogee, and for that reason he did not wish to appear to confirm my information in respect to the confession by De Meules of such theft, and that he could offer no denial or correction as to such statement.

I then saw George Ramsey at his office, who informed me that De Meules was not his full partner then, but was using Ramsey's name to establish himself, that Ramsey knew about De Meules conviction of a felony and fraudulent admission to the Oklahoma Bar, but that he had not heard the reason that he had been discharged by the Midland Valley, or that he had stolen the exhibit from the District Court as aforesaid, and he advised me to write to De Meules setting him right about my disbarment in New York, and left the impression with me that he would have De Meules procure my admission to the Oklahoma Bar.

Returning to Tulsa I accordingly wrote De Meules, but found him evasive, obdurate and insulting, and I finally under date of June 11, 1922, addressed a letter to the State Bar Commission and sent a copy thereof to each of its members and to each of the members of the State Supreme Court, in which I set out the matters aforesaid and other matters in respect to another ex-convict from Muskogee by the name of Ure, who under the name of J. B. Ryan, engaged in the gasoline marketing business as President of the General

Refining Company of Tulsa, and who admitted to me that he had conspired with bankers, railroad men, lawyers and others to rob the public by means of false tokens, and avoided prosecution by committing the crimes in one state with the evidence thereof in another, and had obtained nearly \$500,000.00, which had been taken by such lawyers and other co-conspirators, and in said letter I set forth facts which tended to show a connection by De Meules with such conspiracy. A copy of this letter was mailed by me to De Meules in a postpaid wrapper and he never denied such statements, nor corrected the same. In such letter I urged the State Bar Commission to rid itself of De Meules as morally irresponsible and not to permit the implication to go abroad that De Meules was merely a type of the Commission and Bench and Bar of Oklahoma, and I stated that so long as De Meules was a member of such Commission I would decline an admission to the Oklahoma Bar on the recommendation of such Commission.

De Meules never replied to said letter, and I now make profert thereof as legal evidence of the facts therein stated, as aforesaid. The only criticism I ever received of such letter was a personal statement of Justice Fred Branson of the Supreme Court to me in substance and effect that I should have known better than to have thought that the Bar Commission or the Supreme Court cared anything about De Meules' character or the character of any other member of the Commission, as such members were selected through political influence and not on the basis of character.

Thereafter when Justice Hunt was elected as a member of the Supreme Court from the Fifth District, he procured De Meules to be dismissed from the Commission, and I then again tried to be admitted, but De Meules' influence persisted in the Commission, and again the Commission rejected me, which rejection was confirmed by the Supreme Court by a vote of five to four, on the assigned ground that I could not qualify for admission on motion because the State statute so prohibited where an attorney had been disbarred, the Court ruling that such statute did not merely apply to qualification in the State from which the attorney came to this State, but applied to any disbarment anywhere regardless of a pardon. However, I was informed by Chief Justice Branson that my rejection was because of personal influence brought upon the Judges against me, and I am otherwise informed that such influence was brought by Ramsey and De Meules and others because of personal opposition to me and due to my

opposition to fraudulent methods, and not because I was not entitled to admission.

Notwithstanding Ramsey's knowledge that De Meules had been convicted of theft and that he had fraudulently gained his admission to the Oklahoma Bar by suppression of that fact, and had subsequently stolen said exhibit from the court files at Pawhuska, Ramsey removed to Tulsa and entered into a full co-partnership with De Meules to avail himself of De Meules' dishonest propensities, and in this connection I call your attention to another serious matter that relates both to Ramsey and De Meules which should receive your attention.

In 1926 Charles Page, well known millionaire, died at Tulsa, leaving a will providing an annuity of \$24,000.00 per year payable monthly to his wife, Lucille Page. C. B. Stewart, a lawyer of Oklahoma City and Tulsa, who had formerly been a partner of ex U. S. Senator, Joseph W. Bailey at Gainesville, Texas, was attorney for Page prior to his death, and for his estate thereafter, and was counsel for the benevolent trust known as Sand Springs Orphan Home, founded by Page. Mrs. Page consulted with Judge Stewart, who told her of her right to take this annuity under Page's will or to reject the same and take one-third of Page's estate under the state statute making such provision, and he further told her that if she elected to take under the will she would need no attorney and that he could advise her, but that if she desired to elect under the statute she would need a personal attorney as her claims might conflict with those of the Sand Springs Orphan Home, of which he was counsel, and therefore he could not properly advise her, and she thereupon herself suggested the firm of Poe and Lundy, lawyers of high character, and Judge Stewart told her she had chosen well, and Poe and Lundy thereupon were employed by her and proceeded to advise her to properly protect and assert her interest in that connection, and told her that she could pay them for their services either by a lump sum to be agreed upon, or for the reasonable value of their services when completed, or on a contingent fee to be proportioned on the amount recovered, as to which method of payment they had not yet agreed, when said Ramsey and De Meules made an agreement with Ross Rayburn, Mrs. Page's brother, to divide their fees with him if he could procure their employment in said matter, and thereupon they falsely represented to Mrs. Page that Judge Stewart and the Sand Springs Orphan Home would not accord her her legal rights, but would oppose same, and that Poe and Lundy were incompetent to cope with Judge Stewart, but that

the only person who could cope with him was Judge Ramsey, although they well knew that the trustees of the Sand Springs Orphans Home and their counsel, Judge C. B. Stewart, and the executors of the estate of said Charles Page stood each and all ready and willing and anxious to accord and secure to Mrs. Page her just and legal rights under the law, and that Poe and Lundy were ready and able as her attorneys to procure such rights for her, and that said Ramsey and De Meules were unable to render any further services to her, and that their services were wholly unnecessary, but yet she was so influenced by said deceit practiced upon her that she insisted that a written contract be entered into jointly by the partnership firms of said Poe and Lundy and said Ramsey and De Meules by which said firms were to jointly receive a large percentage of the property to which Mrs. Page was entitled by statute from her said deceased husband's estate, which contract was executed by them, and thereupon her election to so take under the statute and not under said will was filed and after some negotiation between Judge Poe and Judge Stewart, the just amount and value in money to which she was entitled, namely about \$1,900,000.00, was agreed upon and accepted by Mrs. Page, which included a fee of \$212,000 for said attorneys for making such demand, which fee pursuant to such contingent contract, was paid to said firms equally by Mrs. Page, namely \$106,000 to the Poe and Lundy firm, which was all that such services were reasonably worth, and in excess of which any further sum was unconscionable, and namely \$106,000 to the Ramsey and De Meules firm, for which no useful or necessary services were rendered by them, and which was wholly unconscionable and unjust, and the taking of which caused great scandal in Tulsa, and brought the bar and the administration of justice into great disrepute.

Thereupon said firm of Ramsey and De Meules proposed to the firm of Poe and Lundy that said firms divide their fees with Ross Rayburn, Mrs. Page's brother, for his services to them, which proposition was rejected by Poe and Lundy on the ground that the employment of Poe and Lundy by Mrs. Page was not procured by her said brother, Ross Rayburn, but was directly by Mrs. Page herself, and that he had done nothing for Poe and Lundy and that they knew him in said matter only as the brother and advisor of Mrs. Page, and that they deemed it improper and unjust to share their fees with him. I am not informed whether Ramsey and De Meules welched on Ross Rayburn or not, but I understand that they paid him something for his services in securing their

employment and for the payment to them of their said unconscionable fee. I am informed that Mrs. Page has learned of the perfidy of her brother and Ramsey and De Meules, and considers herself helpless in the matter, but I have been unable to communicate with her personally owing to her absence from home.

Responding to your request that I name the former Justice of the Supreme Court of Oklahoma, who is now one of the attorneys of your Board in its employ, to prosecute its affairs and who was stated by me to have been guilty of gross misconduct, I now name said George Ramsey, law partner of said De Meules, one of your Governors, as the person referred to, and I more particularly state for your information, that on September 3, 1920, Charles W. Grimes of Tulsa, a person of the highest character, then a lawyer and now an oil operator, he having abandoned the profession of the law because it had become disreputable in Oklahoma, wrote a letter to W. J. Hughes, an attorney in the office of the Solicitor General at Washington, D. C., respecting the matters hereinafter mentioned, in consequence of which the First Assistant Secretary of the Interior held a hearing in Washington on January 31, 1921, as to the approval of certain oil and gas leases, assignments and operating agreements covering the Susie Crow allotment of land in Creek Nation, Creek County, Oklahoma, at which said George Ramsey was present as an interested party, and at which hearing said Grimes detailed the history of certain litigations in the Supreme Court of Oklahoma, namely the cases of George W. Canfield, et al, Plaintiffs in error vs. Lolly Jack et al, Defendants in error No. 8793 and Lusanna Brink, Plaintiff in error, vs. George W. Canfield et al, Defendants in error, No. 8837.

At such hearing said Charles W. Grimes stated facts in detail showing that George Ramsey had been an attorney in said matters contrary to the interests of certain Indians, and while said litigation was pending in the Supreme Court, procured himself to be appointed a Justice thereof, and although he took no ostensible part in the decision of said Court in such cases, such decisions resulted in two of the full blooded Indian heirs being divested of their title by purchase after the land became extremely valuable for oil and gas purposes for the sum of \$1,000.00 although reasonably worth with accumulated royalties \$500,000, and that another full blood Indian whose interest in the land and oil royalties was reasonably worth \$75,000.00 had been divested of her entire interests by purchase for \$1,000.00 and the services of her attorneys, and that a large part of the money was

accumulated from oil royalties while the lands were restricted and were inalienable by the Indians without the approval of the Secretary of the Interior, which approval was not secured, yet nevertheless said decision disbursed such fund to the pretended purchasers from said Indians in violation of the Federal law, and that on the eve of such decision George Ramsey resigned from the Supreme Court. On June 30, 1920, his prevailing client, Ira E. Cornelius of Muskogee, made a quit claim deed to said George Ramsey in consideration of "legal services rendered" to an undivided 1/30 of W $\frac{1}{2}$  of SE $\frac{1}{4}$  and SE $\frac{1}{4}$  of SW $\frac{1}{4}$  of Section 4, Township 18 N., Range 7 E., Creek County, Oklahoma, including an assignment of 1/30 of all oil and gas rights and royalties accruing from said land (filed for record July 3, 1920, and duly recorded in Book 206, at page 274, in the office of the County Clerk of Creek County, Oklahoma), being a part of the same land and interests involved in said suit.

The admitted implication at such hearing of such facts was that George Ramsey had used his position as a Justice of the Supreme Court of Oklahoma to bring about a wrongful taking of the property of such Indians in violation of Federal law by the Supreme Court of Oklahoma. George Ramsey being present at the hearing, the Assistant Secretary of the Interior asked him if he made any denial of said facts and Ramsey arose and evaded answering by telling a funny story, but made no denial of the facts and the Secretary announced that if the loot from the Indians was not restored action would be taken by the United States in behalf of the Indians to recover same.

Thereafter the matter was investigated by agents of the Department of the Interior and of the Department of Justice for the purpose of suit and to avoid being made a party to such suit. on October 24, 1921, George Ramsey reconveyed by quit claim deed said land and property rights to his said client and grantor, Ira E. Cornelius, which deed was filed for record on October 26, 1921, and duly recorded in Book 229, at page 625, in the records of said County Clerk. Thereupon a suit was brought by the United States in behalf of such Indians against said Cornelius and others, the owners of the record title to such lands and in possession of such property in the United States District Court, Eastern District of Oklahoma at Muskogee to set aside such fraudulent conveyances, and thereupon, notwithstanding said decisions of the Supreme Court of the State of Oklahoma affirming their titles as aforesaid, said Cornelius and said Ramsey, interested with him and in his name, and the other defendants to said suit admitted the

fraudulent nature of said decisions and of the acts of said George Ramsey by paying to the Secretary of the Interior the amount fixed and determined by him as the value of said property rights belonging to said Indians, of which they had been so fraudulently deprived, namely the sum of \$137,000.00.

That said actions of George Ramsey have brought the people of the State of Oklahoma, the Supreme Court and the Bar of Oklahoma and said George Ramsey himself into great disrepute and contempt.

In response to your request to me to name the vicious persons who have dominated and now dominate your Board and the State Bar of Oklahoma I now name George Ramsey and said Edgar A. De Meules, who pursuant to a conspiracy between themselves and others procured the last Legislature to pass the State Bar Act for the avowed purpose of intimidating the Supreme Court from the exercise of its implied Constitutional power to admit and disbar and to regulate the conduct of the attorneys of its bar, and pursuant to such conspiracy procured said Edgar A. De Meules to be appointed as a Governor of the State Bar at large and the election of said De Meules as vice-president of said State Bar and the selection of George Ramsey as the attorney of said State Bar, and pursuant thereto said Ramsey and De Meules did prepare and secure the adoption of rules and regulations for the Government of said State Bar by which the Supreme Court is practically deprived of all power, except its constitutional supervision of judicial power exercised by your Board, and constituting machinery by which corrupt attorneys may be protected from public complaint, and enabling them on the other hand to inflict grievous injury upon objects of their malice, by the exercise by the one and same persons of legislative, judicial and executive power, in public or in secret, that said Ramsey and De Meules have exercised and now exercise by virtue of their said positions and influence, dominating control over your Board of Governors and the State Bar, into which they have procured the former disreputable Bar organization to be merged, and they have used and are now using such power for their own purposes, and particularly to oppress me.

The question involved in my application for admission to the Bar of Oklahoma under the former law was the contention which was urged by De Meules, that I had been disbarred in New York and should be required, notwithstanding my pardon of the offence upon which the disbarment was made, to be readmitted in New York before being admitted here, which proposition I rejected because of the

general rule in New York not to admit an attorney except upon six months prior residence there, and his declaration of intention to permanently reside there, which unusual rule was and is stringently enforced because attorneys in New York issue from their own offices and in their own names processes of the court ordinarily issued in other jurisdictions by the clerk of the court, and because the attorneys are custodians of the court records in cases, ordinarily required in other jurisdictions to be filed with the clerk of the court, with which rule I could not comply because I had no intention to leave Oklahoma to reside six months in New York or to falsely declare my intention of permanently residing there. It was suggested by De Meules and those collaborating with him that I make application to the Court in New York for readmission for the ostensible purpose of determining my eligibility as to character for admission in Oklahoma, as if the Supreme Court of Oklahoma could not determine that for itself. However, the said De Meules procured the old Bar Commission and the Supreme Court of Oklahoma to take his view in that respect, as above stated.

In framing the rules and regulations of the State Bar of Oklahoma under the State Bar act governing admission to the practice of law in Oklahoma, said Ramsey and De Meules, with the intent to forever exclude me from admission to the State Bar provided by rule 14, as follows:

No attorney who has ever been disbarred in any other state or territory of the United States or in the District of Columbia shall be admitted to the practice of law in this state, unless the order of disbarment shall have been vacated or set aside *during the time of the bona fide residence of such attorney in said State.* \* \* \*

It is inconceivable that it would ever occur to anyone to dictate to the disbarring court in another jurisdiction the terms upon which it should rectify a miscarriage of justice, and the only conceivable purpose that such provision in rule fourteen as to residence in the foreign state was to make it impossible for me to be admitted here.

With the intent to harass and annoy me, and in gratification of their malice and personal spite against me and in the execution of their purpose to prevent me from practicing law in Oklahoma, said Ramsey and De Meules procured your Board through its Committee of the State Bar to secure a certified copy of the order disbarring me in New York as a statutory consequence of my conviction of murder and to file same with the Clerk of the

United States Supreme Court with the information that I now live in Oklahoma, during recess of the court, with the intent to thereby deceive the Supreme Court of the United States and furtively convey the false impression that I was not a worthy citizen in Oklahoma and that I was unworthy to be an attorney of the Supreme Court of the United States and was disqualified by rule of said Court to be such attorney and that the Supreme Court of the United States owed a duty of comity to the Supreme Court of Oklahoma to disbar me from the Supreme Court of the United States, suppressed the facts from said Court that subsequent to the order of disbarment in New York I was unconditionally pardoned by the Governor of New York, and was then a worthy citizen of the State of Oklahoma and a member of the bars in good standing of the United States Circuit Courts of Appeals for the Fifth and Eighth Circuits and of the various Federal District Courts of Oklahoma and Texas and of the Supreme Court of the State of Texas and of the bar of the United States Treasury Department, and that I was a person of fair private and professional character, and by such deceit, wrongfully procured an order from the Supreme Court of the United States suspending me from practicing in that Court and directing me to show cause why I should not be disbarred from practice in that Court.

That such action on the part of said Ramsey and De Meules, done in the name of your Board, has brought your Board into the contempt and disgust of every right thinking person, from which you can only free yourselves by showing that you are not conscious confederates of said Ramsey and De Meules, but merely their puppets and submit to their domination for their own malicious and selfish purpose.

That after the Supreme Court of Oklahoma had referred my said letter to its Clerk to your Board to afford you an opportunity to purge yourself of your unworthy members, officers and attorneys, your Board caused a statement to be made to the Associated Press for transmission throughout the United States that my charges contained in said letter would not be considered by your Board and that while I had been refused admission to practice in the Oklahoma State Courts your Board had nothing further to consider in my case, which statement contained two aspects by necessary implication, one being that you identified the persons indicted by me in said letter to be Edgar A. De Meules and George Ramsey, and that you had sufficient information respecting said matter to believe that my statements were probably true, and that you desired to suppress the truth of such

matter by ignoring same and to carry the matter off with insolence and arrogance, and the other being the false innuendo that my refusal from admission to practice in your State Courts was due to a determination by the Supreme Court of Oklahoma that I was a person of bad moral character, and that therefore any statement I might make was unworthy of your consideration, and further that you have no respect for the Supreme Court of Oklahoma which referred such matter to you. Such constructions are placed on your said statement by various persons, and very likely by the Supreme Court itself, and your subsequent action in deciding to invite me to give evidence before you appears to have been an afterthought in consequence of adverse public opinion.

In the circumstances no intelligent person can escape the conclusion that the Board of Governors of the State Bar of Oklahoma has lost its usefulness, and that before it attacks an inoffensive citizen with whom it has no proper concern, and before it can be qualified as an arbiter of the morals of the Bar of Oklahoma that it first purge itself of its own unworthy members and associates.

In response to your suggestion that you seek evidence to disbar as attorneys your unworthy members, I wish to say that Ramsey and De Meules have for many years been the actual and sometimes the titular leaders of the Bar of Oklahoma, and that there cannot be any doubt that their acts and moral standards are the standards of the Oklahoma Bar, thus forcing its self respecting members from active participation in the government of the bar and ashamed indifference to it, and that it would be futile to attempt to disbar Ramsey and De Meules in Oklahoma for any depravity they might commit.

I do not mean to be offensive to you, but I am earnestly striving to arouse some smoldering spark of self respect to the end that you might demand resignations in your organization of unworthy persons, or otherwise dispose of them, and secure in their places leaders who can command public confidence, else the Supreme Court or the Legislature must demolish your organization.

This is a matter of great public concern, and neither your Board or any of its members can afford to act in secret, or rely upon a lawyerlike defensive. That which is true should be admitted. That which is indefensible should not be defended. That which is explainable should be explained.

Respectfully submitted,

ALBERT T. PATRICK,  
Thompson Building,  
Tulsa, Oklahoma.

STATE OF OKLAHOMA, }  
COUNTY OF TULSA } ss.

Albert T. Patrick, being by me duly sworn, says that he knows the contents of the foregoing instrument and that the same is true to the best of his knowledge, information and belief, and that the sources of his information are from most of the parties specifically named therein and the papers therein referred to, and he signed his name to said instrument in my presence.

Witness my hand and seal this March 28, 1930.

(SEAL)

JEAN Y. ALLEN,

*Notary Public, State of Okla.*

My Commission expires October 28, 1933.

Duplicate original filed in the office of the Clerk of the Supreme Court of the State of Oklahoma, March 29, 1930.

LETTER OF ALBERT T. PATRICK DETAILING PROCEEDINGS BEFORE THE BOARD OF GOVERNORS OF THE OKLAHOMA STATE BAR ON MARCH 29, 1930.

March 31, 1930.

Mrs. Jessie E. Moore, Clerk of the Supreme Court of Okla., Capitol Station, Oklahoma City, Okla.,

Dear Mrs. Moore:

The resolution of the Board of Governors of the State Bar of Oklahoma which invited me to appear before them on March 29, directed a copy thereof to be sent to the Clerk of the Supreme Courts of the State and of the United States, so I likewise filed in your office a copy of my response thereto on that date, as well as with said Board, and I personally appeared before them on that date.

To my utter amazement all eight of the individual members of the Board of Governors who were present, expressly and positively disclaimed any knowledge of or responsibility for the proceedings taken against me in the Supreme Court at Washington. The Secretary of the Board explained to them that a resolution of the Board had been passed instructing him in the cases of lawyers who were disbarred in the Oklahoma Courts to certify copies of such disbarment orders to the Clerk of the Supreme Court of the United States, and that he had received a list of the lawyers purporting to have been so disbarred in Oklahoma, on which my name appeared, and acting under said resolution had written the Clerk of the Supreme Court of the United States submitting such list, and the Clerk had replied that only the name

of myself and one other were members of the Bar of the Supreme Court of the United States, and that he had acted in filing certified copies of my disbarment in New York without the express authority of the Board. It was not stated who introduced the resolution referred to or who furnished the Secretary with said list of disbarred lawyers, upon which my name erroneously appeared, and so my accusations that same had been engineered by George Ramsey and Edgar A. De Meules, and that such action so far as same had been especially and wrongfully directed against me remain undenied.

The Board, however, said that they had no concern either with my practicing in the Supreme Court of the United States or in the Supreme Court of Oklahoma, and would not so concern themselves unless I made application for admission to the Bar of Oklahoma to them in accordance with its rules. I pointed out that it was impracticable for me to comply with their rules, as rule 14 provided in effect that I was ineligible for admission unless I should return to New York and reside there and then secure my admission in that state, such rule appearing to have been especially directed against me personally, inasmuch as it undertook to give an effect to an order of disbarment in another state even though it might be vacated by the Court making it. They stated that in the adoption of the rules they supposed that they were following like rules which had been adopted in California, and did not know that their rules had been personally directed against me. I accepted the individual statements of the members of the Board in good faith and told them that they had completely won my confidence and that I therefore withdrew the expressions and inferences to the contrary in my response, except as to Edgar A. De Meules, one of the Board of Governors, and George Ramsey, one of the attorneys for the Board, who were law partners and were accused by me not only of engineering said false proceedings against me, but of various offenses set out in my said response, and they then asked me if I desired to proceed against Ramsey and De Meules for disbarment, and I replied that it was of no especial concern to me, no more than to them, and they thereupon voted to cite Ramsey and De Meules to answer the accusations I had filed with them and to show cause why they should not be disbarred.

Ramsey and De Meules were then arraigned before them and informed of the accusations and directed to file their responses thereto within ten days, and to show cause therein why they should not be disbarred. Addressing me, De Meules ad-

mitted that he had been convicted of a felony at Dubuque, Iowa, and offered to furnish me with a certified copy of such conviction, which I declined, informing him I had already sent for the same. Ramsey stated that he spoke for himself and not for De Meules, and hysterically denied any guilty participation in the acts charged and said that I knew he was innocent, and that any man who would accuse him of such acts was not fit to be a member of the bar, and he appealed to the members of the Board of Governors as his friends and fellow practitioners to protect him from such accusations, and stated that if they found against my accusations I would probably accuse them also, but the Board instructed him to put his defense in his response in accordance with the rules, and stated that he and De Meules would be tried as other accused lawyers are tried without favor and without fear of any criticism. April 24 was the day set to take evidence.

It thus appears that the proceeding against me in Washington was not by authority of or with the knowledge of the Board of State Governors of Oklahoma, and that the Supreme Court of the United States was deceived in that respect as well as by the concealment of the fact of my pardon of the offense in consequence of the conviction for which I was disbarred in New York, so that the order of the Supreme Court of the United States suspending me and ordering me to show cause why I should not be disbarred in that court appears to have been obtained by fraud or inadvertance committed in the name of the State Bar of Oklahoma, but without its authority.

In the circumstances, I think the Supreme Court of Oklahoma ought to certify to the Supreme Court of the United States, in response to its implied courteous request for information, and out of the comity which exists between those two great courts, that the proceeding there against me was not instituted by the State of Oklahoma; also that I am known to some of the members of your court personally and to the others by reputation to be a good citizen of the State of Oklahoma and to be of good professional and private character, and that no violation of comity arises from the fact that I am a member of the Bar of the Supreme Court of the United States and a practitioner of the Federal Courts and Departments and live in Oklahoma.

I wish to further state that I am convinced that it is the intention of the Governors of the State Bar and of the members of this Court to rid the Bar of its dominance by its unworthy members, so that a lawyer can take some pride in being a member of the Bar, and I therefore would

be willing to be admitted to the Oklahoma Bar, and to that end I think that this Court should vacate its order denying me admission despite my pardon, which by statute of the State of New York removed my statutory disability for admission there upon my compliance with the rules of residence, with which residence it was and is unjust for the State of Oklahoma to insist that I should comply, as it practically amounts to an alternative of banishment from this state.

If your Court should desire to hear me I will gladly come to Oklahoma City for that purpose.

Yours sincerely,

ALBERT T. PATRICK,  
Thompson Building,  
Tulsa, Oklahoma.

Carbon copy to The Board of Governors of the Oklahoma State Bar, Oklahoma City.