

CONFIDENTIAL

the case of the State Vs. Leo M. Frank. As a matter of fact, the said Conley could have assisted the said Leo M. Frank in the disposition of the body of Mary Phagan, as testified to, and have been seen by the said Boozer. In other words, the testimony of the said Boozer, even if true, a thing that the State denies, is with reference to immaterial matter.

2. State of Georgia, answering the second amendment says that C. B. Ragsdale has repudiated this affidavit, and insists that he was procured to swear to the falsehoods as contained in the allegations as embodied in this amendment, and says that he was paid money to swear as he did. The true history of this transaction is well known to the agents of one William J. Burns, a detective in the employ of Frank or some of Frank's friends, who has been co-operating with the defense in getting up evidence to overturn the verdict of guilty, and the particulars of the transaction, the State alleges, were handled by one Lehon, an agent of the William J. Burns Detective Agency.

In addition to this, the said Ragsdale is absolutely unworthy of belief, being impeached, as the State will show, by the affidavits of many reputable citizens who knew the said Ragsdale, in the county of Cherokee State of Georgia, where he formerly resided, and in the city of Atlanta. Also the State says that one R. L. Barber, who is alleged to corroborate and sustain the story as told by said Ragsdale, is a notoriously worthless character, and the said Barber's general reputation for veracity is impeached by many affidavits, which will be submitted on the hearing.

In addition, the said Barber has absconded and cannot be found and the information given the officers and officials of the State in control of the management of this case is, that the said Barber has absconded for the purpose of evading punishment for the wilful and deliberate lies he has sworn in connection with this transaction, and the state alleges that the said Barber was paid \$100 to make said false affidavit, submitted by the attorneys for the defendant, Leo M. Frank.

These allegations, the State will prove by affidavits to be submitted herewith.

This will illustrate the methods, the State is informed.

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