

its beginning to its inception, is accurately set out in the original motion for new trial, and certified to by the Judge. At times, when the presiding Judge would decide against the defendant the crowd would make demonstrations of approval. As illustrating the conditions surrounding the trial of Frank, and of the prejudice and bias in the public mind against him, we attach hereto, as exhibit A, grounds sixty five, sixty six and seventy five of the original motion for new trial, certified to by the presiding Judge. The facts alleged in this exhibit are true as therein stated, and are here sworn to by these deponents for the purpose of illustrating and showing the public prejudice and bias against Frank before and during the trial. The public prejudice was so great against Frank that it was with the greatest difficulty that any information could be obtained with reference to any facts or circumstances surrounding the crime which would be beneficial to Frank. Witnesses who had such information would either avoid giving information or give it only upon condition that they should not be called as witnesses and that their names should not in any way be associated with the case. Minola McKnight, one of the witnesses for Frank, had been arrested and placed in the station house, because she would not give such a statement as met the approbation of the detectives, and was kept in confinement until she gave a false statement. This incident was given the widest publicity by the press and had the inevitable tendency to prevent people from making any statements in his favor, or giving any information that would be beneficial to his case.

As soon as ^{we} were employed, ^{we} began at once an earnest, active and laborious investigation into all the facts and circumstances of the case. ^{we} They met with the greatest difficulty in obtaining information, even when such information was in the keeping of people being interviewed. From the time of the employment of counsel, as aforesaid, up to the date of the trial, ^{we} they gave almost continuous, laborious and earnest effort to discover everything which could throw any light upon the facts and circumstances surrounding the trial and showing who was the real perpetrator of the crime. Not only so, but we employed assistants to aid us in discovering every fact and circumstance that might throw light