

which were thrown on the floor in the trash and certain blue prints found in the desk were placed in the steel cabinet on the fourth floor.

GROUND 15.

J. W. WRENN, Sworn for the Movant At the instructions of C.W. Burke I called on Ivey Jones at the railroad freight depot. I ~~represented~~ ^{information} represented to Ivey Jones that I was seeking/about an accident and that the injured man had given his (Ivey Jones') name as a witness to the alleged accident. I asked Ivey Jones what he knew regarding the accident that had taken place on April 26, 1913, and Jones replied that he had witnessed no accident on that date. I told Jones that I could not understand why the injured man had used his name as a witness and asked Jones if he would not detail to me his entire movements on Memorial Day and to describe each person with whom he came in contact. This pretense of looking into an accident was adopted for the reason that I believed that if Ivey Jones' mind was taken away from all matters connected with the Frank case, he would tell the truth as to his movements on that day. Thereupon Jones made the statement set out in his affidavit, I taking notes of his statement and carried them to C.W. Burke. Burke dictated from said notes the affidavit already introduced, dated February 6, 1914. The affidavit as written was then carried to Ivey Jones and read over to him and Ivey Jones swore to it in the presence of said Burke signing his name to it. The paper signed by Ivey Jones did not have big letters at the top like a grocery store heading, and it is not true that Jones signed it with a pencil, but he did sign it with a fountain pen. No pretense was practiced on Jones to get him to sign the paper, but on the contrary, Ivey Jones signed the paper voluntarily after he knew just what it contained.

C. W. BURKE, Sworn for the Movant. On or about the 5th day of February, 1914, I instructed J. W. Wrenn to locate one Ivey Jones, a negro truck driver who appeared as a witness for the State in the trial of Leo M. Frank. I instructed Wrenn to pretend to Jones that
247 he was one of the claim agents of one of the railroads; that the railroad had been sued by a man who gave the name of Ivey Jones as a witness who had seen the accident, which occurred on Memorial