

in Evansville prepare the Articles of Incorporation, and take care of the legal matters?

A: Yes, sir.

Q: Do you recall who that lawyer was?

A: Not offhand.

Q: Did he at that time or after filing of the Articles of Incorporation submit to you any suggested By-laws and a Constitution?

A: Revisions, you mean?

Q: No, sir. Did he submit to you a suggested Constitution and By-laws?

A: I'm not sure, but he may have.

Q: If there had been some Constitution and By-laws submitted to you would you have taken them to Dallas, Texas?

A: Yes, sir.

Q: Do you recall whether or not there were any constitution and By-laws adopted at that convention in Dallas, Texas?

A: Yes, sir. There was a committee appointed down there to draft By-laws and they did draft them.

Q: Were they submitted to the convention and adopted?

A: They were. Also a motto.

Q: Do you recall the motto, doctor?

A: "Liberty, Intelligence, Our Nation's Safety."

Q: The original drafting of the Constitution and By-laws then evidently were left in the custody of Mr. Jones as Secretary is that right?

A: Yes, sir.

Q: Do you recall anything about the Code of Ethics?

A: Yes, sir, there was a Code of Ethics also adopted.

Q: Were they prepared by a committee at that convention?

- A: Yes, sir, there was a committee that prepared the Code of Ethics.
- Q: You have read the present Code of Ethics now in force by Lions International?
- A: I think I have read the last one -- I'm not sure.
- Q: Is it the same as the original draft, or do you recall?
- A: Similar, I should say.
- Q: Are you acquainted with the Constitution and By-laws of Lions International? Have you had an opportunity to read them?
- A: No, sir, not except when I have had occasion to gain some knowledge through the change that was made in the Articles of the Association in Indianapolis.
- Q: You are speaking now of the Amended Articles of the Association that was filed by Mr. Jones sometime in 1935?
- A: Yes, sir.
- Q: That is the only information that you have as to any of the present laws or authority of Lions International?
- A: That's right.
- Q: In other words, then you have no way of comparing the present constitution and By-laws with the original draft?
- A: No, sir.
- Q: You have no knowledge, so you can't give us that?
- A: That is right.
- Q: Do you recall the constitution committee consisting of F. L. Lewis, Joseph Trienens and E. H. Kaercher at that convention in Dallas?
- A: Since you mentioned the names it seems that is the committee that was appointed.
- Q: That was the committee that did make the recommendations and

and submit a constitution which was finally adopted by the convention, is that right?

A: Yes, sir.

Q: The Club Ethics, was that adopted at the meeting in St. Louis, or the meeting in Dallas?

A: I think there was a Code of Ethics adopted in Dallas, but I think it has been changed since.

Q: Wasn't there a revision of it in St. Louis at the second meeting?

A: I think so.

Q: There was just a tentative draft of it submitted and approved pending the final draft in St. Louis, is that right?

A: That is the way my memory serves me.

Q: The club Ethics Committee as you appointed it was James McCray of Memphis, and J. W. McMeese, Paris, Texas, Russell D. Law of Colorado Springs, Colorado. Those gentlemen, do you recall them?

A: The names are familiar.

Q: But except from the record that I am reading from, as to the Minutes of that meeting that would be the only way that you have to substantiate the statement that they were the men that drafted the Code of Ethics?

A: That's right.

Q: Doctor, I would like to establish this fact as to these various clubs and the situation that existed by reason of Mr. Hicks organizing, or purportedly being an organizer of the Royal Order of Lions, and organizing these luncheon clubs in Texas, and so forth -- what was the attitude of the officers of the Supreme Den of the Royal Order of Lions as to these organizations, supposedly subordinate lodges of

the Supreme Lodge, when they expressed their dissatisfaction in the fact that they were a part of a Secret Order rather than a luncheon club -- by that I mean did the Supreme Den of the Royal Order of Lions consider them a subordinate of the Supreme Lodge, or what was the attitude of the officers, and particularly you, as the Supreme President?

A: The officers could see that there was so much dissatisfaction and when I suggested that the only way to overcome it would be to incorporate a separate organization and turn the clubs over to it and let the clubs have what they wanted, that that could be the only way they would be satisfied, the Officers all agreed, and said, "That is all right. Go ahead and do it."

Q: During the time between the organizing of the supposedly subordinate lodges and the organizing of the International Association, did you consider them a subordinate lodge?

A: We considered them as so, but they didn't consider themselves as being subordinate lodges -- from the letters that we got.

Q: Was it the attitude that at the time of the creation of this organizing of this Association that they would be a part of that organization from the time that the subordinate lodges were organized, or did you consider them as beginning as of the date of the organization of the Association?

A: When we incorporated the International Association of Lions Clubs, then we considered all clubs that we had organized as belonging to that organization.

Q: I know that some place back in here there was some discussion about calling a convention and you considered waiting until you had fifty clubs organized. Do you recall

giving that information to anyone?

A: I don't recall it, but I think there was some discussion among the officers of the Royal Order of Lions that as soon as we had fifty clubs organized we would then incorporate and call a convention; but there was so much dissatisfaction we decided not to wait; they left it all to me.

Q: Doctor, you said something here about the officers of the Royal Order of Lions had a discussion about calling a convention after there were fifty clubs organized; then it was the intention to consider these clubs that had been organized by Mr. Hicks purportedly a part of the Supreme Lodge of the Royal Order of the Lions as far as you and the Supreme Officers were concerned, but the members of the organizations out in Texas and Oklahoma considered it a luncheon club?

A: Yes, sir.

Q: Was it your intention to permit them to function as a luncheon club up until the time you had fifty clubs, then to file the Articles of Incorporation?

A: Yes, sir.

Q: But due to the dissatisfaction that was coming in, you and the other officers considered it advisable to file the Articles prior to the time of having fifty clubs?

A: That is right.

Q: So if a club was organized or claim that they became organized in 1915 as a luncheon club, then they would actually start as an organization from that time?

A: Sure.

Q: And you would have considered them as such?

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A: Absolutely.

Q: Were there any Royal Order of Lions clubs represented at the meeting in Dallas, Texas?

A: There were none.

Q: Do you recall the approximate number of Royal Order of Lions Lodges that were in existence at the time of the Dallas meeting?

X  
A: I can't tell you exactly, but I'll estimate that there was possibly one hundred (100) at that time.

Q: I see a Samuel Hick's name here. Do you have any recollection of him?

A: I do not.

Q: I believe you told me this morning that Carmi Hicks and E. A. Hicks were no relation at all?

A: That's right.

Q: Can you give me any information as to why the word "Lion" was used?

A: Well, I can't tell you exactly, but when the Royal Order of Lions was incorporated there was quite a good bit of discussion as to what name it should be given. We had at that time a Minister who was stopping at the Vendome Hotel -- I can't recall what business he was in outside of he did do some preaching, and he was the one that we had some conferences with, and he was the one that wrote the Ritual. I can't think of his name; but, anyway, I think he was the one that helped to decide on the name; because, as he explained it, "Call it the Lions, and base it upon the Book of Daniel."

NAME  
Q: Then when you found out it was necessary to organize an Association, you continued the name of "Lions" over into the

name of that?

A: That is right. Except we didn't call it the Royal Order of Lions, we called it the International Association of Lions Clubs.

Q: It was purely by the writing of the Ritual by this Preacher and the suggestion as to the Book of Daniel that the word "Lion" was used?

A: That's right.

Q: At that time did you have any Tail Twister and Lion Tamer?

A: Not by that name, no.

Q: Did you have someone that carried out the functions of their duties?

A: Yes, sir.

Q: What officers were there besides the president, Vice President and Secretary-Treasurer of Lions International?

A: There were no others.

Q: Did you at any time have anything to do with the recreation of the offices of Tail Twister and Lion Tamer?

A: I did not.

Q: You have no knowledge of when they were first brought into the organization as officers?

A: I do not.

Q: Doctor, I would like to ask you if there is anything that you would want to say that I have omitted that might be pertinent to the history of Lions International?

A: I can't think of anything in particular. Except that I will say that after Mr. Lewis served his term as President it seemed that from that time on or approximately about the the time that Mr. Lewis went out of office, that Mr. Jones was very cold to me and what correspondence we had was just short and to the point, and it wasn't friendly like it had

been previous to that time. Naturally, we just quit writing. I don't remember who wrote last; if I remember right I think I wrote the last letter, but that doesn't make any difference; but it always seemed to me that after that, from what I could gather through friends, the first indication that I had that Mr. Jones was being unfair to me was letters which I received from Cyrus Ray, of Abilene, Texas; then I later received correspondence and letters from Mr. Fred Coss of San Francisco, California, complaining about Jones assuming the roll of organization, and claiming the honor for the organization of the International Association of Lions Clubs; when Mr. Coss knew, of his own mind and from experience that I was the originator; he was very much wrought up over the subject and wrote a letter to the local club in San Francisco, and also to some radio station that had broadcast some information about Mr. Jones being the originator; but it seemed that neither letter was ever answered.

Q: Did you write Mr. Coss about that?

A: Yes, sir, I wrote Mr. Coss.

Q: What is the gist of your letter to him?

A: As near as I can remember now I told him not to get so worked up about it, that evidently Jones was looking for honor and glory and if that is what he was looking for, let him have it. It wasn't so important to me, because I was busy here in Evansville, and I had more work here to do in my practice than I could take care of.

Q: In reference to your correspondence with Mr. Ray, he was a member of the Abilene Club, was he not?

A: Yes, sir.



- Q: You have submitted to Mr. Delage a copy of all of those letters?
- A: Yes, he has copies of those letters that Mr. Ray wrote me.
- Q: And your correspondence with him also?
- A: Yes, sir, he has copies of my correspondence with him also. Then, Mr. Hicks, who was the organizer, after he had ceased working for the organization under Mr. Jones, and had settled in Los Angeles, California, wrote me several letters telling me that he didn't think that Mr. Jones had treated me right, and that Mr. Jones had informed him that I was connected with the old organization of International Association of Lions Clubs, or some other name, but that I didn't have anything to do with the present organization of the International Association of Lions Clubs, and furthermore that I had been paid for all claims that I might have on the organization.
- Q: You are not making any claim now, are you, on the organization?
- A: No, sir.
- Q: You are giving all of this information voluntarily for the purpose of perpetuating and establishing the records and for no financial gain or any financial honor to you or any kind of an honor to you?
- A: I don't want a cent.
- Q: You are not asking for any honor to be bestowed upon you, is that right?
- A: That is right.
- Q: Is there anything else then, in connection with this that you can think of?
- A: Nothing of importance. Of course, there has been little

things that happened from time to time; I have been sent newspaper clippings from friends of mine in different parts of the United States, where Melvin Jones was mentioned, and so on and so forth; but I failed to keep a lot of them, thinking they were unimportant--so I didn't keep them.

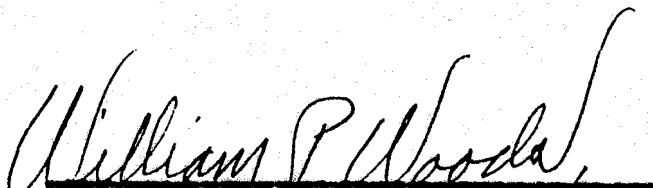
Q: You have never, at any time, yourself, or either by the assistance of anyone else endeavored to discredit this situation that has been created?

A: Never. I have always spoken very highly of it. I give Mr. Jones a lot of credit. I think he did an excellent job in organizing as many clubs that he has, and overseeing the organization of those clubs. I give him a lot of credit for it.

Q: Doctor, that is all that I have on this, unless there is something else that you want to say.

A: that is all that I have.

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WILLIAM P. WOODS

STATE OF INDIANA }  
COUNTY OF VANDENBURGH } SS:

C E R T I F I C A T E

I, Louis J. Carnaghi, a notary public in and for the County of Vanderburgh, State of Indiana do hereby certify that I did on March 20, 1952 take down the foregoing affidavit under oath of Doctor William F. Woods in the McCurdy Hotel, Room 704, in Evansville, Indiana, and that I did later transcribe same from my notes, and that the foregoing transcript is a true, correct and complete transcript of all that transpired.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this \_\_\_\_\_ day of March, 1952.

My Comm expires 2/3/56.