



# Forensic Intelligence International, LLC

*the Kauth house*, 318 Cooper Avenue, Hancock, Michigan 49930

151 Moore Street SE, Crawfordville, Georgia 30631

Tel. 906-370-9993 (MI), 706-456-2696 (GA), 706-294-9993 (cellular)

Fax & Voice Mail 603-452-8208 | E-mail: [sdresch@forensic-intelligence.org](mailto:sdresch@forensic-intelligence.org)

Monday, August 5, 2002

Office of the General Counsel  
Oklahoma Bar Association  
P.O. Box 53036  
Oklahoma City, OK 73152-3036

**Complaint Against:** **Jay M. Galt**  
**White, Coffey, Galt & Fite, P.C.**  
**6520 North Western, Suite 300**  
**Oklahoma City, Oklahoma 73116**

**Alleging Violation of:** **Oklahoma Rules of Professional Conduct**  
**Rule 3.3. Candor Toward The Tribunal**  
**(a) A lawyer shall not knowingly:**  
**(1) make a false statement of fact or law to a tribunal; ...**  
**[5 O.S. § Rule 3.3 (OSCN 2002), Appendix 3-A]**

**In Representation of:** **Oklahoma Natural Gas Company**

**Before:** **Corporation Commission of the State of Oklahoma**  
**Cause PUD No. 98000188 (Applicants: McAdams & Walker)**

**By Filing of:** **Communications Received from and Communications to**  
**Michael McAdams, May 28, 2002**

Statement of Facts:

The referenced filing by Mr. Galt included, inter alia:

- An e-mail message from Stephen P. Dresch to “Mike & Sylvia McAdams” dated May 25, 2002, 5:16 p.m. This message included the following sentence: “Russ rejected that proposal on ethical grounds (which, apparently, do not weigh so heavily with Galt, former second-string bagman for first-string bagman Tater Anderson).”
- A letter from Mr. Galt to Michael E. McAdams, dated May 28, 2002. This letter includes the following sentences: “... I might also clear up a few misstatements in Mr. Dresch’s May 25 e-mail. ... Finally, I was never associated with Bill Anderson on either a professional or personal basis.”

The evidence will demonstrate conclusively that Mr. Galt’s denial, in a filing before the Commission in a pending matter, of any association, professional or personal, with William L. [“Bill,” “Tater”] Anderson was false and that Mr. Galt knew, or certainly should have known, that the statement was false when he filed it before the Commission.

Specifically, documentary evidence and witness testimony can be offered to confirm the following (based directly on material filed with the Clerk of the Oklahoma Corporation Commission):

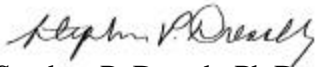
As commissioner-elect Anthony did not have to wait long for Tater Anderson’s next approach. At 7 p.m. on the day after the election Anderson called Anthony at home to congratulate him on his victory. In mid December, after another intercession by Hank Bradley of Metro Bank,

Anderson called Anthony again, offering to raise money to retire his campaign debt. Anderson suggested a reception at which Anthony could meet people interested in being of assistance, advising that the reception should take place before Anthony took office to avoid campaign-finance prohibitions.

Anderson's first installment toward retirement of Anthony's campaign debt came through Oklahoma City attorney Jay Galt, who represented a regulated utility, Public Service Corporation of Oklahoma. As had Anderson in October, Galt gave Anthony \$1,000 in cash and a list of five purported donors. Galt explained that the funds in fact came from Anderson. Among the purported donors were T. M. Anderson, Stephen C. Anderson and LaRuth Anderson.

The undersigned hereby requests that, in response to this complaint, the General Counsel discharge his obligations under Rules 5 and 6 of the Rules Governing Disciplinary Proceedings [5 O.S. § Rules 5 and 6]. The undersigned further affirms that he will provide such information and assistance as the General Counsel may request.

Sincerely,



Stephen P. Dresch, Ph.D.

Attachments: Galt Filing of "Communications Received from and Communications to Michael McAdams," Cause PUD No. 98000188, May 28, 2002.

Dresch Letter to Galt, "Re: OCC Cause PUD 980000188 Filing of 'Communications Received from and Communications to Michael McAdams'," June 5, 2002.