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# The Ambulance Chasing Panacea: Being a discussion of the Milwauee Circuit Court's Investigation of Legal Abuses

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# THE AMBULANCE CHASING PANACEA

## *Being a discussion of the Milwaukee Circuit Court's Investigation of Legal Abuses*

PAUL A. HOLMES*

FUNDAMENTAL questions of law arising out of the Milwaukee Circuit Court investigation of legal abuses have now been definitely settled by the Supreme Court of Wisconsin. Pioneering the way for the entire country, the Milwaukee Circuit Court has developed a workable method of delving into and ascertaining facts in regard to legal abuses and of correcting and curbing those abuses thus discovered. The machinery of this method has been attacked on the grounds of unconstitutionality, has been examined by the Supreme Court of this state and has been upheld as constitutionally sound. The investigation itself, which began more than a year ago, is, at this writing, not as yet definitely concluded, and it is probable that proceedings therein and arising therefrom may well continue for several months.

It is not the purpose of this article, however, to attempt to give a history of the facts adduced through the investigation or to discuss any of the controversial points arising over the manner in which the investigation was conducted. Neither is it the purpose of this article to enter into any ethical dissertation in regard to the propriety of any or all of the steps taken, conclusions drawn or results accomplished.

As this is being written, it appears probable that disbarment proceedings will be begun against certain attorneys. It appears probable, also, that further facts may be brought to light regarding the evils of a highly organized ambulance chasing system. These probable future developments, however, will almost certainly follow the paths laid down by the proceedings already held or by clear provisions of statute law. They will be interesting and important of themselves to the individuals affected and to the community concerned, but it now appears unlikely that they will have the effect of raising any additional fundamental questions of law.

For that reason, an article dealing with the law already made, the precedents established, and the results so far achieved, is not now untimely.

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Before the investigation was begun a situation existed in the city of Milwaukee, Wisconsin, similar in a greater or lesser degree to situations existing in many of the large cities of the United States, whereby a comparatively small group of attorneys obtained all except a negligible portion of the personal injury business through the assistance of highly trained solicitors.

So well organized was the system of solicitation that hardly a person in the entire city who happened to suffer an accident in an automobile, street car, or railroad train was spared the immediate visitation of a veritable horde of solicitors who competed vigorously with each other to obtain his or her signature to a "contract" authorizing the institution of a lawsuit for damages.

Nor were the solicitors the only persons who sought out the accident victims with demands for signatures on dotted lines. Fully as enterprising were claim adjusters for insurance and public utility companies, and the accident victim who escaped the solicitor was almost sure to fall into the hands of an adjuster whose business it was to secure a quick and cheap settlement for his company or a sworn statement of facts tending to exempt his company from liability.

Lawyers who employed solicitors often brought large numbers of claims against the same company to the office of that company for discussion and settlement as a group rather than as a collection of individual cases to be settled on their individual merit. This practice enabled attorneys to settle with their clients, if they desired, on any basis they pleased rather than on the basis of the actual amount allowed by the company for the particular claim, thus opening the door to fraud which, as information recently made public by the district attorney of Milwaukee County indicates, was practiced in many instances.

Aware of the prevalence of these evil practices, directors of the Lawyers' Club of Milwaukee prepared and presented to the Milwaukee Circuit Court a petition setting forth the existence of these abuses in general terms and praying the court to assume jurisdiction and conduct an inquiry to ascertain the facts.

In a previous article on this subject[1] the writer described at some length the manner in which the investigation was instituted and conducted in its early stages. For the purpose merely of giving the present article a clear background, it might be well to recall briefly that the Honorable Charles L. Aarons, judge then presiding over the Circuit Court calendar, ordered a hearing on the petition, at which hearing the petitioners appeared and reiterated and elaborated upon the charges made in the petition. Judge Aarons thereupon directed that

[1] MARQUETTE LAW REVIEW, Vol. II, No. 4, page 183.

a further hearing be held at which sworn testimony might be taken and set such matter for hearing before himself, directing in the same order that two other judges of the Milwaukee circuit, the Honorable Gustave Gehrz and the Honorable John J. Gregory, sit with him as associates.

Several attorneys appeared before the tribunal on the first day of the hearing and confessed that they had been engaged in ambulance chasing, so called—the acceptance of solicited cases from solicitors and the splitting of fees with these solicitors. These attorneys announced that they had seen the error of their ways, were convinced the practice was improper, and were willing to co-operate with the court in every possible way in remedying harm already done and in stamping out the practice.

These attorneys surrendered to the court what they represented as all the cases in their possession tainted with champerty. Hundreds of cases were thus thrown open to the court for investigation, and the three judges began individual inquiries into each case. Wherever the actual existence of champerty was found, and this was in most of the cases so submitted, the judges directed the attorneys involved to withdraw entirely from the litigation. Many cases were found where the plaintiffs did not know that a lawsuit had been started and informed the court that they had not authorized and did not wish to engage in a lawsuit.

However, there were certain attorneys in the city who did not come voluntarily into court with a confession and in regard to whom evidence had been brought to the attention of the court indicating, in the opinion of the court, the necessity of further investigation to determine whether these attorneys had been guilty of improper and unethical practices.

As a result of some of such investigations, a Milwaukee attorney, ——— — ———, conceived that his professional standing and reputation was being injured. He began in the Milwaukee Circuit Court, through the service of a summons and a subpœna for an adverse examination of the defendants, a lawsuit against three of the attorneys, who, as directors of the Lawyers' Club, were conducting the investigation, charging them with conspiring to use the investigation as a means of blackening his character and alleging that they were actuated by jealousy and desire for personal gain.

The judges ruled that Mr. ——— should immediately acquaint them with any evidence he might have in regard to bad faith on the part of those conducting the investigation. They invited him to appear in court and on his appearance directed him to take the oath and submit to interrogation as a witness. He refused, however, to acknowledge

jurisdiction by the court over him and challenged the court's right to compel him to be sworn as a witness. The record of the proceedings discloses that he explained his position by saying, in part:

Judges are not courts. There is a vast distinction between a judge and a court. When judges associate themselves together for inquisitorial purposes, they act without authority, either in the constitution or laws. A tribunal thus constituted cannot in a summary way inquire into the subject matter of an action which is to be tried in a court lawfully constituted. I deny your power or authority to hold public hearings behind the backs of lawyers, or citizens, receive and allow to be published lies and slander about them, without giving such citizens and lawyers reasonable notice in advance of the hearing, telling them of what matters will be heard and of whom the witnesses will be, and allow an opportunity for preparation and examination and honest and straight-forward investigation.

Judge Aarons explained that the order to him to be sworn was made by the judge of Branch Number Eight of the Circuit Court and not by the three judges. He asserted that Judges Gehrz and Gregory were sitting with him only as associates and conferees. This explanation did not cause Mr. ——— to alter his position, however, and Judge Aarons thereupon adjudged him guilty of a criminal contempt committed in the immediate view and presence of the court, and sentenced him to serve thirty days in the county jail.

Mr. ——— surrendered to the sheriff and shortly thereafter secured his liberty under bond through applying to another branch of the Circuit Court for a writ of habeas corpus. While a hearing on this writ was pending, the Wisconsin Supreme Court, exercising its original jurisdiction on petition of the attorney general, ordered the judge who had issued the writ to show cause why a writ of mandamus should not issue directing that the writ of habeas corpus be quashed and Mr. ——— remanded to the custody of the sheriff of Milwaukee county to serve his sentence.

This article is not concerned with the question of whether the judge of one court of co-ordinate jurisdiction can determine upon application for a writ of habeas corpus whether another co-ordinate branch of the same court had jurisdiction to adjudge the applicant guilty of contempt, a question which was not finally determined even by the resulting proceedings in the Supreme Court. Suffice to say, therefore, that the matter was, in the manner above outlined, brought for the first time before a court of last resort for determination. Upon the decision of the Wisconsin Supreme Court in this case hung the answer to the question of whether the procedure adopted by the Milwaukee Circuit Court for remedying the abuses practiced by members of its bar was legal or illegal.

The Wisconsin Supreme Court answered emphatically that the procedure was legal. The decision was, however, later expressly modified in regard to remarks contained in it concerning the power of judges to consult with each other in the solution of questions of law submitted to them for determination. As given, the decision was that of five members of the Supreme bench, Chief Justice Aad J. Vinje taking no part and Associate Justice Charles H. Crownhart refusing to concur.

In a per curiam decision filed a few days in advance of the opinion, the court determined (*State ex rel Reynolds* v. *Circuit Court,* 193 Wis. 132):

1. That Branch Number Eight of the Circuit Court for Milwaukee County had jurisdiction to investigate the charges presented in the petition signed by ——— — ——— and others.
2. That the fact that two other circuit judges sat with the presiding judge of Branch Number Eight did not change the nature of the judicial tribunal that was proceeding with its investigation under the ——— petition or deprive Branch Number Eight of the power to punish for contempt.

The court also ruled that, upon the facts appearing in Mr. ——— verified petition for the writ of habeas corpus, the writ should not have been issued. The writ was ordered quashed and Mr. ——— ordered remanded to the custody of the sheriff. He was, however, permitted by the Supreme court to remain at liberty for the purpose of prosecuting a writ of error.

In regard to the right of the Circuit Court to begin its inquiry under the ——— petition, the opinion, which was written by Associate Justice E. Ray Stevens, states:

No question is raised, and none can be raised but that Branch Number Eight had the power and the jurisdiction to investigate the conditions which the ——— petition alleged existed in Milwaukee County. Attached to the petition of the attorney general and made a part thereof is an opinion by Judge Aarons which discloses some of the facts established by the evidence taken in the investigation under the ——— petition. This opinion presents so clear a picture of the baneful effect of the activities of "ambulance chasers" and "claim adjusters" as to leave no doubt that the court ought to have taken jurisdiction and to have proceeded with an investigation for the purpose of eliminating unprofessional practices and of preventing the use of the processes of the court in such manner as to interfere with and obstruct the functions of the courts whose calendars are clogged with champertous cases brought under contracts procured by "ambulance chasers."

At another point in the opinion, Justice Stevens states that "the court has the inherent power to do whatever was necessary to conduct

its investigation," and that among its inherent powers was that of punishing for contempt those who refused to be sworn and to give testimony.

Mr. ——— prosecuted a writ of error to the Supreme Court from his contempt sentence, and after arguments were heard, Justice Stevens filed an opinion in the case of ——— v. *State* (216 N.W.——). This opinion was filed November 8, 1927 and was followed November 30 by a dissenting opinion written by Justice Crownhart. As in the preceding case, Chief Justice Vinje took no part.

It is the opinion by Justice Stevens in this case which may be regarded as settling definitely the law in Wisconsin in regard to the right of Circuit Courts to conduct investigations for the purpose of remedying abuses resulting from improper conduct by members of their bars. The opinion, upon analysis, will be seen to lay down the broad rule that the circuit judges of any circuit having more than one judge may sit en banc as a judicial tribunal and in the exercise of their statutory power (as the opinion interprets Wisconsin statute 252.07, subsection 3) "to promote justice and to expedite the business of the courts," and of their inherent power to "clear their calendars of champertous actions and to surround themselves with members of the bar who are truly sworn ministers of justice," may require testimony to be given under oath.

Justice Stevens states that the proceeding under the ——— petition is a "special proceeding" which will not lead to a judgment or determination that will bind any particular individual. The opinion continues:

> In the exercise of their power to promote justice and to expedite the business of the courts, judicial tribunals are not compelled to ask the aid of the district attorney or to await the slow process of calling a grand jury. Even though a grand jury might have dealt with the matter on the ground that champerty and maintenance are offenses against the law, still that remedy was not exclusive. Courts possess the inherent power to do whatever may be necessary to purge their calendars of champertous cases and to discipline members of their bars.

Justice Stevens points out that the court was not proceeding in an action against a single offender, but was engaged in a proceeding against an offending practice which was more far reaching in its results than the acts of any single individual could be. He asserts that "the powers which have inhered in courts from the earliest days of their history give these tribunals ample authority to deal with situations like that presented by the ——— petition."

Referring to the Wisconsin case of *In Re Courtroom* (148 Wis. 109), where it was held that courts have the incidental power neces-

sary to preserve the full and free exercise of their judicial functions, he states that "if courts have the inherent power to take such judicial action as may be essential to secure the necessary physical surroundings in which to perform their functions, they must of necessity have the inherent power to clear their calendars of champertous actions and to surround themselves with members of the bar who are truly sworn ministers of justice."

Explaining the nature of inherent power, he says:

> This power on the part of courts is not based upon legislative action. It inheres in the nature and constitution of judicial tribunals. Without it courts could not continue to function as the needs of justice may require.

The court affirmed the sentence of contempt imposed by Judge Aarons, but modified the judgment to permit Mr. ——— to purge himself of his contempt by submitting to the taking of the oath and the giving of testimony.

The dissenting opinion filed by Justice Crownhart expresses views so widely divergent from those of the majority of the court that the two opinions are as far apart as the poles. The dissenting justice condemns the entire Circuit Court proceedings in terms which are in many instances vituperative. He expresses grave fears for the Bill of Rights and fundamental safeguards of the Constitution if the term "inherent rights" is to be regarded as signifying a power over and beyond the Constitution rather than as signifying implied powers incident to the grant of judicial power by the Constitution.

"No authority in the statutes, and none at common law, for such an inquisition, has been cited to this court for this extraordinary proceeding, and none is cited in the opinion of the court," he says. "I think none can be found."

He asserts that the principle of *ex necessitate rei* provides no excuse for the adoption of "strong arm methods," stating that the statutes of Wisconsin "point the way to remedy any such abuses so clearly and adequately that no one need doubt their effectiveness when called into action in good faith."

He further states:

> Inquisitions by courts are foreign to the common law courts, except through the governmental agency of a grand jury. That was the situation when the Constitution was adopted and since. If the necessity existed for inquisitional power, in the courts, it seems to me it would have been exercised at some time during these centuries. It cannot now be presumed; on the contrary it can be presumed that the grand jury, the district attorney, individual contempt, disbarment proceedings and the criminal law are sufficiently potent to fully and adequately prevent these evils. . . . . I am in full sympathy with any effort to liberalize

the procedure of the courts, and thus make justice more certain. But in doing this it seems to me that courts must be careful not to arrogate to themselves power to proceed in a summary and unauthorized way contrary to the fundamental safeguards guaranteed by the Constitution. The Bill of Rights is not to be overthrown and cast out of the Constitution because of a supposed necessity which in fact does not exist. Attorneys, no less than other citizens, are under the protection of the Constitution. If the decision in this case is allowed to stand as a precedent, and if it is carried to its logical conclusion, I foresee a dangerous invasion of the rights of the people, contrary to the intent of the framers of our Constitution.

Commenting on the manner in which the investigation was prosecuted, he says:

It must be noted that this proceeding was instituted by a private corporation composed of attorneys in competition with other attorneys in Milwaukee County. It was not a proceeding instituted by the bar of Milwaukee County representing all the attorneys. Members of this private corporation offered their services to prosecute the proceedings, and their services were accepted. The inquisition was not prosecuted by public officials. To allow private attorneys to prosecute for crimes which they themselves charge without necessity therefor, and due appointment by the court, is against public policy and is contrary to the decisions of our court, and contrary to the spirit of justice.

As was stated at the outset of this article, it is not the purpose of the writer to discuss any of the controversial points in regard to the propriety of any or all of the steps taken. The dissenting opinion may therefore be dismissed with the foregoing brief summary of the arguments advanced by it. It is said that the majority and dissenting opinions represent two conflicting schools of philosophy. It will be conceded that two more diametrically opposed points of view could not well be imagined. However, the majority opinion, which finds in the inherent power of the court the power necessary to conducting an investigation into matters relating to the conduct of members of its bar, and in the statute above referred to (252.07, subsection 3) authority for judges of a circuit containing more than one judge to sit en banc for the purpose of conducting such an investigation in order to promote justice and expedite the business of the circuit, is the law in Wisconsin and is apparently destined to become a precedent for similar investigations throughout the nation.

In view of the remarks in the dissenting opinion concerning the fact that directors of the Lawyers' Club of Milwaukee acted as prosecutors, it would be improper to leave this subject without calling attention to the view of the majority of the court as to the value of the service rendered by these attorneys. In the case of *State ex rel Reynolds* v. *Circuit Court,* supra, Justice Stevens states:

The members of the bar who, at the sacrifice of their personal and professional business, aided the court in its investigation and in the subsequent proceedings are entitled to commendation. It is only by the constant and unselfish devotion of time and energy on the part of both the bench and the bar that the ideals of an honorable profession can be maintained in these days when the tendency is to commercialize all callings. The fact that so many members of the Milwaukee bar have put aside their own professional engagements to devote their time and energy to aiding the courts in stamping out abuses that have crept into the practice of their profession gives the strongest assurance that the members of the bar still cherish the high ideals of an honorable profession.

Following the filing of the majority opinion in ——— v. *State,* supra, Mr. ——— appeared before Judge Aarons and his associates, Judges Gehrz and Gregory, and purged himself of his contempt by submitting to the taking of the oath. He thereupon was directed to furnish evidence in support of the charges contained in the affidavit he had made in connection with his lawsuit against three of the attorneys conducting the investigation.

Commenting upon the effect of his efforts to comply with this direction, Judge Aarons stated in a report on the investigation subsequently made that "the accusations of fraud and bad faith made by Mr. ——— in his affidavit . . . . were wholly unfounded, and that on the contrary, they (those against whom the charges were made) acted in good faith and in strict accord with their functions as officers of the court in their conduct of the proceedings."

The report of Judge Aarons contained an exhaustive analysis of the vast amount of testimony taken during the hearings. The judge stated:

> The calendar was not only purged of a large number of tainted cases, but an educational result was accomplished. Plaintiffs in such actions were given to understand that their lawyer cannot with evenly balanced mind perform his proper quasi judicial function and advise his ostensible client when he himself is the real litigant. He cannot represent his client when he is so involved personally that the litigation becomes in effect his own. A lawyer, when appearing in a representative capacity for others, should act for others and never for himself. Where he is in reality acting for himself, he has destroyed his true function, he has become a spokesman for his own interests, while ostensibly acting as the advocate of another. This is abhorrent to the law. In the opinion of the court, the inquiry conducted was the best known practical way to procure the evidence before trial, and to thereby enable the court in a timely and effectual manner to put a stop to the evil in so far as it was indulged in by members of the bar.

The judges made a comprehensive survey of the conduct and attitude of all of the attorneys whose activities were brought to their attention

during the investigation. In regard to some of these attorneys, who confessed their wrong doing at the beginning of the inquiry and who in the court's opinion, actually and in good faith rendered material assistance in clearing up the situation, the judges expressed the view that such attorneys should not be further penalized. In other instances, however, where attorneys were shown to have been guilty of misconduct affecting, in the opinion of the court, their standing as attorneys, the judges announced their determination to refer the transcript of the record disclosing such conduct to the state board of bar commissioners.

"When such a case is shown to exist," Judge Aarons said, "the courts ought not to hesitate, from sympathy for the individual, to protect themselves from scandal and contempt, and the public from prejudice, imposition or injury, by removing grossly improper persons from participation in the administration of the laws."

Reference of the record concerning certain attorneys to the board of bar commissioners is in accordance with a statute relating to procedure in disbarment cases whereby members of the board are empowered to act as complainants in instituting disbarment proceedings in the Supreme Court. (Chapter 314, Laws of 1927.)

There is one final phase of the existing achievements of the investigation remaining to be discussed—statutes enacted by the legislature or recommended and not as yet enacted as a result of disclosures of the investigation.

Judge Aarons in a memorandum decision handed down while the 1927 Legislature of the State of Wisconsin was in session made numerous recommendations for remedial legislation.

After discussing the situation in general terms, he said:

> There is only one logical conclusion. Clearly and unequivocally must the word go forth that the taking of legal employment contracts from persons *in extremis must be stopped—and stopped effectively!* That the taking of signatures of injured persons *in extremis* to releases of their rights *must be stopped—and stopped effectively!* That both sides to a controversy must be given equal opportunity to secure the facts. That those who may be injured—often maimed or crushed—many times also lacking in sufficient experience and foresight—must be adequately protected from the struggling swarm of "chasers" and "adjusters" vieing and competing with one another in their relentless race for selfish advantage, and to overreach and impose upon the helpless.
>
> What shall be the remedies? It is realized that solutions cannot be reached in a day. But our faces must be grimly set to the task. A beginning must be made.
>
> The principal and urgent reason for making this preliminary memorandum at this time is the need of legislative action and the advanced stage of the state legislative session at Madison.

A series of legislative enactments is herein recommended which are calculated to operate effectively as a preventive of the abuses and vices mentioned:

1. A law abolishing "ambulance-chasing," so-called, and declaring void contracts so procured, prescribing a penalty for violation, defining the term "investigator," on the one hand, and the term "adjuster," on the other hand, and providing that both be licensed in a manner similar to that now prescribed for private detectives. The term "investigator" should not be understood to include or sanction "ambulance chasers" as denounced in this memorandum.

2. A law declaring it to be unprofessional conduct and grounds for disbarment for any attorney to violate his oath, or to stir up strife and litigation, or to hunt up cases or breed or encourage litigation in order to secure clients, or to employ agents or runners for like purposes or to reward others directly or indirectly, to do the same to bring business to the attorney's office, or to remunerate any person to influence the criminal, the sick, or the ignorant to seek the attorney's services. Such a law should also make void, as to the attorney, any contract made in violation thereof and bar him from appearing in any such forbidden case, saving, however, to the client the right to recover back all money paid upon any such contract.

3. A law prohibiting the splitting of fees for professional services by attorneys with persons who are not licensed to practice law and prescribing the penalty for violation.

4. A law defining "common barratry" as the practice of soliciting, maintaining or exciting judicial actions or proceedings, and fixing a penalty.

5. A law to broaden and strengthen the present statute prohibiting the practice of law without a license.

6. A law to require that every pleading, except demurrers, in cases brought in courts other than before Justices of the Peace be duly verified.

7. A law to require either party in tort actions upon demand of the other, to furnish a list of the names and addresses of all known witnesses and supplemental lists of such as may be ascertained later, and to provide adequate means of enforcement thereof.

Or a law requiring the prompt filing of such lists with the clerk of the Circuit Court, there to be available of both parties subject to proper court control.

8. A law providing for the review by the Court, in some simple, inexpensive proceeding, of settlements made by parties not represented by an attorney, placing the burden of proving the fairness and reasonableness of the settlement upon the party making the payment.

9. A law to permit the court in which perjury has been perpetrated to hold a preliminary examination and bind over the wrongdoers from trial.

The recommendations herein contained are given in substance only, and necessarily in somewhat general terms. They will, no doubt, require amplification in respect to details before legislative action is taken.

These recommendations were supported by practically all the circuit judges of Milwaukee County, and the legislative committee of the Milwaukee Bar Association, thereupon drafted bills under each of the headings listed by Judge Aarons, and caused them to be introduced in the State Legislature. While statutes were adopted outlawing solicitation of lawsuits or ambulance chasing on the side of the plaintiff, bills which were introduced for the purpose of prohibiting similar misconduct on the part of adjusters failed of enactment. A measure providing for the licensing of both investigators and adjusters likewise failed to become law.

On the general subject of ambulance chasing, Chapter 457 was passed, adding two new subsections to Statute 256.29. One of these defines unprofessional conduct constituting ground for the disbarment of attorneys and includes stirring up of litigation, the employment of agents, ambulance chasers or others to drum up legal business.

Chapter 459 was enacted to fulfill the demand for a law prohibiting fee splitting for professional services on the part of attorneys with persons not licensed to practice law. This statute defines such fee splitting and makes it not only grounds for disbarment but a criminal offense.

Common barratry is defined by Chapter 400 and made punishable by a fine not exceeding $500 or imprisonment for not more than six months in the county jail.

A law was passed as Chapter 414 permitting any court in which perjury should be committed to hold a preliminary examination and bind the accused over for trial.

The statute prohibiting the practice of law without a license was strengthened by the enactment of Chapter 458 defining the practice of law in these terms, "every person whose business it is, for fee or reward, to prosecute or defend causes in any court of record or other judicial tribunal of the United States or any of the states or give advice in relation to causes or actions therein pending."

A bill providing a method for a review of settlements made by parties not represented by attorney and placing the burden of proving the fairness of such settlements on the party making payment failed to pass the legislature. So also did a bill requiring either party in actions for damages for personal injury or death caused by the actionable negligence of another to furnish a list of the names and addresses of all known witnesses to the accident.

Many matters of fact arising from the investigation still remain to be determined. The investigation itself is unfinished at this writing. Disbarment proceedings, as recommended, have not as yet been begun. Recent developments indicate that still more startling details of evil

practices remain to be revealed. Regardless however of what these eventualities may be, it is now apparent that the investigation has accomplished its primary purpose, the stopping of organized ambulance chasing in Milwaukee, and has further served to establish reliable guideposts for the direction of those who may in other cities of the country or in Milwaukee at some future time desire to avail themselves of a workable, efficient method of dealing with legal abuses of the type which defy correction by ordinary means.

It is also apparent that confidence of the people in the courts has been strengthened by the vigorous impartiality with which the investigation has been conducted, and that the tendency toward a growing distrust of the legal profession on the part of the public, brought about by just such abuses as this proceeding has effectually corrected, has been sharply arrested by this salutary demonstration that professional ethics and ideals are not mere empty words and that only those "sworn ministers of justice" whose professional conduct indicates that they are worthy of their high calling will be permitted to discharge the important duties imposed upon them in the administration of justice.