

Mr. Daniel L. Goelzer
General Counsel
Securities and Exchange Commission
Washington, D.C. 20549

Dear Mr. Goelzer:

I was interested to see your tentative list of the past membership of the GC office. I did not realize until now that you meant to include non-lawyer personnel. This moves me to add two names:

Agnes (R.?) Hill was my secretary until the SEC moved to Philadelphia in March 1942. I think that she did not move because she owned a little house in Washington. She was several years older than I, and I am 72, so you are unlikely to find her.

Margaret (L.?) Burton was Chester T. Lane's Administrative Assistant when he was General Counsel, and she ran the DC office with a firm hand. She left the office when he ceased to be GC (see the next page), and I have not heard of her since.

I give you one more new name: Ezra Weiss was in the GC office before he moved to the New York office, where he became the resident expert on Reg. A and Rule 10b-5 and published articles on both. He retired perhaps 10 years ago, and thereafter was counsel to a NYC firm.

On the next page I suggest some possible supplements or corrections to your list.

Cordially yours,
Homer Kripke

[handwritten additions:

P.S. As you can see, I have not yet learned to make my word processor at home behave as to paging and various other matters.

P.P.S. the name Robert Rubin, discussed on p. 2, reminds me of his brother-in-law, Edward Gedalecia, whom I first got to know when we both lived in New Rochelle, New York. He had been in the SEC, probably in the GC office, but possibly only in the New York region. He later represented cheap underwriters, and took a consent decree from the SEC in a well-known case for having given a bum opinion that a series of separate acquisitions of oil well interests for common stock was not a public offering.

P.P.P.S. Can't your people find Bob O'Brian, a former Commissioner and former officer of two big movie companies?!!!]

SUGGESTED SUPPLEMENTS AND CORRECTIONS

You seem to be confused as to the history of the office. It was called the General Counsel's office until 1942 or 1943.

Thus Allen Throop was GC, not solicitor.

Chester T. Lane was GC, not Solicitor, until a few months after the SEC moved to Philadelphia in 1942, but never moved his family there. He went to the Solicitor General's Office for the remainder of WWII, and thereafter was a founding partner of the Shea Greenman Gardner, etc., firm, left them and achieved publicity as counsel for Alger Hiss (in which he was joined by John F. Davis.) Your date of 1946 as the date of termination of Chester's GC position is wrong. It should be 1942. He died about 1950 or 1952.

John F. Davis was the first person with the title of Solicitor instead of GC, beginning in 1942, and ending at about the end of 1943 when he was commissioned in the Coast Guard. He, too, was later in the Solicitor General's office.

Roger S. Foster succeeded Davis as Solicitor in 1944, not 1945. I don't know whether the title of GC was restored during his incumbency.

Arden Andersen: the correct spelling was Andresen.

Parker Bailey was at Davis Polk and Wardwell, NYC, after he left the SEC, and I am sure he was there until he retired.

Steven Boehm: If he was the same fellow I knew at Hastings College of Law, San Francisco, in 1972, and thereafter for a few years at NYU Law School, he entered a NYC law firm when I saw him later, perhaps Milbank Tweed.

Virginia Collins: The man she Harmon Duncombe, has an office at 30 Rockefeller Plaza, NYC. She was still married to him and doing volunteer legal work when I ran into her in New York perhaps about 1960.

Dave Ginsburg: It seems to me that after the one you list left the GC office, another person by the same name, possibly spelled differently, joined it.

Nathan Halpern: the person listed as Nathan L. Halpern at 993 Fifth Avenue in the latest NYC directory available to me is almost certainly he.

Robert S. Rubin: I am not 100% certain about the middle initial, but I believe that he was the Robert Rubin who was my first office-mate at the SEC in 1939; and if it is the same person, I know that I read prayers at his funeral in about 1950. He died of a heart attack while playing tennis.

Anson Phelps Stokes: I gave you this name. I think that I was in error by confusing it with I.N.P. Stokes. They are both well-known names of a prominent NYC family.

Clifford Woodrum: the name that I remember was Clifton Woodrum. As I wrote you once before, unless I am dreaming I saw the name just a few weeks ago as a Congressman from Virginia. I think that I remember that his father was also a congressman from Virginia, but I do not think that I confused the recent reference.

I suppose that most of these remarks are of no importance for your purposes, but it has pleased me to reminisce about a happy period of my life.

[handwritten addition: Mortimer Weinbach was in the GC office. I have seen his name several times over the years as General Counsel of a substantial company in the New York area, probably in New Jersey.]