

STATE OF MARYLAND, BALTIMORE CITY, SS:

I HEREBY CERTIFY, that on this *twenty ninth*
day of March, in the year eighteen hundred and ninety eight,
before me, the subscriber, a Justice of the Peace of the State
of Maryland, in and for said Baltimore City, personally ap-
peared Peter Targarona, the above named petitioner, and made
oath in due form of law that the matters and facts alleged in
the foregoing petition, are true, as therein set forth, to
the best of his knowledge, information and belief.

C. W. Wisner

Justice of the Peace.

In the Matter of
W^m D. L. Borum

March 29, 1898

Peter Targarona vs. William D. L. Borum.

Before the Supreme Bench of Baltimore City.

To The Honorable the Judges of
The Supreme Bench of Baltimore City.

The petition of Peter Targarona, of Baltimore City, respectfully shows:-

First.

That your petitioner is a resident of said Baltimore City, with office at Number 611 S. Sharp street, in said City.

That on the ninth day of March, 1898, your petitioner, upon a warrant sworn out for him by Minnie Targarona, his wife, was arrested charged with assaulting said Minnie Targarona, and on the 12th day of March, 1898, upon a hearing by Justice Charles H. Roberts, sitting as Police Justice at the South-Western Police Station, in said city, said charge against your petitioner was dismissed and he was acquitted of the same.

Second.

That at said hearing the said Minnie Targarona was represented by counsel, one William D. L. Borum, a member of the Bar of Baltimore City and a practising attorney therein, who, during the trial of said case before said Justice, pleaded what your petitioner did not testify to, for the purpose of misleading said Justice, which conduct your petitioner charges was ungentlemanly and unprofessional in practice.

Third.

That the said William D. L. Borum caused said Justice to issue a subpoena for Marshall P. Targarona, a son of your petitioner and the said Minnie Targarona, ^{to} appear as a witness in said case against your petitioner at said trial, when he knew that said child was but five years of age, and that his testimony was not, and could not, be admissible in said case, owing to his extreme youth and lack of sufficient mental capacity as a witness.

Fourth.

That he had the said child brought before the said Justice against the protest of your petitioner and when your petitioner had

had pleaded that it would seriously impair the health of the child who had been ill, and who was then in an exceedingly nervous and bewildered condition from the excitement caused by being brought into a police court, and whose testimony, in his then present condition, should not have been admitted, even though he was a competent witness.

Fifth.

That the fee received by the said William D. L. Borum from said Minnie Targarona, if any, for his services as counsel in said case, was money that your petitioner had given her for the support and care of the said Marshall P. Targarona and Vivian Targarona, children of the said Peter Targarona and Minnie Targarona.

Sixth.

That the said William D. L. Borum was aware that the said Minnie Targarona had commenced proceedings in the Circuit Court Number Two of Baltimore City, in 1897, for a divorce from your petitioner, and for counsel fee and alimony, which proceedings were dismissed on or about the 27th day of October, 1897.

Seventh.

That after the dismissal of said charge against your petitioner and his acquittal of the same, by the said Justice on the 12th day of March, 1898, as aforesaid, the said William D. L. Borum left said Police Station House in company with said Minnie Targarona and accompanied her to her home where he remained a considerable time. That said William D. L. Borum was heard at said Station house to make threats to carry said case to other courts.

Eighth.

That the said William D. L. Borum did on the 14th day of March, 1898, with malice and hatred against your petitioner, falsely and maliciously, and without reasonable and proper cause for so doing, advise the said Minnie Targarona to appear and the said Minnie Targarona did appear before the Grand Jury of Baltimore City, and charged your petitioner with having assaulted her, and upon such a charge procured the indictment of your petitioner by the said Grand Jury of Baltimore City on said charge to appear in the Criminal Court of Baltimore City to answer said charge of assault, and your petitioner was required

to give bond to the State of Maryland in the penalty of three hundred dollars to appear and answer said charge in said court when called.

Ninth.

That your petitioner and the said Minnie Targarina are not living together as man and wife, of which the said William D. L. Borum is aware, and the said Borum is taking advantage of the position of the said Minnie Targarona for the purpose of making money and fees out of her and out of your petitioner, upon falsehoods manufactured and made up by the said Minnie Targarona against your petitioner. That said charge of assault preferred by the said Minnie Targarona against your petitioner is false in every particular and the same was dismissed by said Justice upon a statement of the facts set forth by your petitioner and his proof of the same.

Tenth.

That the said William D. L. Borum has been maliciously advising and counselling the said Minnie Targarona, who has been pursuing your petitioner and annoying him in every conceivable manner, and vexing and harassing him on numerous occasions, bringing your petitioner into ridicule before the public and through the press. That by said advice and such conduct your petitioner's life has been made miserable, his reputation stained, and his business almost ruined until his income is barely sufficient to meet his expenses.

Eleventh.

That your petitioner is a poor Ex-Confederate soldier, sixty three years of age, bodily wounded, and is struggling to make a living at his profession, in order to provide for the care and maintenance of his two children, the said Marshall P. Targarona and Vivian Targarona. That he has always lived a most exemplary and moral life both in practising his profession and in his private life; that he has always borne an honorable reputation, his conduct in all matters professionally and privately, being above reproach, but that he has by reason of the conduct of the parties aforesaid, been maligned and injured in his character, his business ^{interests} have been seriously affected and almost ruined, caused to undergo great physical discomfort and

Before the Supreme Bench
of Baltimore City.

Peter Targaron

vs.

William D. L. Borum

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this

and belief.

give as therein set forth, to the best of his knowledge, information
law that the matters and facts stated in the foregoing petition are
arons; the above named petitioner, and made oath in due form of
in and for Baltimore City aforesaid, personally appeared Peter Targ-
me; the subscriber, a Justice of the Peace of the State of Maryland,
day of March, in the year eighteen hundred and ninety eight, before

Petitioner.

P. Targaron,

his case may require.

And that your petitioner may have such

to answer the charge of battery upon the facts

this Honorable Body on some certain day to be

subpoena for the said William D. L. Borum, commanding him to be

said William D. L. Borum and the said Minnie Targaron.

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Twelfth.

mental anguish, and otherwise damaged and injured.

March 1898

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That all these suits, charges and persecutions against your petitioner is for the purpose of extorting money from him, which your petitioner charges is due to ~~the~~ persecution at the instance of the said William D. L. Borum and the said Minnie Targarona.

Wherefore, Your petitioner prays Your Honors to issue a subpoena for the said William D. L. Borum, commanding him to be and appear before this Honorable Body on some certain day to be therein named, to answer the charge of Barratry upon the facts hereinbefore set forth. And that your petitioner may have such further relief as his case may require.

P. Targarona,
Petitioner.

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this day of March, in the year eighteen hundred and ninety eight, before me, the subscriber, a Justice of the Peace of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Peter Targarona, the above named petitioner, and made oath in due form of law that the matters and facts stated in the foregoing petition are true as therein set forth, to the best of his knowledge, information and belief.

Peter Targarona vs. William D. L. Borum.

Before the Supreme Bench of Baltimore City.

TO THE HONORABLE THE JUDGES OF
THE SUPREME BENCH OF BALTIMORE CITY.

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Fifth.

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That said charge of assault preferred by the said Minnie Targarona against your petitioner is false in every particular, and the same was dismissed by said Justice upon a statement of the facts set forth by your petitioner and his proof of the same.

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That by said advice and such conduct your petitioner's life has been made miserable, his character and reputation stained, and his business almost ruined, until his income is barely sufficient to meet his expenses.

Eleventh.

That your petitioner is a poor Ex-Confederate soldier, sixty three years of age, bodily wounded, and is struggling to make a living at his profession, in order to provide for the care and maintenance of his two children, the said Marshall P. Targarona and Vivian Targarona .

That he has always lived a most exemplary and moral life, both in practising his profession, and in his private life ; that he has always borne an honorable reputation, his conduct in all matters, professionally and privately, being above reproach, but that he has, by reason of the conduct of the parties aforesaid, been maligned and injured in his character, his business interests have been seriously affected and almost ruined, caused to undergo great physical discomfort and mental anguish, and otherwise damaged and injured.

Twelfth.

That all these suits, charges and persecutions of your petitioner is for the purpose of extorting money from him, which your petitioner charges is due to persecution at the instance of the said William D. L. Borum and the said Minnie Targarona,

WHEREFORE, your petitioner prays Your Honors to issue a subpoena for the said William D. L. Borum, commanding him to be and appear before this Honorable Body on some certain day to be therein named, to answer the charge of Barratry upon the facts hereinbefore set forth. And that your petitioner may have such further relief as his case may require.

P. Targarona
Petitioner.

Before the Supreme Bench
of Baltimore City.

Peter Targarona,

-vs-

Wm. D. L. Borum.

"Dismissed"

Apr. 498

Filed Mar. 29th, 1898.