

LAW OFFICE OF

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**B.J. WADE**

April 21, 2015

Tennessee Board of Professional Responsibility  
10 Cadillac Drive, Suite 220  
Brentwood, TN 37027

RE: New Charge Against Respondent: Richard Glassman

Dear Sir or Madam:

This letter will serve as a new charge against respondent, Memphis attorney Richard Glassman. (Your file will reflect that numerous other charges are pending against Mr. Glassman.)

In Mr. Glassman's letter of December 17, 2014, to the Board of Professional Responsibility, he claims that my former paralegal Shannon Crowe was the recipient of case bonuses "for work done on a particular matter". Mr. Glassman apparently made this claim to defend against the charge that he shared attorneys' fees with two paralegals with whom he was having sex. Mr. Glassman's statement to the Board of Professional Responsibility is *false* in two regards.

First, Ms. Crowe has submitted an affidavit to your office that flatly disputes the unsupported allegations of Mr. Glassman. Mr. Glassman has never *attempted* to dispute Ms. Crowe's affidavit.

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But more critical is the statement Mr. Glassman made in his letter of December 17, 2014, to the BPR in which Mr. Glassman claims “our records” (meaning his law firm records, unless he is going to again claim some stork or other mysterious person was responsible, as he typically points to when he is cornered) indicate that Shannon Crowe did receive case bonuses.

Although he received Ms. Crowe’s statement denying she received case bonuses on or about February 15, 2015, he has not denied Ms. Crowe’s specific statement, but most important, he has not produced his firm records, which he boasted he had.

The reason he has not produced these records is because *none* exist. Had these records existed, he would have produced them.

In the past we have seen excuses from Mr. Glassman that would have been the envy of the Artful Dodger in the Charles Dickens novel, “Oliver Twist”:

1. I didn’t advance that money to client Jan Williams; a stork with the accuracy and timing of a Tomahawk cruise missile dropped it in her bank account.
2. “Chancellor Walter Kurtz did not find I “misrepresented” in the Markowitz case because I talked to 4-5 anonymous people (maybe relatives or even street people; we don’t know) who read the Kurtz order and they agreed with me that I didn’t “misinform” Chancellor Kurtz.

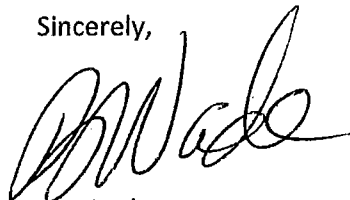
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3. "I don't have the checks in the Jan Williams case, and I won't tell you I have more contemporaneous computer records."
4. "Although I have been charged with splitting fees with two of my paralegals, with whom I was having a sexual relationship, I am claiming that Shannon Crowe received these bonuses as a defense, and I have records to support it, but I won't produce these records."

In conclusion, Mr. Glassman lied to the Board of Professional Responsibility in his December 17, 2014 letter when he:

- a. claimed my former paralegal Shannon Crowe received case bonuses;  
and
- b. claimed his "records" established that Ms. Crowe received case bonuses.

Sincerely,



B.J. Wade

BJW/mlt