

**LACAH IX
THE CASE OF**

1911 TRIANGLE SHIRTWAIST FACTORY FIRE



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SYNOPSIS

It started with a spark. Then, in the time it takes to strike a match, an entire factory became an inferno.

On March 25th, 1911, fire tore through the top floors of the Triangle Shirtwaist Factory in New York City. Within a few minutes, black smoke swallowed the building. By the time the flames died down, 146 workers were dead, mostly young immigrant women, some as young as fourteen. They leapt from the windows, their dresses turning into wings of fire.

At the center of it all stood Isaac Harris and Max Blanck, known as the “Shirtwaist Kings.” To the public, they were symbols of the American dream: immigrants who built an empire of fashion and opportunity. But to their workers, they were rulers of a kingdom built on exhaustion and fear.

The building had passed city inspections. Fire escapes were installed, doors were routinely checked, and the factory met the safety standards of its time. Yet, when the fire broke out, the exits were blocked, the hoses were dry, and the ladders outside reached only to the sixth floor.

The owners said the fire was an accident. They said no one could have predicted it, that no law required sprinklers or drills, that the locked doors were standard practice.

But to the grieving families, it was negligence. Years of ignored warnings and unsafe exits had led to this.

Today, the trial of Isaac Harris asks the question that would define labor law for decades to come: When do we stop calling it an accident, and start calling it a crime?

Witnesses

Prosecution

**AVAILABLE ONLY TO THE
PROSECUTION:**

**Edward Croker
Noah Stern
Sadie Frowne**

Defense

AVAILABLE ONLY TO THE DEFENSE:

**Rose Hauser
Issac Harris
Dr. Jonathan M. Whitfield**

SPECIAL INSTRUCTIONS

1. Witness selection:

The prosecution must call two of the three witnesses allotted to them and the same for the defense.

2. Party representatives:

The prosecution does not have a party representative. The defense's party representative is the defendant, Isaac Harris.

3. Non-Responsiveness

A witness called by either party may not refuse to answer any question – and no attorney may instruct a witness not to respond – based on the witness's Fifth Amendment right to avoid self-incrimination.

Additionally, no witness may refuse to provide a response based on any historically existing mental condition.

4. Legal Materials Used:

The only legal materials that competitors may mention, or judges may rely upon, for any purpose are those outlined in “LACAH Case Law”. All participants must acknowledge such if asked. Accordingly, no party may raise any objections specifically related to the United States Constitution at trial.

5. Outside Evidence:

There should be no outside evidence introduced other than the ones that are provided in the case packet.

SPECIAL INSTRUCTIONS CONT.

6. Trial Date:

The trial begins on the date of December 4th, 1911. Witnesses are not expected to possess knowledge regarding events and/or technologies that only existed after this date.

7. Language:

While teams may employ distinctive accents/ speech characteristics to develop a character, teams may not use such accents/speech characteristics to invent material facts or to prove that a voice heard was or was not the voice of a specific person in the case. Participants must not adopt inappropriate language such as slurs and insensitive comments.

8. Gender:

All witness roles may be played by a person of their own chosen gender. A team shall not conduct examinations or make arguments that would lead the jury to draw a favorable or adverse inference based on the gender of a participant. A team may, however, draw upon a witness's historically accurate gender, when appropriate, to make arguments.

STIPULATIONS

1. Both parties fully comply with their discovery obligations. No pertinent information or evidence withheld during discovery.
2. The fire occurred on March 25, 1911 and 146 workers died because of the fire.
3. The defendant, Issac Harris, is tried on the count of Manslaughter in the second degree.
4. All potential exhibits in this trial have been pre-labeled and pre-numbered. Regardless of which party first offers the exhibit or the order in which they are presented, the assigned exhibit numbers shall be used consistently throughout the trial for all purposes.
5. The exhibits are true and accurate copies and their authenticity may not be challenged. Unless stated otherwise herein, the admissibility of the exhibits on other grounds may be challenged.
6. The defendant, Issac Harris, has no prior criminal convictions.
7. Most of the workers in the Triangular Shirtwaist Factory are young immigrant women, primarily of Eastern European and Italian descent.
8. The Triangular Shirtwaist Factory had passed all official fire safety and labor inspections in the years prior to the fire.
9. Exhibit 8 is pre-admitted into evidence and can be used freely during opening statements and closing arguments.
10. The certifications for Exhibit 7 are sufficient for 803(6)

INDICTMENT

STATE OF NEW YORK v. ISAAC HARRIS

COUNT I:

PEN § 125.15 - MANSLAUGHTER IN THE SECOND DEGREE

A person is guilty of manslaughter in the second degree when:

He recklessly causes the death of another person; OR He intentionally causes or aids another person to commit suicide.

The following term used in that definition has a special meaning:

A person acts RECKLESSLY with respect to a death when that person engages in conduct which creates or contributes to a substantial and unjustifiable risk that another person's death will occur, and when he or she is aware of and consciously disregards that risk, and when that risk is of such nature and degree that disregard of it constitutes a gross deviation from the standard of conduct that a reasonable person would observe in the situation.

In order for you to find the defendant guilty of this crime, the state is required to prove that on March 25, 1911, in the state of New York, the defendant, Isaac Harris, caused the death of 146 Triangle Shirtwaist Factory workers AND that the defendant did so recklessly.

INDICTMENT CONT.

*In this particular case, the Defense will be arguing the responsibility of factory management. Specifically, their carelessness and actions against Isaac Harris' intended instructions caused the death of 146 workers.

CASE LAW

The statutes and cases listed below are the only legal authorities that may be cited at trial.

EXIT DOORS & EGRESS DUTY

People v. Ashland Garment Co. (1910, N.Y. Ct. Gen. Sess.)

The factory posted a rule that all exits remain unlocked; however, for the last hour of most shifts, foremen routinely clicked the Washington-stair latch to stop workers from leaving early and to check bags. After two written warnings from the building superintendent and one prior citation, a fire broke out and the same door was found fastened.

Verdict: A paper policy does not defeat liability when a habitual practice by supervisory agents establishes constructive knowledge of locked exits; conviction affirmed.

People v. Haviland Shirt Co. (1911, N.Y. Ct. Gen. Sess.)

At trial for misdemeanor–manslaughter, the State proved the west exit was usually locked late afternoons to deter pilferage, but witnesses disagreed whether it was locked at the precise time of the fire. A rim-lock

fragment was recovered from debris two weeks later. The factory had passed inspection two months prior.

Verdict: The State must prove a working-hours lock at the time of the emergency plus actual or constructive knowledge; ambiguous timing defeats the lock element—conviction reversed and remanded.

CASE LAW

PRACTICABILITY & CROWDING

Denby Textile Works v. 14th St. Realty (1908, App. Div. 1st Dep't)

Tenants on the eighth and ninth floors lined piece-rate tables along a narrow corridor to the Greene Street stair. During an insurer-ordered drill, crowd pressure forced an inward-swinging door shut; months later, a fire caused the same jam.

Verdict: Where crowd pressure is reasonably foreseeable, inward swing is not “practicable” under the exit-door statute; the party with practical control must re-hang outward or mitigate (clear egress paths, alternate routes) and notify the owner—judgment for plaintiff.

Rosenthal v. Empire Waist Works (1906, App. Div. 1st Dep't)

A ninth-floor shop employed over 200 workers adjacent to a single stair. The tenant argued that masonry and a freight-lift frame made outward re-hanging infeasible.

Verdict: “Practicable” weighs density and evacuation speed; outward opening is ordinarily practicable on crowded floors unless the defendant demonstrates structural impossibility with competent proof, not mere inconvenience or expense—judgment for plaintiff.

Brennan v. Washington Place Mfg. Co. (1909, App. Div. 1st Dep't)

During peak hours, carts and fabric bins were staged in the aisles to speed output. In a fire, workers funneled into choke points.

Verdict: A tenant bears a concurrent duty not to obstruct egress routes; operational congestion that materially slows evacuation breaches that duty even when structural systems belong to the landlord—judgment for plaintiff.

CASE LAW CONT.

Denby Textile Works v. 14th St. Realty (1908, App. Div. 1st Dep't)

Tenants on the eighth and ninth floors lined piece-rate tables along a narrow corridor to the Greene Street stair. During an insurer-ordered drill, crowd pressure forced an inward-swinging door shut; months later, a fire caused the same jam.

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CASE LAW CONT.

STRUCTURAL SYSTEMS — OWNER v. TENANT

Ward v. Reliant Realty Co. (1907, App. Div. 3d Dep't)

After complaints about corrosion, a rear fire-escape platform sheared away during a noon drill, dropping two workers. The lease reserved to the owner all structural work, including escapes, standpipes, and alarms.

Verdict: Fire escapes, standpipes, sprinklers, and building-wide alarms are structural systems for which the owner bears primary duty; tenant not liable absent control, alteration rights, or assumed maintenance—judgment against owner, tenant dismissed.

Davis v. Reliable Standpipe Co. (1906, App. Div. 2d Dep't)

A tenant displayed a hose-cabinet and told workers to “use the line if needed.” During a fire, the standpipe valve above the eighth floor was inoperable due to a broken spindle under the owner’s control.

Verdict: Primary responsibility for water pressure rests with the owner; tenant may be liable only for misrepresenting untested protection or failing to report known defects—mixed verdict.

CAUSATION & FORESEEABILITY

McTiernan v. Fabricon Mfg. Co. (1910, App. Div. 2d Dep't)

Smoke filled a crowded ninth floor; workers panicked, pressed toward an exit later found fastened, and many turned to windows. The defense argued panic—not egress defects—caused the deaths.

Verdict: Panic in a smoke-filled factory is a foreseeable reaction and does not supersede liability where statutory or operational egress failures are a substantial factor—judgment for plaintiff.

CASE LAW CONT.

O’Leary v. City Ladder Co. (1906, App. Div. 1st Dep’t)

Municipal ladders could reach only to the sixth story; victims on the ninth were unreachable.

Verdict: The limits of public rescue equipment do not break causation when a defendant’s unlawful or unreasonable egress conditions forced reliance on rescue that could not reach—judgment for plaintiff.

INSPECTIONS, NOTICE & PRIOR INCIDENTS

State ex rel. Factory Inspector v. Gotham Blouse (1909, Misc.)

Two months before a fire the plant passed inspection, though the inspector noted “watch the west-stair lock ”practice” in marginalia delivered to management. After the fire, the west-stair door was found fastened.

Verdict: Inspection approvals are admissible context but not immunity; documented cautions in or alongside approvals may establish notice—penalty affirmed.

Strauss v. Metropolitan Insurance Syndicate (1907, App. Div. 4th Dep’t)

Insured factories suffered several off-hours fires leading to paid claims; the insurer resisted coverage after a later daytime fire, arguing arson propensity.

Verdict: Prior off-hours fires are inadmissible to prove character or motive, but may be used to show notice of combustibles and housekeeping risks if tied to the same hazards—trial court’s limitation₁₄ affirmed.

CASE LAW CONT.

DRILLS, ALARMS & SPRINKLERS

Hynes v. Metropolitan Spindle Works (1908, App. Term 1st Dep't)

The building had no central alarm, no sprinklers, and no history of fire drills; none were required by ordinance.

Verdict: The absence of drills, sprinklers, or alarms—when not mandated—is admissible to show foreseeability and preparedness, but is not negligence per se; such evidence may aggravate the reasonableness calculus when combined with known egress defects—judgment for defendant on per se claim, with foreseeability evidence admitted.

EVIDENCE: HABIT, PRACTICE & AUTHENTICATION

Kane v. Norwood Textiles (1909, App. Term 1st Dep't)

Workers testified that the Washington-side door was “usually locked after 4 o'clock,” while two supervisors denied any such practice and produced a “doors unlocked” placard signed by the proprietor.

Verdict: Habit evidence is admissible to prove conduct on a particular occasion if the proponent shows a regular, specific, and invariable practice; signage and general policy do not defeat competent habit proof—habit evidence admitted, verdict for plaintiff reinstated.

Briggs v. McFarlane (1911, App. Term 1st Dep't)

A warning note to management about a deteriorated fire escape was anonymously typed and unsigned.

CASE LAW CONT.

Verdict: For authentication, the Court may consider the totality of the circumstances—office typewriter, routing notations, and recipient files—to determine authorship by a preponderance; if satisfied, the document is admissible and weight is for the jury—document admitted.

CRIMINAL RESPONSIBILITY — EDGE CASES

People v. Ironside Mills (1911, Ct. Gen. Sess.)

A fire ignited during a weekend overtime shift. The State proved the exit was customarily locked at close of business to secure stock, but offered no proof the plant was on “working hours” when the lock was set or that management knew overtime had been called.

Verdict: Conviction reversed—failure to demonstrate a working-hours lock or the proprietor’s knowledge within the statute’s terms.

People v. Pritchard & Co. (1907, Ct. Gen. Sess.)

During an evening rush, a foreman locked one exit after a theft report. Minutes later a fire started elsewhere; workers escaped by a second stair. The owners were absent and had previously disciplined locking.

Verdict: Acquittal—State proved neither authorization nor knowledge, and alternative egress remained available and unobstructed.

Note: These authorities are fictional and tailored for mock-trial use to match the Triangle Shirtwaist record.

EVIDENCE

Exhibit 1: Burnt fabric from factory, possibly the ignition source of the fire.

Exhibit 2: Certificate presented to the factory for employing the most Greenwich residents.

Exhibit 3A-3B: Government inspection papers for the factory from November 1905 and November 1910.

Exhibit 4: Factory emergency escape ladders directly after the fire.

Exhibit 5: Factory exit lock found 15 days after the fire. The lock was found near the Washington Place door on the ninth floor.

Exhibit 6: Map of the 9th floor of the factory, where many workers were stationed.

Exhibit 7: Newspaper cartoon portraying a building burning down. Made before the fire, addressing the incompetence of fire departments.

EVIDENCE CONT.

Exhibit 8: Spilled oil found on factory floor with a cigarette, also possibly the ignition source of the fire.

Exhibit 9: Poster of rules workers have to follow at the factory.

Exhibit 10A-10B: Superintendent methodology report.

Exhibit 11: Superintendent safety warning for the factory from November 1910.

Exhibit 12: Factory weekly payroll ledger.

EXHIBIT 1



EXHIBIT 2



EXHIBIT 3A

Government Inspection History

November, 1905-Passed Inspection

Suggestions for Improvement and Potential Safety Issues from the first report:

- Improve fire safety measures
- Ensure greater availability of exits for emergencies
- Strengthen the integrity of structural supports
- Evacuation plan is inadequate
- Insufficient egress routes could cause delays during fire

PASS

EXHIBIT 3B

Government Inspection History

November, 1910-Passed Inspection

-Despite passing, no changes were made between inspections

PASS

EXHIBIT 4



EXHIBIT 5



EXHIBIT 6

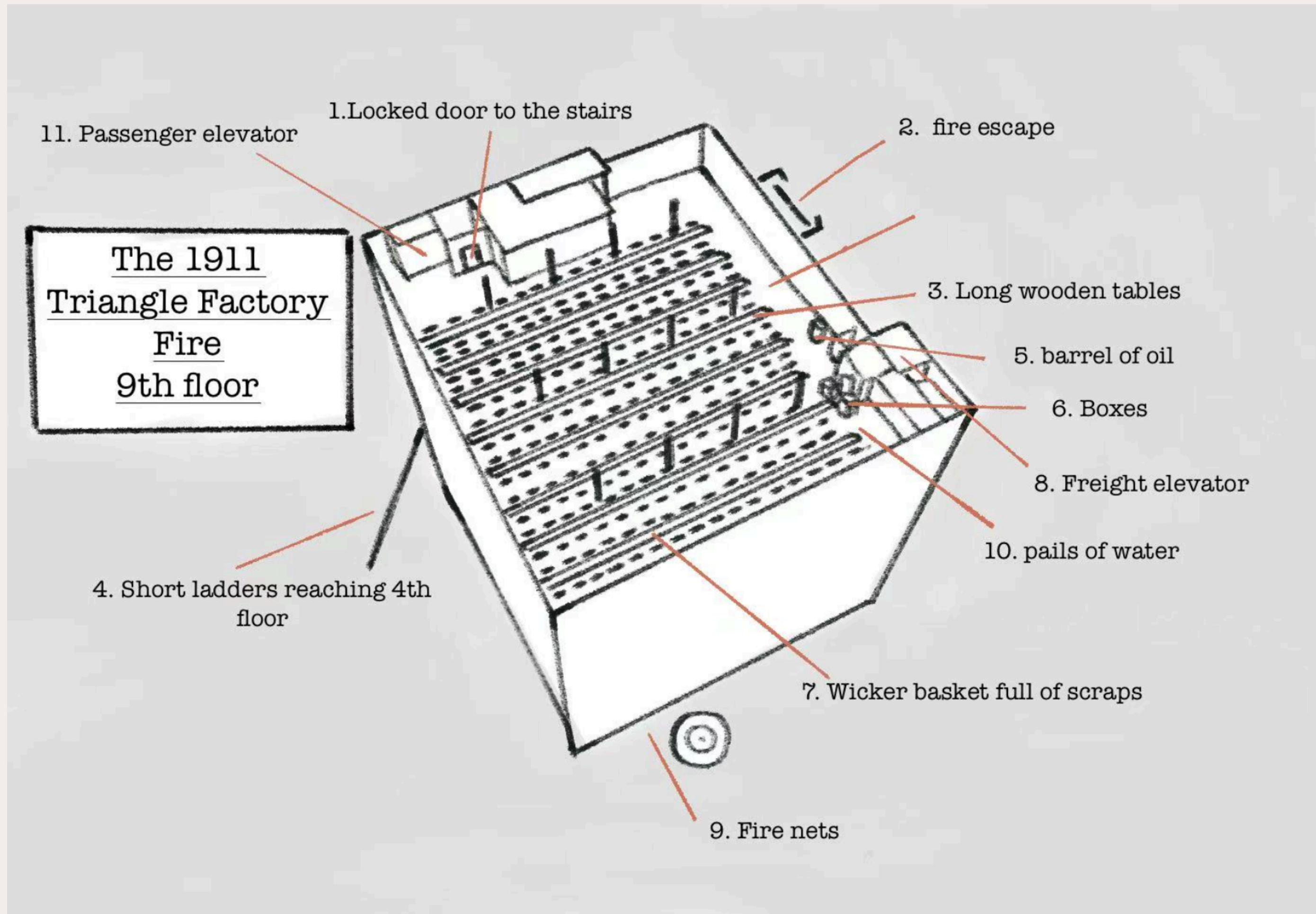


EXHIBIT 7



EXHIBIT 8



EXHIBIT 9

TRIANGLE SHIRWAIST FACTORY WORKPLACE GUIDELINES

1. All doors leading in or to any such factory shall be constructed as to open outwardly, where practicable, and shall not be locked, bolted, or fastened during working hours.
2. Employees work 13-hour shifts with a 30-minute lunch period, for \$6 a week.
3. Smoking is strictly prohibited in the building.
4. Alcohol is strictly prohibited in the building.
5. Talking, unless necessary or authorized, is discouraged and can result in deducted pay.



Isaac Harris

EXHIBIT 10A

SUPERINTENDENT METHODOLOGY REPORT

Prepared by: Noah Stern

Position: Building Superintendent, Asch Building

Date of Record: March 28, 1911

I. Scope and purpose of this report

This report provides a formal account of the fire safety methodologies and structural inspection procedures I employed in my role as superintendent of the Asch Building. It is submitted for the purpose of assisting investigators and legal authorities in understanding the context and infrastructural conditions that were in place at the time of the Triangle Shirtwaist Factory fire on March 25, 1911.

The content herein is a technical overview of operational protocols adhered to over the course of my supervisory tenure. All findings and statements derive from documented building practices that predate the incident. This document does not offer legal conclusions regarding the origin or liability of the fire, but rather presents the relevant supervisory methodologies that govern stairwell access, fire escape conditions, hose functionality, and egress maintenance.

II. Methodologies

Building Egress and Exit Structures:

Exit inspection log: I performed weekly exit inspections to assess path accessibility, checking for obstruction or damage. These exits were often partially obstructed by carts and worktables.

Physical testing: I manually tested the functionality of stairwell doors, including swing direction and latch performance. The Washington Place stairwell door on the 9th floor opened inward, creating entrapment risk during crowd movement.

Fire escape assessment: I conducted monthly visual surveys from adjacent windows and rooftops to inspect the condition of the fire escape, including bolt integrity and stair tread stability. The fire escape lacked intermediate landings, and ended on a platform above ground.

Incident simulations: I applied crowd control principles learned in superintendent certification to evaluate panic scenario hazards, particularly for inward swinging doors.

Interior lightning conditions:

Daily lighting checks: I walked through the building during early morning and late afternoon shifts to assess lighting quality under various natural light conditions. Inconsistent and dim lighting are observed, especially near the rear of the 9th floor. No backup or emergency lighting found.

Complaints and feedback tracking: I logged repeated complaints from workers, especially regarding areas prone to shadows or flickering bulbs.

Incident documentation: I recorded a personal fall incident caused by poor lighting and documented the area involved.

EXHIBIT 10B

Exit signage investigation: I inquired with building owners during initial inspections and confirmed no plans for illuminated signs through internal maintenance correspondence.

Fire equipment and Emergency protocols:

Visual inspections of equipment: I regularly checked fire hose cabinets for dust accumulation and hardware corrosion. A fire hose was present in the Greene Street stairwell.

Maintenance tracking:

I documented hose presence but found no instruction to perform pressure tests; I referenced absence of testing records in maintenance logs.

Alarm system inspection:

I conducted floor-to-floor visual sweeps for any alarm stations, bells, or alert systems and found none.

Interviews with management:

I spoke with workers and never received reports of drills or alarm activations.

Fire prevention:

Routine hazard assessments: I conducted weekly safety walkthroughs of upper floors to assess flammable materials and their storage.

Fire door inspection:

I checked fire doors during circulation and repeatedly found them wedged open, with follow-up verbal warnings issued to floor managers.

Verification of suppression tools:

I checked equipment closets and workspace corners for extinguishers and sprinklers and found none.

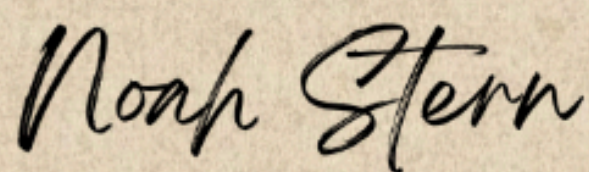
Evacuation awareness audit:

I performed a basic internal audit, asking a sample of five workers to describe exit routes. None could articulate a complete path, which confirms a lack of training and signage.

Limitations of authority:

While I documented and reported many of these issues to tenant representatives and foremen, my role as superintendent did not grant enforcement power over tenant operations or construction modifications. This limited my ability to mandate safety upgrades, or compel management to conduct fire drills or system installations.

Respectfully submitted,



Superintendent, Asch Building

EXHIBIT 11

Safety warning from the Superintendent Noah Stern

Date: November 12, 1910

Subject:

Immediate safety concerns regarding rear fire escape and egress obstruction to the attention of the Triangle Factory tenant representative. I am writing to let you know about my ongoing concern regarding the physical condition of the rear fire escape and its suitability in case of an emergency evacuation. As I have noted during my last two inspections, several bolts securing the structure to the masonry appear rusted. The escape also terminates at a rooftop platform with no safe descent mechanism to ground level. In my professional opinion, this presents a grave safety hazard.

Additionally, I have observed that worktables and carts on the 9th floor frequently obstruct access to the Greene Street and Washington Place stairwells during production hours. This may hinder timely egress and should be addressed at once.

I'd like to ask the tenant to take immediate corrective action. If necessary, I am available to coordinate with your maintenance foreman to arrange inspections or recommend contractors for reinforcement work.

Kindly confirm receipt of this notice, and inform me of your intended course of action at your earliest convenience.

Respectfully,

Noah Stern

Building Superintendent
Asch Building, 23-29 Washington Place



EXHIBIT 12

Triangle Shirtwaist Company Weekly Payroll Ledger

Week Ending: March 25, 1911

Employee Name	Floor Assignment	Job Title	Hours Worked (per day)	Total Hours (Week)
Sarah Green	9th Floor	Operator	10	50
Emily Stone	9th Floor	Operator	10	50
Sadie Frowne	9th Floor	Assistant	10	50
John Doe	9th Floor	Supervisor	9	45
Ruth Cohen	10th Floor	Operator	9	45
Helen Taylor	10th Floor	Assistant	9	45
Alice Johnson	9th Floor	Operator	10	50
Rose Hauser	8th Floor	Supervisor	10	50
Grace Adams	8th Floor	Assistant	9	45
Rachel Miller	10th Floor	Supervisor	9	45

AFFIDAVITS

Edward Croker (Prosecution witness)

Noah Stern (Prosecution witness)

Sadie Frowne (Prosecution witness)

Rose Hauser (Defense witness)

Issac Harris (Defense witness)

Dr. Jonathan M. Whitfield (Defense witness)

Affidavit of Edward Croker

Prosecution Witness

1 After being duly sworn upon oath, I, Edward Croker, hereby state as follows: I am over the age of 18 and
2 competent to make this affidavit. All statements contained herein are based on my personal knowledge, my
3 direct observations, and my review of official reports made under my command. I am testifying voluntarily
4 and was not subpoenaed or otherwise compelled to do so.

5 From a young age, I've always aspired to be a firefighter. I trained in fire science, volunteered in
6 community safety programs, and completed formal instruction in fire suppression and emergency response,
7 eventually attending [insert fire school name] and joining the Fire Department of the City of New York
8 (FDNY). Over time, through experience and dedication, I rose to become Chief of the FDNY.

9 I have served with the Fire Department of the City of New York since June 22, 1884. Over the course of 27
10 years of service, I rose through the ranks to become Chief of Department, a position I held for 12 years. In
11 this role, I was responsible for commanding responses to major fires, overseeing investigations, coordinating
12 with fire marshals, and presenting findings before courts and commissions. Following the Triangle Shirtwaist
13 Factory fire, I retired from the Department to establish the Chief Croker Fire Prevention and Engineering
14 Company, devoted to promoting fireproof construction, standpipes, sprinklers, and other measures to
15 prevent future tragedies.

16 On March 25, 1911, at approximately 4:45 p.m., the Fire Department of the City of New York received alarms
17 from multiple fire boxes in the vicinity of Greene Street and Washington Place. In the span of just fifteen
18 minutes, four separate alarms were transmitted, each confirming the presence of a major fire at the Triangle
19 Shirtwaist Factory, located on the top three floors of the ten-story Asch Building.

20 It should be noted that this building had already suffered four recent fires and had been reported to the
21 Department as unsafe, owing to insufficient fire exits. Nevertheless, when an alarm is sounded, we respond
22 without hesitation.

23 My men and I responded with horse-drawn engines, arriving on scene at approximately 4:47 p.m. By that
24 time, the fire had already been burning for an estimated seven minutes. The entire eighth floor was engulfed
25 in flames, and the fire was rapidly advancing toward the ninth floor, visible along the west wall. Conditions
26 were worsened by strong winds, which whipped the flames through the upper stories, causing them to leap
27 and wave violently.

28 On the Washington Place side of the building, the projecting cornice, just two feet six inches wide, was
29 already crowded with workers, mostly young women, clinging desperately to the ledge. From the street, I
30 could see their terror etched on their faces and hear their panicked cries piercing the air. My chest
31 tightened as I realized how trapped they were, and a sense of helplessness washed over me.

32 Upon arrival, we secured a high-pressure hydrant at the southeast corner of Greene Street and
33 Washington Place, stretched a standpipe connection outside the building, and advanced it up through the
34 eighth floor and into the ninth. By then, however, very few living souls remained inside the areas already

35 overcome by fire; those who could escape had done so by roof, stairwell, or elevator, while others had
36 already jumped.

37 The scene on the sidewalk was horrific. When we first arrived, perhaps five bodies already lay broken on
38 the pavement; by the time the fire was extinguished, that number had risen to thirty. I later learned from
39 bystanders that the young women did not move when they struck the ground; many turned over and over
40 in the air before hitting the sidewalk. Some had torn their hair out in handfuls in their terror. One girl stood
41 at a window until the flames ignited her dress, at which point she leapt and was killed instantly. In other
42 cases, workers did not jump by choice but were pushed outward by the press of bodies behind them.
43 We tried desperately to save them. Firemen stretched life nets ten feet in circumference, held by ten to
44 twelve men each. Such nets were usually strong enough to save those falling from five or even seven
45 stories, but from the ninth floor they were useless. The force of impact tore the nets apart, or else the
46 women struck with such violence that both the nets and the firemen holding them collapsed beneath the
47 weight. Some victims crashed through the iron gratings of the sidewalk itself.

48 Ladders were raised, but they fell two full stories short of reaching those who were trapped. Nobody
49 could wait for us; in their panic, they jumped before rescue could be attempted. Bodies fell so quickly and
50 in such numbers that they obstructed our efforts to place apparatus. My men worked with desperation,
51 running ladders and spreading nets even as more bodies rained down.

52 I saw no one emerge from the Washington Place stairway. Later, it was discovered that the doors on
53 that side were locked and opened inward, making escape impossible.

54 By 5:05 p.m, eighteen minutes after our arrival, the fire was being brought under control. At 5:15 p.m., the
55 blaze was declared extinguished. At 6:20 p.m., we were able to enter the building. Inside, the devastation
56 was beyond description.

57 On the ninth floor, we found bodies fifteen to eighteen feet inside the building. Two were wedged in a
58 narrow crevice behind a dressing room; another lay in front. Eleven bodies were found directly outside the
59 dressing rooms. The body of Margaret Schwartz, whose death has been the subject of particular inquiry,
60 was located just inside a doorway, suggesting she perished while attempting to flee through an exit that
61 was locked.

62 We discovered bodies burned down to bare bones, skeletons bent over sewing machines where they had
63 been working. In total, we counted fifty charred bodies on that floor.

73 alone. The shutters on the windows were sheet iron and steel, warped by heat. The handrail of the
74 Washington Place stairwell was scorched, but less consumed than that of the Greene Street stairwell.
75 Doors to the factory workplace had to be chopped through, and many bodies were piled near them which
76 is evidence that the doors had been locked.

77 We then proceeded to the tenth floor, where the majority of workers had managed to escape upward to
78 the roof. From there, they were rescued by professors and students from New York University in a nearby
79 building. Seeing them lifted to safety amid the smoke and fire offered a brief but profound sense of relief
80 amidst the overwhelming tragedy.

81 By 8:00 p.m., sixty bodies were lowered from the upper floors into wagons grimly nicknamed the “Death
82 Wagons,” which returned again for more. At 8:15 p.m., a lone survivor, trapped in an elevator shaft for four
83 hours as water rose around him, was rescued. In that same shaft, we found thirty bodies crammed and
84 suffocated. By 11:15 p.m., the last of the bodies had been removed from the upper floors.

85 **Origin of Fire:**

86 Following the fire, I conducted interviews and examined the scene to determine the possible causes.
87 Many workers reported that smoking in the workplace was common despite a no-smoking policy. Several
88 indicated that “you couldn’t stop smoking in this workplace, it’s like a tonic.” Based on these accounts, it is
89 our best assessment that the fire likely began when a lit match or cigarette ignited fabric waste or cutting
90 table clippings near oil cans on the Greene Street side of the eighth floor. The fire then spread to paper
91 templates hanging from the ceiling, and burning tissue floated around to other workstations. The oil cans,
92 which were meant solely for machine use, were dangerously exposed to fire.

93 By “waste,” we refer to fabric scraps used in the production of waists; the factory processed 160–180
94 layers of fabric at a time, creating substantial flammable material beneath cutting tables. Cigarette cases
95 were found near the origin of the fire. Numerous attempts were made to use the fire hoses on the eighth
96 and ninth floors, but there was no pressure or water. The fire spread too quickly to be contained even with
97 small amounts of water. Under these conditions, all factors for a major fire were present.

98 **The Lock:**

99 Upon further examination, a mortise or rim lock was found near the Washington Place door on the ninth
100 floor, approximately 11.5 feet away. The “tongue” of the lock was extended, indicating that the door had
101 been secured. This lock was designed for a left-handed door like the Washington Place exit. No key was
102 found. While it cannot be confirmed definitively whether this lock was installed on the Washington Place
103 door or was actively engaged at the time of the fire, it is believed to have contributed to the inability of
104 workers to escape. Notably, this lock was discovered fifteen days after the fire during debris removal.

105 **General Building Fire Safeties:**

106 The building contained a single fire escape, leading only to a second-floor skylight. Although there had
107 been a prior recommendation to extend this escape to a yard or street below, this was never implemented.
108 The fire escape was inadequate in size and strength for the number of people using it, and it collapsed
109 during the fire. The structure was a flimsy metal platform, partially obstructed by an iron shutter. Ladders
110 from the building were set at a 60-degree angle, making ascent difficult, and the ladder connecting the

111 tenth floor to the roof, known as a “goose-neck ladder,” was nearly vertical. Platforms connecting ladders
112 were narrow, and there were no fire escape doors—workers had to step through windows to access them.

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114 been a prior recommendation to extend this escape to a yard or street below, this was never implemented.
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116 during the fire. The structure was a flimsy metal platform, partially obstructed by an iron shutter. Ladders
117 from the building were set at a 60-degree angle, making ascent difficult, and the ladder connecting the
118 tenth floor to the roof, known as a “goose-neck ladder,” was nearly vertical. Platforms connecting ladders
119 were narrow, and there were no fire escape doors—workers had to step through windows to access them.

120 There were two stairwells: Greene Street and Washington Place. The Greene Street stairwell remained
121 usable until the fire reached it, while the Washington Place stairwell was reported locked. Standard safety
122 practice would have required doors to remain unlocked during working hours and aisles to be kept clear.
123 There were no reported fire drills, and although sprinklers were not legally required, none were present.
124 Many of the fire hoses had no water pressure because the pipes connecting the fire lines to the water
125 tower contained broken valves that had not been repaired. Elevators were also used by some workers, but
126 they were unsafe for mass evacuation due to fire exposure, limited capacity, and the presence of smoke
127 and heat.

128 In my judgment, this tragedy was not merely the result of unfortunate chance but of grave neglect in
129 matters of fire safety. Had the building been equipped with working standpipes, sprinklers, properly
130 constructed and unlocked exits, and fire escapes built to regulation, the great majority of these deaths
131 could have been prevented.

132 In the weeks following the fire, I retired from the Department to establish the Chief Croker Fire
133 Prevention and Engineering Company, dedicated to promoting fireproof construction, preventive
134 measures such as standpipes and sprinklers, and proper training and drills. It is my firm belief that the
135 lessons of March 25, 1911 must never be forgotten, and that we owe it to the dead to ensure such a tragedy
136 never occurs again.

137 I am familiar with the following and only the following exhibits: 1, 3A-B, 4, 5, 6, and 8
138 I swear or affirm the truthfulness of everything stated in this affidavit. Before giving this
139 statement, I was told it should contain everything I know that may be relevant to my testimony, and I
140 followed those instructions. I also understand that I can and must update this affidavit if anything new
141 occurs to me before opening statements begin in this case.



Edward Croker

Edward Croker

Subscribed and sworn before on this, the 10th day of April 1911.

Vicky Li
Vicky Li, Public Notary

Affidavit of Noah Stern

Prosecution Witness

1 After being duly sworn upon oath, Noah Stern hereby states as follows: I am over 18 and competent to
2 make this affidavit. I am testifying voluntarily and was not subpoenaed or compelled to testify.

3 My name is Noah Stern. I am 47 years old and I have served as the building superintendent of the Asch
4 building, located at 23-29 Washington Place, New York City, for the past 16 years. I was born and raised in
5 New York, where my family moved quite frequently around. Growing up around so many buildings, it sparked
6 a deep interest in me in how building structures are designed and maintained. So I was determined to turn
7 that curiosity into a career. I pursued a degree related to building systems and construction at NYU Tandon
8 School of Engineering, where I later earned a master's degree in Construction Management. After
9 graduating, I worked in several mid-sized commercial properties before, through a mix of timing and
10 recommendation, I was offered the position of building superintendent at the historic Asch Building.

11 **Background:**

12 I hold a certification in building engineering and have undergone formal training in structural safety and
13 commercial property maintenance. I have 16 years of direct experience overseeing safety inspections,
14 maintenance operations, and compliance protocols for the Asch building, a ten-story commercial building
15 completed in 1900.

16 My responsibilities as superintendent included managing fire escapes, elevators, stairwells, lighting
17 systems, and communication between tenants and safety authorities.

18 I have routinely reviewed fire safety procedures and supervised general maintenance affecting fire exits, the
19 building egress, and the hose line pressure.

20 I will outline my findings and observations while serving as a superintendent of the Asch building. I've
21 investigated the building's fire safety readiness regularly throughout my tenure.

22 **I. Building egress and exit structures:**

23 The Asch building had three primary exit points: the Washington place stairwell, the Greene street
24 stairwell, and the fire escape at the rear of the building. These three exits were meant to serve hundreds of
25 factory workers across multiple floors. I monitored these exits over time and paid close attention to their
26 physical integrity and accessibility. Despite this, I often saw that worktables and material carts partially
27 obstructed the path to these exits during production hours. This would not have posed an urgent threat
28 under normal circumstances, but it did raise concerns about their use during an emergency.

29 The fire escape system was poorly constructed. It has a single narrow exterior staircase affixed to the rear
30 of the building. I also noted corrosion and rust on its bolts, and a lack of intermediate landings. I often
31 worried that it could not hold the weight of multiple evacuees at once, but I don't have authority to force
32 repair. So I reported its deterioration to tenant management, marked as Exhibit 11, but no significant
33 reinforcements were made. I also observed that the fire escape did not extend all the way to the ground but
34 instead ended at a roof level platform, requiring an unsafe drop or the use of a ladder. From a structural and

35 safety standpoint, I don't believe this met even the minimal safety expectations for a building housing
36 industrial operations on upper floors.

37 One of the most troubling issues I documented during my inspections was the inward-opening door at
38 the Washington place stairwell. On the 9th floor, where many of the workers were stationed, this door was
39 designed to swing inward. I tested the function of this door several times and recognized how easily it
40 could become jammed in the event of a crowd. As someone familiar with crowd control principles and
41 egress protocols, I understood that panic could cause workers to push against the door, thereby making
42 it inoperable. I now realize that this design likely played a role in the high death toll.

43 **II. Lighting conditions:**

44 During my rounds, I frequently passed through the workrooms on the 9th floor. I observed that the
45 lighting was dim and inconsistent, especially the lights near the rear of the floor. Without backup lighting,
46 visibility is significantly reduced on cloudy days or when the voltage fluctuates. I frequently receive
47 complaints from workers that it is difficult to navigate work safely under these conditions. On one
48 occasion, I tripped over a pile of fabric where a light bulb was not working. During my tenure, I never saw
49 any plan to install emergency or backup lighting. Well, if there is such a lightning condition during a fire, it
50 would be very dangerous because people might not be able to see the escape route clearly.

51 I also found that no illuminated exit signs had been installed above doorways or stairwell entries. I
52 investigated this matter during an early inspection and learned that the building's owners had deemed
53 such signs unnecessary. I strongly disagreed. In my professional view, a lack of exit sign will cause
54 disorientation and chaos, especially during smoke-filled emergencies. These omissions likely caused the
55 difficulty of evacuating workers from the upper floors.

56 **III. Fire equipment and protocols:**

57 I found that a fire hose was mounted in the Greene Street stairwell, connected to a vertical standpipe. I
58 examined the hose's casing and fittings and did routine maintenance checks for dust, but I never
59 conducted a formal pressure test, nor was I instructed to do so. I now understand that an untested hose
60 might provide a false sense of preparedness. I was also never present for, nor aware of, any employee
61 being trained in how to operate the hose.

62 As for fire drills, to the best of my knowledge, I never witnessed a single drill conducted by the factory. I
63 know that conducting a fire drill requires approval from the main management department, and I wasn't
64 part of the factory management so was not directly informed of all internal procedures. When I inquired
65 with management for a fire drill, I was told drills would disrupt productivity and were unnecessary given
66 our 'low risk' status, and I shouldn't be worrying about this. I must say, if there has been a fire drill, it's not
67 conducted effectively in any way.

68 I also found no evidence of any central fire alarm system in the building. I looked at the halls and
69 workspaces and saw no alarm pull stations, bells, or sirens. I had no knowledge of any communication
70 protocol except word of mouth warnings or shouts in an emergency. The absence of an audible alarm
71 system likely directly contributed to the delay in workers' awareness of the fire and, subsequently, their
72 chance of escape,

73 As for fire drills, to the best of my knowledge and based on my 16 years of daily presence in the building, I
74 never witnessed a single drill conducted by the Triangle Shirtwaist Factory. I frequently passed through
75 the 8th and 9th floors during working hours, and if any drills had taken place during that time, I believe I
76 would have been aware. That said, I was not part of factory management and was not directly informed of
77 all internal procedures.

78 In the final year before the fire, I grew increasingly concerned about city-wide discussions of factory
79 safety. I asked a representative from Triangle whether drills had been conducted or were planned. I was
80 told that drills were “unnecessary disruptions” due to the building's “low-risk profile.” From my
81 understanding, any fire drills in a commercial building like ours would have required coordination with
82 building supervision- namely myself- as part of safety protocol. I was never asked to assist or supervise
83 any such drill.

84 Based on this, I concluded that drills were likely not conducted. Regardless, I believe that if they were
85 held, they were not thorough, building-wide, or regular enough to create familiarity or preparedness
86 among the workers.

87 **IV. Lack of standard fire prevention measures:**

88 In my inspections of the 8th, 9th, and 10th floors, I found large piles of cotton, muslin, and scrap fabric
89 collected in bins and corners. These were flammable and exposed to oil-stained floors and open
90 electrical outlets. I never once saw fireproof receptacles used for storage. When I asked the foremen
91 about it, they stated such containers were too expensive and not mandatory.

92 I also found out that the fire doors designed to control the spread of smoke and flame were often
93 wedged open with crates or stools. I removed these objects occasionally, but they often reappeared
94 within days. I reported this issue to the floor supervisors, but they claimed that open doors can help to
95 improve airflow and access for carts.

96 The Asch building has no automatic sprinkler system, and no portable extinguishers near work areas.
97 Nor did I ever see evacuation maps or diagrams posted on any floor. During one internal audit, I asked five
98 workers if they knew the fastest route to exit. None could describe the full path. This deeply concerned
99 me.

100 **V. Reflections:**

101 In my role as superintendent, I brought up some of these concerns, such as overcrowding near exits
102 and poor fire escape conditions, with tenant representatives. I was not empowered to enforce changes.
103 I also did not have legal authority to require drills or insist on structural modifications. But I do believe
104 more could have been done.

105 In hindsight, the building lacked nearly every protective barrier that could have mitigated the scale of
106 this disaster: emergency lights, tested hoses, clear sign, suppression equipment, trained personnel, and
107 visible exit plans. My methodology report for testing the safety conditions of this building is marked as
108 Exhibit 10.

109 **VI. Conclusion:**

110 Based on my expertise and direct observations, it is my professional opinion that the structural and

111 safety conditions of the Asch building failed to meet even the basic fire protection standards expected at
112 the time, and these failures contributed materially to the high number of deaths in the Triangle Shirtwaist
113 Factory Fire.
114 I am familiar with exhibits 10 and 11.



Noah Stern

Noah Stern

Subscribed and sworn before on this, the 10th day of April 1911.

Selina Liu

Selina Liu, Public Notary

Affidavit of Sadie Frowne

Prosecution Witness

1 After being duly sworn upon oath, Sadie Frowne hereby states as follows: I am over 18 and competent
2 to make this affidavit. I am testifying voluntarily and was not subpoenaed or compelled to testify.

3 My story begins in a small thatched-roof cottage in the Polish countryside, where I was born in 1893 as
4 the third of nine children. Our village of Brzostowa was little more than a dozen of peasant farms, where
5 life was centered around the harvest and the church. My earliest memories are of helping my mother
6 tend our vegetable patch while my father and older brothers worked the fields. The earth was our
7 lifeblood, but it was never generous enough. When I was twelve, after three consecutive years of failed
8 crops and with two more mouths to feed, my parents made the impossible decision to leave everything
9 behind. Pa sold our cow to buy tickets to America.

10 I will never forget the passage to America. The stench of waste buckets, the constant retching of
11 seasick passengers, the way we all huddled together for warmth during the Atlantic storms. When we
12 finally saw Lady Liberty's torch through the fog that May morning, we were filled with hope, but life in
13 New York was harder than we thought. Without English or trade skills, my parents could only find work as
14 tenant farmers on a rocky plot, where the soil was barely better than what we'd left behind.

15 By the time I turned sixteen, with four more siblings born in America and the farm yielding less each
16 year, I knew what I had to do. I packed my single dress and a loaf of bread into a burlap sack and took the
17 train to Manhattan, where a distant cousin had promised to help me find work at the Triangle Shirtwaist
18 Factory on Washington Place. They didn't ask for papers or references, just whether I could operate a
19 sewing machine and work long hours. When I said yes to both, they put me to work that same day.

20 The factory was hell. On the ninth floor where I worked, two hundred girls sat elbow-to-elbow at long
21 wooden tables. The air hung thick with floating cotton fibers that suffocated our lungs and turned our
22 spit black. In summer, the heat became so overwhelming that girls regularly fainted at their machines,
23 only to be splashed with a bucket of cold water and ordered back to work. In winter, we shivered in our
24 thin cotton dresses, our fingers getting pricked from growing stiff on the needles. The single toilet for our
25 floor was kept locked except during the half-hour lunch break, and any girl caught sneaking to use it
26 would have a quarter-day's wages docked.

27 Most damning of all were the doors. It is said among the girls that the Washington Place exit on our
28 floor was always bolted shut, said to prevent theft but in reality to keep us from taking unauthorized
29 breaks or leaving early, but no one dared to verify if it's true. There was an unlocked exit leading to
30 Greene Street, but this door was guarded by a foreman who checked each girl's bag on her way out. The
31 freight elevators operated on a strict schedule, and the narrow fire escape - the only one in the entire
32 building - had a broken lock and was partially blocked by crates of finished garments.

33 The morning of March 25, 1911 began like any other Saturday. I arrived at 6:45 AM to find the streets
34 already crowded with tired other factory girls, bloodshot eyes and white lips. The spring air carried a little

35 hopeful warmth, and some of the younger girls ages around 14 chattered about their plans for Sunday:
36 church, perhaps a picnic if the weather held. At precisely 7:00 AM, the floor manager unlocked the Greene
37 Street door and we filed in, our timecards stamped by the watchman.

38 The day went as usual. My work ended at 4:30 PM. As I was packing my things and getting ready to
39 leave, I noticed a sign on the walls. It was faded and I never had time to notice it before. Reading it, I
40 wanted to laugh. It said that all doors were to remain unlocked and smoking was prohibited, yet our
41 working rooms were often filled with cigarette smoke, from the guards and managers. The sign had the
42 signature of Isaac Harris at the bottom. I've only ever heard of him being the millionaire owner of this
43 factory, but I've never seen him around here. Guess he doesn't care enough to enforce the rules he
44 made.

45 Just as I was about to leave, a cry went up from the cutting room on the eighth floor: "Fire!" At first, no
46 one panicked. We all know that small fires from overturned oil lamps were common in garment shops, but
47 then I smelled it. Even on the ninth floor, I could smell the heavy smoke and feel the heat rising from the
48 floorboards. In the blink of an eye, thick black smoke began billowing up the stairwell and through the
49 elevator shafts.

50 There were more screams and then chaos. My friend Margaret, who sat two machines down from me,
51 was the first to reach the Washington Place door. She took the handle and pushed it with all her might. I'll
52 never forget the terror in her voice as she screamed, "It's locked! The door won't open!" More and more
53 people started pressing against Margaret and me, looking to escape. By then, flames were licking across
54 the lint-covered floors, fed by the piles of fabric scraps beneath our tables.

55 Some girls ran toward the Greene Street exit, which was indeed unlocked, but the smoke had already
56 grown too thick in that direction, and girls tumbled down the stairs. Others tried to force their way down
57 the fire escape, only to find the old rusted ladder swinging and breaking under the weight. Our floor
58 managers tried to use the buckets, but there was nothing in them. Girls began lining up in front of the
59 window, climbing onto the narrow ledge. I watched in paralyzed horror as first one, then another, then a
60 dozen more jumped, their skirts billowing like parachutes before they struck the pavement below.

61 As the smoke thickened, I dropped to the floor and crawled blindly toward the elevator shaft. Seeing
62 the cables that went all the way down, I took a leap of faith, gripped it, and attempted to slide down. My
63 last conscious memory is of the darkness and falling down the shaft while gripping the cables. When I
64 awoke in St. Vincent's Hospital, they told me 146 of my coworkers had died, some burned beyond
65 recognition, others crushed in the stairwell stampede, most who had jumped from the windows. It was
66 devastating, as so many lives would have been saved if we only had time to calmly make it down the
67 firefighter's equipment. However, the factory owner never implemented any fire drills, thinking it would
68 take time away from our textile making. Margaret's body was identified by the engagement ring she always
69 wore, still clutched in her hand when she had suffocated from the fumes before she could jump down. I
70 will never forget the day when I lost 146 of my sisters, all because of Isaac Harris' disregard for our
71 insignificant lives, just his important money.

72 I am familiar with exhibits 1, 5, 7, and 8.



Sadie Frowne

Sadie Frowne

Subscribed and sworn before on this, the 10th day of April 1911.

Angelina An

Angelina An, Public Notary

Affidavit of Rose Hauser

Defense Witness

1 After being duly sworn upon oath, Rose Hauser hereby states as follows: I am over 18 and competent to
2 make this affidavit. I am testifying voluntarily and was not subpoenaed or compelled to testify.

3 I've been working in sweatshops since I was 14, but my first time in a sweatshop is not one I'll ever
4 forget. My father found a job for me as a feller hand, and brought me to the shop. Stepping in, the smell
5 almost choked me up. There was no attempt at ventilation. Once my eyes adjusted to the dark room, I saw
6 women hunched over at their tables working, some on machines, others quietly chatting while their hands
7 moved over coats. There were 5 oil lamps, and 16 people, barely enough to see. The floors were covered
8 in oil and fabric scraps, a basket in the corner overflowing and clearly having not been emptied in a while.
9 I was so scared someone was going to accidentally knock over a lamp or something, the place would go
10 up in flames within a second. A man stood folding said coats, and I nervously went up to him.

11 "I'm the new feller hand". He looked away from the coats, looked me up and down, and shouted over
12 the clattering machines. "Presser! This them?" The presser put down his iron and squinted at me. "I
13 suppose so, never met em', but looks about right". The man with the coats sighed, and kicked a stool over
14 to the benches, yelling, "Make way for the new feller hand". He handed me a coat and I squeezed my way
15 past the chairs towards the small space that was made for me. My hands trembled so much that I could
16 barely hold the needle properly, but I eventually finished, if not a bit slowly. When I handed it back to the
17 boss, he spent his time inspecting each seam, leaving me fidgeting on the side. Without looking, he
18 handed me two more coats for me to do.

19 By evening, my wrists and back were aching and my neck felt stiff. I counted down the minutes, looking
20 to leave at 7. But when the clock struck the hour, nobody got up. They stayed hunched over the tables, as
21 hard at work as before. By the time everyone else started leaving, it'd been dark for quite a while. The next
22 morning when I arrived at the shop at 7, it appeared everyone had been there for quite a while, hard at
23 work. A couple women shot me dirty looks. Seeing me, boss shouted, "Girl, you should've been at work at
24 least an hour ago. No office hours here." I hurried over to my seat and he brought me two coats, snapping,
25 "Hurry."

26 As I'd only been in America for a couple months I was still a greenhorn. Coupled with the fact I was still
27 young, he took advantage of me. No matter how fast I sewed, he still shouted at me to hurry. Right before
28 getting off work, he'd give me another coat and tell me, "I need it in the morning". He paid me three
29 dollars and only by the week, even though the rest of the shop did piece work, getting paid by the amount
30 of clothing they finished. When I complained to father, he explained, "It pays him better to employ you by
31 the week. If you did piece work, he'd have to pay you twice the amount he does now. Stay a little longer,
32 get some more experience. Then you can be independent if you like."

33 Of course, this is only one sweatshop, and it was tiny in comparison to the Triangle factory. The tiny
34 sweatshop only had 4 sewing machines and employed 16 girls. Triangle had 400 machines and overall

35 factories were better than sweatshops; you were lucky if you could get a position. They generally paid
36 better wages and were more stable of a source of income if it was year round. There are, of course,
37 exceptions to the rule, like the poor girls who work at Madame Fripperie's. I heard they specifically hired
38 younger girls so that they could pay less. Overall you're lucky if you get a factory position.

39 When a friend of a friend helped me get the position at Triangle, I was so relieved to get away from all of
40 the sweatshops. It would never be my first choice, but it had better pay than the sweatshops, and at least
41 the scraps got emptied once in a while. By that point I already had the training from the sweatshops and
42 could bypass the training stage to directly become an operator. I worked at the factory for quite a while
43 and became friends with the previous office manager Mary Lowenthal. She was such a sweet girl, such a
44 pity that she moved away. I was surprised that she said for me to replace her but took it - anything that
45 could bring in more money for the family. I actually got to meet Isaac Harris a couple times, he was quite
46 the most intense individual if I do say so myself. Always pushing for more more more.

47 I was there when the Triangle factory burned down. Most harrowing experience of my life, and I've lived
48 for quite a while.

49 The day started out as normal. I got to work at 7:00 to unlock the doors, watched over the operators,
50 and inspected the clothes. I distinctly remember it was a friday, so I had to hand out the payroll. I was in
51 charge of the 9th floor, and while I wasn't a full office manager, Fletch was. Fletch was in charge of 8th and
52 10th floor, while I took 9th floor, but I normally went up to his office to get the cash.

53 "Come in". I quickly opened then closed the door behind me. Fletch's office was always a bit cluttered
54 and the smell reminded me of feet. He handed me the box of cash and the ledger of people's different
55 rates. Just as I was about to leave, I suddenly heard shouts of "Fire! Fire!". I shared a look with Fletch, and
56 while I disagreed with his office organization, we quickly put the cash back into the safe and went out to
57 see what was happening. I rushed down the stairs to the 9th floor to see hordes of girls pressing against
58 the Washington door. Now normally in the mornings, the Washington door is unlocked so that girls can get
59 to work faster. In the afternoons we have a guard posted there to prevent people from going through and
60 directing them to the Greene Street door. However, with the shouts of fire gone off, the guard who
61 probably left for a smoke break never came back. The Washington door opens inwards - if you were to try
62 and go outside you have to pull the door. It also gets jammed pretty often. The first girl who got to the door
63 probably couldn't open it, and as the other girls piled on, nobody could push the pull door.

64 I ran back up the stairs to escape the smoke billowing out the Greene Street stairwell. It was going to
65 catch up eventually, but I could prolong it if I could. Looking around, I saw Fletch waving his hand
66 gesturing to me to follow him. Navigating around the long desks, I finally made it to what was apparently a
67 stairwell to the roof.

68 Up on the roof, I could see everything. There was already a cop on a horse near the building, directing
69 the firefighters. 10 or so firefighters pulled out what looked like a big tarp with a red dot in the middle. I
70 later learned they were life nets. They were encouraging people to jump down, but when the first person
71 did, they fell right through the net and left a gaping hole. The nets were too flimsy to catch anyone. More
72 and more people started jumping, preferring a quick death. One girl's skirt got caught on a hook and left

73 her hanging there.

74 As this was happening, the firefighters tried setting up other equipment. They brought a ladder over,
75 but the ladder was only tall enough to reach the 4th floor - not even halfway. Their hoses only got to the
76 second or third floor, not nearly high enough to put out the water. There was no water tower. After the fire
77 finished burning I was taken to the Fire department for a report. Seeing the reporters gathered around the
78 department for more news, I asked that they be taken away for what I was going to say. I described to the
79 Fire Chief and District Attorney what I just mentioned, how the firefighters' gear was inadequate, how
80 people were falling to their deaths while they did nothing.

81 The days after the fire passed in a blur. There were two main things I remembered: a newspaper article
82 and passing out the payroll two weeks later. In the article was an editorial cartoon. Apparently, word of my
83 complaints had somehow gotten out and was picked up by the news. The cartoon depicted the Triangle
84 building on fire, with people jumping and falling out while firefighters on the ground stood and watched.
85 I am familiar with exhibits 1, 6, 7, 8, 9, 12



Rose Hauser

Rose Hauser

Subscribed and sworn before on this, the 10th day of April 1911.

Camellia Mao

Camellia Mao, Public Notary

Deposition of Issac Harris

Defense Witness

1 **Q:** Please state your name and address for the record.

2 **A:** My name is Isaac Harris. I am a resident of New York City and one of the owners of the
3 Triangle Shirtwaist Company.

4 **Q:** Mr. Harris, can you describe your background and how you came to co-own the Triangle
5 Shirtwaist Company?

6 **A:** My partner, Max Blanck, and I are both immigrants who came to this country seeking
7 opportunity. Through years of hard work and dedication, we built this business from humble
8 beginnings. It became one of the largest and most successful garment factories in New York
9 City, which earned us the name, "Shirtwaist Kings." We took immense pride in our contribution
10 to the city's thriving garment industry, which was a cornerstone of its economy, producing over
11 60% of the nation's clothing supply.

12 **Q:** What was your business's role in the city's economy and its immigrant community?

13 **A:** We employed hundreds of individuals, many of them young immigrant women, providing
14 them with a vital means to support themselves and their families in a new country. While the
15 work was undeniably demanding, it offered essential employment opportunities for a large
16 number of women who, regrettably, had limited economic alternatives in that era. We believed
17 we were providing the best opportunities available to them, a chance for financial independence
18 that many might not have found elsewhere.

19 **Q:** Let's discuss the working conditions at the factory. How did they compare to others in the
20 industry?

21 **A:** The working conditions within our factory, including the hours, wages, and the general
22 environment, were, to our understanding, entirely consistent with the prevailing practices and
23 standards of the garment manufacturing industry at that time. We operated within the
24 established norms of a highly competitive business, where efficiency and output were
25 paramount. We found that in order to be competitive, certain practices, such as keeping a close
26 eye on materials and managing breaks, were necessary.

27 **Q:** Did your factory ever undergo inspections by city or state authorities?

28 **A:** Yes, our factory had undergone regular inspections by both the city's Building Department
29 and the State Labor Department, and I can state that we consistently passed these inspections.
30 To our knowledge, the inspectors had no issues with our operations. It is crucial to understand
31 that many of the more stringent safety regulations, such as mandatory sprinkler systems or fire
32 drills, were simply not legally required in New York City at the time of the fire. We cannot be held
33 accountable for failing to implement measures that were not mandated by law. We relied on the
34 judgment of the city's inspectors, and their approvals confirmed our belief that we were
operating within the legal framework of the time.

35 **Q:** Let's focus on the doors, specifically the Washington Place exit on the ninth floor. What was
36 your company's policy regarding locked doors during working hours?

37 **A:** It was our clear and standing policy that all doors were to remain unlocked during working
38 hours, in full compliance with the Labor Law. While it was a common and accepted industry
39 practice to secure exits to prevent theft of valuable merchandise and to manage unauthorized
40 breaks, any such locking was intended solely for security purposes, not to impede egress in an

35 emergency.

36 **Q:** Who was responsible for enforcing this policy on a day-to-day basis, and who had keys to
37 the doors?

38 **A:** I personally used the Washington Place door frequently, often several times a day, and it was
39 always accessible to me. I did not possess a key to these doors, as that was typically managed
40 by foremen for day-to-day operational needs. We trusted our supervisory staff to follow
41 company policy and the law. I would be very surprised if that door was locked on March 25th, as
42 it would have been a direct violation of our policy.

43 **Q:** Please describe what you know about the fire itself.

44 **A:** The fire on March 25, 1911, was a sudden and unforeseen catastrophe that unfolded with
45 terrifying speed, far beyond what anyone could have anticipated. The rapid spread was fueled
46 by the highly combustible materials inherent to a garment factory, a risk common to the industry.

47 **Q:** Do you believe the actions of the workers contributed to the tragedy?

48 **A:** The chaos and panic that tragically ensued among the workers, while deeply understandable
49 given the circumstances, also contributed to the immense difficulty of evacuation. The factory
50 floor was very crowded; the aisles were narrow. This, while regrettable, was also typical of
51 factories aiming for maximum production in a competitive market. We, as owners, were
52 profoundly shocked and devastated by the unimaginable loss of life.

53 **Q:** Was anyone you knew personally affected by the fire?

54 **A:** Yes, my partner, Mr. Blanck, nearly lost his own children in the blaze, a testament to the
55 indiscriminate nature of the disaster. This was a heartbreaking tragedy for everyone involved, a
56 true accident that no one could have wished for or predicted in its devastating scale.

57 **Q:** There have been allegations about previous fires at your factories and claims of insurance
58 fraud. Can you respond to those allegations?

59 **A:** Allegations regarding previous fires at our factories and any suggestions of insurance claims
60 being misleading are entirely unfounded. Our factories, like many industrial operations of the era, had
61 experienced minor fires in the past. These were unfortunate incidents, quickly
62 extinguished, and covered by standard business insurance policies, which is a common and
63 responsible practice to protect assets and inventory. The insurance company never raised any
64 concerns, and their policies were renewed as a matter of course. These occurrences did not
65 indicate a deliberate pattern of arson, nor did they suggest a disregard for safety. We
66 maintained what we believed to be a clean and sanitary factory, which we considered second to
67 none in the country. The idea that we would intentionally endanger our workers or our
68 business for insurance payouts is preposterous and deeply offensive.

69 **Q:** Mr. Harris, in your own words, do you believe you were in any way responsible for the deaths of the
70 146 workers?

71 **A:** I swear under oath that I had no criminal intent to harm any of my employees. The safety and
72 well-being of our workers were important to us, within the context of the industrial practices and

73 regulatory environment of the early 20th century. The fire was a terrible accident, and the
74 subsequent loss of life was a heartbreaking consequence of an unpredictable disaster, not a
75 result of malicious intent or culpable negligence on our part. We mourn the lives lost and have
76 always acted with what we believed to be due care and compliance with the laws as they
77 existed.

78 **Q:** Which of these document are you familiar with?

79 **A:** I am familiar with exhibits 2, 3, 6, and 9. It is my factory after all.



Issac Harris

Dr. Jonathan M. Whitfield
Subscribed and sworn before on this, the 10th day of April 1911.

Jerry Zhong
Jerry Zhong, Public Notary

Affidavit of Dr. Jonathan M. Whitfield

Defense Witness

I. INTRODUCTION.

After being duly sworn upon oath, Dr. Jonathan M. Whitfield hereby states as follows: I am over 18 and competent to make this affidavit. I am testifying voluntarily and was not subpoenaed or compelled to testify.

II. BACKGROUND.

My name is Dr. Jonathan M. Whitfield. I was born in Massachusetts in 1869, which, if you do the math correctly, makes me older than most of the kids I lecture these days (but hopefully a bit wiser too). My father worked in the mills, and my mother stitched shirts in the evenings to help feed our family of six. We didn't have much, but I grew up surrounded by hard work, coal smoke, and the sound of looms. That background is what first got me interested in labor: not just the work people do, but the systems they live under.

Eventually, I landed at the University of Chicago, where I got my Bachelor's in Economics. The whole invisible hand thing fascinated me. I guess I always wanted to understand why people in power make the decisions they do, especially when those decisions impact vulnerable workers. After that, I pursued my Ph.D. in Economic History at Yale. Then, I became a teacher, spreading my learnings to others. I've taught at a few universities: Princeton, Columbia, you name it. These days, I mostly consult on economic issues, especially when they come up in legal settings.

This isn't my first time being called to court. I've testified in over two dozen cases, mostly about working conditions, economic intent, and whether business owners acted in line with market norms or crossed a legal line. I have been asked to provide my professional assessment of the employment and operational practices of Issac Harris, the owner of the Triangle Waist Company, with regard to the fire that occurred on March 25, 1911. I'm being compensated \$7,500 by the defense for my testimony today. I would say that's fair compensation, given the time it takes to review testimony, records, and old inspection reports.

III. INVOLVEMENT IN THE TRIANGLE CASE

I've started my investigation by examining the conditions of the Triangle factory. After talking to a few workers and witnesses, I've had a basic understanding of what the workers at the factory were experiencing everyday. I have to say, the conditions there were difficult: long hours, crowded workspaces, and limited exits. The workers definitely did not have a pleasant time there. But I also must point out that these conditions were, unfortunately, typical of how factories operated in 1911. The Triangular Shirtwaist Factory wasn't unique in this. I've looked over more than 20 factories in the region, and many workplaces in New York City had similar issues: narrow staircases, limited ventilation, and locked doors during working hours.

Why were the doors locked? From what I've seen in factories across the state, it was standard practice at the time to lock certain exits to prevent theft or workers taking breaks without permission. Undeniably, it wasn't safe, but at that time there was no specific law that made it illegal to do so. The Triangle building had the required number of staircases, and it had passed fire and safety inspections before the fire occurred.

IV. ANALYSIS.

35 Upon my investigation, I found out that many of the women who worked at Triangle were young
36 immigrants. They were mostly from Eastern Europe and Southern Italy. They worked long hours for low pay,
37 often around \$6 per week. That doesn't sound like much, but compared to the salaries from other jobs
38 available to working women, it had a better payment.

39 From an economic point of view, the job was also the best opportunity the immigrants could find. Their
40 decision to choose to work at the factory falls under the concept of opportunity cost decision in
41 economics. If they didn't work at the factory, their other choices might be domestic service (as live-in
42 maids), street labor, or sewing clothes from home. Those jobs usually paid less, were less stable, and
43 offered less freedom. In a household service job, a woman might be under strict control of her employer,
44 working longer hours with no privacy. Thus, they've chosen to work in the factory as it is the choice with
45 the lowest opportunity cost, the one that maximizes their gains. In fact, many women lined up hoping to be
46 hired by Triangle. In the language of economics, they were making a rational choice based on the options
47 they had in the limited job market.

48 Of course, I've also spoken to the factory owners themselves. They told me that they didn't know the
49 exit door was locked on the day of the fire. I have no direct evidence to contradict that claim. However,
50 through my investigation on the past reports of the factory, I did find out that there's a troubling pattern in
51 their history. Records show that the Triangle factory experienced two previous fires in 1902. Furthermore,
52 their other business, the Diamond Waist Company, also suffered fires in 1907 and 1910. All of these
53 incidents occurred outside of business hours. Despite these prior incidents, Issac Harris reportedly
54 declined to install a sprinkler system at Triangle. While sprinkler systems were not required by law at the
55 time, their refusal to adopt basic fire prevention measures after multiple fires raises concerns of how their
56 action may potentially lead to the exacerbation of the scale of the fire.

57 **V. CONCLUSION**

58 In my professional opinion, the conditions at the Triangle Waist Company were harsh, but unfortunately
59 typical for the time. Based on my investigation and understanding of the era's industrial norms, Isaac
60 Harris operated within the legal standards of 1911, even if those standards, by today's measure, fall short.

61 At the same time, the prior fires at Triangle and the Diamond Waist Company, and the decision not to
62 invest in additional fire safety measures like sprinklers, raise valid concerns. While there's no conclusive
63 evidence of intent or criminal neglect, it's fair to say more could have been done. Whether that amounts to
64 legal responsibility is for the court to decide. My role is simply to explain the choices made and the
65 context in which they were made.

66 I am familiar with the following and only the following exhibits: 3, 4, 5, 6, 7, 9, 12

67 I hereby attest to having read the above statement and swear or affirm it to be my own and consistent
68 with the testimony provided during my grand jury testimony. I also swear or affirm the truthfulness of its
69 content. Before giving this statement, I was told to include everything I knew that could be relevant to the
70 events described related to these charges. I also understand that I can and must update this affidavit if
71 anything new occurs to me until the date of the trial in this case.



Jonathan M. Whitfield

Dr. Jonathan M. Whitfield
Subscribed and sworn before on this, the 10th day of April 1911.

Phillip Yang
Phillip Yang, Public Notary



**Good Reading
Profitable Reading**
On the advertising pages today
Thousands of bargains advertised
in today's Globe. Be sure to
read the advertisements today
and every day.

The Boston Sunday Globe.

**Read Them Today
Use Them Yourself**
Do you want to read the most useful
today? Use the Globe's many
columns of news. The Globe is
the best read section in New
England.

VOL LXXIX—NO 85.

BOSTON, SUNDAY MORNING, MARCH 26, 1911—EIGHTY PAGES.

ESTABLISHED 1872 BY
THE BOSTON HERALD.

PRICE FIVE CENTS.

FIRE IN FACTORY KILLS 148; GIRLS LEAP TO THEIR DEATH

Blazing Bodies Whirl to Street in Scores, Flames Pursue Victims to Ninth and Tenth Story Windows.

ULTIMATUM BY RUSSIA TO CHINA

Demands Satisfactory Reply to
Note of Feb 16 by Tuesday.

Will Hold Chinese Responsible For
Obstinacy---Situation Grava.

**DE LA BARRA
FOR CABINET**
Ambassador Will Be
Diaz' Premier.
Gen Reyes Coming Home to

PEACE MESSAGE FROM JAPAN.

Emperor Glad President Did Not Believe
"False and Wicked Reports."

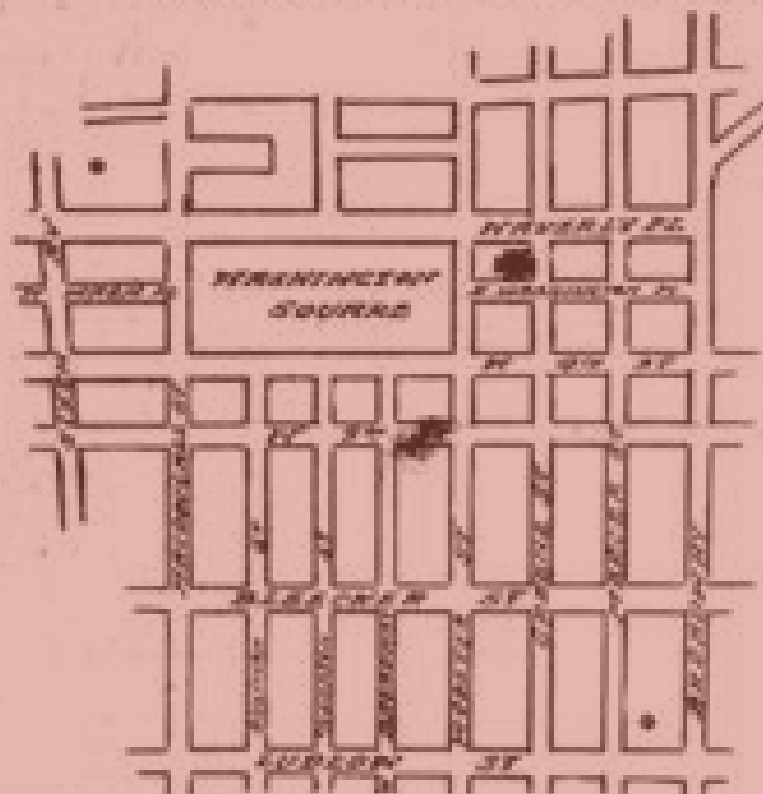


EMPEROR OF JAPAN.

WASHINGTON, March 25.—Baron Uchida, the Japanese ambassador, called at the White House today and presented to President Taft the following personal message from the emperor of Japan:
"To the President of the United States of America:—I was greatly pleased to receive your very kind message conveyed to me through my ambassador in Washington, and I thank you for it. I was already well convinced that you had given me cordiality the false and wicked reports regarding Japan, but it was especially a source of profound satisfaction to me to receive from you the assurance that the relations of amity and good understanding between our two countries were never better or more cordial than at this time. I am most happy to be able cordially to reciprocate that assurance."
"Meiji."

Shirtwaist Operators Die at Machines in New York, Seared By Blast of Fire Sweeping Shop.

MAP SHOWING LOCATION, MARKED BY
CROSS, OF FIRE THAT KILLED 150



Women Cut Off From Exits, No Outside Escapes.

Pressure of the Maddened Crowd
Hurls Dozens to Pavement.

Elevator Shafts Clogged With Dead After Hundreds Get Out.

NEW YORK, March 25.—One hundred and forty-eight souls—nine-tenths of them girls from the East Side—were crushed to death on the pavements, smothered in smoke or shriveled crisp in a factory fire this

(Continued on the Eighth Page.)

