

PRIVILEGED: ATTORNEY-CLIENT WORK PRODUCT MATERIAL

The following constitutes a typed version of handwritten notes I took during my telephone conversation with Robert White's attorney, Robert Adler (date: January 23, 1998) (time: 10:35 a.m. - 11:25 a.m.)

Adler started out talking about his problems with the subpoena.....

"Some of these things are too broad - if we have to, we'll file a Motion to Quash"

I've had research done as far as statutory authority, and feel I now have a grasp of the statute. I've never dealt with you folks before.

A lot of this stuff is too broad. Like "anything having to do with Evelyn Lincoln." "I'm not going to let you do a fishing expedition here, unless a court orders it."

He cited as an example, the fact that he was not going to let us just go through "White's house looking for things."

"I do have a list of items - Consignment List from the auction. So, there is such an animal. Robert White has never inventoried his JFK collection. But, when it got down to the auction, this list was made for purposes of the auction."

Most of the stuff has no relevance....stuff like Caroline Kennedy doodles, etc.

I asked him who generated the list, and he said White and Allen Burt.

I asked him when and he said "within the last several weeks."

With regard to what was on the list, he said, "It's ongoing, it's a fluid process - some things go on, and some things come off the list.

Adler volunteered to fax me the list, and suggested that we go over it and see if there is anything that we determine to be relevant.

Adler stated that White had sent him a memo with a list of items that were in his collection - over and above those items listed for the auction. When I asked him more about this list, Adler stated that the list was "An attorney client privileged list."

We then went over each of the requests as set forth in Attachment B of our subpoena (denoting each numbered request as a paragraph)

Paragraph One

- No bullet fragments
- No tissue samples
- "White gave me two, small leather swatches from the backseat of the limousine (blood stained) These were the swatches that he received from Mr. Ferguson of Ford Motor Company)"

- No items
- No apparel
- No sunglasses (in response to my specific question)

White did get a number of items from Evelyn Lincoln pertaining to what she had on the day that Kennedy was assassinated:

- Polaroid picture of the gathering crowd near the airplane
- Eyeglasses
- E.L.'s purse
- American League Baseball pass

Adler then mentioned some other things that White had:

- Letter addressed to Pierre Salinger (Adler unsure of the content)
- Program from "Welcome to Texas" Dinner

Paragraph Two

- Nothing related to Jacqueline Kennedy
- White has a hospital bill from Parkland Hospital to Connally (no itemization?)

- Photograph with autograph of Mrs. Connally
- Photograph of Gov. Connally (nothing to do with Dallas)
- Oswald's signature from an Easter Card sent by Oswald to his brother in the 1950's
- Jack Ruby - shell casing from the gun used by Ruby to shoot LHO (Adler thinks White got this from a collector)
- An advertising pamphlet purported to be in Jack Ruby's pocket at the time he shot LHO (said pamphlet touts Jack Ruby's business)
- Two pairs of shoes owned by Ruby
- Ruby's ash tray
- Ruby's business card
- Contract for a stripper in one of Ruby's nightclubs
- **handwritten notes from Ruby (Adler didn't know what they said)**
- Various other artifacts (according to White's communication with Adler)
- White also has a small file with notes (cryptic notes?) where JFK is thinking about going to Dallas (Adler didn't know any more about this one)

Paragraph Three

- Nothing relating to the Bay of Pigs
- White has a Cuban Missile Crisis calendar (Evelyn Lincoln)
- Doodles by JFK during the Cuban Missile Crisis
- Telegram from Kruschev to JFK re: Cuban Missile Crisis (White has the original Which is translated into English) (no Russian language appears on document)

- Dictabelts

- Adler says that White said that the dictabelts may or may not have a discussion about the Cuban Missile Crisis. I asked Adler whether he knew if White had listened to the dictabelts, and Adler stated that he did not know whether White had listened to them or not.

- Nothing on organized crime

- Vietnam: Dictabelts may or may not contain relevant information.

NOTE: Adler then stated that he has not had a chance to have a paralegal sit down and go through all of this stuff.

- Adler then mentioned the dairies and journals and told me they go back to the 1950's. Alder stated that these may have comments about Vietnam.

At this point, Adler stated something like: "it's areas like these where I'm going to have to draw the line with you....."

- Per Adler: what possible relevance would dairies from the 1950's have

Adler also stated, "I don't want your interests coinciding with the interests of the auction. Please get back to me immediately if you have any questions.....or if you envision this happening (i.e. our interests colliding with the auction) ."

Paragraph Four

- Adler referenced the Guernsey Auction list and said that was it.

Paragraph Five

Adler stated, "Big time breadth problems"

Adler stated that White got a file cabinet from the will. "What we're just not going to do is to turn over everything that relates to Evelyn Lincoln." "I would tell you if there was anything that related to Dallas...or anything..."

Adler: "Both White and I are on your side as far as getting things out there that relate to public's need to know what happened in Dallas."

Adler then told me that "White has one thing that Evelyn Lincoln gave to him." He described a toy that a kid from South America had given JFK. JFK kind of liked the toy. EL gave that item to

White during her lifetime. EL wrote him a note explaining the origin and significance of the item so that White would know its provenance. EL would do this from time to time with different items.

At this point, Adler referred to our meeting last Thursday and to the question posed by myself regarding whether White had any correspondence from either of the Lincoln's detailing the items they gave him (to which White had responded no initially, and then later stated that Harold Lincoln had gone through the file cabinet with him and made notes of what was being given to him). Adler stated that both he and White had thought that we were talking about assassination-related items only when I asked that question. .

White has stacks of things (some in Safeway boxes, all stacked up, etc.) White would never have taken the time to organize any of these things. "These things may not all be in one place" "White has a billiard room with stuff all over the table, etc."

Adler again stated his "Breadth problem" objections.

Re: McGuire - McGuire apparently gave White photographs (Adler doesn't know what the photographs depict), books, advertising poster for EL's book

Re: Blakeslee - Nothing.

Paragraph Six

Adler: "I've asked White this question four times over - no inventories. The executor did not inventory anything that was in those filings. "So - history will not be able to record that."

White has the filing cabinet itself. White stated that he would be real surprised if the file cabinet still contained all the items....

Paragraph Seven

"Big time breadth problem"

Adler asked me to make a proffer as to what we were looking for here. He stated that both he and White did not understand this request. "I'm having trouble with this question. I'm not certain that the document requests tell me what you're looking for."

I explained by examples (such as White writing to other beneficiaries, or to a museum requesting to participate in an exhibit, etc.)

Adler seemed to process this and then stated, "I'll go back to White before we go into this battle - I'll go back and ask him...."

Paragraph Eight

The only thing they had under this category was business-related things pertaining to the Guernsey auction. He is negotiating for example, with Guernsey. Adler then stated, "I've been involved from the sidelines as to essentially how it worked." The auction people want more stuff, but White doesn't want to sell everything. "I don't think there's a paper trail - I'll ask White."

Paragraph Nine

White's Kennedy collection is either at his Mother's house or at Guernsey's in New York. I asked Adler if any of the collection was stored with any other private individual and Adler stated NO.

Paragraph Ten

Adler: "I think the answer is no (other than the Guernsey matter)." White hasn't sold any items that he got from the estate. White hasn't given away any items he got from the estate.

White collects everything. He kept his parking ticket from when he came to meet with the Assassination Records Review Board.

Concluding Statements

Adler: "To cut to the chase - I don't think White has stuff that you're looking for. Rather than get into a big hoopla....as to what you're really looking for, and what you're not.

Adler's biggest objections relate to letting us see "anything White ever obtained from Lincoln under the will."

Adler mentioned that ..."as you probably know, White has JFK's expired passport and Jackie's expired passport." (Adler stated that this had been in the file cabinet from Lincoln to White)

I then told him I would consult with the individuals I needed to consult with, and get back to him.

We also discussed dates for the deposition. Adler said he was not available on the 12th, but was available on the 13th. Also available on the 17th and 18th of February - or the 29th or 30th of January.

“My suggestion is maybe we should sit down - I’ll bring White in - talk about this more.”.

Adler’s not going to let us come and look at what White has.

I also discussed the possibilities of meeting dates - Adler will be around next Tuesday and Wednesday.