

December 31, 1997

HAND-DELIVERED

The Honorable Frank W. Hunger
Assistant Attorney General for the Civil Division
United States Department of Justice
10th and Constitution Avenue, N.W., Room 3143
Washington, D.C. 20530

Re: Assassination Records Review Board Subpoena Request No. 17 (Robert White)

Dear Mr. Assistant Attorney General:

The Assassination Records Review Board requests that the Department of Justice issue a subpoena duces tecum to:

Mr. Robert White
302 Bloomsbury Avenue
Baltimore, MD 21228

Mr. White is reported to have records and objects in his possession that relate to the assassination of President Kennedy. We would like to schedule Mr. White's deposition for February 12, 1998 at 9:30 a.m., at the offices of the Assassination Records Review Board.

Please do not hesitate to contact me if the Review Board may be of any assistance.

Sincerely,

T. Jeremy Gunn
Executive Director

Enclosure

cc: Art Goldberg, Esq.

**SUBPOENA DUCES TECUM
FOR THE PRODUCTION OF DOCUMENTS
AND APPEARANCE FOR TESTIMONY
BEFORE THE ASSASSINATION RECORDS REVIEW BOARD**

To: Mr. Robert White
302 Bloomsbury Avenue
Baltimore, MD 21228

YOU ARE HEREBY REQUIRED AND DIRECTED, PURSUANT TO 44 U.S.C. § 2107, TO APPEAR BEFORE:

T. Jeremy Gunn, Executive Director and General Counsel of the Assassination Records Review Board, at the offices of the Assassination Records Review Board on the 12th day of February, 1998, at 9:30 a.m., and at the same time each day thereafter until completed, or at such other mutually agreeable time and place, to testify under oath regarding records and objects relating to President John F. Kennedy.

YOU ARE HEREBY REQUIRED to bring with you, to produce and to make available for inspection and copying or reproduction at said time and place any and all objects and records as defined in Attachment A hereto, that are in your possession, custody, or control, and that are described in Attachment B hereto.

The production of documentary material in response to this subpoena must be made under a sworn certificate, in the form set forth, by the person to whom this subpoena is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production.

Inquiries concerning compliance with this subpoena should be directed to: Kim Herd, Senior Attorney, Assassination Records Review Board, 600 E Street, N.W., Washington, D.C., 20530, (202) 724-0088; (FAX) (202) 724-0457.

ISSUED AT _____

THIS ____ DAY OF _____, 1998

By: _____

FRANK W. HUNGER
Assistant Attorney General

ATTACHMENT A

DEFINITIONS AND INSTRUCTIONS

1. "You" means Mr. Robert White, any of Mr. White's agents, representatives, partners, or any other person who may have possession, custody or control of Mr. White's records and objects that are identified in this subpoena.
2. "And" and "or" and the use of the singular or plural of any noun should be understood in the broadest reasonable sense and should be construed inclusively in favor of producing the largest number of records and objects.
3. "Object" means all physical entities *except* "records" as herein defined. "Objects" include memorabilia such as rocking chairs, tie clips, ash trays, clothing, toiletries, picture frames, model ships, etc.
4. "Records" should be understood broadly to include, without limitation, memoranda, documents, handwritten notes, typewritten notes, journals, diaries, entries, drawings, photographs, electronic recordings, dicta belts, tape recordings, motion pictures, correspondence, contracts, computer files or databases, agreements and legal instruments.
5. To the extent that it is impossible to comply with any of these requests, you should comply fully with all remaining requests and be prepared to explain the reasons why you cannot comply with any request.
6. To the extent that you are unable to make available one or more records and/or objects that would otherwise be responsive to this subpoena, provide a list that identifies (for each record and/or object that is not produced): (a) a description of the record and/or object; (b) the source from whom you obtained the record and/or object; (c) the date that you originally obtained the record and/or object; and (d) the reason why you are unable to make the record or object available.

ATTACHMENT B

YOU ARE HEREBY REQUIRED to bring all records and objects now in your possession, custody, or control, as follows:

1. All objects that relate to the assassination of President John F. Kennedy, or to his trip to Texas in November, 1963, including for example, bullet fragments, tissue samples, items from the Presidential limousine, or any items or apparel worn by President Kennedy at the time of the assassination.
2. All records that may relate, directly or indirectly, to the assassination of President John F. Kennedy including, but not limited to, records pertaining to Jacqueline Kennedy, Governor and Mrs. Connally, Lee Harvey Oswald, Jack Ruby, J.D. Tippit, President Kennedy's trip to Texas in November, 1963, etc.
3. All records of President Kennedy's administration or President Lyndon Johnson's administration that relate to the following: Cuba (including, for example, any records that refer to the Bay of Pigs or the Cuban Missile Crisis), Organized Crime, Vietnam (including, for example, any records that refer to President Kennedy's conversations with Maxwell Taylor relating to the Vietnam War), the Secret Service, the FBI, the CIA, and the U.S. Military.
4. All records that set forth, list, document, index, catalogue, inventory or identify in any way, the objects or records that are now (or ever have been) in your custody or control that relate to President John F. Kennedy or the Kennedy Administration.
5. All records you obtained directly or indirectly from Evelyn Lincoln (the personal secretary of President John F. Kennedy), Harold Lincoln (the husband of Evelyn Lincoln), Frank McGuire (beneficiary of Lincoln's will), or from Stephen Blakeslee (the executor of Evelyn Lincoln's estate), at any time, including records you obtained

as a beneficiary of Evelyn Lincoln's and/or Harold Lincoln's will.

6. All records that set forth, list, document, index, catalogue, inventory or identify the objects or records of President John F. Kennedy or the Kennedy administration that were in Evelyn Lincoln's estate, Harold Lincoln's estate, or in either of their possession, custody, or control at any time.
7. All correspondence with other individuals, institutions, or organizations, regarding the terms of Evelyn Lincoln's and/or Harold Lincoln's will.
8. All records pertaining to the sale, transfer, gift, or bequest of any objects or records that relate to President John F. Kennedy, by yourself to any other individual and/or institution.
9. Any records reflecting the names and addresses of persons or institutions other than yourself with whom you have stored or currently store any objects and/ or records that relate to President John F. Kennedy.
10. All records reflecting the disposition of President John F. Kennedy objects or records from the estate of Evelyn and/or Harold Lincoln, including all correspondence with the John F. Kennedy Library regarding JFK records or objects.

You are required to bring with you all of the above-described objects and records, including, without limitation, any objects and/or records you have in your possession, custody, or control that may presently be on loan to another party or in the physical possession of another party.

You are NOT required to bring with you any commercially published books, articles, videotapes, or audiotapes (or commercially available research materials) related to the assassination of President John F. Kennedy.

CERTIFICATE OF COMPLIANCE¹

I/We do hereby certify that a diligent search for the documentary material called for by the subpoena issued pursuant to 44 U.S.C. Sec. 2107 has been made, and that all of the documentary material in the possession, custody or control of the person or entity to whom the subpoena is directed has been produced and made available at the time, place and manner specified. A list identifying all of the documents and materials is attached.

Any documentary material otherwise responsive to this subpoena which has been withheld from production under a claim of privilege or for any other reason has been identified herein by (1) the type of document; (2) the general subject matter of the document; (3) the date of the document; (4) the privilege claims; and (5) such other information as is sufficient or necessary to identify the document, including, where appropriate, the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and address to each other.

Signature

Title

Sworn to before me this
_____ day of _____, 1998

Notary Public

¹In the event that more than one person is responsible for producing the documentary material called for by this subpoena, the certificate shall identify the specific items for which each certifying individual is responsible.

My commission expires: