

GENERAL OPENING REMARKS

- Could you please state your full name for the record.

- Address?

- My name is. I am.

- Also present..

- We are taking your deposition pursuant to the authority that we have under the President John F. Kennedy Assassination Records Collection Act.

- Before we go any further.....

- Take a break?

- Clarify a question?

- Court reporter administer the oath?

- The first thing to do is show you a document, marked Exhibit No. , and ask you whether you've seen that document before?

- Do you understand that you are here pursuant to the subpoena tha is attached to this Exhibit?

- You understand that you are here under oath?
- Background info?

- Where do you currently reside?

- Currently employed?

- Employment history?

- Brief description of your educational background?

- You are a collector of items related to President John F. Kennedy - correct?

- When did you start collecting?

- Where would you find items that you collected?

- What did you do with these items?

- How long have you been collecting?

- Could you give us an estimate of how many items you have in your collection?

- In a general way, how do you have them organized?

- How do you keep track of the items in your collection?

- Do you have list of all the items in your collection?

- Box lists

- Card lists

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- Where did you get most of these items?

- Did you receive any items from Evelyn Lincoln or her husband, Harold Lincoln?

- Briefly explain how you came to know Evleyn Lincoln?

- Did you ever receive items from Evelyn Lincoln and/or Harold Lincoln during their lives, that you placed in your collection?
- Approximately how many items did you receive from them while they were living?

- Approximately how many items did you receive from them as a beneficiary under their wills?

- Mark inventories???????

- Tell me a little background about your friendship with Evelyn Lincoln....

- When did you first make contact with Evelyn Lincoln?

- What was the nature of your correspondence?

- How many times did you correspond with her?

- When did you first meet with Evelyn Lincoln?

- Describe your friendship?

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- I'd like to show you part of Exhibit No. , which is Attachment B, - which required you to bring with you all records and objects now in your possession, custody, or control?

- Did you bring any papers with you pursuant to Attachment B of Exhibit ?

- Have you previously provided us with any records that we are seeking pursuant to Attachment B?

- Read them off for the record (each item provided)

- Inventories (mark each one for identification)

- Inventory of Lincoln Items

- Could you describe, in brief, what this document is?
- - When did you write this?

- Did you bring any other documents with you that are responsive to Attachment B of the subpoena?
 - Go through and list out each one of them.....
 - * May come back and ask you questions later.....
- Did you do anything to prepare for the deposition today?
- What did you do?

RELATIONSHIP WITH EVELYN LINCOLN

(I'm going to start off by asking some background questions, and then get more specific about the subpoena)

- How did you correspond with her?
- Ever been to her home?
- Did you ever ask her about any JFK items that you had?
- During the course of your correspondence, did she ever give any JFK items to you?
- Did you ever buy any of these items from her?

- Did she ever provide documentation?
- Was there ever any understanding about what you would do with the items she gave you?
- List every single item you received from Evelyn Lincoln during her life time?
- What did Mrs. Lincoln tell you about how she had obtained these materials?
- Did you ever buy anything from Mrs. Lincoln during her life time?
- What, and how much did you pay for it?
- Did you ever intervene and “assist Ms. Lincoln by acting as a buffer between her and other collectors and researchers that approached her regarding Kennedy?
- Ask him about thoroughness, etc.
- Did Ms. Lincoln ever introduce you to anyone else that had in any way been associated with the Kennedys?
- Did any of these individuals give you any of the items which make up your collection?
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- Did Ms. Lincoln ever talk to you about the assassination?
- “She had some strange ideas about Lyndon Johnson, but stated that she never spoke of or showed him any documents or evidence to support her ideas.

EVELYN LINCOLN INVENTORY

GO OVER LIST THAT HE PROVIDED (Have this marked as an Exhibit)

- What does the inventory represent?
- When did you prepare it?

- How did you prepare it?

- When did you prepare this inventory?

(Told Brian Rosen and Dave Montague - "Approximately two weeks after the funeral, Mr. White viewed the contents of all the trunks and file cabinets with Stephen Blakeslee and Frank McGuire for the purpose of creating an inventory and appraisal of the estate at Blakeslee's request.)

- Describe in detail, how you did this inventory?

- Who was present when you did it?

- Were Blakeslee and McGuire present with you the entire time?

- Did you take notes?

- How did you take notes?

- How extensive were they?

- Why did you take notes?

- What did you do with these notes?

(Told ARRB that he had forwarded these notes and blank stationary to Blakeslee, who created the final letter, inventory and appraisal.)

- How long did the inventory take?

- Were Blakeslee and McGuire present with you the entire time?

- What do you mean by?

- How did you come up with the figure, \$159,650?

- Are there other items that you received from Evelyn Lincoln that are not here?

-Go through line by line what is of interest to us on the inventory?

- Did you have all of these items in one place, or did you have to go through them line by line?

- IS there anything you received from Evelyn Lincoln at any time - either before or after her death, that is not listed on the inventory?

Individual Items under the Inventory

A. JBK Handwritten Will (No. 4)

B. Rice Hotel Stationary (No. 9)

C. Grave Site Plans sent to EL (No. 20)

D. Two page list of directives to EL from JFK (No. 24)

E. Stenographic notes taken by Mrs. Lincoln during dictation (No. 27)

F. No. 30 - Note from Godfrey McHugh

G. No. 53 - Copies - Daily Appointment Listings

1. Aug. 20, 1962

2. Aug. 21, 1962

3. Aug. 24, 1962

4. Aug. 25, 1962

5. Aug. 27, 1962

6. Aug. 29, 1962

7. Aug. 30, 1962
8. Aug. 31, 1962
9. Sept. 5, 1963
10. Sept. 6, 1963
11. Sept. 9, 1963
12. May 27, 1963
13. July 23, 1963

H. - No. 54 - Blue Book which lists WH employees

No. 59 - Stenographic Page with typed information

No. 60 - Yellow legal pad with doodles, notes

No. 75 - Used Dictabelts

No. 93 a 3 by 5 card with pencil doodles

No. 96 Business Cards - (4) with notes

No. 98 - "Notes from the desk of JFK"

No. 99 - "Notes from the desk of Herbert Lehman" with JFK Notes

No. 109 - White House note pad sheet with JFK notes (2)

No. 110 - Carbon Copy - typed notes - related to Sorenson's job as spec. Ass

No. 116 - Notes, doodles, jottings - JFK (approx. 20)

No. 118 - Approximately 45 ? From 1957 - 1966, personally addressed to EL

No. 124 - . Western Union Telegram

No. 125 - Letter in envelope to Pierre Salinger

No. 126 - Western Union Telegram

No. 128 - . Index Card

No. 134 - Polaroid Pictures - EL personal, taken from plane

No. 135 - European Trip - 1963

No. 138 - EL's typed copies of dictation and dictation notes

No. 142 - File Folder of Newspaper Clippings

No. 144 - White House Era Photographs

No. 146 - Personal Photographs of EL

No. 151 - Various Memoranda and notes

No. 172 - Seven Page Letter - JBK to JFK

No. 175 - File Folder - Eisenhower Lodge with JFK Doodles

No. 193 - Folder carried by JFK as president

No. 225 - Miscellaneous Photographs and reproduction photos -

No. 229 - JFK Photograph with incomplete note

No. 230 - Photograph

No. 231 - Presidential Briefing Binders (by country name)

No. 233 - For Presidential Signature - Military Aide

No. 244 - Letter draft from JFK to Richard Russell

No. 250 - Constituent Telegram from Texas to JFK

No. 251 - Air Force One Note

- No. 258 - Folder Used by JFK
- No. 259 - Folder with SS WHITE HOUSE DETAIL PHOTOS
- No. 260 - Book on Secret Service
- No. 267 - RFK Letter - 1963
- No. 271 - Dr. Burkely Medical Bag Tag
- No. 273 - Copy of Dr. Burkely Report - Nov. 22, 1963
- No. 281 - Photograph - JFK entering Air Force One
- No. 294 - Presidential Limousine Use Flag
- No. 295 - American Limousine Use Flag
- No. 296 - JFK Doodles
- No. 308 - Political Papers - notes from RFK to JFK
- No. 305 - Rice Hotel - Houston - pad

Dictabelts - in what condition did you receive them?

- Any transcripts of anything that was heard on these Dicta Belts?
- Do you possess any logs or other records relevant to the Dicta Belts?
- Any documentation or records that accompanied the Dicta Belts?
- Are they in the same condition as when you received them?
- How are they changed?

- Any records or logs that relate to any analog tapes?

SUBPOENA

- Did you review the Request for Documents that was attached to the subpoena?

- Did you make an effort to bring with you all of the documents that were requested in the subpoena?

- Have you brought those records and objects with you today?

Paragraph One

We asked you to provide: "All objects that relate to the assassination of JFK 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 JFK at the time of his assassination...."

- You will provide:

1. Swatches from the Limousine

- who did you get it from?

- What condition was it in?

-

- when?

- provenance of the item

- documentation?

- ever sold or traded it?

2. Letter from Pierre Salinger (you did provide)

3. "Welcome to Texas" dinner program (you did provide)

4. Evelyn Lincoln personal items (that she had on her the day JFK died)

A. Polaroid picture of a crowd gathering

- Did Evelyn Lincoln provide any documentation?

- What - let's see it

B. Purse

- Documentation

- You stated that these were the only items that fell within this category, and that you'd be willing to produce them

ITEM DESCRIPTION - ASSASSINATION-RELATED ITEMS

We asked for the following:

- First Time you mentioned these items

- Do you recall a conversation you had with ARRB members on April 10, 1997, in which you stated that you did not receive any items from the Lincolns that are assassination-related.

- Consignment List

- Have any additional items been added to the Consignment List

- Ask questions about each and every item received.

- Provide explanations as to why you didn't produce anything else under this.

Paragraph Two

We asked you to provide: “Any **records** that may relate to the assassination - including but not limited to, records pertaining to Jacqueline, Connallys, LHO, Jack Ruby, Tippit, President Kennedy’s trip to Dallas, etc.

- You stated that you would provide:

1. Handwritten notes from Ruby
2. A small file with notes that referred to JFK’s trip to Dallas
3. Bill from Parkland Hospital
4. An Easter Card with LHO’s signature
5. A shell casing from the gun used by RUBY to shoot Oswald
6. Contract for a stripper employed in one of Ruby’s clubs
7. Various other artifacts.

Paragraph Three

- We asked for: “All records of JFK or LBJ administration that relate to
The following:
- Cuba (including any records that refer to the Bay of Pigs or the Cuban
Missile Crisis)
- Organized Crime
- Vietnam (including JFK conversations with Maxwell Taylor)
- Secret Service

- FBI

- CIA

- U.S. Military

- You stated that you would produce the following:

1. Calendar from Cuban Missile Crisis
2. JFK doodles during Cuban Missile Crisis
3. Diaries from the 1950's (won't produce)
4. Dictabelts (You stated that they may or may not contain a discussion of
Cuba or Vietnam)

Paragraph Four

We asked for inventories of objects and records that relate to JFK or JFK administration.

- You initially told us you only had two lists:

1. Guernsey's Consignment List
2. A list your client compiled in response to our subpoena

- You stated that Mr. White has so many items that it could take him months, if not a year to inventory all of them."

- **Compromise:** "Categories of the Robert White Collection"

- How did you prepare this?

- What did you use to make your estimates?
- What do each of these categories mean?
- Are you also telling us that this is the only inventory of items you have ever created?
- How did you come up with these categories?

1. Feature Items - Museum Display (5%)

- What do you mean by this category?

2. Kennedy Family Collectibles - other than JFK (10%)

- JBK not listed - none for her?
- Robert and Ethel listed - any records?

3. Political Memorabilia (20%)

“Mass Produced”

- Is everything in this category “Mass Produced?”

4. Books, Letters, Newspapers, Magazines, **Pamphlets**, Campaign Literature (40%)

5. Evelyn Lincoln- Related items (10%)

6. Assassination-Related material (10%)

7. Miscellaneous (trivia) (5%) -

Paragraph Five

We asked for all items from:

- Evelyn Lincoln (living and bequests)
- Harold Lincoln (living and bequests)
- Frank McGuire
- Stephen Blakeslee

1. Evelyn Lincoln - concerns re: fishing expedition

A. Mostly, memorabilia-type things

B. Inventory

- How much is set forth here?

- How did you prepare this inventory?

- When did you first prepare it?

C. Go through line by line of everything

2. What, if anything did you receive from Frank McGuire

3. What if anything did you receive from Stephen Blakeslee?

- Immediately after Harold's death?
- Other than the file cabinet and trunk?
- What other items of "Kennedy Memorabilia" did you receive?

Paragraph Six

- We requested: "inventory of JFK objects from the Lincoln estates"
- It's true that you prepared an "Appraisal List"
- Go over each item line by line
- Stationary?
- When did you receive these materials back?
- What did you do with them?
- Did you keep copies of your notes?
- Did you ever ask Blakeslee for a copy of your notes?
- When you inventoried the trunks, how did you label them for purposes of your notes?
- Why do they appear different here?
- Did you ask Blakeslee about this?
- WHITE PROVIDED US WITH A LIST AND DESCRIPTION OF THE ITEMS HE RECEIVED FROM THE LINCOLN ESTATE" all of which are "memorabilia" unrelated to the assassination.

- Describe the diaries you observed in the file cabinets. (Day journals with red covers, packed together)
- Any appointment books separate from day journals?
- What happened when you were done with the inventory?
- When did you actually, physically receive your file cabinets?
- How big were the file cabinets you received?
- How big were the file cabinets the others received?
- Ever go back to the Lincoln's apartment?
- What, if anything, did you receive from Stephen Blakeslee that was different from what was in the file cabinet

- Are you incorporated as a business?.
- Describe the file cabinet you received?
- Describe the other file cabinets you viewed as part of your appraisal process?

Paragraph Seven

- "We requested that you provide us with a list of any correspondence, notes, or records generated by or directed to your client that in any way discusses the disposition of items in the Lincoln will.

- You said you didn't have anything responsive to this request.

We proposed that you provide us with a list of any correspondence, notes or records generated by or directed to your client, that in any way discuss the disposition of items in the Lincoln Will.

- You did not provide this.

Court Proceedings

- At what point did you feel it was necessary to file suit?
- What was the nature of the suit you filed?
- Why did you believe Maria Wray took items to which you were entitled?
- What was your contact with the Wray's when they came to Maryland?
- Do you have any information regarding Maria Wray's challenge to the authenticity of documents?
- What were your claims under the suit
- What were the terms of the agreement?

Paragraph Eight

We asked first for all records pertaining to sale, transfer, gift, or bequest of any objects or records that relate to JFK, by yourself to any other individual/institution

- You said the only thing your client has is Guernsey's Auction-related

We asked that you provide us with a list of any items or correspondence that pertain to items discussed by your client and Guernsey's that were ultimately not included:

- You did not do this

- Guernsey Catalogue - question about each of the items circled - are they "Robert White" items, or do these items belong to others, and do you know to whom?

Paragraph Nine

- Do you currently store any of these items in safety-deposit boxes?

Paragraph Ten

- Have you ever sold or given away any items you received from the Lincoln Estate?

- What did you give away?

- To whom?

- Compensated?

- Give away any documentation that accompanied these items?

General Questions

- Did you ever offer to sell anything to the Kennedy Library, that you received from Mrs. Lincoln?

- Did you ever offer to sell anything to the Kennedy family?

- File on Dallas trip - containing seating plans for the various events and motorcade arrangements for the various locations?

- Any records that contain any reference to a "bubble top"

- Franklin Mint Situation

- When were you contacted by them
 - When did you exhibit your collection?
- Did you ever sell any items from your collection to them?
- To anyone else?
-