

DEPOSITION OF ROBERT WHITE - DAY 2

- Deal with the National Security Concerns
- Ask him if he brought the following:
 - Flags
 - When did you receive these flags?
 - From whom?
 - Copy of the Will
 - JFK Doodles on Yellow Paper
 - Jack Ruby Notes
- Ask him re: Analogs
- Ask him re: Origin of "Cuban Crisis Calendar"
- Ask him about labeling and show him the example

Deal with Provenance of each of these:

ITEMS 164 - 169

Item # 164 - May 25, 1962 Annotated memorandum
(National Security Concerns)

Item # 165 - May 21, 1962 WH Typed Memorandum with JFK Corrections
(National Security Concerns)

Item # 166 - July 5, 1962 - WH Letter draft with JFK Handwritten Corrections

Item # 167 - 1961 - JFK's Dictation and Steno Notes and typed drafts
(National Security Concerns)

Item # 168 - 1962 - Same as above

Item # 169 - 1962 - JFK dictation steno notes and typed drafts
(National Security Concerns)

Items 170 - ?

- Ask him if he's thought more about any AR records?
- What from his AR collection did he not put on that list?

Deal with Provenance of the items he already sent:

Item # 93 - Welcome to Texas

Item # 94 - Multipage tour

Item # 94 - Complete Schedule of JBK in Mexico

EVELYN AND HAROLD LINCOLN - More Background

- Did you ever tell any one that the Lincoln Items represent 60% of your core collection?
- Do you have a letter dated April 5, 1989, which reads, "Dear Robert....and consists of EL telling you about objects given to her by her boss? (Quoted in a Annapolis Quarterly)
- Did she ever tell you that after the assassination, she had gone into the President's office and collected items?
- After EL's death, did HL ever show you any file Cabinets or trunks?
- Did Harold Lincoln ever go through a file cabinet with you and make notes for you about the objects that were going to be given to you?
- Did Harold Lincoln ever give you letters itemizing memorabilia he had given to you? (Harold

Lincoln letters are part of the lawsuit)

- Where are these letters? (Should have produced pursuant to Paragraph 5)

“All records you obtained.....”

- What exactly did you receive as a beneficiary under the will?

(File cabinet ES and Kennedy Memorabilia, such as brief case, signing table
Rocker and stereo)

- Describe the dimensions of the file cabinet?
- What other items did you receive?
- When did you receive them?
- Did you ever buy any items from either of the Lincolns?
- Did the Lincolns ever introduce you to anyone who gave, showed, or sold
You any Kennedy items?
- Whom?
- What did they contribute to your collection?
- Did other researchers ever approach Evelyn Lincoln in your presence?
- Did you ever introduce other collectors/researchers to Evelyn Lincoln?

INVENTORY OF EVELYN LINCOLN ITEMS

- Mark List given to Rosen and Montague
- Do you remember a meeting with Rosen and Montague on April 10, 1997?
- Do you remember giving them a list of items that you received from the Lincoln estate, all of
which are “memorabilia” unrelated to the assassination?

- Show him both lists
- Do you also remember telling them on April 10, 1997 that you had not received any items from the Lincolns that are assassination-related?
- Showing you the Dr. Burkley report - does this discuss the assassination?
- Texas Trip notes?
- Presidential Limosine Flags
- Rice Hotel - Houston

PARAGRAPH Four

- Aside from the inventories you provided, are there any others?
- Go through Robert White "Categories" Inventory and ask him specific Questions about each category

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"All inventories that document objects or records relating to JFK
That are now, or ever have been, in your collection."

1. We initially asked you inventories - and you told us you didn't have Any?
2. You're attorney stated that it would be difficult for you to prepare Something like this because of the volume
3. How did you go about locating the RUBY notes?

- Do you keep them in boxes?
- Do you have a list of these boxes?

- Aside from the inventories you provided us, are there any others?
- You stated that the Assassination Material Is 10% of your collection -
And that you have approximately 10,000 items
- Are all of these 1,000 items in that tub or on those shelves?

- What do you mean by "Feature Items"

- Do you recall talking with the Review Board last year at around this time?

- At that time, did you tell the Board through your attorney that you did not have any assassination-related material?

3. Guernsey Consignment List

- When did you compile this list

- Any items added or subtracted since you were issued the subpoena?

4. Guernsey Catalogue?

- Did these items come from you?

- Do you know who they came from?

(Our mission is to find federal records related to JFK assassination)
(- that's why we're asking if he knows who they came from)

2. List that your client provided in response to subpoena (Atty/Client)

- Did you ever give your attorney a list of items>

-What did that list contain?

- What is the basis for your saying it is atty-client privileged?

- Contain legal advice?

- Contain information about strategies?
- If it is nothing other than a list, how can it be atty/client?
- How was that list different than a regular list?

Paragraph 5

“All records you obtained directly or indirectly from EL, HL, Blakeslee
Mcguire, at any time, including records you obtained as a beneficiary
Of EL’s will.”

1. EL Inventory - is this a complete list?

2. Blakeslee
 - Cover everything given to you by Blakeslee
 - Time Frame
 - Any documentation covering that?

3. Frank McGuire
 - Any non-commercially produced items?

4. Harold Lincoln - what did he give you after his wife’s death?
 - What documentation did he provide?

Paragraph 6

“All documents that set forth, list, document, index, catalogue, Inventory, or identify the objects or records of Pres. JFK or the Kennedy Administration that were in EL’s estate, HL’s estate, or either of their Possession, custody or control at any time”

- Did you ever prepare an inventory
- Mark the inventory
- Robert White’s Appraisal
- What experience do you have as an appraiser?
- Special training?
- Certified in any way?
- Do you belong to the American Society of Appraisers?
- Do you belong to any professional associations?
- How many other appraisals have you prepared?
- Have you ever appraised any JFK items for anyone else?
- What kind of fee to you charge?
- Are you incorporated as a business?
- How many other appraisals have you done?
- Describe your filing system
- Have you ever appraised any other Kennedy items?
- At the time you did the inventory, did you know that you were a beneficiary?

- What does this inventory represent?
- When did you prepare it?
- Who directed you to prepare this?
- Did you meet with Blakeslee before you did the inventory?
- How many meetings did you have with Blakeslee before you prepared the Written appraisal?
- Did Blakeslee give you any instructions before you prepared it?
- Did he make comments about how exhaustive the inventory should be?
- Who was present during those meetings?
- When did you do the inventory?
- How long after Harold Lincoln's death?
 - Describe, in detail, how you did this inventory?
- How many file cabinets?
- Dimensions?
- How many trunks?
- Who was present when you did it?
- Were they present with you the entire time?
- Did you sort through all of the file cabinets and trunks?
- How thorough was your search?
- Did you take notes?

- What did you take notes with?
- How extensive were the notes?
- Why did you take notes?
- In total, how long did the inventory take?
- Describe the file cabinets and trunks that you inventoried?
- Were there any at the apartment that you did not inventory?
- Size
- How many?
- What did you do with these notes?
- After Blakeslee typed up the inventory, did he send it back to you?
- Was this part of an arrangement?
- When did you decide to do it this way?
-
- When?
- Did you go over it thoroughly?
- Did you make any corrections?
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- Did he send your notes back with the inventory?
- Did you ever ask him for your notes back?
- For your records?
- Do you know if he still has them?

- How did you come up with the figure, \$159,650?
- What was the value you assigned to your share?
- Where, on this list, does the other Kennedy Memorabilia appear?
- Did you assign a value to that?
- Was that included in the figure you assigned your share?

GO THROUGH EACH ONE OF THESE CATEGORIES

- After the inventory, did you ever go back to the Lincolns' apartment?
- Between the time that you did your inventory, and the time that you
Received your cabinet, did you obtain any Kennedy items?
- Were you given Kennedy Items?
- Ever look through the file cabinet meant for you or the other beneficiaries?
- Why does the file cabinet enumeration appear differently here?
- Did Stephen Blakeslee ever give you anything from the Lincoln estate
After you received your file cabinets?
- What did he give you?
- Have any documentation to go along with these items?

Paragraph 7

“All correspondence with other individuals, institutions, or Organizations regarding the terms of the EL and HL will.”

1. 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.”

(I proffered - “Write corresponding with any other beneficiaries)

- you did not provide us with this list.

- When you saw this item, what steps did you take to comply with Paragraph 7?

- Do you have a file with correspondence?

- An individual box or file cabinet where you keep notes, letters, etc.?

- Did you ever write to anyone?

- What was the nature of this correspondence?

- What did you discuss in this correspondence?

- Did you receive any replies?

- Did you ever write to Blakeslee?

- Ever write to Maria Ray?

- Ever write to Frank McGuire ?

- Did you ever write to any institutions discussing the items you received as a Beneficiary under the EL wills?

2. Any Court documents?

- Go over court case (?)

- What items did you allege that Maria Ray took?

Paragraph 8

**“All records pertaining to the sale, transfer, gift or bequest of any
Objects or records that relate to President JFK, by yourself to
Any other individual or institution.”**

- Did you ever give away or trade any records or objects?

(What we need is to be able to track down and identify records and
Objects related to the assassination of JFK)

(You have told us that you don't have an inventory - we thus need
To search as many avenues as possible)

1. The only thing your client has is the Guernsey's list
2. You did not produce our suggestion: “We propose that
You provide us with a list of any items or correspondence
That pertain to items discussed by your client and Guernseys
That did not make it onto the consignment list.
3. Do you have any contracts, etc. that set forth the terms of any
Sales, etc.
4. Any items with National Security Classifications

Court documents

- Letter from Jeffrey Ray to Blakeslee

Paragraph 9

“All records reflecting where you store any Kennedy items”

1. All stored at your mother's?

- Do you live with your mother?
- Where, in your mother's house, do you store these items?
- Do you have any items "Carefully stored away?"

- Anything stored at your house?
- Anything stored in safe deposit boxes?

Paragraph 10

"All records reflecting the disposition of JFK objects or records from the
Estate of EL and/or HL, including all correspondence with JFK Library
Regarding JFK records or objects."

1. You told me he hasn't sold or given anything away - then you
Said something different - which is it?
 - Any records that you had before the subpoena that you have since
Disposed of?
 2. What did you give away?
 3. To Whom?
 4. Did you give away any documentation that accompanied these items?
 5. Did you ever Trade any JFK items with other collectors?
2. Court documents
- Did you ever file a lawsuit over the terms of the Lincoln Will?
 - What was the nature of that suit?

(White claimed that the Wrays removed JFK memorabilia from
The Lincoln's home during their stay on Nov. 1, 1995

- Why did you believe that Maria Wray took the items to which you
Were entitled?
- What was your contact with the Wrays when they came to Maryland?
- Did you ever produce any documentation from Harold Lincoln
Pertaining to any of the items you received?
- Where is that documentation?
- What is the nature of it?
- Did you have any information regarding Maria Wray's challenge
To the authenticity of documents?
- Were you the subject of a lawsuit?
- What is the current status of the suit?
- How was it resolved?

OTHER COLLECTORS

- Know of anyone else?

OTHER ISSUES

- Let me remind you that you are under oath
- Testifying under penalty of perjury?

- Did you have a meeting on April 10, 1997 with ARRB staff?
- Present in the room were three other people - Brian Rosen, Dave Montague, Robert White, and David Glassman?
- Did you tell them that you did not receive any items from the Lincolns that
Are assassination-related?
- You provided them with a list and descriptions of items that he received
From Lincoln estate, all of which are "memorabilia" unrelated to the
Assassination.
- You told them that your inventory did not reveal any items related to the assassination
(other than diaries or appointment books that went to the JFK Library)
- Do you also recall a meeting you had