

DEPOSITION OF ROBERT WHITE

I. Opening Remarks

- State full name for the record
- Address
- My name is
- Others present
- We are taking your deposition pursuant to the authority we have under
The President John F. Kennedy Assassination Records Collection Act
- Take a break?
- Clarify any questions
- Court reporter administer the oath

- Mark subpoena as exhibit
- Did you receive a copy of this?
- You're here pursuant to a subpoena duces tecum for the production of
documents and appearance for testimony?
- Did you bring those documents with you now?

- (We may take a break to look at the documents)
- Anything else that you did not bring with you that you now realize is
Responsive to the subpoena?

- Anything that is assassination-related that you did not bring, you must turn Over by 9:00 a.m. tomorrow.
- You must turn these over tomorrow at 9 a.m

II. **Background information**

(Just a few questions - more in depth later)

- Where do you currently reside?
- Are you presently employed?
- You're a collector of Kennedy Items
- When did you start collecting?
- What sparked your interest in Kennedy items?
- Where would you find the items you collected?
- What would you do with the items you collected?
- What were the circumstances of your meeting Evelyn Lincoln?
- Did you also meet her husband, Harold Lincoln?
- Would you describe your friendship with the Lincoln's as a close one?
- Did you ever receive Kennedy Items from the Lincolns?
- During their lives?
- Were you a beneficiary of their wills?

General Questions re: size of Collection

- How many items are in your collection?

- What's the basis for the estimate of the number of items in your Collection?
- Did you ever tell a member of the media that you had in the Neighborhood of 100,000 items?
- In a general way, how do you have your collection organized?
- How do you keep track of the items in your collection?
- Have you at any time, ever prepared lists?
- Box lists?
- Card files?
- Computers?
- Audio recordings?
- Video recordings?

IV. SUBPOENA (Preparation)

- A. What did you do to prepare for responding to subpoena?
- B. What steps did you take?
- C. What did you do to guarantee that your search was conscientiously made?
- D. Did you go through every item in your collection?
- E. Did you do different things to prepare for different paragraphs?
- F. First Round - overall, global approach
- H. Did you review the Request for Documents that was attached to

The subpoena?

- I. Did you make an effort to bring with you all of the documents that
Were requested in the subpoena?
- J. Have you brought these records with you today?
- H. What did you do to prepare for the deposition today?

- Within the last couple of weeks, did you provide the Review Board with any
inventories or lists of items in your collection?

Item Source: Evelyn and Harold Lincoln and the Lincoln Estate

- A. When did you prepare this?
- B. Understand that you said estimate, but are there other items
On here that weren't on here before?
- D. What did you receive from EL and HL that is not included on this
List?
- E. Is there anything that you received from EL at any time - either
Before or after her death, that is not listed on the inventory?
- F. Do you have all these items in one place?
- G. How can we be certain taht everything you identified no this list
Is everything you have?

Categories of the Robert White Collection

- A. When did you prepare this?
- B. Understand that you said estimate, but are there other items
On here that weren't on here before?
- C. How do we know that everything you identified on this list is
Everything that you have?
- F. Do you have all these items in one place?
 - Go through each category
 - How did you come up with these categories?
 - How did you determine what was assassination-related material?
 - How do you know that others aren't AR?

Assassination-Related Items

- A. When did you prepare this?
- B. Understand that you said estimate, but are there other items
On here that weren't on here before?
- C. How do we know that everything you identified on this list is
Everything that you have?
- D. Do you have all these items in one place?

Consignment List

- A. When did you prepare this?
- B. Since your attorney gave us this list - anything added or subtracted?

EVELYN and HAROLD LINCOLN - MORE BACKGROUND

- Of the 100,000 items you mentioned, how many of those did you
Receive from Evelyn Lincoln?
- Did you ever tell anybody that the Lincoln items
Represent 60% of your core collection?" (Which magazine?)
- Did she ever discuss with you how and where she received any of these items?
- Did you ever see any documentation that explains how Evelyn Lincoln
Came into possession of any of these items?
- Please discuss this
- Did EL or HL ever authenticate any JFK items for you?
- How would she do this?
- 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 newspaper article)
- Does this letter also describe a rummage-style sale at Averill
Harriman's home in Georgetown - which EL attended and carried
Away "man, many very personal items?" (The New Yorker)
- Did Evelyn Lincoln ever tell you what these items were?
- Did she ever tell you that after the assassination, she had gone
Into the President's office and collected items?
- Did EL ever tell you that "JBK gave Bill Greer the limo flags and he
Gave them to her?"

- After EL's death, did HL ever show you any file Cabinets or trunks?

(White told Rosen and Montague - "Harold Lincoln showed White
Where the file cabinets were, but they were unable to open any of the
Locks)

- How soon after EL's death did this occur?

- 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 you?

- Where are these letters (should have produced under Paragraph 5)

- Ask about Harold Lincoln letters (part of lawsuit with Maria Wray)

- Where is this letter now?

- Must produce it.

- Approximately how many items did you receive while they were living?

- What did you receive as a beneficiary under their will?

(File cabinet ES and Kennedy Memorabilia, such as brief case, signing
Table, rocker and stereo)

- How big was the file cabinet?

- When did you physically receive the file cabinet?

- What other items did you receive?

- Did you ever buy any items from either of the Lincolns?

- Did the Lincolns ever introduce you to anyone who gave, sold
Or showed you Kennedy items?

- Whom?

- What did they contribute to your collection?

- Did other researchers approach Evelyn Lincoln in your presence?

- Did you ever introduce other collectors/researchers to Evelyn Lincoln?

Inventory of Evelyn Lincoln Items

- H. Mark as Exhibit - List given to Rosen and Montague?
 - Do you remember a meeting with Rosen and Montague?

 - Do you remember telling them on April 10, 1997, that you had not
received any items from the Lincolns that are
assassination-related?

 - Do you also remember giving them a list of items you received
From Lincoln estate, all of which are “memorabilia” unrelated
to the assassination?

CATEGORIES OF THE ROBERT WHITE COLLECTION

- Ask any follow up questions
- Anything that you did not include on this?

ASSASSINATION-RELATED ITEMS

- Follow up questions
- What did you do to ensure that your search was thorough?
- Anything else that you did not include?
- At this time, you're saying that you don't have anything else?

OTHERS THAT YOU PRODUCED HERE TODAY IN RESPONSE TO SUBPOENA DUCES TECUM

1. Mark as Exhibit
2. Go through Provenance of each

YOU STATED THAT YOU HAD 100,000 items - how many of those have you produced to the ARRB in response to its subpoena?

IX. Subpoena Paragraphs

Paragraph 1

example,
Pres.

“All objects that relate to the assassination of JFK or
To his trip to Texas in November, 1963, for
Bullet fragments, tissue samples, item from the
Limousine, or any items or apparel worn by JFK at
The time of the assassination.”

1. You were to provide:
 1. Swatches from the limousine (provenance)
 2. Letter from Pierre Salinger (you did provide)
 3. “Welcome to Texas” Dinner Program (you did provide)
 4. Evelyn Lincoln Personal items she had on her on Nov. 22, 1963
 - A. Polaroid picture of crowd gathering
 - B. Purse
- Do you have any other items which fall under this category?
- What did you do to ensure that you were thorough in response to
Our requests under this paragraph?
- At this time, you’re saying that you don’t have any thing else?

Paragraph 2 -

Kennedy

“All records that relate, directly or indirectly, to
The assassination of Pres. JFK, including, but not
Limited to, records pertaining to Jacqueline
Governor and Mrs. Connally, LHO, Ruby, Tippit,

President Kennedy's trip to Dallas?"

1. You were to provide:
 - A. Nothing pertaining to JBK
 - B. Bill from Parkland to Gov. Connally (Provenance)
 - C. Easter Card with LHO signature
 - D. A pamphlet located in Ruby's pocket on day he shot LHO
 - E. Shell casing from gun used by Ruby
 - F. A contract for a stripper at Ruby's nightclub
 - G. Handwritten Ruby notes
 - H. Small file with notes that referred to JFK's trip to Dallas
 - I. Various other artifacts

- What did you produce under this category?

- Did you ever receive a file on "Dallas trip containing seating plans for the various locations?"

- Any item which references a "bubble top?"

- Do you recall a conversation with Brain Rosen and Dave Montague
Which took place on April 10, 1997?
(In which you stated that you had not received any items that
Were assassination-related?)

Paragraph 3

" All records of LBJ and JFK administration that relate to: Cuba,

**Organized Crime, Vietnam (including Maxwell Taylor), USSS,
FBI, CIA, and U.S. Military”**

1. You agreed to provide:
 - A. Calendar from Cuban Missile Crisis
 - B. Telegram from Krushchev to JFK re: Cuban Missile Crisis (ProV)
 - C. Dictabelts
 - Ever receive any analog tapes?
 - Have any logs regarding the Dictabelts or Analogs?
 - How did you first receive these?
 - (EL taped them to her stationary and labeled them
By date)
 - What condition, etc.
 - Do you have any transcripts of what appears on Dictabelts?
 - Any documentation or records that accompanied Dictabelts?
 - Are they in the same condition as when you received them?
 - Did EL say where she received these?
 - Did EL provide documentation in any way?

Paragraph 4

- “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 are you able to locate items?

- 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?

- What do you mean by "Feature Items"

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?

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)

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?

- Do you remember giving Brian Rosen and Dave Montague a list of items
You received under the Lincoln Will?
- Where do these appear on the EL inventory?

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”

- Robert White’s Appraisal (Mark as Exhibit)
- 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?
- 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?
- 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?
-
- 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 5,500 figure?

GO THROUGH EACH ONE OF THESE CATEGORIES

- After the inventory, did you ever go back to the Lincolns' apartment?

- At any time after you did the inventory, did you take 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 (?)

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.

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?

X. Items that he already provided to us?

1. Mark each of them for purposes of the record.

(NOTE: For those items that you want documentation - get it)

What did you bring here today?

1. Mark each item as an exhibit

2. Go through each item and determine provenance
 - Where did you get the item?

 - From whom?

 - When did you get it?

 - Condition of the item when you received it?

 - Any documentation accompanying the item?

- What did you do to determine the item's authenticity?
- Did you consult with anyone?
- Is it altered in any way from how you originally received it?

NOTE: Make sure you cover:

- Dictabelts
- Ruby Notes
- Small file with Notes taht referred to JFK's trip to Dallas
- Dr. Burkley
- Flags

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